

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

Interoffice Memorandum

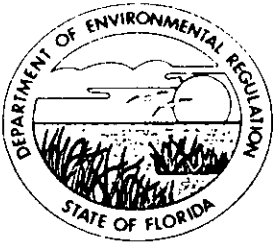
TO: Howard L. Rhodes
FROM: Clair Fancy
DATE: May 6, 1993
SUBJ: Amendment of Permit
Rinker Material Corporation

Attached for your approval and signature is a reissued air construction permit for a stationary soil thermal treatment facility at Rinker's cement plant in Miami, Dade County, Florida. The original construction permit, issued under an earlier policy for these operations, is being replaced with one that incorporates the recent requirement adopted in the air regulations for these operations.

I recommend your approval and signature.

CF/WH/plm

Attachment



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

May 6, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James S. Jenkins, III
Rinker Material Corporation
Post Office Box 650679
Miami, Florida 33265-0679

Dear Mr. Jenkins:

Re: Amendment of Permit No. AC13-187599
Stone Dryer Modification

The Department is in receipt of Mr. John Koogler's August 13, 1992, and October 29, 1992, letters requesting that the referenced permit be amended. Mr. Koogler requested that: the compliance testing requirements be clarified; that the permittee be allowed to substitute operating parameters for the incinerator destruction efficiency tests; that EPA Method 25A be used to measure volatile organic compound (VOC) emissions, and that the facility be allowed to treat polychlorobiphenyls (PCBs) contaminated soils. These requests are acceptable, with conditions. Additional changes pursuant to the recent amendment of the Department's air pollution control regulations that incorporated specific standards for soil thermal treatment facilities are also being made to this permit. Construction permit No. AC13-187599 is being reissued to incorporate these amendments and changes. Also, the expiration date is being extended to protect your rights to petition for a hearing on the reissued permit.

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 amendment. Petitions filed by other persons must be filed within 14 days of receipt of this amendment. 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;

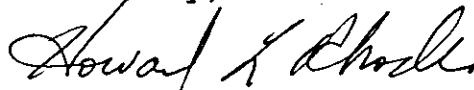
Mr. James S. Jenkins, III
Amendment of AC13-187599
Page Two

- (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 amendment. 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 receipt of this amendment 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.

A copy of this letter shall be filed with the referenced permit and shall replace the original permit.

Sincerely,

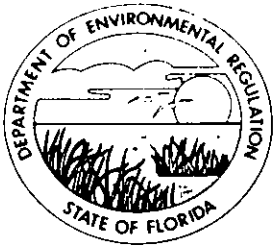


Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/WH/plm

Attach: Permit No. AC13-187599

cc: Isidore Goldman, SED
Patrick Wong, DERM
John Koogler, P.E.



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

PERMITTEE:
Rinker Materials Corporation
P. O. Box 650679
Miami, Florida 33265-0679

Permit Number: AC13-187599A
Expiration Date: June 30, 1993
County: Dade
Latitude/Longitude: 25°46'48"N
80°25'10"W

Project: Modification of the
Stone Dryer

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-212 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:

Modify the existing stone dryer system to decontaminate up to 40 TPH of petroleum contaminated soil. Major components of the system are Gencor Ultraflame low excess air oil burners for the existing 7 ft. diameter by 80 ft. long rotary dryer, an 85% efficient Joy-Western multicyclone, a 99.9% efficient Micropul baghouse with 3,366 sq. ft. of cloth area, a 99.5% efficient natural gas fired IT/McGill afterburner, two heat exchangers for energy recovery, a raw material gallery controlled with a Micropul baghouse that discharges approximately 500 acfm at 400°F through a 1.0 ft. square stack that is 45 ft. high, material handling equipment (screens, inclined belt feeders, bucket elevator, crusher, and stacker), fuel systems (used petroleum oil meeting the provisions of 40 CFR 266, Subpart E, propane, natural gas, and No. 2 fuel oil for the dryer, and natural gas and propane for the afterburner), a by-pass stack to be used only when the kiln is drying stone, and associated equipment. Air pollutants from the dryer are discharged in approximately 36,500 acfm of 800°F flue gases through a 4.5 ft. diameter by 80 ft. high stack.

