

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)      2.  Restricted Delivery (Extra charge)

3. Article Addressed to:  
 Mr. Terance Tinnelly  
 President  
 Morse Boulger, Inc.  
 100 Denton Avenue  
 Garden City Park, New York 11040-4005

4. Article Number  
 P 938 762 691

Type of Service:  
 Registered       Insured  
 Certified       COD  
 Express Mail       Return Receipt for Merchandise

Always obtain signature of addressee or agent and **DATE DELIVERED**.

5. Signature - Address  
 X *[Signature]*

6. Signature - Agent  
 X

7. Date of Delivery  
 10 2 89

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1988      \* U.S.G.P.O. 1988-212-865      DOMESTIC RETURN RECEIPT

P 938 762 691

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

Sent to Mr. Terance Tinnelly, Morse	
Street and No.      Boulger 100 Denton Ave.	
P.O., State and ZIP Code Garden City Park, NY 11040-400	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date Mailed: 9-28-89 Permit: AC 05-163277	

PS Form 3800, June 1985



# 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

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

Mr. Terance Tinnelly, President  
Morse Boulger, Inc.  
100 Denton Avenue  
Garden City Park, New York 11040-4005


September 27, 1989

Enclosed is construction permit No. AC 05-163277 to construct a pathological incinerator No. 7 to be located at the Resource Power Development facility in Cocoa, Brevard County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
C. H. Fancy, P.E.  
Bureau of Air Regulation

Copy furnished to:

C. Collins, Central District  
R. Caldwell  
R. Meyer

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 9/28/89.

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.

Kimi Joken  
Clerk

9/28/89  
Date

Final Determination

Resource Power Corporation  
Brevard County

Pathological Incinerator No. 7  
Permit No. 05-163277

Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

September 21, 1989

## Final Determination

Resource Power Corporation's application for a permit to construct a pathological incinerator at their facility in Cocoa, Brevard County, Florida, has been reviewed by the Bureau of Air Regulation.

Public Notice of the Department's Intent to Issue the construction permit was published in the Florida Today on August 24, 1989.

Copies of the Preliminary Determination have been available for public inspection at the Department's Central District office in Orlando, and the Department's Bureau of Air Regulation in Tallahassee.

No comments were received during the public notice period.

The final action of the Department will be to issue the permit as noticed during the public notice period.



# 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:**  
Resource Power Development  
Corporation  
100 Denton Avenue  
Garden City Park, New York  
11040-4005

**Permit Number:** AC 05-163277  
**Expiration Date:** September 30, 1990  
**County:** Brevard  
**Latitude/Longitude:** 28°24'29"N  
80°46'09"W  
**Project:** Pathological Incinerator  
No. 7

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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 construction of a pathological incinerator No. 7 to be located at the Resource Power Development Corporation facility on 810 S. Industry Rd., in Cocoa, Brevard County, Florida.

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

Attachments are listed below:

1. Department's letter dated May 9, 1989.
2. Company's letter received May 16, 1989.

**PERMITTEE:**  
Resource Power Development  
Corporation

Permit No. AC 05-163277  
Expiration Date: Sept. 30, 1990

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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. Neither 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 is not 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; 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.

PERMITTEE:  
Resource Power Development  
Corporation

Permit No. AC 05-163277  
Expiration Date: Sept. 30, 1990

**GENERAL CONDITIONS:**

6. The permittee shall 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor 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 provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including 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.



PERMITTEE:  
Resource Power Development  
Corporation

Permit No. AC 05-163277  
Expiration Date: Sept. 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 for 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 17-4.120 and 17-30.300, F.A.C., 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 or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

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

PERMITTEE:  
Resource Power Development  
Corporation

Permit No. AC 05-163277  
Expiration Date: Sept. 30, 1990

**GENERAL CONDITIONS:**

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 dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. 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 corrected promptly.

**SPECIFIC CONDITIONS:**

1. The maximum allowable operating rate shall not exceed 2000 pounds of infectious waste burned per hour.

2. The emissions from this source shall not exceed 8 lbs/hr for particulate matter (PM) and 28 lbs/hr for HCL. Carbon monoxide (CO) emissions shall not exceed 100 parts per million by volume, dry basis, corrected to 7% O<sub>2</sub> on a hourly average basis. Tests shall be conducted in accordance with EPA Method 5, Determination of Particulate Matter Emissions from Stationary Sources and EPA Method 10, Determination of Carbon Monoxide from Stationary Sources.

3. This source is permitted to operate continuously, (8760 hours per year). No PVC materials are to be burned in this unit.

4. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor pursuant to F.A.C. Rule 17-2.620(2).

5. All unconfined emissions of particulate matter generated at this site shall be adequately controlled (F.A.C. Rule 17-2.610(3)). The area must be watered down should unconfined emissions occur.

6. Hazardous wastes generated in connection with any of the sources at this facility must be disposed of in accordance with F.A.C. Chapter 17-30.

**PERMITTEE:**  
Resource Power Development  
Corporation

Permit No. AC 05-163277  
Expiration Date: Sept. 30, 1990

**SPECIFIC CONDITIONS:**

7. No visible emissions are allowed under normal operation except that 20% opacity is allowed for up to three minutes in any one hour. Tests shall be conducted in accordance with EPA Method 9, Determination of Opacity of Emission from Stationary Sources, F.A.C. Rule 17-2.700(6)(b)(9), Dec. 5, 1988. The Central District office shall be notified at least 15 days prior to any compliance test. The incinerator must be tested within 10% of permitted capacity.

8. Incinerator operating instructions shall be clearly posted. The instructions shall include but not be limited to:

- a. Frequency of clean out and method of ash disposal.
- b. Type of waste and method of loading.
- c. Maximum load rate (no greater than 2000 pounds/hour).
- d. Preheating of afterburner section prior to ignition of primary burn section.
- e. Minimum temperature in secondary chamber (1800°F to be achieved prior to primary ignition).
- f. Minimum residence time shall be one (1) second.

All biological waste incinerator operators shall be trained by the equipment manufacturer's representatives or another qualified organization as to proper operating practices and procedures. The content of the training program shall be submitted to the Department for approval. The applicant shall submit a copy of a certificate verifying the satisfactory completion of a Department approved training program prior to issuance or renewal of the operating permit. The owner shall not allow the incinerator to be operated unless it is operated by an operator who has satisfactorily completed the required training program.

9. This source shall burn propane fuel only.

10. When the Department, after investigation, has good reason (such as complaints, increased visible emissions, etc.), to believe that any applicable emission standard contained in Chapter 17-2, F.A.C., or in this permit is being violated, it may require the owner or operator of the source to conduct compliance tests to identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of the tests to the Department.

11. This permit does not preclude compliance with any applicable local permitting requirements.

PERMITTEE:  
Resource Power Development  
Corporation

Permit No. AC 05-163277  
Expiration Date: Sept. 30, 1990

**SPECIFIC CONDITIONS:**

12. This source shall comply with all applicable provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code.

13. The permittee will be required to submit reports on the actual operation and emissions of this facility. This report shall also include but not be limited to the data specified in specific condition No. 8.

14. This source (incinerator No. 7) and all other incinerators at this facility shall comply with F.A.C. Rule 17-2.600(1)(d), Specific Emission Limiting Standards, by the compliance date of July 1, 1992. A compliance plan and schedule shall be submitted to the Central District office before July 1, 1992.

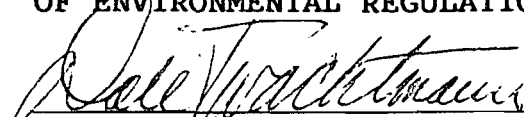
15. Operating permits for incinerators #1, #2 and #3 shall be surrendered prior to the issuance of the operating permit for incinerator No. 7.

16. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

17. An application for an operation permit must be submitted to the Central 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 22 day  
of September, 1989

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
Dale Twachtmann, Secretary



RECEIVED  
State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
SEP 29 1989

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

Office of the Secretary

TO: Dale Twachtmann  
FROM: Steve Smallwood *by dale*  
SUBJ: Approval of Air Construction Permit  
AC 01-163277, Resource Power Corporation  
DATE: September 21, 1989

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to construct a pathological incinerator at their facility in Cocoa, Brevard County, Florida.

No comments were received during the public notice period.

Day 90, after which the permit will be issued by default, is September 30, 1989.

I recommend your approval and signature.

SS/TH/t

attachments

*Please call  
Patty Adams  
when signed  
8-1344*

Check Sheet

Company Name: Resource Power Development Corp.  
Permit Number: AC05-163277  
PSD Number: \_\_\_\_\_  
Permit Engineer: \_\_\_\_\_

**Application:**

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

**Cross References:**

- AC05-15189
- 
- 

**Intent:**

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT or LAER Determination
- Unsigned Permit

Correspondence with:

- EPA
- Park Services
- Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)
- Waiver of Department Action
- Other

**Final**

**Determination:**

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

**Post Permit Correspondence:**

- Extensions/Amendments/Modifications
- Other

In the folder labeled as follows there are documents, listed below, which were not reproduced in this electronic file. That folder can be found in one of the file drawers labeled Supplementary Documents Drawer. Folders in that drawer are arranged alphabetically, then by permit number.

**Folder Name:** Resource Power Development Corporation

**Permit(s) Numbered:**

AC	05	-	163277
----	----	---	--------

Period during  
which document  
was received:

Detailed Description

Period during which document was received:	Detailed Description
APPLICATION 8 DEC 1988	1. 24"×36" BLUEPRINT: FACILITY MODIFICATION SITE PLAN (PROJECT NUMBER: E 2713-1; SHEET 1 OF 4

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

1.  Addressee's Address
2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

John W. Bottorff  
 Bottorff & Assoc.  
 6729 Edgewater Commerce  
 PKWY  
 Orlando, FL 32810-4278

4a. Article Number

P 617 884 183

4b. Service Type

- Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

7. Date of Delivery

10/29/91

8. Addressee's Address (Only if requested and fee is paid)

5. Signature (Addressee)

6. Signature (Agent)

*Barbara J. Gorman*

PS Form 3811, October 1990

U.S. GPO: 1990-273-861

**DOMESTIC RETURN RECEIPT**

P 617 884 183



**Certified Mail Receipt**

No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

PS Form 3800, June 1990

Sent to <i>John Bottorff</i>	
Street & No. <i>Bottorff &amp; Assoc</i>	
P.O., State & ZIP Code <i>Orlando, FL 32810-4278</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date <i>10/29/91</i>	
<i>Inc. # 7</i>	
<i>AC 05-163277</i>	





# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 22, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John W. Bottorf  
Bottorf and Associates  
6729 Edgewater Commerce Parkway  
Orlando, Florida 32810-4278

Dear Mr. Bottorf:

Re: Incinerator #7, AC 05-163277

The Department is in receipt of your September 24 letter, in behalf of Resource Power Development Corporation, requesting an extension of the expiration date for the construction permit referenced above. The request is acceptable and the expiration date shall be changed as follows:

FROM: September 30, 1991  
TO: June 30, 1992

Regarding Specific Condition No. 2, we have determined the following:

Specific Condition No. 2 will be deleted provided that stack testing to demonstrate compliance with the Biological Waste Incineration Facilities Standards for particulate matter (PM), hydrochloric acid (HCl), and carbon monoxide (CO) emissions be conducted (and the test results be submitted to the Central District office) before the expiration date of this permit (June 30, 1992).

On July 1, 1992, this incinerator and all other incinerators at the Resource Power Corporation facility shall be operating in accordance with Rule 17-2.600(d) or they shall cease operation. The emission standards applicable to facilities with a capacity greater than 2000 pounds per hour are as follows:

- a. Particulate matter emissions shall not exceed 0.020 grains per dry standard cubic foot of flue gas, corrected to 7% O<sub>2</sub>.
- b. Hydrochloric acid (HCl) emissions shall not exceed 50 parts per million by volume, dry basis, corrected to 7% O<sub>2</sub> on a three hour average basis; or shall be reduced by 90% by weight on an hourly average basis.

Mr. John W. Bottorf  
Page 2 of 2

- c. Carbon monoxide (CO) emissions shall not exceed 100 parts per million by volume, dry basis, corrected to 7% O<sub>2</sub> on an hourly average basis.

A copy of this letter must be attached to the above construction permit and shall become a part of that permit.

Sincerely,



Carol M. Browner  
Secretary

CMB/TH/plm

Attachment to be Incorporated:

Mr. John W. Bottorf's letter of September 24, 1991

c: A. Zahm  
John Turner



CONSULTING ENGINEERS — ANALYTICAL LABORATORY

6729 EDGEWATER COMMERCE PARKWAY • ORLANDO, FLORIDA 32810-4278 • (407) 298-0846 • FAX (407) 299-7053

September 24, 1991

Project No. 701

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Florida Dept. of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED  
SEP 25 1991  
Division of Air  
Resources Management

Subject: Brevard County -  
Resource Power  
Development Corporation  
Incinerator #7  
AC05-163277

Dear Mr. Fancy,

Construction of the referenced source has just been completed and the construction permit will expire on September 30, 1991. Additional time is needed for compliance testing and submission of the test results with the Application to Operate.

On behalf of Resource Power Development Corporation, we are requesting that the referenced permit be amended to change the expiration date to 6-30-92.

Specific Condition #2 of the referenced permit sets emission limits for particulate, HCL and carbon monoxide, and requires stack testing to demonstrate compliance with these limits. The emission limits for particulate and HCL were derived from AP42 emission factors and manufacturers estimates contained in the permit application. They were merely emission estimates, not intended to be used as emission limits, and not contained in 17-2 FAC.

This unit was permitted prior to the effective date of the new Biological Waste Incinerator Rule, 17-2.600, (1)(d) F.A.C as an existing source and therefore it should only be required to meet the emission limit set forth in Rule 17-2.600(1)(a) F.A.C., ie, 1. No visible emissions (5 percent opacity) except that visible emission not exceeding 20 percent opacity are allowed for up to three minutes in any one hour period, and 2. No objectionable odors allowed.

This applicant has submitted an application to construct the required pollution control equipment necessary to meet the emission limits set forth in Rule 17-2.600(1)(d) F.A.C, and will demonstrate compliance with these limits prior to July 1, 1992.

C. H. Fancy, P.E.  
September 24, 1991  
Page 2

For the reasons stated above, we are requesting on behalf of Resource Power Development Corporation, that specific condition #2 be deleted from the referenced permit.

If you have any questions regarding these requests, please call Roger Caldwell at 407-298-0846.

Very truly yours,



John W. Bottorf, Jr., P.E.

JWB/ms

Cy: Jay Kilkenny  
R. Lee Torrens

*J. Nelson*  
*A. Johnson, C. Dist.*



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Carol M. Browner  
FROM: Steve Smallwood *[Signature]*  
DATE: October 21, 1991  
SUBJ: Amendment to Construction Permit AC 05-163277  
Resource Power Development Corporation

Attached for your approval and signature is a letter extending the expiration date for the above referenced construction permit.

The Bureau recommends approval of this amendment.

CF/TH/plm

Attachment

September 24, 1991

Project No. 701

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality Management  
Florida Dept. of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED  
SEP 25 1991  
Division of Air  
Resources Management

Subject: Brevard County -  
Resource Power  
Development Corporation  
Incinerator #7  
AC05-163277

Dear Mr. Fancy,

Construction of the referenced source has just been completed and the construction permit will expire on September 30, 1991. Additional time is needed for compliance testing and submission of the test results with the Application to Operate.

