

INTEROFFICE MEMORANDUM

Date: 31-Dec-1991 11:35am EST
From: Iris Littleton (TAL)
LITTLETON_I
Dept: Office General Counsel
Tel No: 904/488-9730

TO: Remote Addressee (REVELL, DUANE)
CC: Janet Llewellyn (TAL) (LLEWELLYN_J)
CC: Pat Manning (TAL) (MANNING_P)
Subject: New OGC Case Assignments

TO: Duane Revell
FROM: Iris - OGC - Tallahassee

Received 12/26/91 request for an Administrative Hearing from Michael E. Savastio against intent to issue dredge and fill permit 52-176846-9 to Pinellas County.

Received 12/30/91 request for an Extension of Time from Florida Mining & Materials/Brooksville Cement Plant permits AC27-173474 and AC27-186923.

cc: B. Mitchell

HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(904) 222-7500

FAX (904) 224-8551

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RICHARD S. BRIGHTMAN
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JULIE B. ROME
KRISTIN C. RUBIN
CECELIA C. SMITH

OF COUNSEL
W. ROBERT FOXES

December 30, 1991

BY HAND DELIVERY

Carol M. Browner, Secretary
c/o Office of General Counsel
Florida Department of Environmental
Regulation
2600 Blair Stone Road, Room 654
Tallahassee, Florida 32399-2400

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DEC 30 1991

Division of Air
Resource Management

Re: Florida Mining & Materials
Brooksville Cement Plant Kilns No. 1 and 2
Permits No. AC 27-173474, AC 27-186923, PSD-FL-124B

Dear Secretary Browner:

On April 15, 1991, Florida Mining & Materials ("FMM") received the Department's Notice of Intent to amend the referenced air construction permits to authorize performance testing of Kilns No. 1 and 2 with tire derived fuel and/or used oil at its Brooksville Cement Plant located in Hernando County, Florida. Pursuant to your Order dated November 21, 1991, FMM has until December 30, 1991 to file a petition for administrative proceedings regarding the permits.

I am writing on behalf of FMM to request an extension of sixty (60) additional days, to and including February 28, 1992, in which to file a petition for administrative proceedings regarding the permits. This request is made pursuant to Florida Administrative Code Rule 17-103.070, which provides that a timely request for extension of time shall toll the running of the time period in which to file an appropriate petition. As good cause for granting the requested extension of time for filing, FMM would show the following:

1. As proposed, the amended permits contain fourteen specific conditions that would establish various requirements applicable to performance testing and related matters.

Carol M. Browner, Secretary
December 30, 1991
Page 2


2. FMM understands that Hernando County Board of County Commissioners is interested in the proposed permit amendments. Additional discussions with representatives of Hernando County are anticipated, in conjunction with the Citizen Advisory Committee consideration of the protocol for performance testing of solid hazardous waste derived fuel at FMM's Brooksville Cement Plant.

3. This request is filed as a protective measure to avoid waiver of FMM's rights to challenge the permit amendments as proposed. Grant of this request will allow all interested parties an opportunity to discuss the pertinent permit provisions and to achieve a mutually acceptable resolution of points in need of clarification or correction, without the initiation of formal administrative proceedings.

I hereby certify that I have contacted Bruce Mitchell, of the Department's Bureau of Air Regulation, regarding this matter and that he does not object to the grant of this request.

Accordingly, I respectfully request that you formally extend the time for filing of a petition for administrative proceedings in regard to the Department's Notice of Intent to revise air construction permits No. AC 27-173474, AC 27-186923 and PSD-FL-124B to and including February 28, 1992.

Sincerely,


Peter C. Cunningham

FlMinExt:gbb

cc: Clair Fancy, P.E.
Bruce Mitchell
W. Douglas Beason, Esquire
Segundo Fernandez, Esquire
Don Kelly
Diane Schenke, Esquire

HOPPING BOYD GREEN & SAMS

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OCT 30 1991

Division of Air
Resources Management

October 29, 1991

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W. ROBERT FOKES

BY HAND DELIVERY

Carol M. Browner, Secretary
c/o Office of General Counsel
Florida Department of Environmental
Regulation
2600 Blair Stone Road, Room 654
Tallahassee, Florida 32399-2400

Re: Florida Mining & Materials
Brooksville Cement Plant Kilns No. 1 and 2
Permits No. AC 27-173474, AC 27-186923, PSD-FL-124B

Dear Secretary Browner:

On April 15, 1991, Florida Mining & Materials ("FMM") received the Department's Notice of Intent to amend the referenced air construction permits to authorize performance testing of Kilns No. 1 and 2 with tire derived fuel and/or used oil at its Brooksville Cement Plant located in Hernando County, Florida. Pursuant to your Order dated September 9, 1991, FMM has until October 29, 1991 to file a petition for administrative proceedings regarding the permits.

