

Memorandum

Florida Department of Environmental Protection

TO: Clair Fancy

THRU: Scott Sheplak

FROM:  Bruce Mitchell

DATE: 6/14/02

SUBJ: Request to Conduct CAM Evaluations from Gulf Power Company
Crist, Schultz and Smith Plants

On June 5th, we received three (3) requests from Mr. Dwayne Waters (Gulf Power Company), requesting a construction permit for authorization to conduct evaluations (performance tests) on opacity, PM, and ash resistively for the CAM affected emissions units located at the above referenced Plants. All of the emissions units are coal fired boilers with ESPs on them for control of PM and opacity. The request indicates the potential of exceeding the PM allowable limit to determine the ESP's efficiency level at which the exceedence will occur, which will help in defining the CAM Plan approach for the emissions unit being tested.

I spoke with Mr. Waters on Wednesday morning and discussed some of the details on the project, mainly about the potential exceedence of the PM emissions limit(s) with any of the affected emissions units. He said that he was being provided only with enough funds to conduct three (3) performance tests per emissions unit. Therefore, the testing plans are as follows:

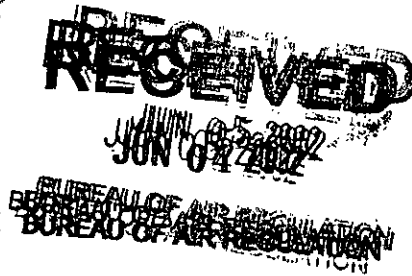
1. Conduct a performance test (three 1-hour runs) using EPA Method 17 at "normal" operations;
2. Conduct a performance test (three 1-hour runs) using EPA Method 17 at a reduction in the ESP efficiency; and,
- 3.a. If the test results show that the PM allowable limit was exceeded; then the ESP's efficiency will be increased and a third performance test using EPA Method 17 will be conducted (supposedly between "normal" and "at the reduced efficiency"); or,
- b. If the test results show that the PM allowable limit was not exceeded; then the ESP's efficiency will be further decreased and a third performance test using EPA Method 17 will be conducted in an attempt to define the outer range of the ESP's efficiency at which the PM allowable limit will be exceeded; and,
- c. If the outer range is not established by the 2nd and 3rd performance tests, then the performance testing is ended for that emissions unit; and, Gulf Power Company will use the data to help define their CAM Plan for that emissions unit tested.

Note: Concurrent VE performance testing evaluations will be required while conducting the PM performance tests. I believe that all of the emissions units have COMS in their stacks for continuous opacity readings, which, with the VE readings, should provide additional data to use in developing the CAM Plan for the affected emissions unit.

The Scholtz Plant is tentatively scheduled for July 15th. The AC protocol requires a 14-day Public Notice prior to issuance.

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111



RECEIVED

JUN 05 2002

BUREAU OF AIR REGULATION



Certified Mail

May 29, 2002

R. Bruce Mitchell
Title V Section – Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: CRIST ELECTRIC GENERATING PLANT
AUTHORIZATION TO CONDUCT CAM PROTOCOL TESTING
PERMIT No: 0330045-001-AV

0330045-003-AC

Thanks again for meeting with me last year and sending examples of similar permitting activities to help Gulf Power properly coordinate our proposed testing of Crist Units 4, 5, 6 for development of a Compliance Assurance Monitoring (CAM) protocol. As you are aware, CAM is a requirement that must be addressed in the next round of Title V permit renewals for all facilities having pollution control equipment. In order to meet this goal, Gulf Power is planning a series of special particulate emission tests to calibrate a EPRI (Electric Power Research Institute) computer model to evaluate the performance of the Crist electrostatic precipitators (ESPs). Simply stated, this evaluation will require Gulf Power to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate emissions standard.

Therefore, Gulf Power requests a permit amendment to allow the CAM protocol developmental testing on Crist Units 4,5,6 from September 1 through November 30, 2002 as needed to complete all tests and measurements. Authorization of these tests is consistent with the Department's power and duty under Section 403.061(18), Florida Statutes, to "[e]ncourage and conduct studies, investigations, and research relating to pollution and its causes, effects, prevention, abatement, and control."