On behalf of Resource Power Development Corporation, we are requesting that the referenced permit be amended to change the expiration date to 6-30-92.

Specific Condition #2 of the referenced permit sets emission limits for particulate, HCL and carbon monoxide, and requires stack testing to demonstrate compliance with these limits. The emission limits for particulate and HCL were derived from AP42 emission factors and manufacturers estimates contained in the permit application. They were merely emission estimates, not intended to be used as emission limits, and not contained in 17-2 FAC.

This unit was permitted prior to the effective date of the new Biological Waste Incinerator Rule, 17-2.600, (1)(d) F.A.C as an existing source and therefore it should only be required to meet the emission limit set forth in Rule 17-2.600(1)(a) F.A.C., ie, 1. No visible emissions (5 percent opacity) except that visible emission not exceeding 20 percent opacity are allowed for up to three minutes in any one hour period, and 2. No objectionable odors allowed.

This applicant has submitted an application to construct the required pollution control equipment necessary to meet the emission limits set forth in Rule 17-2.600(1)(d) F.A.C, and will demonstrate compliance with these limits prior to July 1, 1992.

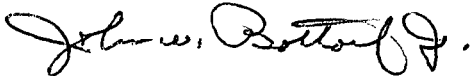
		QUESTIONS? CALL 800-238-5355 TOLL FREE		AIRBILL PACKAGE TRACKING NUMBER		8576968422	
Date <b>9-24-91</b>				<b>RECIPIENT'S COPY</b>			
From (Your Name) Please Print <b>Bottorf &amp; Associates, Inc.</b>		Your Phone Number (Very Important) <b>(407) 298-0846</b>		To (Recipient's Name) Please Print <b>C. H. Fancy</b>		Recipient's Phone Number (Very Important) <b>(904) 488-3704</b>	
Company Department/Floor No.		Company Department/Floor No.		Company Department/Floor No.		Company Department/Floor No.	
Street Address <b>729 Edgewater Commerce Parkway</b>				Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) <b>2600 Blair Stone Road</b>			
City <b>Orlando</b>		State <b>FL</b>		City <b>Tallahassee</b>		State <b>FL</b>	
ZIP Required <b>32810-4278</b>		ZIP Required <b>32399-2400</b>					
YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.) <b>01</b>				IF HOLD FOR PICK-UP - Print FEDEX Address Here Street Address City State ZIP Required			
PAYMENT 1 <input checked="" type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card 5 <input type="checkbox"/> Cash/Check							
SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING (Check services required)		PACKAGES WEIGHT YOUR DECLARED VALUE		Emp. No. Date Federal Express Use	
Priority Overnight Service (Delivery by next business morning†) Standard Overnight Service (Delivery by next business afternoon†)		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box #) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> DRY ICE Lbs. 6 <input type="checkbox"/> OTHER SPECIAL SERVICE 7 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 8 <input type="checkbox"/> HOLIDAY DELIVERY (if observed) (Extra charge)		Total Total Total DIM SHIPMENT (Chargeable Weight) lbs.		Emp. No. Date Federal Express Use Base Charges Declared Value Charge Other 1 Other 2 Total Charges	
Economy Distribution Service (formerly Standard Air) (Delivery by second business day†) Heavyweight Service (for Extra Large or any package over 150 lbs.) 70 <input type="checkbox"/> HEAVYWEIGHT ** 80 <input type="checkbox"/> DEFERRED HEAVYWEIGHT **		9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> HOLIDAY DELIVERY (if observed) (Extra charge)		Received At 1 <input type="checkbox"/> Regular Stop 2 <input checked="" type="checkbox"/> On-Call Stop 3 <input type="checkbox"/> Drop Box 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station		Received By: X Date/Time Received FedEx Employee Number Release Signature Date/Time	
11 <input type="checkbox"/> YOUR PACKAGING 12 <input type="checkbox"/> FEDEX PAK * 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE 15 <input type="checkbox"/> FEDEX LETTER * 16 <input type="checkbox"/> FEDEX LETTER ** 17 <input type="checkbox"/> FEDEX PAK * 18 <input type="checkbox"/> FEDEX PAK ** 19 <input type="checkbox"/> FEDEX BOX 20 <input type="checkbox"/> FEDEX TUBE						REVISION DATE 4/90 PART #119500 GBFE 8/90 FORMAT #027 © 1990 P PRINTED IN U.S.A.	

C. H. Fancy, P.E.  
September 24, 1991  
Page 2

For the reasons stated above, we are requesting on behalf of Resource Power Development Corporation, that specific condition #2 be deleted from the referenced permit.

If you have any questions regarding these requests, please call Roger Caldwell at 407-298-0846.

Very truly yours,



John W. Bottorf, Jr., P.E.

JWB/ms

Cy: Jay Kilkenny  
R. Lee Torrens

*J. Nelson*  
*A. Zahon, C. Dist.*



**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)  
 2.  Restricted Delivery (Extra charge)

3. Article Addressed to:  
 John W. Bottoy, P.E.  
 Bottoy Assoc. Inc.  
 4595 Park Breeze Court  
 Orlando, FL 32808-1057

4. Article Number  
 P 256 396 113

Type of Service:  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Address  
 X *J. Bottoy*

6. Signature - Agent  
 X

7. Date of Delivery  
 7-13-90

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1988 \* U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 256 396 113

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

PS Form 3800, June 1985

\* U.S.G.P.O. 1989-234-555

Sent to	<i>John Bottoy</i>
Street and No.	<i>Bottoy Assoc</i>
P.O., State and ZIP Code	<i>4595 Park Breeze Ct Orlando, FL</i>
Postage	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	<i>7-11-90</i>
	<i>AC 05-163277</i>



# 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

July 9, 1990

John W. Bottorf, P.E.  
Bottorf Associates, Inc.  
4595 Park Breeze Court  
Orlando, Florida 32808-1057

*4 copies  
Resource  
Paper  
Development  
File  
Group*

Dear Mr. Bottorf:

Re: Incinerator No. 7  
AC 05-163277

The Department is in receipt of your letter dated June 18, 1990, requesting an extension of the expiration date of permit No. AC 05-163277 for the Resource Power Development Corporation (RPDC), incinerator No. 7, located at the RPDC facility in Cocoa, Brevard County, Florida. This request is acceptable. The expiration date will be changed as follows:

From: September 30, 1990  
To: September 30, 1991

This letter must be attached to the above mentioned permit and shall become part of the permit.

Attachment to be Incorporated:

- Mr. John W. Bottorf's letter of June 18, 1990.

Sincerely,

*Dale Twachtmann*  
Dale Twachtmann  
Secretary

DT/plm

c: C. Collins, Central Dist.

4595 PARKBREEZE CT. • ORLANDO, FLORIDA 32808-1057 • 407/298-0846

RECEIVED

June 18, 1990

Project No. 701  
JUN 21 1990

C. H. Fancy, P.E., Deputy Chief  
Bureau of Air Quality Management  
Department of Environmental Regulations  
2600 Blair Stone Rd.  
Tallahassee, Florida 32399-2400

DER-BAQM

Subject: Brevard County - AP  
Resource Power Development Corp.  
Incinerator #7  
AC05-163277

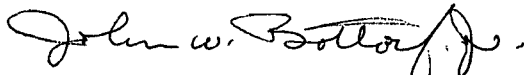
Dear Mr. Fancy,

Start of construction for the referenced source has just begun, and the construction permit will expire on 9-30-90. Additional time is needed to complete construction, start-up and compliance testing.

On behalf of Resource Power Development Corporation, we are requesting that the referenced permit be amended to change the expiration date from 9-30-90 to 9-30-91.

If you have any questions, please call Roger Caldwell at 407/298-0846.

Very truly yours,



John W. Bottorf, Jr., P.E.

JWB/ms

Cy: Lee Torrens

*J. Heron*  
*C. Collins*  
CAF/BA



RECEIVED

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

JUL 9 1990

Office of the Secretary

# Interoffice Memorandum

TO: Dale Twachtmann  
 for FROM: Steve Smallwood *cta j...*  
 DATE: July 9, 1990  
 SUBJ: Amendment of Permit No. AC 05-163277  
 Resource Power Development

*please call Kim  
 Tober when  
 signed  
 81344*

Attached for your approval and signature is a letter that will extend the expiration date of an air construction permit for a pathological incinerator in Brevard County, Florida.

The extension is not controversial.

I recommend your approval and signature.

SS/TH/plm

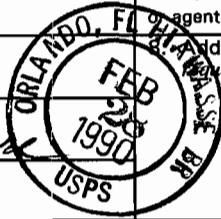
Attachment

*Bruce -  
 Should This go  
 certified? (4)  
 Teresa  
 Chuck Collins  
 Reading File  
 File Copy  
 Kt*

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)      2.  Restricted Delivery (Extra charge)

3. Article Addressed to: John W. Bottorf, P.E. Bottorf Assoc., Inc 4595 Park Breeze Ct Orlando, FL 32808-1057	4. Article Number P 938 762 873
Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
Always obtain signature of addressee agent and DATE DELIVERED.	
5. Signature - Address X	Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>Manion H. Lewis</i>	
7. Date of Delivery	



PS Form 3811, Mar. 1988 \* U.S.G.P.O. 1986-212-865 DOMESTIC RETURN RECEIPT

P 938 762 873

**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

Sent to <i>John W Bottorf</i>	
Street and No. <i>Bottorf Assoc. 4595 Park Breeze Ct</i>	
P.O. State and ZIP Code <i>Orlando, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	

PS Form 3800, June 1985



# 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

February 22, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

John W. Bottorf, Jr., P.E.  
Bottorf Associates, Inc.  
4595 Park Breeze Court  
Orlando, Florida 32808-1057

Dear Mr. Bottorf:

Re: Permit No. AC 05-163277

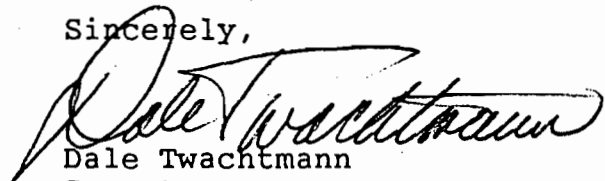
The Department is in receipt of your letter dated January 29, 1990, on behalf of Resource Power Corporation, Inc. requesting to change incinerator manufacturer from a Morse Boulger, Inc. Model #RBK-2000 to a Consumat Model #C-760.

The Department has considered your request and agreed with your proposal.

Attachments to be Incorporated:

John W. Bottorf's letter of January 29, 1990.

Sincerely,



Dale Twachtmann  
Secretary

DT/plm

4595 PARKBREEZE CT. • ORLANDO, FLORIDA 32808-1057 • (407) 298-0846

January 29, 1990

C. H. Fancy, Deputy Chief  
Bureau of Air Quality Management  
Department of Environmental Reg.  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Project No. 701

DER-1

RECEIVED  
FEB 2 1990

Subject: Brevard Co. - AP  
Resource Power Development Corp.  
Incinerator #7  
AC05-163277

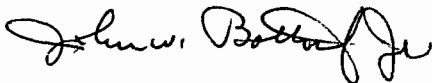
Dear Mr. Fancy

The referenced incinerator has not been installed as of this date. On behalf of the permittee, we are requesting a modification to the referenced permit.

Resource Power Development Corporation wishes to change incinerator manufacturer from a Morse Boulger, Inc. Model #RBK-2000 to a Consumat Model #C-760 modified, to be the same as the RBK-2000. The only difference will be the ash removal method that will utilize a ram system in place of the moveable grate system. All other physical and operational parameters, such as primary and secondary chamber volumes, temperatures, gas flow rates, emission rates, stack height, stack diameter, stack temperature, residence time, burner size, fuel type, fuel rate, incineration rate, waste type, operating hours, etc., will not change.

If you have any questions regarding this request for permit modification, please call Roger Caldwell at 298-0846.

Very truly yours,



John W. Bottorf, Jr., P.E.

JWB/ms

Cy: Bob Ratcliff  
Lee Torrens

*D. DeLeon*  
*C. Collins, Chief*  
*CHF/JKP/BT*

# MORSE BOULGER, INC.

100 DENTON AVENUE  
GARDEN CITY PARK, N.Y. 11040-4005  
TEL. (516) 747-9600 • FAX: (516) 747-9334

RECEIVED

AUG 31 1989

DER-BAQM

August 25, 1989  
CS-89-146

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

Attention: Mr. C.H. Fancy, P.E.  
Deputy Chief

Re: DER File No. 05-163277

Dear Mr. Fancy:

In conformance with the guidelines contained in the Intent to Issue forwarded to us on August 9, 1989, we are providing the enclosed notice of publication.

Please feel free to contact us if there are any questions or if additional information is required.

Very truly yours,

MORSE BOULGER INC.



Charles Scolaro, P.E.  
Senior Engineer

Attachment: Florida Today August 24, 1989 Legal Notice

cc: Roger Caldwell (Bottorf Associates Inc.)  
Lee Torrans (RCA)  
Matt Gaskin (MBI)

*J. DeLeon*  
*C. Collins, CF Dist*

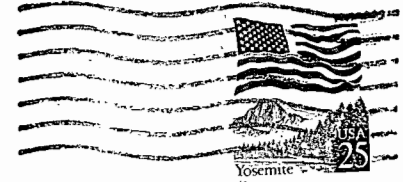


ORIGINAL PARTS, SERVICE, KERNERATOR HOPPER DOORS  
NEW INCINERATORS AND KASCADE STOKERS





MORSE BOULGER, INC.  
100 DENTON AVENUE  
GARDEN CITY PARK, N.Y. 11040-4005



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

Attention: Mr. C.H. Fancy, P.E., Deputy Chief



# CAPE PUBLICATIONS, INC.

**The Times**

Published Weekly on Wednesday

**THE TRIBUNE**

Published Weekly on Wednesday



**Published Daily**

STATE OF FLORIDA  
COUNTY OF BREVARD

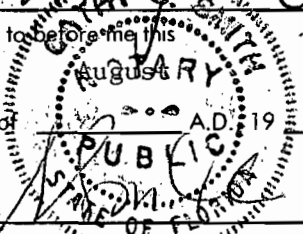
Before the undersigned authority personally appeared Linda L. Spicer who on oath says that he/she is Legal Advertising Clerk of the FLORIDA TODAY, a newspaper published in Brevard County, Florida; that the attached copy of advertising being a Legal Notice

\_\_\_\_\_ in the matter of \_\_\_\_\_  
permit to Resource Power Corporation (RPC)  
\_\_\_\_\_ in the \_\_\_\_\_ Court

was published in the FLORIDA TODAY NEWSPAPER  
in the issues of August 24, 1989

Affiant further says that the said FLORIDA TODAY NEWSPAPER is a newspaper published in said Brevard County, Florida and that the said newspaper has heretofore been continuously published in said Brevard County, Florida regularly as stated above, and has been entered as second class mail matter at the post office in COCOA, said Brevard County, Florida for a period of one year next preceeding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Linda L. Spicer  
Sworn and subscribed to before me this 24th day of August, 1989  
Cathy  
Notary Public  
State of Florida at Large  
My Commission Expires March 29, 1992



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 Resource Power Corporation (RPC), 100 Denton Avenue, Garden City Park, New York 11040-4005, to install/construct a pathological incinerator to be located at the RPC facility in Cocoa, 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 proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of 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 District  
3319 Maquire 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.  
TC099657-11-8/24, 1989,  
Thursday

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)      2.  Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Terance Tinnelly, President Morse Boulger, Inc. 100 Denton Avenue Garden City Park, NY 11040-4005	4. Article Number P 938 762 643
	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
Always obtain signature of addressee or agent and <b>DATE DELIVERED.</b>	
5. Signature - Address X <i>Terance Tinnelly</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery 8/14/89	

PS Form 3811, Mar. 1988      \* U.S.G.P.O. 1988-212-885      DOMESTIC RETURN RECEIPT

P 938 762 643

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

PS Form 3800, June 1985

Sent to Mr. Terance Tinnelly, Resource	
Street and No.      Power Corp. 100 Denton Ave.	
P.O., State and ZIP Code Garden City Park, NY 11040-4000	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 8-10-89 Permit: AC 05-163277	



*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

August 9, 1989

Mr. Terance Tinnelly, President  
Morse Boulger, Inc.  
100 Denton Avenue  
Garden City Park, New York 11040-4005

Dear Mr. Tinnelly:

Attached is the Technical Evaluation and Preliminary Determination and proposed permit for Resource Power Corporation to construct a 2000 lbs/hr pathological waste incinerator in Cocoa, Brevard County, Florida. This package was mailed to the company's address in Hollywood on July 27, 1989, and returned to the Bureau of Air Quality Management on August 7 marked addressee unknown.