I am writing on behalf of FMM to request an extension of sixty-two (62) additional days, to and including December 30, 1991, in which to file a petition for administrative proceedings regarding the permits. This request is made pursuant to Florida Administrative Code Rule 17-103.070, which provides that a timely request for extension of time shall toll the running of the time period in which to file an appropriate petition. As good cause for granting the requested extension of time for filing, FMM would show the following:

1. As proposed, the amended permits contain fourteen specific conditions that would establish various requirements applicable to performance testing and related matters.

Carol M. Browner, Secretary
October 29, 1991
Page 2

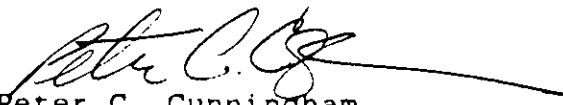
2. FMM understands that Hernando County Board of County Commissioners is interested in the proposed permit amendments. Additional discussions with representatives of Hernando County are anticipated, in conjunction with the Citizen Advisory Committee consideration of the protocol for performance testing of solid hazardous waste derived fuel at FMM's Brooksville Cement Plant.

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Sincerely,


Peter C. Cunningham

FlMinExt:gbb

cc: Clair Fancy, P.E.
Bruce Mitchell ✓
W. Douglas Beason, Esquire
Segundo Fernandez, Esquire
Don Kelly
Diane Schenke, Esquire

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AUG 30 1991

Division of Air
Resources Management

August 30, 1991

BY HAND DELIVERY

Carol M. Browner, Secretary
c/o Office of General Counsel
Florida Department of Environmental
Regulation
2600 Blair Stone Road, Room 654
Tallahassee, Florida 32399-2400

Re: Florida Mining & Materials
Brooksville Cement Plant Kilns No. 1 and 2
Permits No. AC 27-173474, AC 27-186923, PSD-FL-124B

Dear Secretary Browner:

On April 15, 1991, Florida Mining & Materials ("FMM") received the Department's Notice of Intent to amend the referenced air construction permits to authorize performance testing of Kilns No. 1 and 2 with tire derived fuel and/or used oil at its Brooksville Cement Plant located in Hernando County, Florida. Pursuant to your Order dated June 3, 1991, FMM has until August 30, 1991 to file a petition for administrative proceedings regarding the permit.

I am writing on behalf of FMM to request an extension of sixty (60) additional days, to and including October 29, 1991, in which to file a petition for administrative proceedings regarding the permit. This request is made pursuant to Florida Administrative Code Rule 17-103.070, which provides that a timely request for extension of time shall toll the running of the time period in which to file an appropriate petition. As good cause for granting the requested extension of time for filing, FMM would show the following:

1. The proposed permit amendments contain fourteen specific conditions that would establish various requirements applicable to the performance testing and related matters.

Carol M. Browner, Secretary
August 30, 1991
Page 2

2. FMM understands that Hernando County Board of County Commissioners is interested in the proposed permit amendments. Additional discussions with representatives of Hernando County are anticipated, in conjunction with the Citizen Advisory Committee consideration of the protocol for performance testing of solid hazardous waste derived fuel at FMM's Brooksville Cement Plant.

3. This request is filed as a protective measure to avoid waiver of FMM's rights to challenge the permit amendments as proposed. Grant of this request will allow all interested parties an opportunity to discuss the pertinent permit provisions and to achieve a mutually acceptable resolution of points in need of clarification or correction, without the initiation of formal administrative proceedings.

I hereby certify that I have contacted Bruce Mitchell of the Department's Bureau of Air Regulation, regarding this matter and that he does not object to the grant of this request.

Accordingly, I respectfully request that you formally extend the time for filing of a petition for administrative proceedings in regard to the Department's Notice of Intent to revise air construction permits No. AC 27-173474, AC 27-186923 and PSD-FL-124B to and including October 29, 1991.