This system is located at the permittee's Portland cement manufacturing plant at 1200 Northwest 137th Avenue, Miami, Dade County, Florida 33265-0679. The UTM coordinates of this site are Zone 17, 558.2 km E and 2851.3 km N.

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.

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
Expiration Date: June 30, 1993

Attachments are listed below:

1. Application received Dec. 10, 1990.
2. Rinker's letter dated Feb. 22, 1991.
3. Environmental Quality Management, Inc. letter dated Mar. 5, 1991.
4. Environmental Quality Management, Inc. letter dated May 8, 1991.
5. DERM letter dated Jun. 27, 1991.

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:
Rinker Materials Corporation

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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.

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

PERMITTEE:
Rinker Materials Corporation

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GENERAL CONDITIONS:

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 prescribed 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 17-730.300, 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.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;

PERMITTEE:
Rinker Materials Corporation

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GENERAL CONDITIONS:

- 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:

Miscellaneous

1. Part of this permit consists of the 14 General Conditions. The following index of the Specific Conditions of this permit is provided for convenience.

<u>Purpose of Specific Conditions</u>	<u>Specific Condition Numbers</u>
Miscellaneous	1 - 2
Construction Requirements	3 - 5
Emission Restrictions	6 - 11
Operation Requirements	12 - 25
Compliance Requirements	26 - 29
Administrative Requirements	30 - 34

2. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 17-296 and 17-297, F.A.C., or any other requirements under federal, state, or local regulations. The permittee is also required to comply with F.A.C. Rule 17-775 and any applicable county regulation which may include requirements for a county operation permit.

Construction Requirements

3. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.

4. The stack sampling facilities must comply with Rule 17-297.345, F.A.C.

PERMITTEE:
Rinker Materials Corporation

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SPECIFIC CONDITIONS:

5. The facility shall be equipped with a means to measure the pressure drop across the particulate matter air pollution control device and continuous emissions monitors and recorders for hot zone temperature and carbon monoxide concentration (Rule 17-296.415(1)(c), F.A.C.).

Emission Restrictions

6. Particulate matter (PM) and lead emissions from the dryer shall not exceed any of the following limits (Based on data in the application and Rule 17-296.415(2)(b), F.A.C.):

- (A) 0.04 grains PM per dry standard cubic foot.
- (B) 3.3 pounds PM per hour (max.), 1.0 pounds PM per hour (avg.).
- (C) 4.38 tons PM in any 12 consecutive month period.
- (D) 0.13 pounds lead per hour.

7. Particulate matter emissions from the fugitive dust baghouse shall not exceed 0.02 grains/dscf, nor 0.5 lbs/hr. Visible emissions from any part of the process shall not exceed 5 percent opacity.

8. Carbon monoxide emissions shall not exceed 100 parts per million by volume, dry, during any 60 consecutive minute period (Rule 17-296.415(1)(b), F.A.C.).

9. Visible emissions from the afterburner stack shall not exceed 5 percent opacity (Rule 17-296.415(2)(a), F.A.C.).

10. Reasonable precautions shall be taken to minimize uncontrolled particulate matter emissions (Rule 17-296.310, F.A.C.). These provisions are applicable to any source, including vehicular movement, transportation of materials, and industrial related activities such as loading, unloading, storing, and handling. Before and after thermal soil treatment is accomplished, unconfined emissions of particulate matter from the soil shall be controlled by the application of water and/or containment (Rule 296.415(3), F.A.C.).

11. Operation of this facility shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor (Rule 17-296.320, F.A.C.).

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Rinker Materials Corporation

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SPECIFIC CONDITIONS:

Operation Requirements

12. The system shall be properly operated and maintained (F.A.C. Rule 17-210.300(2)). No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly (F.A.C. Rule 17-210.650. The afterburner must be in service any time the stone dryer is used to decontaminate soil. The use of the afterburner is not required when the dryer is used to dry stone. In case of excess emissions resulting from a malfunction, the permittee shall notify the Dade County Department of Environmental Resources Management and the Department's Southeast District office within 1 working day of the cause and duration of the upset. If requested, the permittee shall submit a full written report on the malfunction. (Rule 17-210.700, F.A.C.).

