

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
Telephone (352) 336-5600
Fax (352) 336-6603



May 20, 2003

RECEIVED

0337520

Florida Department of Environmental Protection
Bureau of Air Regulation
New Source Review Section
2600 Blair Stone Road MS 5505
Tallahassee, FL 32399-2400

MAY 21 2003

BUREAU OF AIR REGULATION

Attention: Mr. Jeffery F. Koerner,

RE: New Hope Power Partnership, Project No. 0990332-016-AC (PSD-FL-196M)

Dear Mr. Koerner:

On March 26, 2003, the Department issued a second request for additional information (RAI) for New Hope Power Partnership's (NHPP) air construction permit application to increase the annual heat input limitation of the Okeelanta Cogeneration Plant. The purpose of this correspondence is to provide responses to the Department's requests. The responses to each item in the RAI are provided below.

1. **Comment: Your additional information indicates that an SCR system is not technically feasible due to high concentrations of potassium, sodium, and phosphorous in the flue gas. Please provide supporting documentation of the flue gas concentrations for these pollutants. Compare these levels with those of boilers that do employ SCR, such as coal-fired units.**

Response: In order to investigate this, NHPP obtained samples of ESP ash and mechanical dust collector ash from the cogeneration boilers at two different times on April 11, 2003. The ash samples were sent to the lab and analyzed for sodium, potassium, and phosphorous. These elements are known SCR catalyst deactivators. The results of the analysis are shown in Table 1 attached. The lab analysis sheets are also attached. As shown, one set of ash samples exhibited potassium levels of greater than 8 percent. This level of potassium is much greater than the level found in coal ash, which is seen to range from 0.3 to 2.8 percent.

Further testing of the NHPP ash would be expected to yield frequent levels of potassium of 8 percent and greater, as well as other undesirable constituents in regards to SCR application. Recent analysis of bagasse ash from U.S. Sugar's Clewiston mill revealed potassium levels of 15 percent and chlorine levels of 7.6 percent in the ash.

Recent correspondence from a leading SCR catalyst manufacturer, Topsoe, stated that potassium levels in ash approaching 10 percent, coupled with chlorine, would produce a large amount of KCl aerosols in the flue gas, which would in turn result in a very rapid deactivation of the catalyst. The catalyst would have to be placed after the ESP to be manageable.

We believe this information provides further basis for rejecting high-dust SCR based on technical infeasibility.

2. **Comment:** Currently, NO_x emissions are reduced using SNCR to achieve a standard of 0.15 lb/MMBtu of heat input based on a 30-day rolling average. Have any of the boilers failed to comply with this limit since the beginning of commercial operation?

Response: Over the last 3 or 4 years, there has been only one exceedance of the 0.15 lb/MMBtu 30-day rolling NO_x standard. That exceedance was due to a malfunction.

3. **Comment:** The Department understands the issue of flexibility regarding unrestricted annual operation. However, the cogeneration units currently operate with an annual capacity factor of less than 60%. Some of the cost effectiveness calculations estimate an upper range of 90%. Please estimate the maximum expected annual capacity factor (in terms of heat input rate) for the cogeneration plant. Consider the following:

- What factors typically prevent operation at rated capacity?
- Do these units normally operate at capacity during the cane-milling season? During the off-season?
- Do the units ramp down at nighttime?
- Does the available fuel supply limit operation at capacity?
- How many days are planned for scheduled down times to perform maintenance and inspections?
- How many days have periods of unscheduled maintenance accounted for in the past?

Response: At the requested maximum heat input rate of 19,972,800 MMBtu/yr, the cogeneration plant expects to average between 70- and 80-percent annual capacity factor (i.e., between 13,980,960 MMBtu and 15,978,240 MMBtu), depending upon process requirements.

Heat input is typically lower during the summer or off-season. Scheduled and unscheduled outages also contribute to operation at less than capacity.

The units normally operate at capacity during the crop season. During the off-season, the units operate at approximately less than 80 percent of maximum capacity.