Sincerely,



Peter C. Cunningham

FlMinExt:gbg

cc: Clair Fancy, P.E.
Bruce Mitchell ✓
W. Douglas Beason, Esquire
Segundo Fernandez, Esquire
C. M. Coleman, Jr.
Diane Schenke, Esquire

HOPPING BOYD GREEN & SAMS

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OF COUNSEL
W. ROBERT FOKES

July 29, 1991

BY HAND DELIVERY

Mr. Steve Smallwood
Director, Division of Air Resources
Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Florida Mining & Materials;
Request For Approval of New Stack at
Brooksville Cement Plant Kiln No. 1
Permit No. AC 27-186923

Dear Steve:

I am writing on behalf of Florida Mining & Materials (FMM) to clarify a statement made in your letter of June 25, 1991 to Mr. Don Kelly, Manager of the Brooksville Cement Plant, regarding the referenced matter. Your letter indicated that the Department does not object to FMM's request to construct a new stack for Kiln No. 1, but noted that "you will not be able to take credit for the increased plume rise by combining the 16 baghouse system flues (i.e., in any future modeling demonstrations)."

Joe Tessitore and I contacted Tom Rogers of the Bureau of Air Monitoring and Assessment to discuss this statement, and based upon that conversation we understand that it is intended solely to acknowledge that provisions of the Department's stack height rule (Florida Administrative Code Rule 17-2.270) may, in some cases, prohibit taking credit for certain "dispersion techniques" in modeling demonstrations. Mr. Rogers agreed that credit can be taken for the new stack height (150 feet), and that the referenced rule only precludes modeling credit for any increased "plume rise" that is associated with a new stack configuration. The attached letter from Mr. Tessitore sets forth pertinent facts about the new stack proposed for Kiln No. 1 which

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JUL 29 1991

Division of Air
Resources Management

Mr. Steve Smallwood
July 29, 1991
Page 2

demonstrate that there will be no increase in exhaust gas temperature and no increase (in fact a reduction) in exhaust gas exit velocity. Consequently, FMM understands that full modeling credit may be taken for the new stack parameters, which is the approach taken in the modeling analysis presented in the pending application (dated June 7, 1991) for approval of a test burn of solid hazardous waste fuel at Kiln No. 1.

In reliance upon this understanding, FMM intends to commence construction of the new stack for Kiln No. 1, at a cost of approximately \$1.3 million, within one week of the date of this letter unless the Department advises of any disagreement with FMM's analysis regarding the modeling credit allowable for the new stack.

The Department's continued consideration in this matter is much appreciated. Should you or members of your staff have any questions, please do not hesitate to call me.

Sincerely,



Peter C. Cunningham

/kkm:Smallwood

cc: Clair Fancy
Tom Rogers
Diane Schenke, Esquire
Don Kelly
Joe Tessitore

Attachment



CROSS/TESSITORE & ASSOCIATES, P.A.

4763 S. CONWAY ROAD, SUITE F
ORLANDO, FLORIDA 32812
407/851-1484

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JUL 23 1991

Hopping Boyd
Green & Sams

July 22, 1991

Mr. Peter C. Cunningham
Hopping Boyd Green & Sam
123 South Calhoun Street
Post Office Box 6526
Tallahassee, Florida 32314

Subject: Florida Mining & Materials
(C/TA # F03.360)

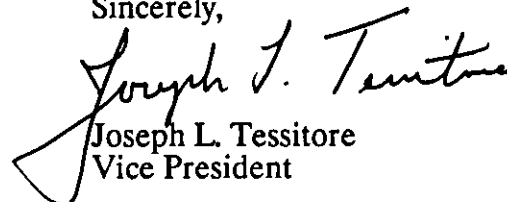
Dear Mr. Cunningham:

This letter is to address the statement contained in the June 25 letter from Mr. Steve Smallwood (FDER) regarding increased plume rise resulting from the proposed No. 1 Cement Kiln Stack modification. This modification will consist of combining the exhaust gas flows currently exiting 16 baghouse vents to one common stack. The letter from Mr. Smallwood states that credit cannot be taken for increased plume rise resulting from this modification. I have reviewed DER 17-2.270 Stack Height Policy which provides the relevant regulation and provides a description of dispersion techniques to effect such plume rise. I have concluded that there would be no increase in plume rise, associated with the proposed stack modification, as disallowed by the referenced regulation. The following facts support this conclusion:

- 1) The proposed stack height (150 ft) is less than 65 meters.
- 2) The proposed stack modification will not affect the exhaust gas flow temperature.
- 3) The proposed stack modification will effect a reduction in exhaust gas exit velocity, thus resulting in a decrease in plume rise due to the velocity component. The attached analysis provides supporting calculations for comparing current and proposed exit velocities.