13. The facility shall only treat petroleum contaminated soil as defined in F.A.C. Rule 17-775.200(9), (F.A.C. Rule 17-296.415), whose metal concentrations do not exceed the limits shown in Table I of F.A.C. Rule 17-775.400(3).

14. Soil containing more than 1.4 percent petroleum (daily average) products shall not be treated in this facility unless it is processed at a rate less than 40 TPH and potential VOC emissions do not exceed 22.8 pounds per hour.

15. This facility may treat polychlorobiphenol (PCB) contaminated soil. Any soil containing PCB must meet all the requirements of F.A.C. Rule 17-775.410(6). The permittee shall maintain a log that shows the PCB content of any soil containing used oil, hydraulic oil, and/or mineral oil; the source of the PCB contaminated soil; the tons of PCB contaminated soil treated; the PCB content of the oil that contaminated the soil; the quantity of PCBs in each batch of soil that is treated; and the total amount of PCBs treated during the preceding 12 month period. Emissions of PCBs from the stack shall not exceed 154 pounds in any consecutive 12 month period. The cumulative weight of emissions shall be calculated using either of the following methods:

- (a) The weight of PCBs entering the kiln shall be assumed to be the weight emitted.
- (b) The weight of emission shall be calculated using the weight entering the kiln with adjustment for documented destruction in the facility by a test program conducted by the permittee that is approved by the Department.

Method (a) shall be used until a destruction rate has been established on this system by stack test. Test protocol and methods

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to be used in determining destruction efficiency shall be submitted to the Department for approval. Method (b) shall not be used until the test results have been reviewed and accepted by the Department.

16. The input rate of petroleum contaminated soil to the facility shall not exceed 40 tons per hour. Material entering the kiln cannot be larger than 2 inches in diameter. The permittee shall have the means of determining feed or production rates of the facility on site.

17. The unit shall not be operated in a manner that creates a nuisance.

18. This unit shall be allowed to operate continuously, 24 hours per day, 7 days per week, 52 weeks per year.

19. The input of petroleum contaminants in the soil into the facility shall not exceed 1120 pounds per hour (daily average).

20. The dryer is authorized to burn up to 27.4 MM Btu/hr of waste oil (193 GPH) containing a maximum of 0.4 percent sulfur and 500 ppm lead, No. 2 distillate oil (193 GPH) containing a maximum of 0.5 percent sulfur, and propane (180 CFM)/or natural gas (460 CFM). The maximum fuel oil consumption shall not exceed 769,459 gallons in any 12 month period.

21. The fume incinerator (afterburner) is authorized to burn up to 15.0 MM Btu/hr of natural gas (250 CFM) or propane(100 CFM). The fume incinerator shall be in service any time the stone dryer is being used to process material containing contaminated soil. The by-pass stack must be closed when the unit is processing contaminated soil.

22. Contaminated soil shall not be treated by the facility unless the afterburner is operating at a minimum temperature of 1600 degrees Fahrenheit, and a minimum retention time of 0.5 seconds. If the permittee can document that the retention time of the flue gases in the afterburner is 1 second or more, the afterburner temperature may be reduced to 1500 °F (Rule 17-296.415(1)(a), F.A.C.).

23. All emission monitoring equipment shall be properly installed, calibrated, operated, and maintained in accordance with the manufacturer's requirements for that instrument.

24. Pressure drop across the particulate matter air pollution control device shall be recorded hourly and the temperature and

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Rinker Materials Corporation

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SPECIFIC CONDITIONS:

carbon monoxide concentration of the hot zone shall be recorded continuously (Rule 17-296.415(1)(c), F.A.C.).

25. Use of the existing cement kiln to decontaminate soil shall cease when the stone dryer begins operation as a soil decontamination unit or when this construction permit expires, whichever event occurs first.

Compliance Requirements

26. The Southeast District and Dade County Department of Environmental Resources Management shall be notified in writing at least 15 days in advance of any formal compliance test to be conducted on this facility. The notification shall give the date, time, place, and contact person for the test (Rule 17-297.340(1)(i), F.A.C.).