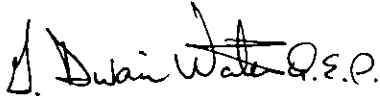
Mr. R. Bruce Mitchell
May 29, 2002
Page 2

The specific equipment to be tested is the electrostatic precipitator. The pollutants and or parameters measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature and other unit specific parameters that are needed for the computer model. Test methods to be utilized include EPA Method 9, EPA Method 17, CEM monitoring data (SO₂, NO_x, CO₂), and possible particulate size distribution.

Attached is an authorization statement by Robert G. Moore, the Responsible Official outlining his approval of this permit amendment request. Also attached is a statement by a professional engineer regarding the certification of the test protocol and schedule. Please note that we recently discussed this project with the Northwest Florida District office to outline this request, our test schedule and the basic CAM procedure. Ms. Sandra Veazey and her staff are being copied on this correspondence.

If you have any questions or need further information regarding the test procedures or CAM protocol development for Plant Crist, please call me at (850) 444.6527.

Sincerely,



G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor

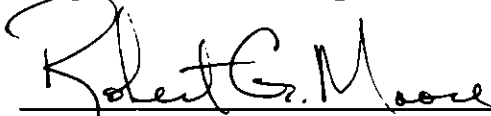
cc: w/att: Jim. Vick, Gulf Power Company
Joe Martin, Gulf Power Company
John Dominey, Gulf Power Company
Kevin Beaty, Gulf Power Company
Greg Terry, Gulf Power Company
Danny Herrin, Southern Company Services
Milan McGill, Southern Company Services
Clark Mitchell, Southern Company Services
Gary Perko, HGSS

Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida
Mr. Keith White, FDEP Northwest District Office, Pensacola, Florida

**CERTIFICATION BY RESPONSIBLE OFFICIAL
CRIST UNITS 4,5,6 COMPLIANCE ASSURANCE
MONITORING TEST PERMIT AMENDMENT REQUEST**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Crist Electric Generating Plant for which this permit amendment is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete.”

Responsible Official Signature:



Robert G. Moore
Vice-President of Power Generation/Transmission

5/29/02

Date:

**CRIST UNITS 4,5,6 COMPLIANCE ASSURANCE
MONITORING TEST PROTOCOL AND SCHEDULE
CERTIFICATION BY PROFESSIONAL ENGINEER**

“I, the undersigned, am a registered professional engineer in the state of Florida and hereby certify to the best of my knowledge that all information submitted for this permit amendment to conduct special emissions testing for compliance assurance monitoring at the Crist Electric Generating Plant is true, accurate and complete.”

Professional Engineer Signature:



Gregory N. Terry
Registration Number: 52786

5.30.02

Date

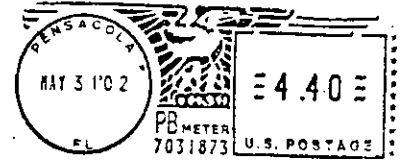


One Energy Place
Pensacola FL 32520

CERTIFIED MAIL



7099 3400 0003 1937 0474



R BRUCE MITCHELL
TITLE V SECTION BUREAU OF AIR REGULATION
FDEP MAIL STATION 5510
2600 BLAIR STONE RD
TALLAHASSEE FL 32399-2400

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

JUN 05 2002



BUREAU OF AIR REGULATION A SOUTHERN COMPANY

May 29, 2002

R. Bruce Mitchell
Title V Section – Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: SMITH ELECTRIC GENERATING PLANT
AUTHORIZATION TO CONDUCT CAM PROTOCOL TESTING
PERMIT No: 0050014-001-AV

Gulf Power hereby requests authorization to conduct Compliance Assurance Monitoring (CAM) testing at Plant Smith for Units 1 & 2 during 2002. As you are aware, CAM is a requirement that must be addressed in the next round of Title V permit renewals for all facilities having pollution control equipment. In order to meet this goal, Gulf Power is planning a series of special particulate emission tests to calibrate a EPRI (Electric Power Research Institute) computer model to evaluate the performance of the Smith ESPs. Simply stated, this evaluation will require Gulf Power to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate emissions standard.