The units do not ramp down at nighttime.

The available fuel supply does not limit operation of the facility or its capacity.

Approximately 2 weeks per year are planned for scheduled down times to perform maintenance and inspections.

During the past 3 years, the cogeneration facility has transitioned through a series of design issues that has contributed to downtime that is not representative of normal operating conditions. Therefore, it is difficult to accurately separate downtime from unscheduled maintenance versus downtime due to design issues.

4. **Comment:** The application refers to a project in Virginia for the Multitrade facility identified as RBLC #0183. (The Department believes the correct RBLC is #0174.) Under the application review for NO_x emissions, this facility is identified as a "peaking plant", which should allow for consideration of higher urea injection rates to achieve lower NO_x emissions. However, the Department's review indicates that this is a spreader stoker boiler fired by wood. The current Title V permit for this facility does not describe the boiler as a "peaking unit". Please provide information that supports this boiler as a "peaking unit".

Response: Information regarding the Multitrade facility was obtained from the Virginia Department of Environmental Quality in June 2002. In addition, Mr. Owen Barnes of the facility was contacted (434-324-8223). The facility has three identical boilers; spreader stokers fired by wood. While it is true that Multitrade's permit allows 8,760 hr/yr operation at maximum heat input rate for all three boilers, Mr. Barnes stated that it was a peaking plant when originally permitted, and indeed, is still operated as a peaking plant. This was confirmed from the first quarter 2002 Excess Emissions Report obtained from Virginia DEQ. This report contains a capacity factor report (attached) that shows over the previous 12 months, the facility had operated at monthly capacity factors ranging from 7 percent to 68 percent. The 12-month rolling capacity factor was 33 percent. Peak operation was in August while the lowest operation was in October.

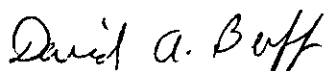
5. **Comment:** The Weyerhaeuser facility in Mississippi (RBLC #MS-0026) is identified as an electric utility boiler. This boiler is rated at 90 MMBtu per hour. The Department believes that the facility is not an electric utility, but rather a lumber mill and plywood plant. Please review and comment.

Response: We obtained the PSD permit for this facility from the Mississippi DEQ, and spoke with the DEQ. The DEQ stated that the Weyerhaeuser Company Bruce Facility produces dimensional lumber. The principle raw material is southern yellow pine. The boilers are used to produce steam for the dry kilns. The BACT determination was for two boilers, a 60-MMBtu/hr woodwaste boiler and a 90-MMBtu/hr woodwaste boiler.

Please feel free to call James Meriwether, New Hope Power Partnership, at (561) 993-1003 or Dave Buff, Golder Associates Inc., at (352) 336-5600, if you have any questions or comments concerning this additional information. We believe this information adequately responds to the RAI, and that the application can now be deemed complete.

Sincerely,

GOLDER ASSOCIATES INC.



David A. Buff, P. E., Q. E. P.
Principal Engineer
Florida P. E. #19011
SEAL

DB/nav

Enclosures

cc: R. Blackburn, DEP
J. Meriwether, NHPP
W. Tarr, Florida Crystals
G. Cepero, Florida Crystals
D. Dee, Landers & Parsons
D. Larocca, Golder
Q. *Ittner*, PBCs.
L052003 Q. *Bittle*, EPA
Q. *Bennah*, NPS

