

Department of Environmental Protection

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

Virginia B. Wetherell Secretary

May 21, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bob Jamison, President Sunbelt Resources, Inc. 5453 Jug Factory Road Tuscaloosa, Alabama 35405

Dear Mr. Jamison:

Re: Application for Permit to Operate

File No. 7770068-004-AO

The Department has reviewed your May 14 application for a permit to operate a mobile soil thermal treatment unit in Florida. Additional information is needed to process this application. Please provide this office with the following:

- 1. A recent emission tests report as required by Permit No. AC37-216863B for this unit. Until acceptable emission tests are performed on this unit, the Department will be unable to issue operating permit.
- 2. A request to extend construction permit No. AC 37-216863B to allow time for Sunbelt to obtain a job in Florida, conduct the required tests, and submit a test report to the Bureau of Air Regulation.

The Department will resume processing your application after receipt of the requested information. If you have any questions on this matter, please call Willard Hanks at (904) 488-1344.

Sincerely,

A. A. Linero, P.E.

Administrator

New Source Review Section

AAL/wh/h

cc: District Air Program Administrators County Air Program Administrators Mark Hagmann, Koogler & Assoc.

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Do not use f	Mail Coverage Provided for International Mail
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7770068	5-21-96 8-004-AD

SENDER: I also wish to receive the Complete items 1 and/or 2 for additional services. Complete items 3, and 4a & b. following services (for an extra Return Receipt Service · Print your name and address on the reverse of this form so that we can fee): return this card to you. · Attach this form to the front of the mailpiece, or on the back if space 1. Addressee's Address does not permit. · Write "Return Receipt Requested" on the mailpiece below the article number *2. \square Restricted Delivery . The Return Receipt will show to whom the article was delivered and the date Consult postmaster for fee. delivered. Article Addressed to: 4a. Article Number 4b. Service Type ☐ Registered Insured using Certified ☐ cod RETURN ADDRESS ☐ Beturn Receipt for ☐ Express Mail <u>Merchandis</u>e 7. Date of Delive Signature (Addressee) 8. Addressee's Address (Only if requested Thank and fee is paid) 6. Signature (Agent) PS Form **3811**, December 1991 ±U.S. GPO: 1993--352-714 DOMESTIC RETURN RECEIPT



KA532-96-01 May 7, 1996

Willard Hanks
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED MAY 14 1996

BUREAU OF AIR REGULATION

Subject: Sunbelt Resources, Inc. (AC37-216863B)

Mobile Soil Remediaton Unit Air Operation Permit Application

Dear Mr. Hanks:

This enclosed permit application is a request for an intiial operation permit for the subject unit. The application is accompined by a check for \$1,500.00 as the appropriate fee.

If you have any questions, please feel free to contact me. Thank you for your consideration and assistance in reviewing this application.

Sincerely,

Mark A. Hagmann

KOOGLER & ASSOCIATES

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	SUNBELT RESOURCES, INC. Ph 205-758-3657	2440
	P.O. Box 2703 Tuscaloosa, Al 35403	61-01/620 BRANCH 194
	<u>5 - 13</u>	1996
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Department of **Environmental Protection**

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - SHORT FORM

See Instructions for Form No. 62-210.900(2)

I. APPLICATION INFORMATION

This section of the Application for Air Permit form identifies the facility and provides general information on the scope of this application and the purpose for which this application is being submitted. This section also includes information on the owner or authorized representative of the facility and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department using ELSA, this section of the Application for Air Permit must also be submitted in hard-copy.

Identification of Facility Addressed in This Application

Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility site name, if any; and the facility's physical location. If known, also enter the facility identification number.

1.	. Facility Owner/Company Name:					
	Sunbelt Resources, Inc.					
2.	Site Name:					
	Mobile So	il Therm	al Treatment Ur	nit ·		
3.	Facility Identification Number:			[X] Unknown		
4.	Facility Location: (Mobile Unit)					
	Street Address or Other Locator:					
	City:	County:		Zip Code:		
	-	•				
5.	Relocatable Facility?		6. Existing Peri	nitted Facility?		
	[X] Yes [] No		[X] Yes	[] No		

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	5-14-96
2. Permit Number:	1770064-004-AO

1

Owner/Authorized Representative

1. Name and Title of Owner/Authorized Representative:

Bob Jamison, President

2. Owner/Authorized Representative Mailing Address:

Organization/Firm: Sunbelt Resources, Inc. Street Address: 5453 Jug Factory Road

City: Tuscaloosa

State: AL

Zip Code: 35405

3. Owner/Authorized Representative Telephone Numbers:

Telephone: (205) 758-3657

Fax: (205) 349-4288

4. Owner/Authorized Representative Statement:

I, the undersigned, am the owner or authorized representative* of the facility addressed in this Application for Air Permit. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described in this application so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.