Therefore, Gulf Power requests a permit amendment to allow CAM protocol developmental testing on Smith Units 1 and 2 from September 1 through November 30, 2002 as needed to complete all tests and measurements. Authorization of these tests is consistent with the Department's power and duty under Section 403.061(18), Florida Statutes, to "[e]ncourage and conduct studies, investigations, and research relating to pollution and its causes, effects, prevention, abatement, and control."

Mr. R. Bruce Mitchell

May 29, 2002

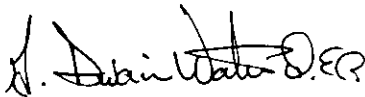
Page 2

The specific equipment to be tested is the Smith Unit 1 & 2 electrostatic precipitators. The pollutants and or parameters measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature and other unit specific parameters that are needed for the computer model. Test methods to be utilized include EPA Method 9, EPA Method 17, CEM monitoring data (SO₂, NO_x, CO₂), and possible particulate size distribution.

Attached is an authorization statement by Robert G. Moore, the Responsible Official outlining his approval of this permit amendment request. Also attached is a statement by a professional engineer regarding the certification of the test protocol and schedule. Please note that we recently talked with the permitting staff at the Northwest Florida District office to outline this request, our test schedule and the basic CAM procedure. Ms. Sandra Veazey and her staff are being copied on this correspondence.

If you have any questions or need further information regarding the test procedures or CAM protocol development for Plant Smith please call me at (850) 444.6527.

Sincerely,



G. Dwain Waters, Q.E.P.
Air Quality Programs Supervisor

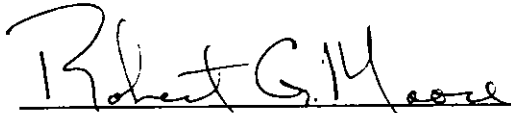
cc: w/att: Jim. Vick, Gulf Power Company
Mike Sarab, Gulf Power Company
Marie Largilliere, Gulf Power Company
Kevin Beaty, Gulf Power Company
Greg Terry, Gulf Power Company
Danny Herrin, Southern Company Services
Milan McGill, Southern Company Services
Clark Mitchell, Southern Company Services
Trey Hall, Gulf Power Company

Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida
Mr. Kevin White, FDEP Northwest District Office, Pensacola, Florida

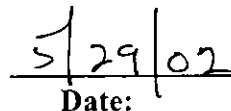
**CERTIFICATION BY RESPONSIBLE OFFICIAL
SMITH UNIT 1 & 2 COMPLIANCE ASSURANCE
MONITORING TEST PERMIT AMENDMENT REQUEST**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Smith Electric Generating Plant for which this permit amendment is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete.”

Responsible Official Signature:



Robert G. Moore
Vice-President of Power Generation/Transmission




Date:

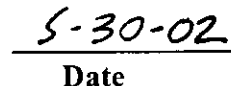
**SMITH UNIT 1 & 2 COMPLIANCE ASSURANCE
MONITORING TEST PROTOCOL AND SCHEDULE
CERTIFICATION BY PROFESSIONAL ENGINEER**

“I, the undersigned, am a registered professional engineer in the state of Florida and hereby certify to the best of my knowledge that all information submitted for this permit amendment to conduct special emissions testing for compliance assurance monitoring at the Smith Electric Generating Plant is true, accurate and complete.”