As agreed upon in a telephone conversation with your office on August 8, 1989, we are sending this package to you for your review and comments as well as for publication of the Notice of Intent to Issue. 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,

Patricia G. Adams  
Planner

Bureau of Air Quality Management

PGA/kt

attachments

cc: Roger Caldwell  
John Turner, Central District

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 Resource Power Corporation (RPC), 100 Denton Avenue, Garden City Park, New York 11040-4005, to install/construct a pathological incinerator to be located at the RPC facility in Cocoa, 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.

Is your RETURN ADDRESS completed on the reverse side?

<p>● <b>SENDER:</b> Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.</p> <p>1. <input type="checkbox"/> Show to whom delivered, date, and addressee's address. (Extra charge)      2. <input type="checkbox"/> Restricted Delivery (Extra charge)</p>	
3. Article Addressed to:  T. A. Sabrino, President Resource Power Corporation One Oakwood Blvd., Suite 290 Hollywood, FL 33020	4. Article Number  P 938 762 629
	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
	Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .
5. Signature — Address <b>X</b>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent <b>X</b>	
7. Date of Delivery	

Thank you for using Return Receipt Service.

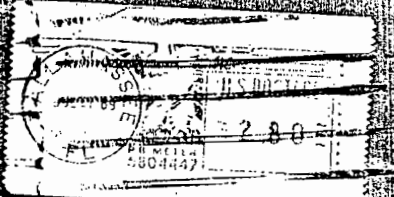
BEST AVAILABLE COPY

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
300 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32305-2700

CERTIFIED

P 438 762 629

MAIL



*3502  
Hollywood St  
33021*

Claims Check  
No. 122905  
 Hold  
Date  
1ST Notice  
2ND Notice  
Return  
Detached from  
PS Form 3849  
Oct. 1982

~~T. A. Sabrino, President  
Resource Power Corporation  
One Oakwood Blvd., Suite 290  
Hollywood, Florida 33020~~

~~1st Notice  
2nd Notice  
Return~~

P 938 762 629

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to T. A. Sabrino, Resource Power	
Street and No. One Oakwood Blvd., Suite 290	
P.O., State and ZIP Code Hollywood, FL 33020	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 7-27-89 Permit: AC 05-263277	

PS Form 3800, June 1985





# 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

July 26, 1989

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

T. A. Sabrino, President  
Resource Power Corporation  
One Oakwood Blvd., Suite 290  
Hollywood, Florida 33020

Dear Mr. Sabrino:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for Resource Power Corporation (RPC) to construct/install a 2000 lb/hr pathological waste incinerator at the RPC facility located at Cocoa, Brevard County, Florida.

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,

*for C. H. Fancy*  
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/TH/plm

Attachments

cc: John W. Bottorf  
John Turner, C District

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

Resource Power Corporation  
One Oakwood Blvd., Suite 290  
Hollywood, Florida 33060

DER File No. 05-163277

---

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, Resource Power Corporation (RPC) applied on April 12, 1989 to the Department of Environmental Regulation for a permit to construct a pathological incinerator to be located at the RPC facility in Cocoa, 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 area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means 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 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. Petitions filed by the permit applicant and the parties listed below must be filed within 14 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 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 applicant have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 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



*for* \_\_\_\_\_  
C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

Copies furnished to:

John W. Bottorf  
John Turner

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 7-27-89.

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.

Martha Wise 7-27-89  
Clerk 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 Resource Power Corporation (RPC), One Oakwood Blvd., Suite 290, Hollywood, Florida 33020 to install/construct a pathological incinerator to be located at the RPC facility in Cocoa, 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 proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of 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 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

Resource Power Development Corporation  
Brevard County

Pathological Incinerator #7  
Permit Number: AC 05-163277  
APIS 30 ORL 0500 08

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting  
New Source Review

July 26, 1989



I. NAME AND ADDRESS OF APPLICANT

Resource Power Development Corporation  
One Oakwood Blvd., Suite 290  
Hollywood, Florida 33020

II. REVIEWING AND PROCESS SCHEDULE

Date of Receipt of Application: April 12, 1989 at  
Central Florida District.

Completeness Review: Department's letter: May 9, 1989.

Applicant Response to letter: May 16, 1989

Application Completeness Date: May 16, 1989.

III. FACILITY INFORMATION

III.1 Facility Location

The proposed source is located at 810 S. Industry Road  
in Cocoa, Brevard County, Florida. The latitude and longitude  
coordinates are 28°24'29"N and 80°46'09"W.

III.2 Standard Industrial Classification Code (SIC)

This facility is classified as follows:

Major Group No. 49 - Electric, Gas, and Sanitary Services

Industry Group No. 495 - Sanitary Services

Industry No. 4953 Refuse System

IV. PROJECT DESCRIPTION

Resource Power Development Corporation (RPD Corp) is a  
major emitting facility. This project involves the construction  
of a new 2000 lb/hr pathological waste incinerator. This  
facility (RPD Corp) currently has 6 incinerators on operation.  
Permits for units #1, 2, and 3 will be surrendered and these  
units will be permanently abandoned after an operating permit is  
issued for unit #7.

V. RULE APPLICABILITY

This project is subject to preconstruction review  
requirements under the provisions of Chapter 403, Florida  
Statutes (F.S.), and Chapter 17-2, Florida Administrative Code  
(F.A.C.).

The proposed source is located in an area (Brevard County) currently designated attainment for all criteria pollutants in accordance with F.A.C. 17-2.420.

The proposed source is exempt from provisions of F.A.C. 17-2.500, Prevention of Significant Deterioration, because its emissions do not exceed the PSD significant emissions rates located in F.A.C. 17-2, Table 500-2.

The proposed source shall be permitted under F.A.C. 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements.

The proposed source shall comply with applicable provisions of F.A.C. 17-2.600, Specific Source Emission Limiting Standard and 17-2.620, General Pollutant Emissions Limiting Standards.

This source (Pathological Incinerator #7) and any other incinerator at this facility shall comply with specific requirements of F.A.C. 17-2.600(1)(d), Specific Source Emission Limiting Standards for Biological Waste Incineration facilities by the compliance date of July 1, 1992.

## VI. SOURCE IMPACT ANALYSIS

### VI.1 Emissions Summary

The operation of the proposed pathological incinerator will produce emissions of particulate matter (PM), carbon monoxide (CO), and hydrochloric acid (HCl). RPD Corp. is a major facility. Emissions of particulate matter will decrease by 23 TPY and carbon monoxide by 34.4 TPY as a result of replacing pathological incinerators Nos. 1, 2 and 3 with No. 7. Units Nos. 1, 2 and 3 will be shut down. Total permitted emissions for the new source (Pathological Incinerator No. 7) shall not exceed 30.7 TPY PM, 13.14 TPY NO<sub>x</sub>, and 122 TPY HCl.

### VI.2 Air Quality Analysis

An air modeling analysis was conducted by the Department for the Resource Power Development Corporation's facility. The Industrial Source Complex Short-Term (ISCST) air quality dispersion model was used in the analysis with one year of meteorological data collected at West Palm Beach in 1985.

The impact of the hydrochloric acid (HCl) emissions from the existing three units (1-3) and the other four units (4-7) were evaluated. Three groups of units were modeled; unit 7 alone, units 4-7, and units 1-6. The results show that Acceptable Ambient Concentration (AAC) levels for HCl for both

the 8-hour (based on 8,760 hrs/year) and the 24-hr (based on 8,760 and 4,368 hrs per year) averaging times are exceeded by the HCl emission from the existing and proposed units. In addition, the modeling indicates that the EPA's proposed reference air concentration (RAC) of 150 ug/m<sup>3</sup> will be exceeded as shown in column (c) below. A summary of the results follows:

Source(s)	Averaging Time	Maximum Concentration ug/m <sup>3</sup>			Location (m)	
		(a)	(b)	(c)		
Unit 7	annual	0.96	0.48		-50,	50
	3-min			149.7		
	1-hr	91.3	45.65		100,	-50
	8-hr	30.1	15.05		-50,	50
	24-hr	19.9	9.95		50,	-50
Units 4-7	annual	9.0	4.50		-50,	50
	3 min			825		
	1-hr	503.	251.5		50,	0
	8-hr	207.	103.5		50,	-50
	24-hr	120.	60.0		50,	-50
Unit 1-6	annual	16.3	8.15		-50,	50
	3 min			830		
	1-hr	506.	253.0		50,	-100
	8-hr	264.	132.0		50,	-100
	24-hr	174.	87.0		50,	-100

Note: Location in x, y coordinates where unit #7 is located at 0,0.

- a) Based on 8760 hours per year operation.
- b) Based on 4380 hours per year operation.
- c) Short term (3 minute) concentration used for comparing to the EPA's proposed reference air concentration (RAC). FR/Vol 52 No. 87/Wednesday, May 6, 1987.

The AAC levels defined for HCl are 140 ug/m<sup>3</sup>, 8-hour average, and 33 ug/m<sup>3</sup>, 24-hour average.

As can be noted from the above table, the existing operation (units 1-6) has greater concentration impacts than the proposed operation (units 4-7). Based on these results, the Department has decided to permit this source (unit No. 7) since its impact, based on comparing the proposed operation versus the existing operation, will improve the plant's overall impact. The applicant should be advised, however, that air dispersion modeling indicates that both the State and Federal ambient guidelines for hydrogen chloride will be exceeded. As this is the case, measures should be considered which would reduce hydrogen chloride impacts to acceptable levels. It is requested that all operating permits for this facility be surrendered,

and new operating permits be issued reflecting compliance of this facility with the Department's regulations for Biological Waste Incineration Facility, F.A.C. 17-2.600(1)(d) before the compliance date of July 1, 1992.

VII. CONCLUSION

Based on the information provided by Resource Power Development Corporation, the Department has reasonable assurance that the proposed project, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of an ambient air 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:**  
Resource Power Development Corporation  
One Oakwood Blvd., Suite 290  
Hollywood, Florida 33020

**Permit Number:** AC 05-163277  
**Expiration Date:** September 30, 1990  
**County:** Brevard  
**Latitude/Longitude:** 28°24'29"N  
80°46'09"W  
**Project:** Pathological Incinerator  
No. 7

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 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 construction of a pathological incinerator No. 7 to be located at the Resource Power Development Corporation facility on 810 S. Industry Rd., in Cocoa, Brevard County, Florida.

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

Attachments are listed below:

1. Department's letter dated May 9, 1989.
2. Company's letter received May 16, 1989.

**PERMITTEE:**  
Resource Power Development  
Corporation

Permit No. AC 05-163277  
Expiration Date: Sept. 30, 1990

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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. Neither 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 is not 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, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; 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.

PERMITTEE:  
Resource Power Development  
Corporation

Permit No. AC 05-163277  
Expiration Date: Sept. 30, 1990

GENERAL CONDITIONS:

6. The permittee shall 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor 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 provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including 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.

PERMITTEE:  
Resource Power Development  
Corporation

Permit No. AC 05-163277  
Expiration Date: Sept. 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 for 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 involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 17-4.120 and 17-30.300, F.A.C., 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 or a copy thereof shall be kept at the work site of the permitted activity.

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:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.



**PERMITTEE:**  
Resource Power Development  
Corporation

Permit No. AC 05-163277  
Expiration Date: Sept. 30, 1990

**GENERAL CONDITIONS:**

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained 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 dates 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 corrected promptly.

**SPECIFIC CONDITIONS:**

1. The maximum allowable operating rate shall not exceed 2000 pounds of infectious waste burned per hour. This is the operating rate at which compliance test shall be conducted.

2. The emissions from this source shall not exceed 8 lbs/hr for particulate matter (PM) and 28 lbs/hr for HCL. Carbon monoxide (CO) emissions shall not exceed 100 parts per million by volume, dry basis, corrected to 7% O<sub>2</sub> on a hourly average basis. Tests shall be conducted in accordance with EPA Method 5, Determination of Particulate Matter Emissions from Stationary Sources and EPA Method 10 Determination of Carbon Monoxide from Stationary Sources.

3. This source is permitted to operate continuously, (8760 hours per year). No PVC materials are to be burned in this unit.

PERMITTEE:  
Resource Power Development  
Corporation

Permit No. AC 05-163277  
Expiration Date: Sept. 30, 1990

**SPECIFIC CONDITIONS:**

4. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor pursuant to F.A.C. 17-2.620(2).

5. All unconfined emissions of particulate matter generated at this site shall be adequately controlled (F.A.C. 17-2.610(3)). Area must be watered down should unconfined emissions occur.

6. Hazardous wastes generated in connection with any of the sources at this facility must be disposed of in accordance with F.A.C. 17-30.

7. No visible emissions are allowed under normal operation except that 20% opacity is allowed for up to three minutes in any one hour. Tests shall be conducted in accordance with EPA Method 9, Determination of Opacity of Emission from Stationary Sources, F.A.C. 17-2.700(6)(b)(9), Dec. 5, 1988. The Central Florida District office shall be notified at least 15 days prior to any compliance test. The incinerators must be tested within 10% of permitted capacity.

8. Incinerator operating instructions shall be clearly posted. The instructions shall include but not be limited to:

- A. Frequency of clean out and method of ash disposal.
- B. Type of waste and method of loading.
- C. Maximum load rate (no greater than 2000 pounds/hour).
- D. Preheating of afterburner section prior to ignition of primary burn section.
- E. Minimum temperature in secondary chamber (1800°F to be achieved prior to primary ignition).
- F. Minimum residence time shall be two (1) seconds.

All biological waste incinerators shall be trained by the equipment manufacturer's representatives or another qualified organization as to proper operating practices and procedures. The content of the training program shall be submitted to the Department for approval. The applicant shall submit a copy of a certificate verifying the satisfactory completion of a Department approved training program prior to issuance or renewal of the operating permit. The owner shall not allow the incinerator to be operated unless it is operated by an operator who has satisfactorily completed the required training program.