Golder Associates

Table 1. NHPP Ash Analysis Compared to Coal Ash

Constituent	NHPP Ash				Coal Fly Ash*				
	ESP Ash #1	ESP Ash #2	Dust Collector Ash #1	Dust Collector Ash #2	Class "F"	Class "C"	hvBb Utah	hvAb Penn.	hvC
Elemental analysis of ash (%)									
Silica (SiO ₂)	NA	NA	NA	NA	58.0	35.9	52.5	51.1	52.0
Aluminum Oxide (Al ₂ O ₃)	NA	NA	NA	NA	29.1	18.9	18.9	30.7	17.5
Iron Oxide (Fe ₂ O ₃)	NA	NA	NA	NA	3.6	6.1	1.1	10.0	15.5
Titanium Oxide (TiO ₂)	NA	NA	NA	NA	1.6	1.4	1.2	2.0	1.3
Calcium Oxide (CaO)	NA	NA	NA	NA	0.8	24.6	13.2	1.6	4.5
Magnesium Oxide (MgO)	NA	NA	NA	NA	0.8	5.4	1.3	0.9	1.1
Sodium Oxide (Na ₂ O)	1.1	0.27	1.2	0.22	0.1	1.9	3.8	0.4	0.6
Potassium Oxide (K ₂ O)	8.2	1.7	8.5	1.4	2.5	0.3	0.9	1.7	2.8
Sulfur Trioxide (SO ₃)	NA	NA	NA	NA	0.2	2.3	6.2	1.4	4.2
Phosphorus Pentoxide (P ₂ O ₅)	0.15	0.13	0.03	NA	0.1	1.1	--	--	0.1
Barium Oxide (BaO)	NA	NA	NA	NA	0.1	0.7	--	--	--
Manganese Oxide (Mn ₂ O ₃)	NA	NA	NA	NA	0.1	<0.1	--	--	--
Strontium Oxide (SrO)	NA	NA	NA	NA	0.1	0.4	--	--	--

NA = Not analyzed

*From "Fossil Fuel Combustion", ABB.

CHAIN OF CUSTODY RECORD

Log # 753TS / TNY

Quote: _____

Company Name New Hope Power PO# _____
 Address _____
 City SA State _____ Zip _____
 Attn: James Meriwether Fax# _____
 Project Name Asl Samples Proj# _____
 Sampler Name/Signature _____ Phone# _____

		Matrix Code				
1	ESPs	41103	1400	SD	1	106
2	ESPs	1	1120	1	1	1
3	Dust Collectors	1	1040	1	1	1
4	Dust Collectors	1	1355	1	1	1
5						
6						
7						
8						
9						
0						

1		SOLID	
LNA	Phosphorous		
X	X		
X	X		
X	X		
X			

LAB USE ONLY

Samples INTACT upon arrival? YES NO N/A
 Received ON WET ICE? Temp. _____
 PROPER PRESERVATIVES indicated? _____
 Received WITHIN HOLDING TIME? _____
 CUSTODY SEALS INTACT? _____
 VOLATILES rec'd W/OUT HEADSPACE? _____
 PROPER CONTAINERS used? _____

Matrix Codes*

SD Solid Waste	OL Oil
GW Ground Water	SL Sludge
EFF Effluent	SO Soil Sediment
AFW Analyte Free H ₂ O	AQ Aqueous
WW Waste Water	NA Nonaqueous
DW Drinking Water	PE Petroleum
SU Surface Water	O Other (please specify)

Pres/Codes-

A. None	G. Na ₂ S ₂ O ₃
B. HNO ₃	H. NaHSO ₄
C. H ₂ SO ₄	I. KCl
D. NaOH	J. MCAA
E. HCL	O. Other
F. MeOH	

REMARKS

They Asst

Asst

Y/N _____ Date required _____ Y _____ N _____ None _____ 1 _____ 2 _____ 3 _____ Other _____ (Y) N (B)

3231 N.W. 7th Avenue
 Boca Raton, FL 33431
 888-862-LABS
 561-447-7373
 888-456-4846 Fax
 561-447-6136 Fax
 C.O.C. # 55600

ORIGINAL

USBiosYSTEMS

Client #: WPB-94-100506
 Address: New Hope Power
 P.O. Box 9
 South Bay, FL 33493
 James Meriwether

Page: Page 1 of 1
 Date: 04/22/2003
 Log #: L75375-1

Sample Description:

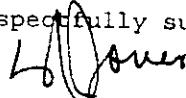
Ash Sample

Analytical Report: ESP's
 Date Sampled: 04/11/2003
 Time Sampled: 14:00
 Date Received: 04/14/2003
 Collected By: Client

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Anly. Date	Analyst
Percent Solids							
Percent Solid	100	%	SM2540B	0.10	04/14	04/14	KB
Metals							
Potassium	82000	mg/kg (dw)	3050/6010	50	04/16	04/21	ZL
Sodium	11000	mg/kg (dw)	3050/6010	50	04/16	04/21	ZL
General Chemistry							
Total Phosphorus as P	1500	mg/kg (dw)	365.1	100	04/17	04/17	MA

All analyses were performed using EPA, ASTM, NIOSH, USGS, or Standard Methods and certified to meet NELAC requirements.
 Flags: BDL or U-below reporting limit; DL-diluted out; IL-meets internal lab limits; MI-matrix interference; NA-not appl.
 Flags: CFR-Pb/Cu rule; ND-non detect (NL estimated); NPL-no free liquids; dw-dry wt; ww-wet wt; C(#)-see attached USB code
 FLDEP Flags: J(#)-estimated 1:surr. fail 2:no known QC req. 3:QC fail %R or %RPD; 4:matrix int. 5:improper fld. protocol
 FLDEP Flags: L-exceeds calibration; Q-holding time exceeded; T-value < MDL; V-present in blank
 FLDEP Flags: Y-improper preservation; B-colonies exceed range; I-result between MDL and PQL

QAP# 980126	DOH# E86240	NC CERT# 444
SUB DOH# 86122,86109,E86048	ADEM ID# 40850	IL CERT# 200020
SC CERT# 96031001	TN CERT# 02985	
USACE	GA CERT# 917	
VA CERT# 00395	USDA Soil Permit# S-35240	

Respectfully submitted,

 LouAnn Jones
 Project Manager

Client #: WPB-94-100506
 Address: New Hope Power
 P.O. Box 9
 South Bay, FL 33493
 James Meriwether

Page: Page 1 of 1
 Date: 04/22/2003
 Log #: L75375-2

Sample Description:


Ash Sample

Analytical Report: ESP's
 Date Sampled: 04/11/2003
 Time Sampled: 11:20
 Date Received: 04/14/2003
 Collected By: Client

Parameter	Results	Units	Method	Reportable Limit	Extr. Date	Anly. Date	Analyst
Percent Solids							
Percent Solid	100	%	SM2540B	0.10	04/14	04/14	KB
Metals							
Potassium	17000	mg/kg (dw)	3050/6010	50	04/16	04/21	ZL
Sodium	2700	mg/kg (dw)	3050/6010	50	04/16	04/21	ZL
General Chemistry							
Total Phosphorus as P	1300	mg/kg (dw)	365.1	50	04/17	04/17	MA

All analyses were performed using EPA, ASTM, NIOSH, USGS, or Standard Methods and certified to meet NELAC requirements.
 Flags: BDL or U-below reporting limit; DL-diluted out; IL-meets internal lab limits; MI-matrix interference; NA-not appl.
 Flags: CFR-Pb/Cu rule; ND-non detect (RL estimated); NFL-no free liquids; dw-dry wt; ww-wet wt; C(#)-see attached USB code
 FLDEP Flags: J(#)-estimated 1:surr. fail 2:no known QC req. 3:QC fail %R or %RPD; 4:matrix int. 5:improper fld. protocol
 FLDEP Flags: L-exceeds calibration; Q-holding time exceeded; T-value < MDL; V-present in blank
 FLDEP Flags: Y-improper preservation; B-colonies exceed range; I-result between MDL and PQL

QAP# 980126 DOH# E85240 NC CERT# 444
 SUB DOH# 86122,86109,E86048 ADEM ID# 40850 IL CERT# 260020
 SC CERT# 96031001 TN CERT# 02985
 USACE GA CERT# 917
 VA CERT# 00395 USDA Soil Permit# S-35240