Professional Engineer Signature:



Gregory N. Terry
Registration Number: 52786



Date

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111

RECEIVED

JUN 05 2002



BUREAU OF AIR REGULATION A SOUTHERN COMPANY

May 29, 2002

R. Bruce Mitchell
Title V Section – Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Mail Station #5510
Tallahassee, Florida 32399-2400

Dear Mr. Mitchell:

RE: SCHOLZ ELECTRIC GENERATING PLANT
AUTHORIZATION TO CONDUCT CAM PROTOCOL TESTING
PERMIT No: 0630014-001-AV

-002

Gulf Power hereby requests authorization to conduct Compliance Assurance Monitoring (CAM) testing at Plant Scholz for Units 1 & 2 during 2002. As you are aware, CAM is a requirement that must be addressed in the next round of Title V permit renewals for all facilities having pollution control equipment. In order to meet this goal, Gulf Power is planning a series of special particulate emission tests to calibrate a EPRI (Electric Power Research Institute) computer model to evaluate the performance of the Smith ESPs. Simply stated, this evaluation will require Gulf Power to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate emissions standard.

Therefore, Gulf Power requests a permit amendment to allow CAM protocol developmental testing on Smith Units 1 and 2 from July 15 through September 31, 2002 as needed to complete all tests and measurements. Authorization of these tests is consistent with the Department's power and duty under Section 403.061(18), Florida Statutes, to "[e]ncourage and conduct studies, investigations, and research relating to pollution and its causes, effects, prevention, abatement, and control."

Mr. R. Bruce Mitchell

May 29, 2002

Page 2

The specific equipment to be tested is the Scholz Unit 1 & 2 electrostatic precipitators. The pollutants and or parameters measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, carbon dioxide, ash content of the fuel, ultimate fuel analyses, unit operational parameters including load, fuel flow, excess air, flue gas temperature and other unit specific parameters that are needed for the computer model. Test methods to be utilized include EPA Method 9, EPA Method 17, CEM monitoring data (SO₂, NO_x, CO₂), and possible particulate size distribution.

Attached is an authorization statement by Robert G. Moore, the Responsible Official outlining his approval of this permit amendment request. Also attached is a statement by a professional engineer regarding the certification of the test protocol and schedule. Please note that we recently talked with the permitting staff at the Northwest Florida District office to outline this request, our test schedule and the basic CAM procedure. Ms. Sandra Veazey and her staff are being copied on this correspondence.

If you have any questions or need further information regarding the test procedures or CAM protocol development for Plant Scholz please call me at (850) 444.6527.

Sincerely,



G. Dwain Waters, Q.E.P.

Air Quality Programs Supervisor


cc: w/att: Jim. Vick, Gulf Power Company
Mike Sarab, Gulf Power Company
Ken Peacock, Gulf Power Company
Kevin Beaty, Gulf Power Company
Greg Terry, Gulf Power Company
Danny Herrin, Southern Company Services
Milan McGill, Southern Company Services
Clark Mitchell, Southern Company Services
Trey Hall, Gulf Power Company

Ms. Sandra Veazey, FDEP Northwest District Office, Pensacola, Florida
Mr. Kevin White, FDEP Northwest District Office, Pensacola, Florida

**CERTIFICATION BY RESPONSIBLE OFFICIAL
SCHOLZ UNIT 1 & 2 COMPLIANCE ASSURANCE
MONITORING TEST PERMIT AMENDMENT REQUEST**

“I, the undersigned, am the responsible official, as defined in Chapter 62-210.200, F.A.C., for the Scholz Electric Generating Plant for which this permit amendment is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this request are true, accurate and complete.”

Responsible Official Signature:



Robert G. Moore
Vice-President of Power Generation/Transmission

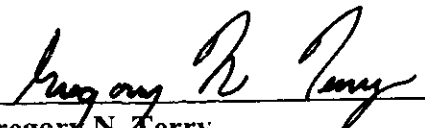
5/29/02

Date:

**SCHOLZ UNIT 1 & 2 COMPLIANCE ASSURANCE
MONITORING TEST PROTOCOL AND SCHEDULE
CERTIFICATION BY PROFESSIONAL ENGINEER**

“I, the undersigned, am a registered professional engineer in the state of Florida and hereby certify to the best of my knowledge that all information submitted for this permit amendment to conduct special emissions testing for compliance assurance monitoring at the Scholz Electric Generating Plant is true, accurate and complete.”

