

**Technical Center**  
101 Hampton Avenue  
Needham, MA 02494  
Tel: 781-972-2300

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MAY 15 2012

DIVISION OF AIR  
RESOURCE MANAGEMENT

May 11, 2012

Mr. Jason Waters  
Environmental Protection Commission of Hillsborough County  
Roger P Stewart Center  
3629 Queen Palm Rd  
Tampa FL 33619  
813-627-2600

Re: Operating permit No. 0571326-003-AO/004-AC condition 21e submission

Dear Mr. Waters,

Enclosed are the monthly mercury throughput results for the high carbon fly ash stream through March 2012 for the Separation Technologies' fly ash processing facility as specified in our operating permit specific condition 21e.

Please contact me directly, if you have any questions about the enclosed information.

Regards,



Frank Hrach  
Director of Process Engineering  
Separation Technologies LLC  
781-972-2311 office

cc : ALinero FDEP  
RWiechert ST (via email)

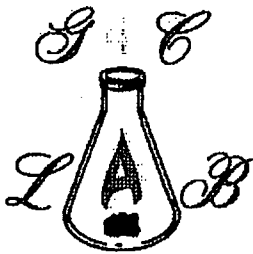
Hg Summary

|                              | Composite<br>Feed ash<br>processed | Composite<br>Feed ash<br>wt%<br>LOI | Composite<br>Feed ash<br>Hg level<br>ppm | Estimated<br>Feed ash<br>Hg rate<br>lb/month | ProAsh<br>produced<br>stons | Composite<br>ProAsh<br>wt%<br>LOI | Composite<br>ProAsh<br>Hg level<br>ppm | Estimated<br>ProAsh<br>est. Hg rate<br>lb/month | HCFA<br>produced<br>stons | Composite<br>HCFA<br>wt%<br>LOI | Composite<br>HCFA<br>Hg level<br>ppm | Estimated<br>HCFA<br>Hg rate<br>lb/month |
|------------------------------|------------------------------------|-------------------------------------|--|--|-----------------------------|-----------------------------------|--|---|---------------------------|---------------------------------|--------------------------------------|--|
| Mar-08                       | 2441                               | 7.1                                 | 0.200                                    | 0.98   | 1630                        | 2.6                               | 0.062                                  | 0.20  | 811                       | 12.6                            | 0.403                                | 0.65                                     |
| Apr-08                       | 6260                               | 7.6                                 | 0.187                                    | 2.34   | 4173                        | 3.2                               | 0.058                                  | 0.48  | 2087                      | 21.5                            | 0.548                                | 2.29                                     |
| May-08                       | 3528                               | 5.0                                 | 0.235                                    | 1.66   | 2028                        | 2.6                               | 0.108                                  | 0.44  | 1500                      | 11.7                            | 0.499                                | 1.50                                     |
| Jun-08                       | 9701                               | 6.2                                 | 0.234                                    | 4.54   | 5620                        | 2.4                               | 0.097                                  | 1.09  | 4081                      | 15.2                            | 0.546                                | 4.46                                     |
| Jul-08                       | 16417                              | 8.5                                 | 0.376                                    | 12.35  | 10407                       | 3.8                               | 0.118                                  | 2.46  | 6010                      | 17.4                            | 0.578                                | 6.95                                     |
| Aug-08                       | 9693                               | 7.1                                 | 0.557                                    | 10.80  | 4299                        | 4.1                               | 0.255                                  | 2.19  | 5394                      | 10.7                            | 0.779                                | 8.40                                     |
| Sep-08                       | 12218                              | 5.7                                 | 0.406                                    | 9.92   | 7686                        | 3.6                               | 0.204                                  | 3.14  | 4532                      | 9.3                             | 0.644                                | 5.84                                     |
| Oct-08                       | 11481                              | 4.7                                 | 0.314                                    | 7.21   | 8885                        | 3.0                               | 0.147                                  | 2.61  | 2596                      | 16.5                            | 1.213                                | 6.30                                     |
| Nov-08                       | 11014                              | 4.5                                 | 0.389                                    | 8.57   | 7694                        | 3.1                               | 0.255                                  | 3.92  | 3320                      | 7.7                             | 0.728                                | 4.83                                     |
| Dec-08                       | 9788                               | 5.9                                 | 0.682                                    | 13.35  | 6894                        | 3.4                               | 0.261                                  | 3.60  | 2894                      | 10.5                            | 1.087                                | 6.29                                     |
| Jan-09                       | 16133                              | 6.3                                 | 0.243                                    | 7.84   | 11015                       | 3.3                               | 0.104                                  | 2.29  | 5118                      | 8.0                             | 0.525                                | 5.37                                     |
| Feb-09                       | 13801                              | 7.1                                 | 0.180                                    | 4.97   | 9015                        | 3.1                               | 0.081                                  | 1.46  | 4786                      | 11.2                            | 0.347                                | 3.32                                     |
| Mar-09                       | 18134                              | 7.9                                 | 0.274                                    | 9.94   | 10900                       | 3.2                               | 0.106                                  | 2.31  | 7234                      | 15.5                            | 0.540                                | 7.81                                     |