9. This source shall burn propane fuel only.

10. When the Department, after investigation, has good reason (such as complaints, increased visible emissions, etc.), to

**PERMITTEE:**  
Resource Power Development  
Corporation

Permit No. AC 05-163277  
Expiration Date: Sept. 30, 1990

**SPECIFIC CONDITIONS:**

believe that any applicable emission standard contained in Chapter 17-2, F.A.C., or in this permit is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the Department.

11. This permit does not preclude compliance with any applicable local permitting requirements.

12. This source shall comply with all applicable provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code.

13. The permittee will be required to submit reports on the actual operation and emissions of this facility. This report shall also include but not be limited to the data specified in specific condition No. 8.

14. This source (incinerator No. 7) and all other incinerators at this facility shall comply with F.A.C. 17-2.600(1)(d), Specific Emission Limiting Standards by the compliance date of July 1, 1992. A compliance plan and schedule shall be submitted to the Central District office before July 1, 1992.

15. Operating permits for incinerators #1, #2 and #3 shall be surrendered prior to the issuance of operating permit for incinerator No. 7.

16. 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. 17-4.090).

17. 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. 17-4.220).

**PERMITTEE:**  
**Resource Power Development**  
**Corporation**

**Permit No. AC 05-163277**  
**Expiration Date: Sept. 30, 1990**

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 1989

**STATE OF FLORIDA DEPARTMENT**  
**OF ENVIRONMENTAL REGULATION**

---

Dale Twachtmann, Secretary



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

To: Teresa Heron

From: Tom Rogers *TR*

Date: May 31, 1989

Subject: Resource Power Development Corp.  
Modeling Evaluation for HCl Emissions

I have completed a modeling analysis of the subject facility. The HCl emissions from the existing three units (1-3) and the proposed four units (4-7) were evaluated. Three groups of units were modeled; unit 7 alone, units 4-7, and units 1-6. The results show that the Acceptable Ambient Concentration (AAC) levels for HCl at both 8-hour and 24-hour averaging times are exceeded.

The Industrial Source Complex Short-Term (ISCST) air quality dispersion model was used in the analysis with one year of meteorological data collected at West Palm Beach in 1985. A summary of the results follows.

*Based on 8760 hr/yr*

Source(s)	Averaging Time	Max. Conc. (ug/m <sup>3</sup> )	Location (m)
Unit 7	annual	0.96	-50, 50
	1-hr	91.3	100, -50
	8-hr	30.1	-50, 50
	24-hour	19.9	50, -50
Units 4-7	annual	9.0	-50, 50
	1-hr	503.	50, 0
	8-hr	207.	50, -50
	24-hr	120.	-50, 50
Units 1-6	annual	16.3	50, -100
	1-hr	506.	50, -100
	8-hr	264.	50, -100
	24-hr	174.	50, -100

Note: Location in x,y coordinates where unit 7 is located at 0,0.

The AAC levels defined for HCl are 140 ug/m<sup>3</sup>, 8-hour average and 33 ug/m<sup>3</sup>, 24-hour average.

The results of this analysis should be used in conjunction with other environmental and engineering factors in making any final decision. Reasonable effort should be made to achieve the acceptable ambient concentration levels, however, predicted exceedance of these levels should probably not be used as the sole basis for permit denial.

\*\*\* SOURCE DATA \*\*\*

SOURCE NUMBER	PK E E	PART. CATS.	EMISSION RATE		X (METERS)	Y (METERS)	BASE ELEV. (METERS)	HEIGHT (METERS)	TEMP.	EXIT VEL.	BLDG. HEIGHT (METERS)	BLDG. LENGTH (METERS)	BLDG. WIDTH (METERS)
			TYPE=0,1 (GRAMS/SEC)	TYPE=2 (GRAMS/SEC)					TYPE=0 (DEG. K);	TYPE=0 (M/SEC);			
10	0 0	0	0.35300E+01	0.0	0.0	0.0	14.30	1255.00	13.50	1.07	7.32	43.50	43.50
20	0 0	0	0.35300E+01	-6.9	0.0	0.0	14.30	1255.00	13.50	1.07	7.32	43.50	43.50
30	0 0	0	0.24600E+01	-14.9	0.0	0.0	11.00	1144.00	10.40	0.99	7.32	43.50	43.50
40	0 0	0	0.91000E+00	-20.6	0.0	0.0	9.90	783.00	6.90	0.61	7.32	43.50	43.50
50	0 0	0	0.35000E+00	17.7	-82.9	0.0	6.10	783.00	6.90	0.38	7.32	43.50	43.50
60	0 0	0	0.35000E+00	13.7	-82.9	0.0	6.10	783.00	6.90	0.38	7.32	43.50	43.50



*Exp. Mail MB13119600X  
5-15-89  
Orlando, FL*

*file copy*

CONSULTING ENGINEERS

4595 PARKBREEZE CT. • ORLANDO, FLORIDA 32808-1057 • (407) 298-0846

May 12, 1989

Project No. 701-7

C. H. Fancy, Deputy Chief  
Bureau of Air Quality, Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED

MAY 16 1989

Subject: **DER-BACM**  
Brevard Co.- AP  
Resource Power Development  
Corporation  
Pathological Incinerator NO. 7  
AC05-163277

Dear Mr. Fancy:

We are in receipt of your May 9, 1989 letter requesting additional information to complete the referenced application. The information is addressed in the order requested:

Item 1. The manufacturer of this proposed incinerator estimated an emission rate for HCL of 28 lbs/hr.

Below we convert 8 lbs/hr. particulate to grains per dry standard cubic feet of flue gas, corrected to 7% O<sub>2</sub>.

$$\frac{(8 \text{ lbs/hr.})(7000 \text{ grains/lb.})}{(60 \text{ min/hr.})(5986 \text{ DSCFM})} = .156 \text{ GDSCF}$$

Corrected to 7% O<sub>2</sub>

$$.156 \frac{(20.9-7)}{(20.9-12.22)} = .25 \text{ GDSCF}$$

Item 2. The building is 80' wide, 140' long and 24' high.

Item 3. Currently at this facility, there are three incinerators; each having 1 stack. These are units #1, 2 & 3, and are located on the southeast corner of the property, as shown on the attached site plan. This company holds construction permits for units #4 & 5, and is waiting for a permit for unit #6 to be issued by the Central District office. An application has been submitted to the Central District to modify the permit for unit #4 to allow the installation of an improved incinerator instead of the one described in the permit. Permits for units #1, 2 & 3 will be surrendered and the units will be permanently abandoned, not relocated to the northeast corner of the property, after an operating permit is issued for unit #7.

# POST OFFICE TO ADDRESSEE

# EXPRESS MAIL NEXT DAY SERVICE



181311760

For Postal Use

<b>ORIGIN</b>		Date In: 5-15-81	Postage: \$ 8.75
Post Office ZIP Code: 32810	Time In: 10:35 A.M. / P.M.	Return Receipt: \$ 30	FEE'S
Initials of Receiving Clerk: AKS	Weight lbs. 4 oz.	C.O.D. \$	
<b>ACCEPTANCE</b>			
<input checked="" type="checkbox"/> Next Day Delivery or <input type="checkbox"/> Second Day Delivery <input type="checkbox"/> By 12 Noon or <input checked="" type="checkbox"/> By 3:00 P.M.		Total Postage & Fees: \$ 9.65	
<input type="checkbox"/> Express Mail Military Service <input type="checkbox"/> International Express Mail		Country Code	

Express Mail Corporate Account No.:	Federal Agency Account No.:
-------------------------------------	-----------------------------

For Customer Use

**FROM:**  
 Botton F + Associates  
 4575 Parkbreeze Ct.  
 Orlando FL 32828-1000

For Postal Use

<b>DESTINATION</b>	Date of Delivery: 5-16	Time of Delivery: 9:00	A.M. / P.M.
X Signature of Addressee or Agent: <i>W. Meyer</i>			
<b>DELIVERY WAS ATTEMPTED</b>	Date:	Time:	A.M. / P.M.
Signature of Delivery Employee 1: <i>[Signature]</i>		2:	
<b>Waiver of Signature and Indemnity (Domestic Only)</b>		I wish delivery to be made without obtaining the signature of the addressee or the addressee's agent (if in the judgement of the delivery employee, the article can be left in a secure location) and I authorize the delivery employee to sign that the shipment was delivered and understand that the signature of the delivery employee will constitute valid proof of delivery. SIGNED: <i>[Signature]</i>	

For Customer Use

**ADDRESSEE'S COPY**

**TO:** Telephone Number: 704 487 7131  
 C.H. Fancy, Deputy  
 2600 Blair Stone Rd.  
 Tallahassee, FL 32310  
 TEXA



May 12, 1989

- 2 -

Mr. C. H. Fancy

If the permit modifications request for unit #4 is denied, for some reason, then permits for units #2, 3 & 4 will be surrendered instead.

Ultimately this facility plans to install units #4, 5, 6 & 7 on the northeast corner of the property, as shown on the attached site plan. Each unit will have 1 stack, for a total of 4 stacks.

This facility is aware of the proposed Biohazardous Waste Incinerator rule change and intends to fully comply with such rule, when required in July, 1992.

We trust this submittal completes the referenced application. If you have additional questions, please call Roger Caldwell at 407/298-0846.

Very truly yours,



John W. Bottorf, Jr., P.E.

JWB/ms

cy: Tony Sobrino

copied: *S. Heron*  
*C. Collins*

P 274 010 382

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED

NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Sent to Mr. J. A. Sabrino, Resource	
Street and No. Power Dev. 1 Oakwood Blvd., Suite 290	
P.O. State and ZIP Code Hollywood, FL 33020	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 5-9-89 Permit: AC 05-163277	


**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

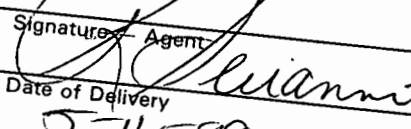
1.  Show to whom delivered, date, and addressee's address. (Extra charge) 2.  Restricted Delivery (Extra charge)

3. Article Addressed to:  
Mr. J. A. Sabrino, President  
Resource Power Development Corp.  
One Oakwood Blvd., Suite 290  
Hollywood, FL 33020

4. Article Number  
P 274 010 382

Type of Service:  
 Registered  Insured  
 Certified  COD  
 Express Mail  Return Receipt for Merchandise

5. Signature - Address  
X 

6. Signature - Agent  
X 

7. Date of Delivery  
5-11-89

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Mar. 1988 \* U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

May 9, 1989

Mr. J. A. Sabrino, President  
Resource Power Development Corporation  
One Oakwood Boulevard, Suite 290  
Hollywood, Florida 33020

Dear Mr. Sabrino:

Re: AC 05-163277, Pathological Incinerator No. 7

The Bureau of Air Quality Management (BAQM) has received your application for a permit to construct a pathological waste incinerator at your facility located in Cocoa, Brevard County, Florida.

Based on our initial review of your proposal, it has been determined that the following additional information is needed to complete your application.

- o Estimate the emissions of hydrochloric acid (HCl) in pounds per hour and particulate matter in grains per dry standard cubic foot of flue gas, corrected to 7% O<sub>2</sub>.
- o Submit building dimensions. This data is necessary to model the ambient air impact of the pollutants emitted by this operation.
- o How many stacks are at your facility? How are they arranged (one for each incinerator, two for three, etc.)? Please explain. Process drawings and plot plans would clarify this information.

If you have any questions about the information requested, please call Teresa Heron, Review Engineer, at (904) 488-1344 or write to me at the above address.

Sincerely,

*for* *Ch. H. Fancy*

C. H. Fancy  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/TH/plm

cc: John Turner

DEPARTMENT OF ENVIRONMENTAL REGULATION

**ROUTING AND TRANSMITTAL SLIP**

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)	Initial
	Date
2.	Initial
<i>Bill</i>	Date
3.	Initial
	Date
4.	Initial
	Date

REMARKS:

Re: Incinerator

Bill, I don't feel confident about permitting this incinerator with the NAC limits showed in Tom's report. However, the rules are not effective yet and the toxic police is not enforceable either. What should I do? I will be asking Gary about it since he wrote the rule. Anyway, I will put a provision to make sure this permit will comply

INFORMATION

- Review & Return
- Review & File
- Initial & Forward

DISPOSITION

- Review & Respond
- Prepare Response
- For My Signature
- For Your Signature
- Let's Discuss
- Set Up Meeting
- Investigate & Report
- Initial & Forward
- Distribute
- Concurrence For Processing
- Initial & Return

FROM: *with the NAC regulations by 199*

DATE: *5/1/89*

PHONE

Thanks,

Teresa

**ROUTING AND  
TRANSMITTAL SLIP**

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Bill Thomas

Initial

Date

2.

Bureau of Air Quality Manag.

**RECEIVED**

Initial

Date

3.

Department of Environmental Regulation

APR 18 1989

Initial

Date

4.

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

DER-BAQM

Initial

Date

REMARKS:

This facility became  
a major filter incrementor  
#6. I checked with C.M.C.  
Older permit is included.

INFORMATION

Hollywood office in  
NY -

Morse Boulger Inc.  
100 Denton Ave.  
Garden City Park NY  
11040-4005

Erance Timmelly Inc.

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

John Linn

516-747-9600

DATE

4/14/89

PHONE

SC 325-1202

305/646-2509  
disconnected

marion

407/298-0846



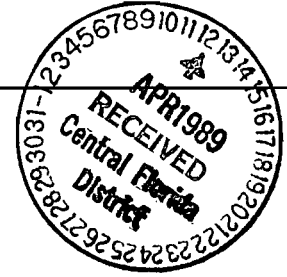
4595 PARKBREEZE CT. • ORLANDO, FLORIDA 32808-1057 • (407) 298-0846

## LETTER OF TRANSMITTAL

DATE: April 6, 1989

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

JOB NO. 701 Resource Power Dev. Corp.



We are forwarding to you

- Copy of Letter       Tracings       Shop Drawings
- Reports       Prints       Specifications
- Proposal       Applications

Copies	Dated	Description
4	4/4/89	Application to Construct Air Pollution Sources, Resource Power Development Corp. with check #1253 in the amount of \$500.00 for permit fee.

These are Transmitted

- For Approval       For Review & Comment       As Required
- For Your Use       Correct & Resubmit       For Your Signature
- Approved       Returned for corrections       Approved as Noted

cy: Tony Sobrino

By: Roger T. Caldwell  
 Roger T. Caldwell, Vice President  
 Environmental Division

BAQ

APPLICATION TRACKING SYSTEM

04/12/89

APPL NO: 163277

APPL RECVD: 04/12/89 TYPE CODE: AC SUBCODE: 10 LAST UPDATE: 04/12/89

DER OFFICE RECVD: ORL DER OFFICE TRANSFER TO: BAQ APPLICATION COMPLETE: 00/00/00

DER PROCESSOR: J. TURNER B. Thomas

APPL STATUS: AC DATE: 04/12/89 (ACTIVE/DENIED/WITHDRAWN/EXEMPT/ISSUED/GENERAL)

RELIEF: \_\_ (SSAC/EXEMPTIONS/VARIANCE)

(Y/N) N MANUAL TRACKING DISTRICT: 30 COUNTY: 05
(Y/N) DNR REVIEW REQD? LAT/LONG: 28.24.29/80.46.09
(Y/N) N PUBLIC NOTICE REQD? BASIN-SEGMENT: .
(Y/N) N GOV BODY LOCAL APPROVAL REQD? COE #:
(Y/N) Y LETTER OF INTENT REQD? (I/ISSUE D/DENY) ALT#:

PROJECT SOURCE NAME: RESOURCE POWER DEVELOPMENT/INCIN #6 7

STREET: 810 SOUTH INDUSTRY DRIVE CITY: COCOA
STATE: FL ZIP: PHONE:

APPLICATION NAME: SOBRINO, J. A.