27. This facility shall be tested (EPA test methods are specified in 40 CFR 60, Appendix A, revised July 1, 1992) at 90 - 100% of its permitted process rate within 30 days of placing it in service concurrently for:

- (A) Particulate matter (PM) emissions by EPA Methods 1, 2, 3, 4, and 5.
- (B) Visible emissions by EPA Method 9.
- (C) Carbon monoxide (CO) emissions by averaging each hour of the readings from the CO continuous emission monitor during the PM test periods.
- (D) Afterburner temperature by averaging each hour of the temperature readings from the continuous temperature monitor during the PM test period.
- (E) Afterburner residence time using the test data collected by EPA Methods 1 and 2.
- (F) Fuel oil sulfur limits based on analysis referenced in 40 CFR 60.17 or other methods after Department approval. A certified analysis by the fuel oil supplier will be acceptable.
- (G) Contaminated soil analysis for volatile organic aromatics (VOA), total recoverable petroleum hydrocarbons (TRPH), polynuclear aromatic hydrocarbons (PAH), volatile organic halocarbons (VOH), and metals as required by Rule 17-775.410, F.A.C.

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
Expiration Date: June 30, 1993

SPECIFIC CONDITIONS:

(H) The initial compliance test and any test data submitted with an application for permit to operate (every 5 years) shall include analysis of the filter and impinger catch for arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver along with similar analysis of the contaminated and treated soil processed during the test.

28. Compliance tests results shall be submitted to the Southeast District and Dade County within 45 days of the test.

29. When the Department, after investigation, has good reason to believe that any applicable emission standard or condition of this permit is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the plant and to provide a report on the results of said tests to the Department (Rule 17-297.340(2), F.A.C.).

Administrative

30. The permittee shall maintain a daily log that shows the date, operation time, pressure drop across the PM control device, processing rate, type and quantity of fuel consumption in the dryer and afterburner, and operation problems. These records shall be maintained for a minimum of 3 years.

31. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements, all continuous monitoring system performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on these systems or devices, all soil analysis required by Rule 17-775, F.A.C., and all other information required by rule or this permit, recorded in a permanent form suitable for inspection. The file shall be retained for at least 3 years following the date of such measurements, maintenance, reports, and records.

32. The permittee shall submit to Southeast District each calendar year, on or before March 1, an annual operation report for this facility for the preceding calendar year containing at least the following information pursuant to Subsection 403.061(13), F.S.:

- (A) Annual amount of material and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Annual hours of operation.

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
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SPECIFIC CONDITIONS:

- (D) Any changes in the information contained in the permit.
- (E) All compliance test reports for the preceding year.
- (F) Temperature and CO exceedance reports for the year.

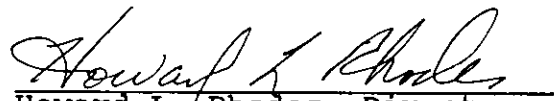
33. The permittee may request, in writing, that the permit(s) for this facility be modified to authorize the treatment of materials not meeting the specifications in F.A.C. Rule 17-775. The request to the Division of Air Resources Management shall include the appropriate processing fee for a modification, the history of the soil to be treated, an analysis of the contaminants suspected to be in the soil, an estimate of the emissions from the unit while processing the soil, and calculations showing that the ambient air impact from the unit will not exceed the Air Toxic Reference Concentration for any toxic pollutant. Public notice may be required by the Department as part of the review to modify the permit(s). The Department will approve or deny each request in writing on a case-by-case basis.

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

35. An application for an operation permit must be submitted to the Southeast District 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 (Rule 17-4.220, F.A.C.).

Issued this 17 day
of May, 1993

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Howard L. Rhodes, Director
Division of Air Resources
Management

Is your RETURN ADDRESS completed on the reverse side?

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 below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

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

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
James S Jenkins III
Pinker Material Corp.
PO Box 650679
Miami, FL 33265-0679

4a. Article Number
P 230 524 355

4b. Service Type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

5. Signature (Addressee)
James S Jenkins III

6. Signature (Agent)
William Orma

7. Date of Delivery
 MAY 26 1993

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

PS Form December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

P 230 524 355



Receipt for Certified Mail

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

PS Form 3800, June 1991

Sent to	<i>James Jenkins</i>
Street and No.	<i>Pinker Material</i>
City, State and ZIP Code	<i>Miami FL</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>5-18-93</i> <i>AC 13-187599</i>