Professional Engineer Signature:



Gregory N. Terry
Registration Number: 52786

5-30-02

Date



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

April 10, 2001

CERTIFIED MAIL – Return Receipt Requested

Mr. Robert G. Moore
V.P. of Power Generation/Transmission
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Moore:

RE: Authorization to Conduct Pollutant Testing and Parameter Measurements for the Development of a Compliance Assurance Monitoring (CAM) Protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's Electrostatic Precipitator (ESP)

The Department has reviewed the request that you provided on March 8, 2001. We have considered the Department's legal authority to allow Gulf Power Company to conduct the requested testing and measurements on its Crist Electrical Generating Plant's Unit #7's ESP (electrostatic precipitator) located in Pensacola, Escambia County. The purpose is to help the company address Compliance Assurance Monitoring (CAM), which will have to be addressed regarding the ESP upon renewal of their Title V Operation Permit. Paragraph 403.061(16), Florida Statutes (F.S.), authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Rule 62-210.700(5), Florida Administrative Code (F.A.C.), authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide reasonable and practical regulatory controls consistent with public interest.

In accordance with the provisions of Paragraphs 403.061(16) and (18), F.S., and Rule 62-210.700(5), F.A.C., you are hereby authorized to conduct pollutant testing and parameter measurements for the development of a CAM protocol for the Gulf Power Company's Crist Electrical Generating Plant's Unit #7's ESP. This evaluation will require Gulf Power Company to vary the collection efficiency of the ESP to establish a performance curve between opacity, particulate matter emissions and ash resistivity, thus creating an operational condition near or in excess of the Florida particulate matter emissions and opacity standards. The data gathered will allow the calibration of an EPRI (Electrical Power Research Institute) computer model to evaluate the performance of the Crist Unit #7's ESP. The pollutants and or parameters to be measured or monitored will include sulfur dioxide, nitrogen oxides, particulate matter, visible emissions, carbon dioxide, ash content of the fuel, ultimate fuel analysis, unit operational parameters including load.

"More Protection, Less Process"

Printed on recycled paper.

Mr. Robert G. Moore
Gulf Power Company
Crist Electric Generating Plant: Unit #7
Page Two

fuel flow, excess air and flue gas temperature, and other unit specific parameters that are needed for the computer model.

The performance tests and parameter measurements or monitoring shall be subject to the following conditions:

1. Unless waived, the permittee shall notify the Department's Northwest District office and the Bureau of Air Regulation at least 15 days prior to commencement of the performance tests and parameter measurements or monitoring. A written report shall be submitted to these offices within 45 days upon completion of the last test run and parameter measurements and monitoring.
2. The authorized testing and measurement and monitoring schedule is from April 14 to May 4, 2001. If additional time is needed, the permittee shall provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the testing and measurements or monitoring.
3. The parameters to be measured or monitored are sulfur dioxide [CEM (continuous emission monitor)], nitrogen oxides (CEM), carbon dioxide (CEM), particulate size distribution, ash content of the fuel, ultimate fuel analyses, load, fuel flow, excess air, flue gas temperature, and other unit specific parameters that are needed for the EPRI computer model.
4. Emissions testing shall be conducted for the following pollutants and using the following test methods:
 - a. Particulate matter EPA Test Method 17 (including EPA Test Methods 1 thru 4)
 - b. Visible emissions EPA Test Method 9
5. The release of objectionable odors pursuant to Rule 62-296.320(2), F.A.C., is not authorized for this activity.
6. Performance testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to the public health or welfare. Performance testing shall not resume until appropriate measures to correct the problem have been implemented.
7. The performance tests and parameter measurements and monitoring shall be under the direct supervision and responsible charge of a professional engineer registered in Florida.
8. This Department action is just to authorize the performance testing and parameter measurements and monitoring for the Crist Unit #7's ESP for the purpose of developing a CAM protocol.
9. Complete documentation of the activity shall be kept on file for at least 5 (five) years.
10. The Department shall be notified in writing on the date of the last test run and parameter measurement and monitoring completion. If after work hours, notification shall occur on the next work day.