| Apr-09                       | 13405                              | 7.0                                 | 0.190                                    | 5.09   | 8777                        | 3.1                               | 0.065                                  | 1.14  | 4628                      | 15.9                            | 0.445                                | 4.12                                     |
| May-09                       | 16634                              | 6.4                                 | 0.192                                    | 6.39   | 11417                       | 3.2                               | 0.067                                  | 1.53  | 5217                      | 14.8                            | 0.523                                | 5.46                                     |
| Jun-09                       | 20278                              | 6.4                                 | 0.219                                    | 8.88   | 14547                       | 3.4                               | 0.102                                  | 2.97  | 5731                      | 14.7                            | 0.602                                | 6.90                                     |
| Jul-09                       | 18046                              | 6.0                                 | 0.470                                    | 16.96  | 10221                       | 3.3                               | 0.178                                  | 3.64  | 7825                      | 11.3                            | 0.833                                | 13.04                                    |
| Aug-09                       | 17875                              | 5.1                                 | 0.480                                    | 17.16  | 10867                       | 3.5                               | 0.273                                  | 5.93  | 7008                      | 8.5                             | 0.817                                | 11.45                                    |
| Sep-09                       | 18402                              | 5.0                                 | 0.438                                    | 16.12  | 13182                       | 3.3                               | 0.24                                   | 6.33  | 5220                      | 10.9                            | 0.912                                | 9.52                                     |
| Oct-09                       | 14280                              | 4.6                                 | 0.355                                    | 10.14  | 10770                       | 2.9                               | 0.215                                  | 4.63  | 3510                      | 9.9                             | 0.783                                | 5.50                                     |
| Nov-09                       | 11835                              | 4.8                                 | 0.298                                    | 7.05   | 8443                        | 3.3                               | 0.218                                  | 3.68  | 3392                      | 8.3                             | 0.783                                | 5.31                                     |
| Dec-09                       | 20754                              | 5.7                                 | 0.543                                    | 22.54  | 12744                       | 3.5                               | 0.246                                  | 6.27  | 8010                      | 9.4                             | 0.844                                | 13.52                                    |
| Jan-10                       | 12437                              | 5.9                                 | 0.418                                    | 10.40  | 7890                        | 4.0                               | 0.2                                    | 3.16  | 4547                      | 9.1                             | 0.653                                | 5.94                                     |
| Feb-10                       |                                    |                                     |  |  |                             |                                   |  |   | 5798                      | 12.1                            | 1.191                                | 13.81                                    |
| Mar-10                       |                                    |                                     |  |  |                             |                                   |  |   | 6044                      | 11.2                            | 0.993                                | 12.00                                    |
| Apr-10                       |                                    |                                     |  |  |                             |                                   |  |   | 4809                      | 15.6                            | 0.990                                | 9.52                                     |
| May-10                       |                                    |                                     |  |  |                             |                                   |  |   | 4005                      | 22.5                            | 1.154                                | 9.24                                     |
| Jun-10                       |                                    |                                     |  |  |                             |                                   |  |   | 5200                      | 18.6                            | 0.651                                | 6.77                                     |
| Jul-10                       |                                    |                                     |  |  |                             |                                   |  |   | 5106                      | 16.0                            | 0.665                                | 6.79                                     |
| Aug-10                       |                                    |                                     |  |  |                             |                                   |  |   | 4281                      | 15.7                            | 0.948                                | 8.12                                     |
| Sep-10                       |                                    |                                     |  |  |                             |                                   |  |   | 3699                      | 19.0                            | 0.927                                | 6.86                                     |
| Oct-10                       |                                    |                                     |  |  |                             |                                   |  |   | 9322                      | 10.2                            | 1.001                                | 18.66                                    |