Should you have any questions or comments regarding this information, please do not hesitate to contact me.

Sincerely,


Joseph L. Tessitore
Vice President

JLT/slw
cc: Diane Schenke, Southdown
C3576.Doc

REGISTERED PROFESSIONAL ENGINEERS

Federal ID # 59-1638534

NO. 1 CEMENT KILN

Current Velocity: (16 Baghouse Vents)

Total Exhaust Flow = 275,000 ACFM

Existing Baghouse Vent Dimensions = 35" x 22"

Existing Baghouse Vent Cross Sectional Area = 5.35 sf (per vent 16 total)

$$\begin{aligned}\text{Velocity} &= \frac{(275,000 \text{ CF/M})}{(60 \text{ S/M} (16) (5.35 \text{ sf}))} \\ &= 53.5 \text{ FPS}\end{aligned}$$

Proposed Velocity: (Single Common Stack)

Total Exhaust Flow = 275,000 ACFM

Proposed Baghouse Stack Diameter = 13.0 ft

Proposed Baghouse Stack Cross Sectional Area = 132.73 sf

$$\begin{aligned}\text{Velocity} &= \frac{(275,000 \text{ CF/M})}{(60 \text{ S/M} (132.73 \text{ sf}))} \\ &= 34.5 \text{ FPS}\end{aligned}$$

Current Velocity > Proposed Velocity

Thus no increase in Plume Rise due to Velocity Change from Stack Modification

HOPPING BOYD GREEN & SAMS

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CHERYL G. STUART

June 26, 1991

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JUN 26 1991

Bruce Mitchell
Florida Department of Environmental
Regulation
2600 Blair Stone Road, Room 338
Tallahassee, Florida 32399-2400

Bureau of
Air Regulation

Re: Florida Mining & Materials
Amendment of Permits No.
AC 27-173474, AC 27-186923, PSD-FL-124B

Dear Bruce:

I am writing to clarify one point in Joseph L. Tessitore's letter of June 7, 1991 to Clair Fancy transmitting Florida Mining & Materials' application for approval to perform a demonstration test burn using solid hazardous waste fuel at Kiln No. 1. Specifically, please be advised that Florida Mining is not requesting any action by the Department at this time regarding the amendments to the referenced permits to authorize a test burn using tire derived fuel (TDF) and/or used oil at Kiln No. 1 or Kiln No. 2. As we have discussed, those permit amendments have, in effect, been put on "hold" pending further discussions between representatives of Florida Mining and Hernando County. A copy of Florida Mining's second request for extension of time to petition for administrative proceedings on the TDF/used oil test burn approval is attached for your information.

Florida Mining remains hopeful that agreement on both the TDF/used oil test burn and the solid hazardous waste fuel test burn can be reached, and appropriate Department approvals issued, to allow the test burns to proceed by late summer. This letter is intended merely to confirm our conversation regarding the absence of any immediate need for Department action on the TDF/used oil permit amendments.

Your continued consideration in this matter is much appreciated.

Bruce Mitchell
June 26, 1991
Page 2

As always, please do not hesitate to call me if you have any questions.

Sincerely,



Peter C. Cunningham

Mitchell:gbb

cc: C. M. Coleman
Edgar Marston, Esquire
Diane Schenke, Esquire
Segundo Fernandez, Esquire
B. Thomas, Sedco
G. Harper, EPA
C. Shaw, NPS
C. Detrick, HCBCC
CHF/BA

HOPPING BOYD GREEN & SAMS

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OF COUNSEL
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June 26, 1991

BY HAND DELIVERY

Carol M. Browner, Secretary
c/o Office of General Counsel
Florida Department of Environmental
Regulation
2600 Blair Stone Road, Room 654
Tallahassee, Florida 32399-2400

Re: Florida Mining & Materials
Brooksville Cement Plant Kilns No. 1 and 2
Permits No. AC 27-173474, AC 27-186923, PSD-FL-124B

Dear Secretary Browner:

On April 15, 1991, Florida Mining & Materials ("FMM") received the Department's Notice of Intent to amend the referenced air construction permits to authorize performance testing of Kilns No. 1 and 2 with tire derived fuel and/or used oil at its Brooksville Cement Plant located in Hernando County, Florida. Pursuant to your Order dated May 27, 1991, FMM has until July 1, 1991 to file a petition for administrative proceedings regarding the permit.