Respectfully submitted,

 LouAnn Jones
 Project Manager

Client #: WPB-94-100506
 Address: New Hope Power
 P.O. Box 9
 South Bay, FL 33493
 James Meriwether

Page: Page 1 of 1
 Date: 04/22/2003
 Log #: L75375-3

Sample Description:


Analytical Report: Dust Collectors
 Date Sampled: 04/11/2003
 Time Sampled: 10:40
 Date Received: 04/14/2003
 Collected By: Client

Ash Sample

Parameter	Results	Units	Method	Reportable Extr.		Anly.		Analyst
				Limit	Date	Date		
Percent Solids								
Percent Solid	100	%	SM2540B	0.10	04/14	04/14		KB
Metals								
Potassium	85000	mg/kg (dw)	3050/6010	50	04/16	04/21		ZL
Sodium	12000	mg/kg (dw)	3050/6010	50	04/16	04/21		ZL
General Chemistry								
Total Phosphorus as P	300	mg/kg (dw)	365.1	10	04/17	04/17		MA

All analyses were performed using EPA, ASTM, NIOSH, USGS, or Standard Methods and certified to meet NELAC requirements.
 Flags: BDL or U-below reporting limit; DL-diluted out; IL-meets internal lab limits; MI-matrix interference; NA-not appl.
 Flags: CFR-Pb/Cu rule; ND-non detect (RL estimated); NPL-no free liquids; dw-dry wt; ww-wet wt; C(#)-see attached USB code
 FLDEP Flags: J(#)-estimated 1:surr. fail 2:no known QC req. 3:QC fail %R or %RPD; 4:matrix int. 5:improper fld. protocol
 FLDEP Flags: L-exceeds calibration; Q-holding time exceeded, T-value < MDL; V-present in blank
 FLDEP Flags: Y-improper preservation; B-colonies exceed range; I-result between MDL and PQL

QAP# 980126 DOH# E86240 NC CERT# 444
 SUB DOH# 86122,86109,E86048 ADEM ID# 40850 IL CERT# 200020
 SC CERT# 96031001 TN CERT# 02985
 USACE GA CERT# 917
 VA CERT# 00395 USDA Soil Permit# S-35240

Respectfully submitted,

 LouAnn Jones
 Project Manager

Client #: WPB-94-100506
Address: New Hope Power
P.O. Box 9
South Bay, FL 33493
James Meriwether

Page: Page 1 of 1
Date: 04/22/2003
Log #: L75375-4

Sample Description:

Ash Sample

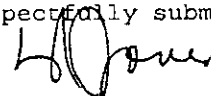
Analytical Report: Dust Collectors
Date Sampled: 04/11/2003
Time Sampled: 13:55
Date Received: 04/14/2003
Collected By: Client

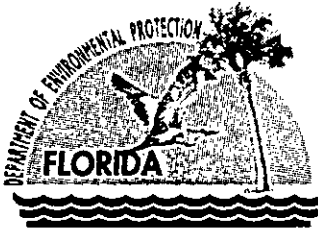
Parameter	Results	Units	Method	Reportable Extr.		Anly.		Analyst
				Limit	Date	Date		
Percent Solids								
Percent Solid	100	%	SM2540B	0.10	04/14	04/14		KB
Metals								
Potassium	14000	mg/kg (dw)	3050/6010	50	04/16	04/21		ZL
Sodium	2200	mg/kg (dw)	3050/6010	50	04/16	04/21		ZL

All analyses were performed using EPA, ASTM, NIOSH, USGS, or Standard Methods and certified to meet NELAC requirements.
Flags: BDL or U-below reporting limit; DL-diluted out; IL-meets internal lab limits; MI-matrix interference; NA-not appl.
Flags: CFR-Pb/Cu rule; ND-non detect (RL estimated); NPL-no free liquids; dw-dry wt; ww-wet wt; C(#)-see attached USB code
FLDEP Flags: J(#)-estimated 1:surr. fail 2:no known QC req. 3:QC fail %R or %RPD; 4:matrix int. 5:improper fld. protocol
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QAP# 980126 DOH# E86240 NC CERT# 444
SUB DOH# 86122,86109,E86048 ADEM ID# 40850 IL CERT# 200020
SC CERT# 96031001 TN CERT# 02985
USACE GA CERT# 917
VA CERT# 00395 USDA Soil Permit# S-35240