| Nov-10                       |                                    |                                     |  |  |                             |                                   |  |   | 6790                      | 12.4                            | 1.384                                | 18.79                                    |
| Dec-10                       |                                    |                                     |  |  |                             |                                   |  |   | 3792                      | 12.5                            | 2.120                                | 16.08                                    |
| Jan-11                       |                                    |                                     |  |  |                             |                                   |  |   | 3135                      | 14.7                            | 2.330                                | 14.61                                    |
| Feb-11                       |                                    |                                     |  |  |                             |                                   |  |   | 4858                      | 14.1                            | 1.303                                | 12.66                                    |
| Mar-11                       |                                    |                                     |  |  |                             |                                   |  |   | 4764                      | 10.0                            | 1.229                                | 11.71                                    |
| Apr-11                       |                                    |                                     |  |  |                             |                                   |  |   | 5713                      | 10.4                            | 1.594                                | 18.21                                    |
| May-11                       |                                    |                                     |  |  |                             |                                   |  |   | 2589                      | 15.9                            | 2.731                                | 14.14                                    |
| Jun-11                       |                                    |                                     |  |  |                             |                                   |  |   | 4986                      | 11.2                            | 1.695                                | 16.90                                    |
| Jul-11                       |                                    |                                     |  |  |                             |                                   |  |   | 3610                      | 11.6                            | 1.660                                | 11.99                                    |
| Aug-11                       |                                    |                                     |  |  |                             |                                   |  |   | 5028                      | 10.9                            | 1.473                                | 14.81                                    |
| Sep-11                       |                                    |                                     |  |  |                             |                                   |  |   | 4933                      | 12.5                            | 1.684                                | 16.61                                    |
| Oct-11                       |                                    |                                     |  |  |                             |                                   |  |   | 3131                      | 15.6                            | 1.781                                | 11.15                                    |
| Nov-11                       |                                    |                                     |  |  |                             |                                   |  |   | 3894                      | 13.2                            | 1.808                                | 14.08                                    |
| Dec-11                       |                                    |                                     |  |  |                             |                                   |  |   | 3141                      | 10.5                            | 1.742                                | 10.94                                    |
| Jan-12                       |                                    |                                     |  |  |                             |                                   |  |   | 4333                      | 11.2                            | 1.554                                | 13.47                                    |
| Feb-12                       |                                    |                                     |  |  |                             |                                   |  |   | 4810                      | 13.8                            | 1.521                                | 14.63                                    |
| Mar-12                       |                                    |                                     |  |  |                             |                                   |  |   | 4266                      | 11.8                            | 1.651                                | 14.09                                    |
| 12-month<br>rolling<br>total |                                    |                                     |  |  |                             |                                   |  |   | 50434                     |                                 | 1.696                                | 171                                      |

Feed Ash = Raw Flyash from Big Bend

ProAsh = Mineral enriched Flyash

HCFA = Carbon enriched Flyash



# G and C Coal Analysis Lab., Inc.

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Summerville, Pa 15864  
814-849-2559  
Fax: 814-849-8878

Received From:  
SEPARATION TECHNOLOGIES LLC  
101 HAMPTON AVE.  
NEEDHAM, MA 02494

Date Received: 04/20/12

Date Reported: 05/11/12

PO# 160169 (ST)

\* RESULTS REPORTED USING EPA METHOD 7473

| <u>Lab #</u>   | <u>Sample ID</u>                  | <u>Mercury/ppb dry</u>           |
|----------------|-----------------------------------|----------------------------------|
| 921439         | T-0312-AB-C                       | 1651                             |
| BCR143R        | Blank:                            | <5.000 ppb dry                   |
| 7896 DUP       | Lab Value 1126 dry                | Certified Value: 1100 ppb dry    |
| 7896 DUP SPIKE | 569 ppb dry<br>Lab Value: 685 ppb | Calculated Value: 661 ppb +/-20% |

The above analytical results were obtained following ASTM procedures.

APPROVED BY

G & C COAL ANALYSIS LAB., INC.