I am writing on behalf of FMM to request an extension of sixty (60) additional days, to and including August 30, 1991, in which to file a petition for administrative proceedings regarding the permit. This request is made pursuant to Florida Administrative Code Rule 17-103.070, which provides that a timely request for extension of time shall toll the running of the time period in which to file an appropriate petition. As good cause for granting the requested extension of time for filing, FMM would show the following:

1. The proposed permit amendments contain fourteen specific conditions that would establish various requirements applicable to the performance testing and related matters.

Carol M. Browner, Secretary
June 26, 1991
Page 2

2. FMM understands that Hernando County Board of County Commissioners is interested in the proposed permit amendments. Additional discussions with representatives of Hernando County are anticipated, in conjunction with the Citizen Advisory Committee consideration of the protocol for performance testing of solid hazardous waste derived fuel at FMM's Brooksville Cement Plant.

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I hereby certify that I have contacted Bruce Mitchell of the Department's Bureau of Air Regulation regarding this matter and that he does not object to the grant of this request.

Accordingly, I respectfully request that you formally extend the time for filing of a petition for administrative proceedings in regard to the Department's Notice of Intent to revise air construction permits No. AC 27-173474, AC 27-186923 and PSD-FL-124B to and including August 30, 1991.

Sincerely,



Peter C. Cunningham

FlMinExt:gbb

cc: Clair Fancy, P.E.
Bruce Mitchell
W. Douglas Beason, Esquire
Segundo Fernandez, Esquire
C. M. Coleman, Jr.
Diane Schenke, Esquire



United States Department of the Interior
FISH AND WILDLIFE SERVICE



IN REPLY REFER TO:

MAILING ADDRESS:
Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225

STREET LOCATION:
134 Union Blvd.
Lakewood, Colorado 80228

RW Air Quality
Mail Stop 60130

MAY 24 1991

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MAY 30 1991

Mr. C.H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Division of Air
Resources Management

Dear Mr. Fancy:

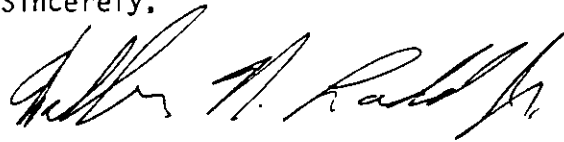
We have reviewed the information that you forwarded to us regarding Florida Mining and Materials' (FM&M) request to conduct performance tests while burning Tire Derived Fuel (TDF) and/or used oil with coal in Kilns 1 and 2 at their Brooksville, Florida, cement plant. The FM&M facility is located approximately 25 km southeast of the Chassahowitzka Wilderness Area, a class I air quality area administered by the U.S. Fish and Wildlife Service.

Florida Mining and Materials expects that actual pollutant emissions would not increase as a result of firing these fuel mixtures. We are pleased to see that the conditions you specified for the proposed performance tests are very extensive and complete. If the performance tests confirm FM&M's assertion that actual emissions of the listed pollutants would not increase, then we would not object to the firing of these fuels in the kilns on a continuous basis. However, given the proximity of the Chassahowitzka Wilderness Area and the toxic nature of the pollutants to be tested (i.e., heavy metals, dioxins, furans, benzene, polynuclear aromatic hydrocarbons, etc.), we would be concerned about potential impacts on sensitive resources at the wilderness area if the emissions of these pollutants would increase. Consequently, if the performance tests show that emissions would increase as a result of firing TDF and used oil in the kilns, FM&M should perform a thorough assessment of the potential effects of the emission increases on resources at the wilderness area. We ask that you then provide us ample opportunity to review this assessment to determine if such impacts would be adverse, before you permit FM&M to burn these fuels continuously.

We understand that Florida Crushed Stone (FCS) has also requested a permit amendment to allow burning of TDF in a kiln at their Brooksville cement plant. If the emissions of toxic pollutants would increase as a result of FCS burning TDF, we would have the same concerns as those discussed above for the FM&M proposal.