Mr. Robert G. Moore
Gulf Power Company
Crist Electric Generating Plant: Unit #7
Page Three

11. Attachment Section.

- a. Mr. G. Dwain Waters's letter received March 8, 2001.
- b. Final Determination.

The Department has relied on the information referenced in the Attachment Section and conversations with representatives of Gulf Power Company in authorizing this activity.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources Management

HLR/rbm

Enclosures

cc: Clair Fancy, DEP - BAR
Scott Sheplak, DEP - BAR
Sandra Veazey, DEP - NWD
Andy Allen, DEP - NWD
Joe Kahn, DEP - BAMMS
G. Dwain Waters, Q.E.P., GPC

FINAL DETERMINATION

Gulf Power Company

Project No.: 0330045-002-AC

I. Public Notice and Comments.

The Public Notice of the permitting project was published in the Pensacola News Journal on March 20, 2001. There were no written comments received in the commenting period (14-days), which concluded at the close of business of April 2nd. However, on March 19th, Mr. Dwain Waters, with Gulf Power Company, phoned Mr. Bruce Mitchell and provided the following comments on the draft authorization letter:

1. On the 1st page, 2nd paragraph, 6th line, insert "and opacity" after "...particulate matter emissions" and make "standard" plural; and, it will read as:

.....particulate matter emissions and opacity standards.

2. On the 2nd page, condition No. 1 requires a notification of 15 days, which would conflict with the proposed date of April 16th. Therefore, "Unless waived," will be placed at the beginning of the condition as follows:

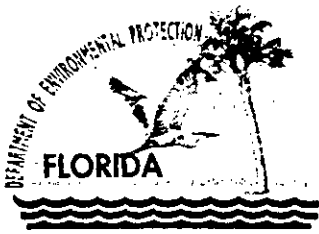
1. Unless waived, the permittee shall notify.....

3. On the 2nd page, condition No. 10, add a statement to the end on the condition to cover a situation where the testing ends after business hours. Therefore, the following sentence will be added to the end of the condition:

If after work hours, notification shall occur on the next work day.

II. Conclusion.

The changes requested were acceptable and did not significantly change the permitting action. Therefore, it is recommended to issue the authorization letter with the above changes made.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

February 14, 2001

Mr. Dwayne Waters
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0328

Dear Mr. Waters:

RE: Guidance for Authorization to Conduct Potential Testing/Measurements for CAM

I have provided some excerpts of documents from some previous permitting activities where authorization to conduct some testing was pursued by Florida Crushed Stone Company. Included are the request, the Intent package, and the authorization letter. As for the request, it seems appropriate that you would provide a cover letter outlining your intent, referring to Section 403.061(18), Florida Statutes, as the suggested route that the Department might use to authorize some testing and/or measurements for CAM. Also, the request should contain the equipment [emissions unit(s)] involved, a finite timeframe (beginning and ending dates) needed to conduct any testing and/or measurements, the pollutants to be pursued, the parameters to be measured, and the specific test method(s) that you would like to perform and/or the equipment that will be used to make measurements. If we needed additional clarification or information, we would forward a request to you. Since you have already received your initial Title V Operation Permit, there would be no processing fee required.

Once we have received an acceptable request, an Intent package would be sent to you providing you with a Public Notice for publication in the newspaper of general circulation. Once through this activity satisfactorily, an authorization would be issued to you to allow you to conduct your testing and/or measurements. After conducting the testing and/or measurements, the data shall be made available to the Department.

I hope that the information provided will be helpful to you in preparing a request to us for authorization to conduct tests and/or measurements for CAM. If not, please give me a call at 850/921-9506.

Sincerely,

R. Bruce Mitchell
Environmental Administrator
Title V Section - Bureau of Air Regulation

RBM/m

Enclosures

cc: C. H. Fancy, BAR
Scott Sheplak, BAR
Sandra Veazey, NWD
Andy Allen, NWD

"More Protection, Less Process"

Printed on recycled paper.