Respectfully submitted,


LouAnn Jones
Project Manager



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

March 26, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Rodney Williams, Plant Manager
New Hope Power Partnership
8001 U.S. Highway 27, South
South Bay, FL 33493

Re: **Request for Additional Information**
Project No. 0990332-016-AC (PSD-FL-196N)
New Hope Power Partnership - Heat Input Rate Increase

Dear Mr. Williams:

Thank you for providing the requested additional information, which was received on March 4, 2003. The Department has a few additional questions and the application remains incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Your additional information indicates that an SCR system is not technically feasible due to high concentrations of potassium, sodium, and phosphorous in the flue gas. Please provide supporting documentation of the flue gas concentrations for these pollutants. Compare these levels with those of boilers that do employ SCR, such as coal-fired units.
2. Currently, NO_x emissions are reduced using SNCR to achieve a standard of 0.15 lb/MMBtu of heat input based on a 30-day rolling average. Have any of the boilers failed to comply with this limit since the beginning of commercial operation?
3. The Department understands the issue of flexibility regarding unrestricted annual operation. However, the cogeneration units currently operate with an annual capacity factor of less than 60%. Some of the cost effectiveness calculations estimate an upper range of 90%. Please estimate the maximum expected annual capacity factor (in terms of heat input rate) for the cogeneration plant. Consider the following:
 - What factors typically prevent operation at rated capacity?
 - Do these units normally operate at capacity during the cane-milling season? During the off-season?
 - Do the units ramp down at nighttime?
 - Does the available fuel supply limit operation at capacity?
 - How many days are planned for scheduled down times to perform maintenance and inspections?
 - How many days have periods of unscheduled maintenance accounted for in the past?
4. The application refers to a project in Virginia for the Multitrade facility identified as RBLC #0183. (The Department believes the correct RBLC is #0174.) Under the application review for NO_x emissions, this facility is identified as a "peaking plant", which should allow for consideration of higher urea injection

"More Protection, Less Process"

Printed on recycled paper.

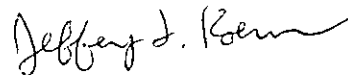
rates to achieve lower NOx emissions. However, the Department's review indicates that this is a spreader stoker boiler fired by wood. The current Title V permit for this facility does not describe the boiler as a "peaking unit". Please provide information that supports this boiler as a "peaking unit".

5. The Weyerhaeuser facility in Mississippi (RBLC #MS-0026) is identified as an electric utility boiler. This boiler is rated at 90 MMBtu per hour. The Department believes that the facility is not an electric utility, but rather a lumber mill and plywood plant. Please review and comment.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you have any questions regarding this matter, please call me at 850/921-9536.

Sincerely,



Jeffery F. Koerner
New Source Review Section

cc: Mr. James Meriwether, New Hope Power Partnership
Mr. David Buff, Golder Associates Inc.
Mr. Ron Blackburn, SD
Mr. James Stormer, PBCHD
Ms. Jeanneane Gettle, EPA Region 4
Mr. John Bunyak, NPS

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 6785



Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
Rodney Williams
 Street, Apt. No.,
 or P.O. Box **9**
 City, State, ZIP+4
South Bay, FL 33493

PS Form 3800, January 2001 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature </p> <p style="text-align: right;"><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery MICHAEL WILLIAMS 4/3/03</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Mr. Rodney Williams Plant Manager New Hope Power Partnership P. O. Box 9 South Bay, FL 33493</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

7001 0320 0001 3692 6785