STREET: ONE OAKWOOD BLVD, SUITE 290 CITY: HOLLYWOOD
STATE: FL ZIP: 33020 PHONE: 305-923-9500

AGENT NAME: BOTTORF & ASSOCIATES

STREET: 4595 PARKBREEZE COURT CITY: ORLANDO
STATE: FL ZIP: 32808 PHONE: 407-298-0846

FEE #1 DATE PAID: 04/12/89 AMOUNT PAID: 00500 RECEIPT NUMBER: 00135157

B DATE APPLICANT INFORMED OF NEED FOR PUBLIC NOTICE
C DATE DER SENT DNR APPLICATION/SENT DNR INTENT
D DATE DER REQ. COMMENTS FROM GOV. BODY FOR LOCAL APP.
E DATE #1 ADDITIONAL INFO REQ--REC FROM APPLICANT
E DATE #2 ADDITIONAL INFO REQ--REC FROM APPLICANT
E DATE #3 ADDITIONAL INFO REQ--REC FROM APPLICANT
E DATE #4 ADDITIONAL INFO REQ--REC FROM APPLICANT
E DATE #5 ADDITIONAL INFO REQ--REC FROM APPLICANT
E DATE #6 ADDITIONAL INFO REQ--REC FROM APPLICANT
F DATE GOVERNING BODY REQUESTED SURVEY RESULTS/REPORTS
G DATE FIELD REPORT WAS REQ--REC
H DATE DNR REVIEW WAS COMPLETED
I DATE APPLICATION WAS COMPLETE 00/00/00
J DATE GOVERNING BODY PROVIDED COMMENTS OR OBJECTIONS
K DATE NOTICE OF INTENT WAS SENT--REC TO APPLICANT
L DATE PUBLIC NOTICE WAS SENT TO APPLICANT
M DATE PROOF OF PUBLICATION OF PUBLIC NOTICE RECEIVED
N WAIVER DATE BEGIN--END (DAY 90)

COMMENTS: 1. joint fee = 2, 3, 4 to be submitted (put in permit)



Resource Power Development Corp.

Source	H (m)	D (in)	T (K)	V (m/s)	HCl <sup>(g/s)</sup>
- Unit 7 ✓	47 ft	3.5'	1800°F	44.2	3.53
- Unit 6 ✓	47 ft	"	"	"	
- Unit 5 ✓	36 ft	39 inch	1600°F	34 ft/PS	1500 lb/hr
* Unit 4 ✓	-	-	-	-	1000 lb/hr
✓ Unit 3 ○	20 ft	15 inch	950°F	22.65 FPS	"
✓ Unit 2 ○					
* Unit 1 ○	32.5 ft	24 inch	950°F	22.65 FPS	"

$H_b = 24' = 7.32 \text{ m}$

$H_w = 80' = 24.38 \text{ m}$

$H_c = 140' = 42.67 \text{ m}$

Effective width = 43.54 m

①②③④⑤ operation hours  
 12 hr / day × 52  
 day well

1144

$$F = \frac{\pi d^2}{4} v$$

$$\text{Unit 7 } F = 425.25 \text{ ft}^3/\text{s} = 25,515 \text{ cfm} \\ = 12.14 \text{ m}^3/\text{s}$$

HCl in stack gas @ 800 ppm =

~~$$\mu\text{g}/\text{m}^3 = \frac{(800) 36 \times 10^3}{24.45}$$~~

$$\text{@ } 1255 \text{ K } \quad \mu\text{g}/\text{m}^3 = \frac{(800) 36 \times 10^3}{102.97} \quad \leftarrow \text{corrected for Temp.} \\ = 279,693 \mu\text{g}/\text{m}^3$$

$$E = (0.279693 \text{ g}/\text{m}^3)(12.14 \text{ m}^3/\text{s}) = 3.40 \text{ g}/\text{s}$$

$$\text{Unit 5 / } F = 8.01 \text{ m}^3/\text{s} \\ \mu\text{g}/\text{m}^3 = \frac{(800)(36 \times 10^3)}{93.86} = 306,840 \mu\text{g}/\text{m}^3$$

$$E = (0.306840 \text{ g}/\text{m}^3)(8.01 \text{ m}^3/\text{s}) = 2.46 \text{ g}/\text{s}$$

$$\text{Units 4, 1 / } F = 2.02 \text{ m}^3/\text{s} \\ \mu\text{g}/\text{m}^3 = \frac{(800)(36 \times 10^3)}{64.25} = 448,249 \mu\text{g}/\text{m}^3$$

$$E = (0.448249 \text{ g}/\text{m}^3)(2.02 \text{ m}^3/\text{s}) = 0.91 \text{ g}/\text{s}$$

$$\text{Units 3, 2 / } F = 0.78 \text{ m}^3/\text{s} \\ \text{Conc.} = \frac{(800)(36 \times 10^3)}{64.25} = 448.249 \mu\text{g}/\text{m}^3$$

$$E = (0.448249 \text{ g}/\text{m}^3)(0.78 \text{ m}^3/\text{s}) = 0.35 \text{ g}/\text{s}$$

### Source Locations

<u>Unit.</u>	<u>X(m)</u>	<u>Y(m)</u>
7	0	0
6	-6.9	0
5	-14.9	0
4	-20.6	0
3	17.7	-82.9
2	13.7	-82.9
1	13.7	-76.6

### Receptor Locations

<u>X (m)</u>	<u>Y (m)</u>
-100 $\overset{50}{\rightarrow}$ 200	-200 $\overset{100}{\rightarrow}$ 100
7	7

# Resource Power Development Corp.

<u>ISCST</u>	<u>1-yr.</u>	<u>HCl emissions</u>	
Unit 7	Max Ann	0.96 $\mu\text{g}/\text{m}^3$	@ -50, 50
	Max 1-hr	91.3 $\mu\text{g}/\text{m}^3$	@ 100, -50
	Max 8-hr	30.1 $\mu\text{g}/\text{m}^3$	@ -50, 50
	Max 24-hr	19.9	@ 50, -50
Units 4-7	Max Ann	9.0 $\mu\text{g}/\text{m}^3$	@ -50, 50
	Max 1-hr	503	@ 50, 0
	Max 8-hr	207	@ 50, -50
	Max 24-hr	120	@ -50, 50
Units 1-6	Max Ann	16.3 $\mu\text{g}/\text{m}^3$	@ 50, -100
	Max 1-hr	506	@ 50, -100
	Max 8-hr	264	@ 50, -100
	Max 24-hr	174	@ 50, -100

HCl TLV-TWA = 7000  $\mu\text{g}/\text{m}^3$  ceiling limit

Florida NAC 8-hr = 140  $\mu\text{g}/\text{m}^3$   
24-hr = 33  $\mu\text{g}/\text{m}^3$

# Resource Power Development Corp.

Unit #	H (m)	D (m)	T (K)	v (m/s)	@ 300 ppm
					HCl (g/s)
7	14.3	1.07	1255.	13.5	3.53 ✓
6	14.3	1.07	1255.	13.5	3.53
5	11.0	0.99	1144.	10.4	2.46
4	9.9	0.61	783.	6.9	0.91
3	6.1	0.38	783	6.9	0.35
2	6.1	0.38	783	6.9	0.35
1	9.9	0.61	783	6.9	0.91

average 300 ppm all increments

• Stack test data.

ISCST

Max 1-hr

Unit 7	<del>156</del> 166 $\mu\text{g}/\text{m}^3$	@ 25 m
Units 4-7	873 $\mu\text{g}/\text{m}^3$	@ 25 m
Units 1-6	1509 $\mu\text{g}/\text{m}^3$	@ 25 m

HCl TWA-TLV 7  $\text{mg}/\text{m}^3$  ceiling

$$8\text{-hr AAC} = 140 \mu\text{g}/\text{m}^3$$

$$24\text{-hr AAC} = 33 \mu\text{g}/\text{m}^3$$

\*\*\* SCREEN-1.1 MODEL RUN \*\*\*  
 \*\*\* DRAFT VERSION XXXX \*\*\*

RESOURCE POWER DEVELOPMENT CORP.

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT  
 EMISSION RATE (B/S) = 3.530  
 STACK HEIGHT (M) = 14.30  
 STK INSIDE DIAM (M) = 1.07  
 STK EXIT VELOCITY (M/S) = 13.50  
 STK GAS EXIT TEMP (K) = 1255.00  
 AMBIENT AIR TEMP (K) = 293.00  
 RECEPTOR HEIGHT (M) = .00  
 IOPT (1=URB,2=RUR) = 2  
 BUILDING HEIGHT (M) = 7.32  
 MIN HORIZ BLDG DIM (M) = 43.54  
 MAX HORIZ BLDG DIM (M) = 43.54

BUDY. FLUX = 29.04 M\*\*4/S\*\*3; MOM. FLUX = 12.18 M\*\*4/S\*\*2.

\*\*\* FULL METEOROLOGY \*\*\*

\*\*\*\*\*  
 \*\*\* SCREEN AUTOMATED DISTANCES \*\*\*  
 \*\*\*\*\*

\*\*\* TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES \*\*\*

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
50.	149.1	4	20.0	21.1	5000.0	15.5	4.4	7.1	HS
100.	134.9	4	20.0	21.1	5000.0	17.5	8.3	9.9	HS
200.	77.57	4	20.0	21.1	5000.0	20.4	15.7	13.2	HS
300.	53.79	4	20.0	21.1	5000.0	22.9	22.8	16.4	HS
400.	40.14	4	20.0	21.1	5000.0	25.1	29.7	19.5	HS
500.	35.56	4	15.0	15.8	4200.0	29.9	36.5	22.6	HS
600.	29.54	4	15.0	15.8	4200.0	29.9	42.0	25.3	HS
700.	25.14	4	10.0	10.6	3200.0	35.2	45.7	19.5	HS
800.	27.57	4	10.0	10.6	3200.0	39.2	55.0	21.1	HS
900.	25.15	4	10.0	10.6	3200.0	39.2	58.7	21.9	HS
1000.	23.32	4	10.0	10.6	3200.0	39.2	53.5	34.1	HS
1100.	21.95	4	8.0	8.4	2550.0	45.1	74.5	36.5	HS
1200.	20.25	4	8.0	8.4	2550.0	45.1	80.9	39.3	HS
1300.	19.74	4	8.0	8.4	2550.0	45.1	87.0	40.2	HS
1400.	18.66	4	8.0	8.4	2550.0	45.1	93.0	42.0	HS
1500.	17.66	4	8.0	8.4	2550.0	45.1	99.0	43.7	HS
1600.	16.71	4	8.0	8.4	2550.0	45.1	104.9	45.4	HS
1700.	16.00	4	8.0	8.4	2550.0	45.1	111.4	46.4	HS
1800.	15.57	4	8.0	8.4	2550.0	45.1	117.2	50.0	HS
1900.	15.14	4	8.0	8.4	2550.0	45.1	123.0	51.6	HS
2000.	14.59	4	8.0	8.4	2550.0	45.1	128.9	53.1	HS
2100.	14.25	4	8.0	8.4	2550.0	45.1	134.8	54.7	HS
2200.	13.91	4	8.0	8.4	2550.0	45.1	140.2	56.3	HS
2300.	13.92	5	1.0	1.1	5000.0	101.9	111.1	44.1	ND
2400.	14.40	5	1.0	1.1	5000.0	101.9	115.5	44.8	ND
2500.	14.65	5	1.0	1.1	5000.0	101.9	119.6	45.5	ND
2600.	15.27	5	1.0	1.1	5000.0	101.9	123.9	46.3	ND
2700.	15.66	5	1.0	1.1	5000.0	101.9	128.1	47.0	ND
2800.	15.02	5	1.0	1.1	5000.0	101.9	132.2	47.7	ND

500.	35.98	4	15.0	15.8	4800.0	29.5	35.8	22.0	HS
500.	22.54	4	15.0	15.3	4800.0	29.9	42.0	25.3	HS
700.	25.14	4	10.0	10.6	3200.0	33.2	43.7	28.5	HS
800.	27.57	4	10.0	10.8	3200.0	34.8	55.0	31.1	HS
900.	28.15	4	10.0	10.8	3200.0	35.2	52.3	31.9	HS
1000.	28.31	4	10.0	10.8	3200.0	35.2	58.5	34.1	HS
1100.	28.95	4	8.0	8.4	2560.0	45.1	74.5	36.8	HS
1200.	29.45	4	8.0	8.4	2560.0	45.1	80.9	38.3	HS
1300.	29.74	4	8.0	8.4	2560.0	45.1	87.0	40.8	HS
1400.	29.88	4	8.0	8.4	2560.0	45.1	93.0	42.0	HS
1500.	29.85	4	8.0	8.4	2560.0	45.1	99.0	43.7	HS
1600.	29.71	4	8.0	8.4	2560.0	45.1	104.9	45.4	HS
1700.	29.00	4	5.0	5.3	1600.0	65.1	111.4	48.4	HS
1800.	28.57	4	5.0	5.3	1600.0	65.1	117.2	50.0	HS
1900.	28.14	4	5.0	5.3	1600.0	65.1	123.0	51.6	HS
2000.	27.59	4	5.0	5.3	1600.0	65.1	128.9	53.1	HS
2100.	26.95	4	5.0	5.3	1600.0	65.1	134.8	54.7	HS
2200.	26.21	4	5.0	5.3	1600.0	65.1	140.2	56.2	HS
2300.	25.92	5	1.0	1.1	5000.0	101.9	111.2	44.1	NO
2400.	24.40	5	1.0	1.1	5000.0	101.9	115.5	44.8	NO
2500.	24.22	5	1.0	1.1	5000.0	101.9	119.8	45.5	NO
2600.	23.27	5	1.0	1.1	5000.0	101.9	123.9	46.3	NO
2700.	22.66	5	1.0	1.1	5000.0	101.9	128.1	47.0	NO
2800.	22.02	5	1.0	1.1	5000.0	101.9	132.2	47.7	NO
2900.	21.35	5	1.0	1.1	5000.0	101.9	136.3	48.4	NO
3000.	20.66	5	1.0	1.1	5000.0	101.9	140.4	49.1	NO
3500.	17.81	5	1.0	1.1	5000.0	101.9	150.7	52.5	NO
4000.	15.46	5	1.0	1.1	5000.0	101.9	160.8	55.7	NO
4500.	13.48	5	1.0	1.1	5000.0	101.9	200.7	58.5	NO
5000.	11.31	5	1.0	1.1	5000.0	101.9	220.3	61.1	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 50. M:  
 74. 167.2 4 20.0 21.1 5000.0 16.5 6.4 8.9 HS

DWASH= MEANS NO CALC MADE (CONC = 0.0)  
 DWASH=NO MEANS NO BUILDING DOWNWASH USED  
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED  
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED  
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X(3#LB

\*\*\* CAVITY CALCULATION - 1 \*\*\*      \*\*\* CAVITY CALCULATION - 2 \*\*\*

CONC (UG/M**3)	=	.0000	CONC (UG/M**3)	=	.0000
CRIT WS @10M (M/S)	=	99.99	CRIT WS @10M (M/S)	=	99.99
CRIT WS @ HS (M/S)	=	99.99	CRIT WS @ HS (M/S)	=	99.99
DILUTION WS (M/S)	=	99.99	DILUTION WS (M/S)	=	99.99
CAVITY HT (M)	=	7.32	CAVITY HT (M)	=	7.32
CAVITY LENGTH (M)	=	30.64	CAVITY LENGTH (M)	=	30.64
ALONGWIND DIM (M)	=	43.54	ALONGWIND DIM (M)	=	43.54

CAVITY CONC NOT CALCULATED FOR CRIT WS > 20.0 M/S. CONC SET = 0.0

\*\*\*\*\*  
 \*\*\* SUMMARY OF SCREEN MODEL RESULTS \*\*\*  
 \*\*\*\*\*

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	167.2	74.	0.