We appreciate you keeping us informed about permitting activities that could impact our resources. We will await the results of the FM&M performance tests. In the meantime, if you have any questions regarding this matter, please contact John Bunyak of our Air Quality Office at (303) 969-2071.

Sincerely,



Wilbur N. Ladd, Jr.
Assistant Regional Director
Refuges and Wildlife, Region 6

cc: B. Mitchell ✓
B. Shomers, SW Dist.
C. Detrick, HCBCC
C. Coleman, FM&M
Q. Dessitore, CT/A
P. Cunningham, HBB&S
N. Stone, FCS
Q. Koogler, K&A
Z. Sellers, H&K
CHF/BA



United States Department of the Interior

NATIONAL PARK SERVICE
AIR QUALITY DIVISION
P.O. BOX 25287
DENVER, CO 80225

IN REPLY REFER TO:

DATE:

5/23/91

TIME:

3:00

FAX PHONE NO. FTS 327-2822 or (303) 969-2822

NUMBER OF PAGES TO FOLLOW:

2

TO:

Bruce Mitchell

PHONE:

FROM:

John Bunyak

National Park Service

PHONE:

(303) 969-2071

SUBJECT:

Florida Mining Materials / Florida Crushed Stone

REMARKS:

Here's a copy of the letter that will be signed and dated shortly. Call me if you have any questions.

HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

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DAVID L. POWELL
DOUGLAS S. ROBERTS
CECELIA C. SMITH

OF COUNSEL
W. ROBERT FOXES

April 29, 1991

BY HAND DELIVERY

Carol M. Browner, Secretary
c/o Office of General Counsel
Florida Department of Environmental
Regulation
2600 Blair Stone Road, Room 654
Tallahassee, Florida 32399-2400

Re: Florida Mining & Materials
Brooksville Cement Plant Kilns No. 1 and 2
Permits No. AC 27-173474, AC 27-186923, PSD-FL-124B

Dear Secretary Browner:

On April 15, 1991, Florida Mining & Materials ("FMM") received the Department's Notice of Intent to amend the referenced air construction permits to authorize performance testing of Kilns No. 1 and 2 with tire derived fuel and/or used oil at its Brooksville Cement Plant located in Hernando County, Florida. Pursuant to the Notice of Intent and Florida Administrative Code Rule 17-103.155, FMM has until April 29, 1991 to file a petition for administrative proceedings regarding the permit.

I am writing on behalf of FMM to request an extension of sixty (60) days, to and including June 28, 1991, in which to file a petition for administrative proceedings regarding the permit. This request is made pursuant to Florida Administrative Code Rule 17-103.070, which provides that a timely request for extension of time shall toll the running of the time period in which to file an appropriate petition. As good cause for granting the requested extension of time for filing, FMM would show the following:

1. The proposed permit amendments contain fourteen specific conditions that would establish various

Carol M. Browner, Secretary
April 29, 1991
Page 2

requirements applicable to the performance testing and related matters.

2. FMM desires additional time to complete its review of the proposed permit conditions.

3. FMM understands that Hernando County Board of County Commissioners is interested in the proposed permit amendments. Additional discussions with representatives of Hernando County are anticipated, in conjunction with the Citizen Advisory Committee consideration of the protocol for performance testing of solid hazardous waste derived fuel at FMM's Brooksville Cement Plant.

4. This request is filed as a protective measure to avoid waiver of FMM's rights to challenge the permit amendments as proposed. Grant of this request will allow all interested parties an opportunity to discuss the pertinent permit provisions and to achieve a mutually acceptable resolution of points in need of clarification or correction, without the initiation of formal administrative proceedings.

I hereby certify that I have contacted Clair Fancy, Chief of the Department's Bureau of Air Regulation, regarding this matter and that he does not object to the grant of this request.

Accordingly, I respectfully request that you formally extend the time for filing of a petition for administrative proceedings in regard to the Department's Notice of Intent to revise air construction permits No. AC 27-173474, AC 27-186923 and PSD-FL-124B to and including June 28, 1991.

Sincerely,



Peter C. Cunningham

FlMinExt:gbb

cc: Clair Fancy, P.E.
Bruce Mitchell
Gary Smallridge, Esquire
Segundo Fernandez, Esquire
C. M. Coleman, Jr.
Diane Schenke, Esquire
B. Thomas, SW Dist
J. Harper, EPA
E. Shaver, NPS
C. R. Smith, HCBAC