\*\*\*\*\*  
 \*\* REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS \*\*  
 \*\*\*\*\*

DEPARTMENT OF ENVIRONMENTAL REGULATION

ST. JOHNS RIVER DISTRICT

3319 MAGUIRE BOULEVARD  
SUITE 232  
ORLANDO, FLORIDA 32803-4767



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

A. ALEXANDER  
DISTRICT MANAGER

APR 12 1989

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: FLORIDA PATHOLOGICAL INCINERATOR [X] New<sup>1</sup> [ ] Existing<sup>1</sup>

DISTRICT TYPE: [X] Construction [ ] Operation [ ] Modification

COMPANY NAME: RESOURCE POWER DEVELOPMENT CORPORATION COUNTY: BREVARD

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) INCINERATOR #7

SOURCE LOCATION: Street 810 S. INDUSTRY RD. City COCOA

UTM: East 522.6 KM North 3142.3

Latitude 28° 24' 29"N Longitude 80° 46' 09"W

APPLICANT NAME AND TITLE: J. A. SOBRINO, PRESIDENT

APPLICANT ADDRESS: ONE OAKWOOD BLVD., SUITE 290, HOLLYWOOD, FLORIDA 33020

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of RESOURCE POWER DEV. CORP.

I certify that the statements made in this application for a CONSTRUCTION permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: J. A. Sobrino

J. A. SOBRINO, PRESIDENT  
Name and Title (Please Type)

Date: 4/4/89 Telephone No. 305-923-9500

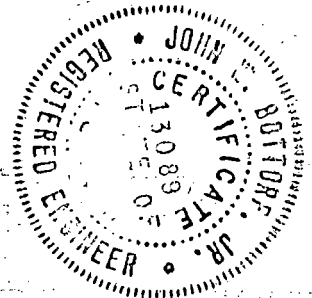
B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

<sup>1</sup> See Florida Administrative Code Rule 17-2.100(57) and (104)



the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed John W. Bottorf, Jr.  
JOHN W. BOTTORF, JR.,  
Name (Please Type)

BOTTORF & ASSOCIATES, INC.  
Company Name (Please Type)

4595 PARKBREEZE CT., ORLANDO, FLORIDA 32808-1057  
Mailing Address (Please Type)

Florida Registration No. 13089 Date: 4/10/89 Telephone No. 407-298-0846

**SECTION II: GENERAL PROJECT INFORMATION**

- A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

THIS PROJECT IS FOR THE CONSTRUCTION OF A NEW 2000 LB/HR. PATHOLOGICAL WASTE INCINERATOR MANUFACTURED BY MORSE BOULGER, INC., MODEL #RBK-2000. PARTICULATE WILL BE CONTROLLED WITH A SECONDARY CHAMBER AND BURNER. THIS PROJECT SHOULD RESULT IN FULL COMPLIANCE.

THIS UNIT WILL BE IDENTICAL TO UNIT #6. PERMITS FOR UNITS #2, 3 AND 4 WILL BE SURRENDERED AFTER COMPLETION OF CONSTRUCTION ON THIS UNIT.

- B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction AFTER PERMIT ISSUANCE Completion of Construction APPROX. 1 YR. AFTER PERMIT ISSUANCE

- C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

SECONDARY BURNER - \$13,000

- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

NONE

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

No. 135157

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Resource Power Services Date April 10, 1989

Address 1 Oakwood Blvd, Ste 210, Hollywood Dollars \$ 500.00  
33000

Applicant Name & Address \_\_\_\_\_

Source of Revenue Same

Revenue Code 601031 Ch 1052 Application Number AC05-1622-77

By K. L. L. L.

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52; if power plant, hrs/yr \_\_\_\_\_; if seasonal, describe: \_\_\_\_\_

F. If this is a new source or major modification, answer the following questions. (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? NO

a. If yes, has "offset" been applied? \_\_\_\_\_

b. If yes, has "Lowest Achievable Emission Rate" been applied? \_\_\_\_\_

c. If yes, list non-attainment pollutants. \_\_\_\_\_

2. Does best available control technology (BACT) apply to this source? NO  
If yes, see Section VI.

3. Does the State "Prevention of Significant Deterioration" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NO

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NO

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NO

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NO

a. If yes, for what pollutants? \_\_\_\_\_

b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

**SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)**

**A. Raw Materials and Chemicals Used in your Process, if applicable:**

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

**B. Process Rate, if applicable: (See Section V, Item 1)**

1. Total Process Input Rate (lbs/hr): \_\_\_\_\_

2. Product Weight (lbs/hr): \_\_\_\_\_

**C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)**

Name of Contaminant	Emission <sup>1</sup>		Allowed <sup>2</sup> Emission Rate per Rule 17-2	Allowable <sup>3</sup> Emission lbs/hr	Potential <sup>4</sup> Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	

<sup>1</sup>See Section V, Item 2.

<sup>2</sup>Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

<sup>3</sup>Calculated from operating rate and applicable standard.

<sup>4</sup>Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

\*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: \_\_\_\_\_ Percent Ash: \_\_\_\_\_

Density: \_\_\_\_\_ lbs/gal Typical Percent Nitrogen: \_\_\_\_\_

Heat Capacity: \_\_\_\_\_ BTU/lb \_\_\_\_\_ BTU/gal

Other Fuel Contaminants (which may cause air pollution): \_\_\_\_\_

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average \_\_\_\_\_ Maximum \_\_\_\_\_

G. Indicate liquid or solid wastes generated and method of disposal.

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H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ ft.  
 Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM Gas Exit Temperature: \_\_\_\_\_ °F.  
 Water Vapor Content: \_\_\_\_\_ % Velocity: \_\_\_\_\_ FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated	2000 LBS/HR: MIXED RED BAG						
Uncontrolled (lbs/hr)							

Description of Waste: INFECTIOUS HOSPITAL WASTE (RED BAG)

Total Weight Incinerated (lbs/hr) 2000 Design Capacity (lbs/hr) 2000

Approximate Number of Hours of Operation per day 24 day/wk 7 wks/yr. 52

Manufacturer MORSE BOULGER, INC.

Date Constructed 4/89 Model No. RBK-2000

	Volume (ft) <sup>3</sup>	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber	1358.5	5.6 X 10 <sup>6</sup>	PROPANE	2 X 10 <sup>6</sup>	1750
Secondary Chamber	864.5	9.14 X 10 <sup>6</sup>	PROPANE	5 X 10 <sup>6</sup>	1800

Stack Height: 47 ft. Stack Diameter: 3.5' Stack Temp. 1800°F

Gas Flow Rate: 25510 ACFM 5986 DSCFM\* Velocity: 44.2 FPS

\*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device:  Cyclone  Wet Scrubber  Afterburner  
 Other (specify) SECONDARY CHAMBER WITH 2 SECOND DWELL TIME

Brief description of operating characteristics of control devices: \_\_\_\_\_

THE SECONDARY BURNER WILL IGNITE AUTOMATICALLY IF THE CHAMBER EXIT TEMPERATURE FALLS  
BELOW 1600°F.

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

THE ASH RESIDUE WILL BE REMOVED DAILY FROM THE UNIT FOR APPROPRIATE LANDFILL DISPOSAL.

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

#### SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

**SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY**

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes  No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes  No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- |                           |                          |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:*           | 4. Capital Costs:        |

\*Explain method of determining



- 5. Useful Life:
- 7. Energy:
- 9. Emissions:

- 6. Operating Costs:
- 8. Maintenance Cost:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.
- b. Diameter: ft.
- c. Flow Rate: ACFM
- d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.
  - a. Control Device:
  - b. Operating Principles:
  - c. Efficiency:<sup>1</sup>
  - d. Capital Cost:
  - e. Useful Life:
  - f. Operating Cost:
  - g. Energy:<sup>2</sup>
  - h. Maintenance Cost:
  - i. Availability of construction materials and process chemicals:
  - j. Applicability to manufacturing processes:
  - k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.
  - a. Control Device:
  - b. Operating Principles:
  - c. Efficiency:<sup>1</sup>
  - d. Capital Cost:
  - e. Useful Life:
  - f. Operating Cost:
  - g. Energy:<sup>2</sup>
  - h. Maintenance Cost:
  - i. Availability of construction materials and process chemicals:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:<sup>1</sup>
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:<sup>2</sup>
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:<sup>1</sup>
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:<sup>2</sup>
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:<sup>1</sup>
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:<sup>2</sup>
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

(8) Process Rate:<sup>1</sup>

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

(8) Process Rate:<sup>1</sup>

10. Reason for selection and description of systems:

<sup>1</sup>Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

**SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION**

**A. Company Monitored Data**

1. \_\_\_\_\_ no. sites \_\_\_\_\_ TSP \_\_\_\_\_ ( ) SO<sub>2</sub>\* \_\_\_\_\_ Wind spd/dir

Period of Monitoring \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year

Other data recorded \_\_\_\_\_

Attach all data or statistical summaries to this application.

\*Specify bubbler (B) or continuous (C).



RESOURCE POWER DEVELOPMENT CORPORATION

INCINERATOR #7

EMISSION CALCULATION BASED ON AP42, TABLE 2.1-1

$$\text{PARTICULATE} = 8 \text{ LBS/TON} \times 1 \text{ TON/HR.} = 8 \text{ LBS/HR.} \times \frac{8760 \text{ HRS/YR.}}{2000 \text{ LBS/TON}} = 35.04 \text{ TONS/YR.}$$

$$\text{NOX} = 3 \text{ LBS/TON} \times 1 \text{ TON/HR.} = 3 \text{ LBS/HR.} \times \frac{8760 \text{ HRS/YR.}}{2000 \text{ LBS/TON}} = 13.14 \text{ TONS/YR.}$$

Table 2.1-1. EMISSION FACTORS FOR REFUSE INCINERATORS WITHOUT CONTROLS<sup>a</sup>  
EMISSION FACTOR RATING: A

EMISSION FACTORS

Incinerator type	Particulates		Sulfur oxides <sup>b</sup>		Carbon monoxide		Organics <sup>c</sup>		Nitrogen oxides <sup>d</sup>	
	lb/ton	kg/MT	lb/ton	kg/MT	lb/ton	kg/MT	lb/ton	kg/MT	lb/ton	kg/MT
<b>Municipal<sup>e</sup></b>										
Multiple chamber, uncontrolled	30	15	2.5	1.25	35	17.5	1.5	0.75	3	1.5
With settling chamber and water spray system <sup>f</sup>	14	7	2.5	1.25	35	17.5	1.5	0.75	3	1.5
<b>Industrial/commercial</b>										
Multiple chamber <sup>g</sup>	7	3.5	2.5 <sup>h</sup>	1.25	10	5	3	1.5	3	1.5
Single chamber <sup>i</sup>	15	7.5	2.5 <sup>h</sup>	1.25	20	10	15	7.5	2	1
Trench <sup>j</sup>										
Wood	13	6.5	0.1 <sup>k</sup>	0.05	NA <sup>l</sup>	NA	NA	NA	4	2
Rubber tires	138	69	NA	NA	NA	NA	NA	NA	NA	NA
Municipal refuse	37	18.5	2.5 <sup>h</sup>	1.25	NA	NA	NA	NA	NA	NA
Controlled air <sup>m</sup>	1.4	0.7	1.5	0.75	Neg	Neg	Neg	Neg	10	5
Flue-fed single chamber <sup>n</sup>	30	15	0.5	0.25	20	10	15	7.5	3	1.5
Flue-fed (modified) <sup>o,p</sup>	6	3	0.5	0.25	10	5	3	1.5	10	5
<b>Domestic single chamber</b>										
Without primary burner <sup>q</sup>	35	17.5	0.5	0.25	300	150	100	50	1	0.5
With primary burner <sup>r</sup>	7	3.5	0.5	0.25	Neg	Neg	2	1	2	1
<b>Pathological<sup>s</sup></b>	8	4	Neg	Neg	Neg	Neg	Neg	Neg	3	1.5

<sup>a</sup> Average factors given based on EPA procedures for incinerator stack testing.

<sup>b</sup> Expressed as sulfur dioxide.

<sup>c</sup> Expressed as methane.

<sup>d</sup> Expressed as nitrogen dioxide.

<sup>e</sup> References 5 and 8 through 14.

<sup>f</sup> Most municipal incinerators are equipped with at least this much control: see Table 2.1-2 for appropriate efficiencies for other controls.

<sup>g</sup> References 3, 5, 10, 13, and 15.

<sup>h</sup> Based on municipal incinerator data.

<sup>i</sup> References 3, 5, 10, and 15.

<sup>j</sup> Reference 7.

<sup>k</sup> Based on data for wood combustion in conical burners.

<sup>l</sup> Not available.

<sup>m</sup> Reference 9.

<sup>n</sup> References 3, 10, 11, 13, 15, and 16.

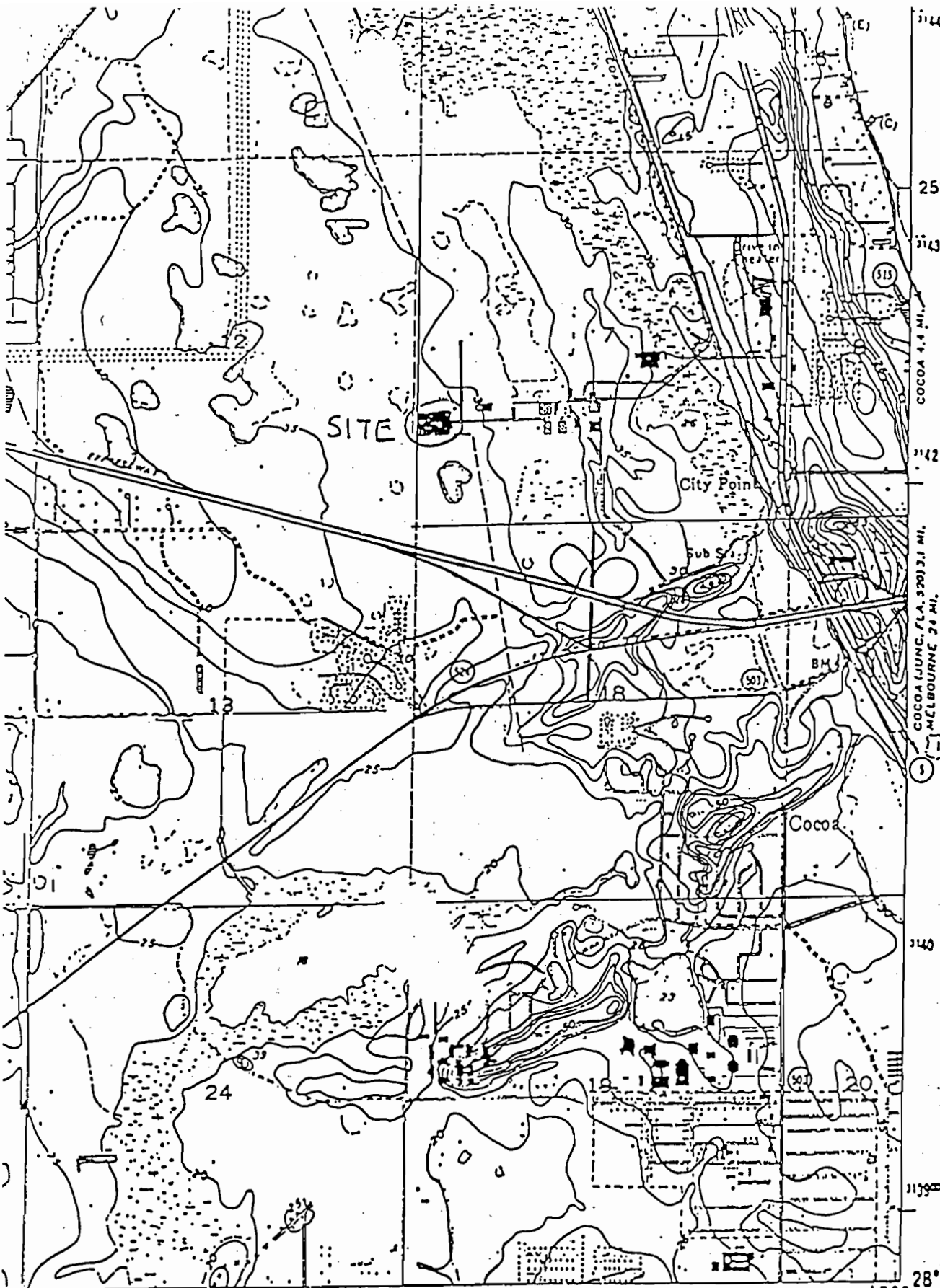
<sup>o</sup> With afterburners and draft controls.

<sup>p</sup> References 3, 11, and 15.

<sup>q</sup> References 5 and 10.

<sup>r</sup> Reference 5.

<sup>s</sup> References 3 and 9.



28° 24' 29" Lat.  
80° 46' 09" Long.

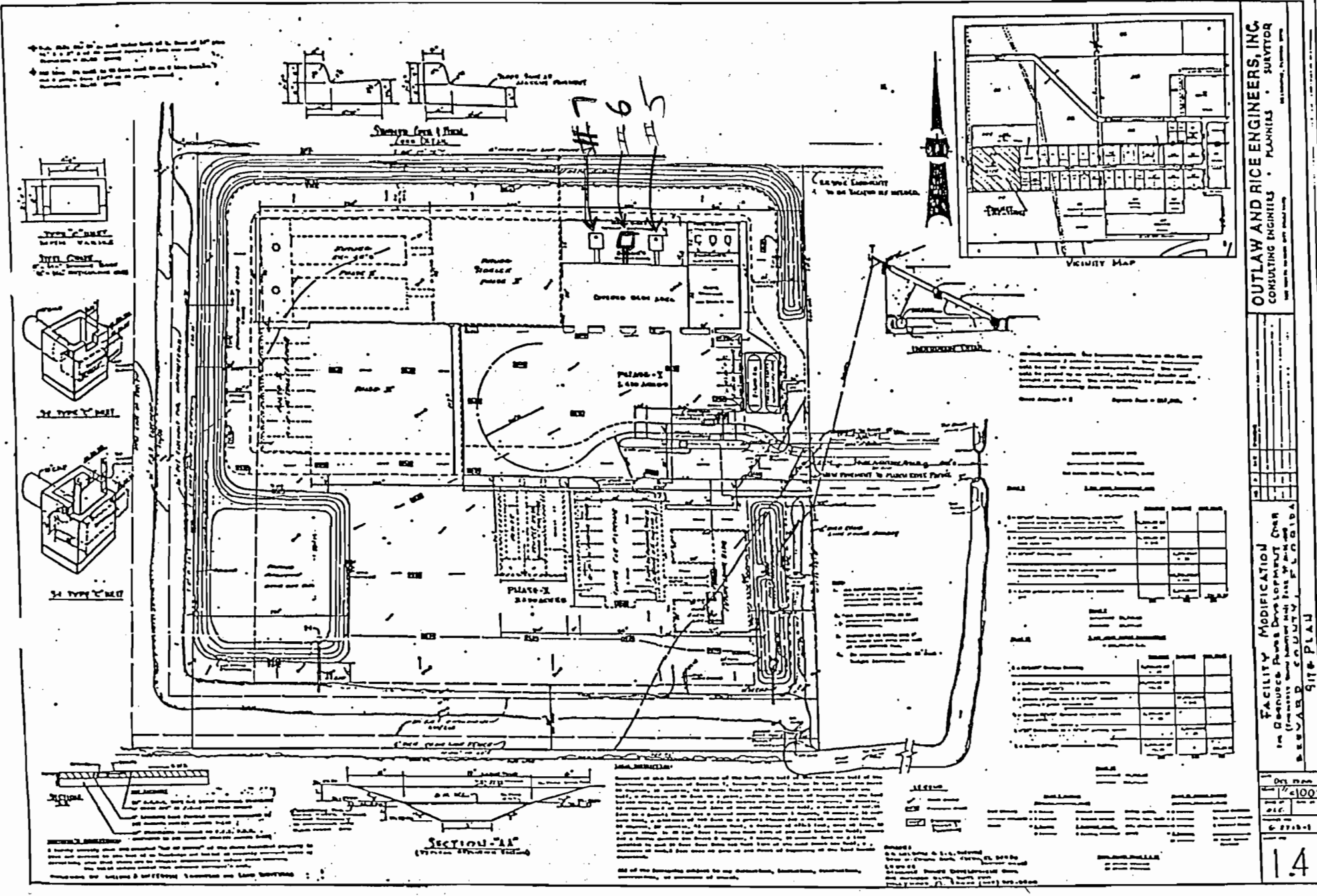
28° 22' 30"  
80° 45'

INTERIOR GEOLOGICAL SURVEY, ALBANY, VIRGINIA, 1981

ROAD CLASSIFICATION

- Heavy-duty ——— Light-duty - - - - -
- Medium-duty - - - - - Unimproved dirt .....

- Interstate Route
- U S Route
- State Route



**OUTLAW AND RICE ENGINEERS, INC.**  
 CONSULTING ENGINEERS • PLANNERS • SURVEYORS  
 11111 Highway 10, Houston, Texas 77036

NO.	DATE	DESCRIPTION
1	10/1/68	PRELIMINARY PLAN
2	11/1/68	REVISION
3	12/1/68	REVISION
4	1/1/69	REVISION
5	2/1/69	REVISION
6	3/1/69	REVISION
7	4/1/69	REVISION
8	5/1/69	REVISION
9	6/1/69	REVISION
10	7/1/69	REVISION
11	8/1/69	REVISION
12	9/1/69	REVISION
13	10/1/69	REVISION
14	11/1/69	REVISION
15	12/1/69	REVISION
16	1/1/70	REVISION
17	2/1/70	REVISION
18	3/1/70	REVISION
19	4/1/70	REVISION
20	5/1/70	REVISION
21	6/1/70	REVISION
22	7/1/70	REVISION
23	8/1/70	REVISION
24	9/1/70	REVISION
25	10/1/70	REVISION
26	11/1/70	REVISION
27	12/1/70	REVISION
28	1/1/71	REVISION
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30	3/1/71	REVISION
31	4/1/71	REVISION
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97	10/1/76	REVISION
98	11/1/76	REVISION
99	12/1/76	REVISION
100	1/1/77	REVISION

**FACILITY MODIFICATION**  
 in Process Plant Development Over  
 (Under the name of the Plant)  
 BEAVER COUNTY  
 SITE PLAN

DATE	10/1/68
SCALE	1" = 100'
PROJECT NO.	68-111-1
14	



# MORSE BOULGER, INC.

100 DENTON AVENUE  
GARDEN CITY PARK, N.Y. 11040-4005  
TEL. (516) 747-9600 • FAX: (516) 747-9334

RECEIVED

FEB 09 1989

BOTTORF & ASSOCIATES, INC.


February 6, 1989  
MG-89-110

Roger T. Caldwell  
Vice President, Environmental Division  
Bottorf Associates, Inc.  
4595 Parkbreeze Court  
Orlando, FL 32808-1057

Dear Roger:

Per your request, attached is a copy of our description of the KASCADE stoker to be used in the Resource Power Development Corp. facility at Cocoa, FL. Please review the attached material and advise me if it should be changed prior to being turned over to the environmental agency which has requested it. Specifically, the environmental agency may have a particular problem or potential occurrence in mind which this description may not address.

Yours truly,  
MORSE BOULGER, INC.



Matt Gaskin, P.E.  
Executive Vice President



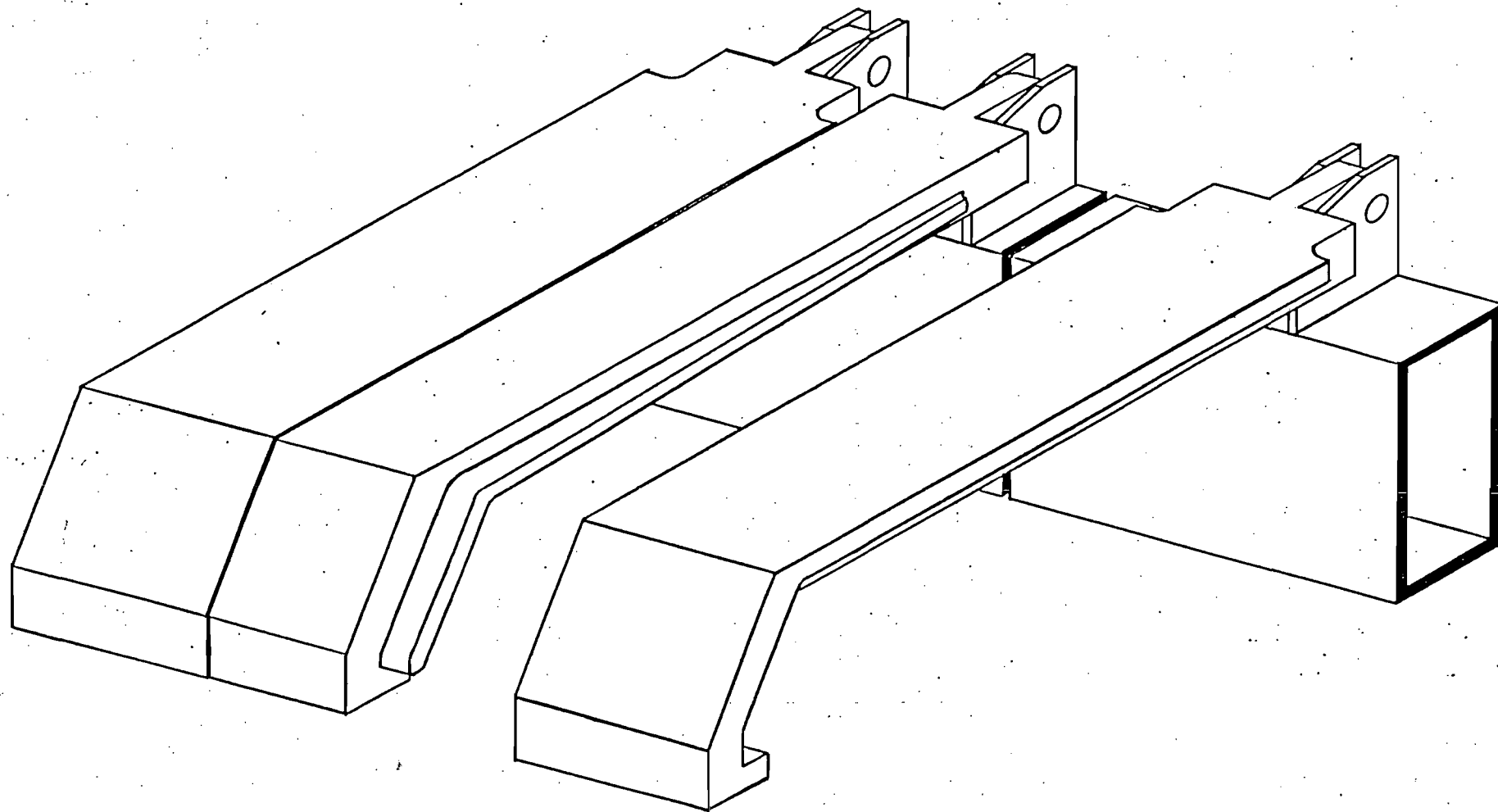
ORIGINAL PARTS, SERVICE, KERNERATOR HOPPER DOORS  
NEW INCINERATORS AND KASCADE STOKERS

MORSE BOULGER, INC.

RBK-2000 STOKER DESCRIPTION

The RBK-2000 Red Bag Waste Incinerator planned for the Resource Power Development Corp. facility of Cocoa, FL includes a hearth that uses the Morse Boulger KASCADE stoker technology. The KASCADE stoker is a patented American grate technology with many years of operational experience for the incineration of Hospital Red Bag waste and Municipal Solid Waste. This system is currently in use in 3 operating units that incinerate Red Bag wastes. The actual burning capacity of these units varies from 1,000 PPH to 1,500 PPH. In addition the system is used on 16 large municipal waste incinerators that total over 3,500 TPD of capacity. The current unit sizes vary from 50 TPD to 330 TPD for the incineration of municipal solid waste.

The system includes "unders" and "overs" castings which have a small air gap between the adjacent castings (See Figure 1). The pressure drop induced across the grate system and the refuse bed provides an even distribution of air without causing high particulate entrainment in the flue gases. No holes are provided in the grate bars since these would tend to



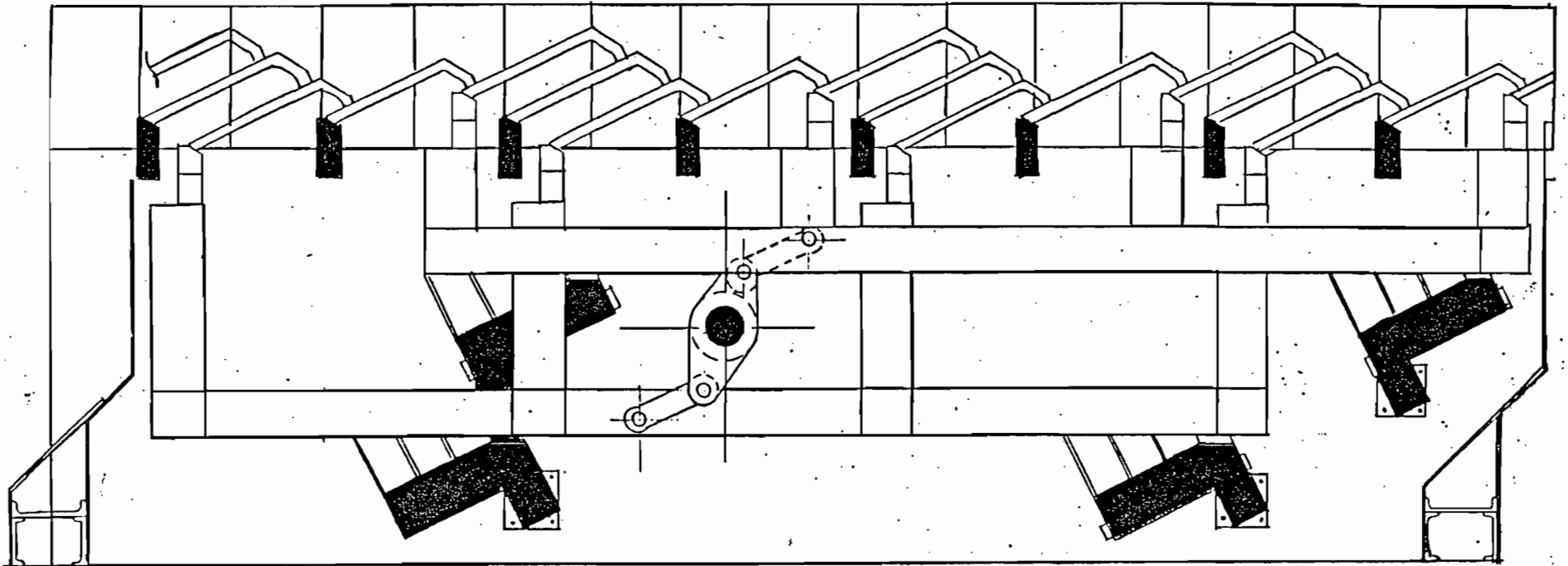
**MORSE BOULGER INC.**  
**KASCADE STOKER GRATE SYSTEM**



**FIGURE 1**

be plugged more easily and would encourage a low-torching effect within the furnace environment. The grates are cast of high temperature and abrasion resistant alloy steel (ASTM A-297-HF). The individual grate castings are interlocked to prevent their uplift during operation. This also minimizes the loss of combustible material to the siftings collection system. The bottom side of the castings are provided with deep projecting ridges to add strength to the casting while maximizing heat transfer between the grate and the incoming air which cools them.

The grate bars are supported by a tubular steel frame which minimizes the collection of white metals and ash build-up. This frame also provides a superior support and drive system for the stoker. The stoker carriage consists of a tubular steel main frame arranged in a rectangle. Uprights extend vertically from the main frame to support the moving grate beams to which the cast alloy grates are attached (See Figure 2). These frames are supported by slide bearings. The slide bearings and other internal bearings of the system are capable of operation at elevated temperatures without lubrication.



KASCADE STOKER GRATE UNIT  
SIDE DRIVE  
LONGITUDINAL SECTION



FIGURE 2

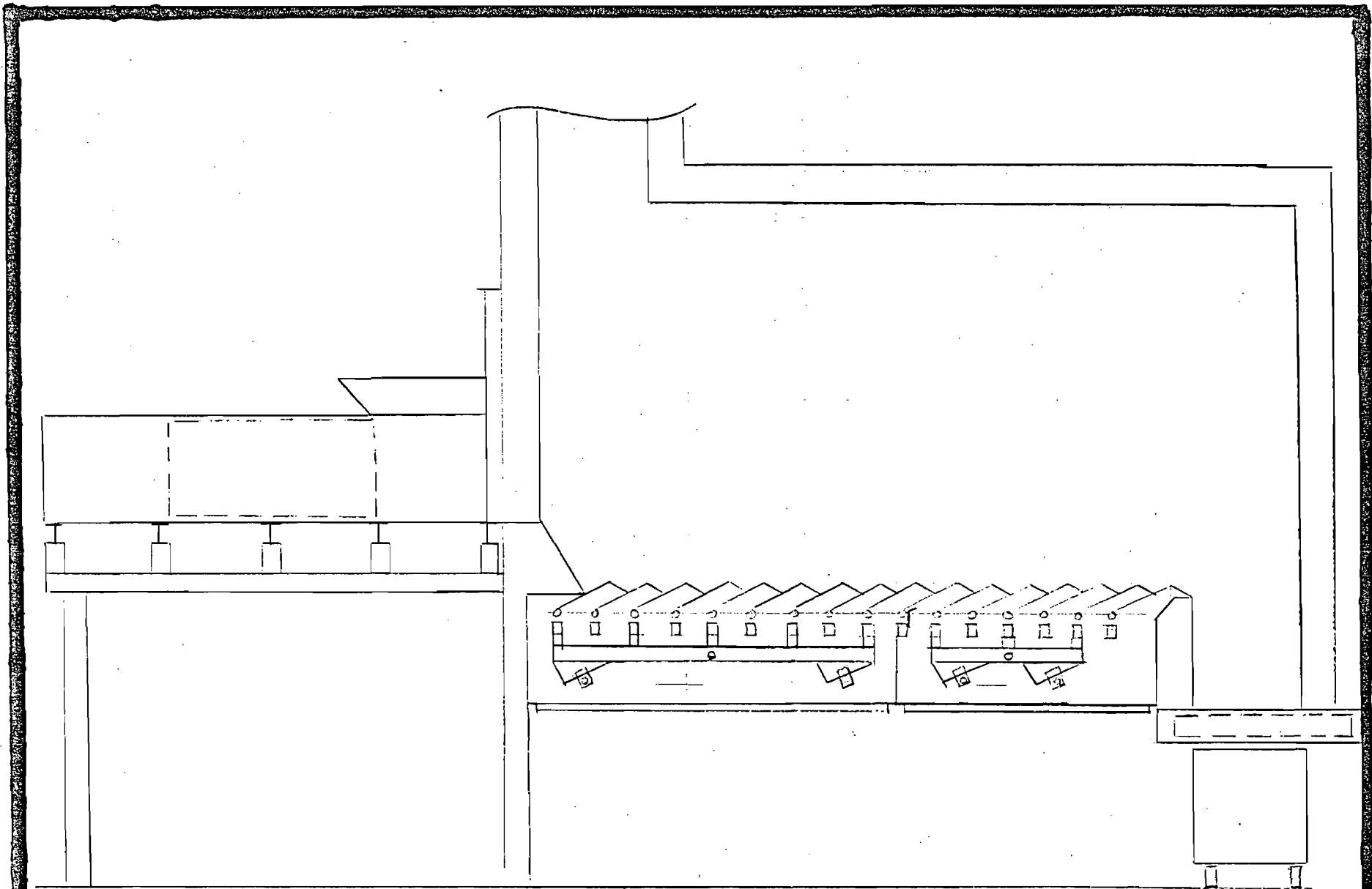
In the single reciprocating design, the moving grates are placed alternately between stationary grate rows. When these carriages are appropriately linked to their drive system they will cause the carriages to move. This motion causes a two grate high step to form alternately about every stationary grate bar at the end of its forward and reverse stroke. The single reciprocating motion turns the waste every 14 inches with a 10 inch high step to expose fresh surfaces to the combustion process. This eliminates the need for permanent steps in the stoker design and reduces the overall height of the unit. The positive movement of the refuse through the furnace also means that the grate system can be installed horizontally or at a lower angle. This also reduces overall plant height. The reciprocating grate action provides these benefits and results in more complete burnout of the waste being incinerated.

The RBK-2000 unit will consist of a stoker having two sections. Each section will have a single reciprocating motion. The second section will consist of a minimum of six rows of grates. The second section will serve to control the discharge of ash residue into the dry ash pit. Each grate section drive consists of a drive shaft and hydraulic actuators on one side of the stoker. This drive arrangement is connected to the carriages by two yokes within the stoker

section. The use of two yokes internally assures the even distribution of the driving force to the carriage without binding or twisting. This becomes especially important when the operating stoker unit is subjected to blockages. The KASCADE stokers dual drive and yoke arrangement minimizes the occurrence of blockages and more easily breaks any blockages which do occur without damage to the grates or their support system.

The independantly driven grate sections are grouped together end-to-end to provide material movement and control through the distinct zones of the furnace hearth (See Figures 3). Each of the zones is provided with a separate air supply for optimum control of the combustion process.

The siftings which are collected from each of these zones are collected in separate dry chambers below the hearth that are air tight. The bottom of each of these sections include a stainless steel pan. The pan can be removed and the undercarriage exposed for steam cleaning prior to maintenance of the unit.



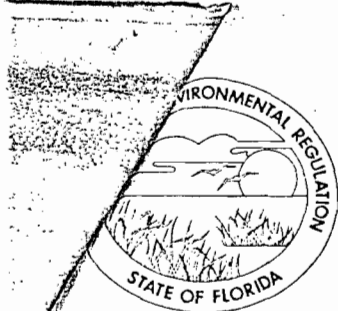
KASCADE STOKER GRATE UNIT  
SINGLE RECIPROCATING - HORIZONTAL

FIGURE 3



The KASCADE stoker offers a proven technology with individual features which compliment the control of the incineration process while minimizing maintenance requirements. The use of a moveable grate system with underfire air assures the combustion of waste throughout the cross-section of the unit. The positive movement of refuse through the furnace minimizes siftings penetration of the stoker and eliminates the need for an inclined stoker. The single reciprocating action of the stoker assures proper turning of the waste for more complete combustion. The use of a dry ash pit assures the thorough and complete burnout of the waste and its cool-down prior to discharge from the unit. The superior drive arrangement places the drive in a convenient location for inspection and maintenance and provides even power distribution to the grates.

The KASCADE stoker is a proven technology for the incineration of Red Bag wastes with similar units currently in operation.



# Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary  
Alex Alexander, Deputy Assistant Secretary

Permittee:  
Energy Combustion Corporation  
228 S. Courtenay Parkway  
Merritt Island, Florida 32952

Attention: Robert A. Hopper, President

I. D. Number:  
Permit/Certification  
Number: AC05-151859  
Date of Issue: 11/10/88  
Expiration Date: 10/10/90  
County: Brevard  
Latitude/Longitude:  
28°24'29"N/80°46'09"W  
UTM: 17-522.6 KmE; 3142.3 KmN  
Project: Incinerator No. 5

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2. 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:

The permittee can construct Incinerator No. 5 manufactured by Morse Boulger, Inc., Model RB1500, with a permitted charging rate of 1500 lbs/hour of a mixture of Types 0, I, II, III, and IV Wastes (red-bag hospital waste). Emissions are controlled with a Propane fired afterburner in the secondary chamber.

This source is located at the Energy Combustion Corporation facility at 810 South Industry Road, Cocoa, Brevard County, Florida.

General Conditions are attached to be distributed to the permittee only.

PERMITTEE:  
Energy Combustion Corporation  
  
Attention: Robert A. Hopper, President

I. D. Number:  
Permit/Certification Number:  
AC05-151859  
Date of Issue:  
Expiration Date: 10/10/90

SPECIFIC CONDITIONS:

1. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor pursuant to Rule 17-2.620(2) F.A.C. 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 pursuant to Rule 17-2.100(131) F.A.C. Odor is defined as a sensation resulting from stimulation of the human olfactory organ pursuant to Rule 17-2.100(132) F.A.C.
2. There shall be no discharges of liquid effluents or contaminated runoff to surface or ground water without prior approval from this office.
3. All unconfined emissions of particulate matter generated at this site shall be adequately controlled. (Rule 17-2.610(3), F.A.C.) Area must be watered down should unconfined emissions occur.
4. This permit does not preclude compliance with any applicable local permitting requirements and regulations.
5. The emissions from this source are expected to be 13.1 tons/year of Particulate Matter.
6. This source is permitted to operate 4368 hours/year.
7. This source will be fired with Propane only.
8. The permitted capacity of this incinerator is 1500 lbs/hour of a mixture of Types 0, I, II, III, an IV Wastes.
9. The emission limitation for this incinerator which has a charging rate of less than 50 tons per day, is that there shall be no visible emissions, except emissions up to 20% opacity may occur for not more than 3 minutes in any one hour (Rule 17-2.600(1), F.A.C.).
10. Each source must be tested in accordance with DER Method 9 within 30 days after being placed in operation.
11. The visible emission test must be conducted in accordance with DER Method 9. The department shall be notified fifteen days in advance of the test so that we may witness it. The type and amount of material burned during the test must be entered on the visible emission sheet. The incinerator must be tested within 10% of its permitted capacity.

PERMITTEE:  
Energy Combustion Corporation  
Attention: Robert A. Hopper, President

I. D. Number:  
Permit/Certification Number:  
AC05-151859  
Date of Issue:  
Expiration Date: 10/10/90

SPECIFIC CONDITIONS:

12. The required test report shall be filed with the department as soon as practical but no later than 45 days after the last sampling run of each test is completed (Rule 17-2.700(7)(a),(b) and (c), F.A.C.).
13. No PVC materials are to be burned.
14. When incinerating pathological material the temperature should be maintained at a minimum of 1600°F in the secondary chamber. This temperature should be measured and recorded on each test report.
15. Hazardous wastes generated in connection with any of the sources at this facility must be disposed of in accordance with Rule 17-30, F.A.C.
16. Each Incinerator should be properly operated and maintained (Rule 17-2.210(2) F.A.C.). No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly (Rule 17-2.240 F.A.C.).
17. When the department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Chapter 17-2, F.A.C. or in this permit is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the department.
18. The construction shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the Department in writing 60 days prior to the expiration of the construction permit and submit a new request for an extension of the construction permit. (Rule 17-4.09 Florida Administrative Code).

To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit the application fee, along with compliance test results and Certification of Completion of Construction to the Department's Central Florida District office 60 days prior to the expiration date of the construction permit.

This permit will expire October 10, 1990 or 6 months after construction is completed and the source is placed in operation, whichever date occurs first.

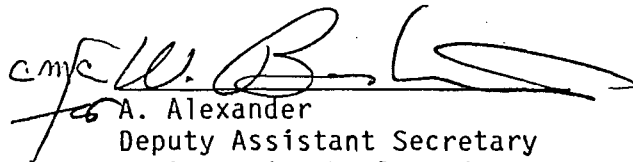
PERMITTEE:  
Energy Combustion Corporation  
Attention: Robert A. Hopper, President

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Permit/Certification Number:  
AC05-151859  
Date of Issue:  
Expiration Date: 10/10/90

SPECIFIC CONDITIONS:

ISSUED NOVEMBER 10, 1988

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
A. Alexander

Deputy Assistant Secretary  
3319 Maguire Boulevard  
Suite 232  
Orlando, Florida 32803  
(407) 894-7555

(Multiple Chamber)

Resource Power Development Corp Facility

Emissions ←

unit	permitted lbs/yr	charge rate lb/hr	Emissions		
			(7 lbs/hr) PM	3 lbs/hr NOx	(10 lbs/hr) CO
1	4368	1000	7.6		10.91
2	8760	500	7.7		11.0
3	8760	500	7.7		11.0
4	4368	1000	7.6		10.9
5	4368	1500	11.5		16.4
6	8760	2000	30.7		43.8
* 7	8760	2000	30.7		43.8
			103.5	11.5	147.8

\* Permits for units # 2, 3, & 4 to be removed upon completion of # 7

\*\* 80.5

\*\* 114.9

\* \* If units # 2, 3, & 4 removed