Signature

Date

^{*} Attach letter of authorization if not currently on file.

Scope of Application

Emissions Unit ID

This Application for Air Permit addresses the following emissions unit(s) at the facility. An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

Description of Emissions Unit

Permit

Type

001		Mobile Thermal Soil Remediation Plant with a Baghouse	AC1E
		and an Afterburner	
	_		
Purpose of	Applica	tion	
This Applic	ation for	Air Permit is submitted to obtain (check one):	
[] Initial units.	air opera	ation permit for one or more existing, but previously unpermitted,	emissions
[X] Initial	air opera	ation permit for one or more newly constructed or modified emission	ons units.
	Current	construction permit number:AC37-216	5863B
[] Air operation permit revision to address one or more newly constructed or modified emissions units.			ed
	Current	construction permit number:	
	Operation	on permit to be revised:	
[] Air op	eration p	ermit renewal.	
	Operation	on permit to be renewed:	

DEP Form No. 62-210.900(2) - Form

Application Processing Fee				
Check one:				
[X] Attached - Amount: \$[] Not Applicable.				
Construction/Modification Information				
1. Description of Alterations: NA				
2. Date of Commencement of Construction: NA				

Professional Engineer Certification

1.	Professional Engineer Name: John B. Koogler, PhD., P.E.			
	Registration Number: 12925			
2.	Professional Engineer Mailing Address:			
	Organization/Firm: Koogler & Associates Street Address: 4014 N.W. 13th Street City: Gainesville State: FL Zip Code: 32609			
3.	Professional Engineer Telephone Numbers: Telephone: (352) 377-5822 Fax: (352) 377-7158			
4.	Professional Engineer Statement:			
	I, the undersigned, hereby certify, except as particularly noted herein*, that:			
	(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and (2) To the best of my knowledge, any emission estimates reported or relied on in this			
	application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.			
	If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [X] if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.			
	Signature Date (seal)			

* Attach any exception to certification statement.

DEP Form No. 62-210.900(2) - Form

Application Contact

1.	Name and Title of Application Contact: Mark A. Hagmann-Envir	nomental Cons	ultant
2.	Application Contact Mailing Address: Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th Street City: Gainesville	State: FL	Zip Code: 32609
3.	Application Contact Telephone Numbers: Telephone: (352) 377 - 5822	Fax: (352) 3	77 - 7158

Application Comment

NA		

DEP Form No. 62-210.900(2) - Form

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1.	Facility UTM Coordinates: NA			
	Zone:	East (km)	: Nort	th (km):
2.	Facility Latitude/Lo	ongitudo: NA		
۷.	Latitude (DD/MM/	~	ongitude (DD/MM/SS):	
	Latitude (DD/141141)	55). LC	ingitude (DD/IVIIVII 66).	
3.	Governmental	4. Facility Status	5. Facility Major	6. Facility SIC(s):
	Facility Code:	Code:	Group SIC Code:	
	0	C	16	1622
7.	Facility Comment (limit to 500 characters):		
trea Ora any	atment unit. Curre ange, Dade, Monro other county with	ently, the facility may o e, Wakulla and Escam	nit state wide as a mobinerate in Polk, Gulf, Obia Counties. The facileting the public notice rate in the county.	kaloosa, Duval, ity may operate in

Facility Contact

1.	Name and Title of Facility Contact:				
	David Peterson, Vice President				
2.	Facility Contact Mailing Address:				
	Organization/Firm: Sunbelt Resources, Inc.				
	Street Address: 5453 Jug Factory Ro	oad			
	City: Tuscaloosa	State:	AL	Zip Code: 35405	
3.	Facility Contact Telephone Numbers:				
	Telephone: (205) 758-3657		Fax: (2	05) 349-4288	
	•				

DEP Form No. 62-210.900(2) - Form

Facility Regulatory Classifications

1. Small Busin	ess Stationary Source?	
[] Yes	[] No	[X] Unknown
2. Title V Sour	rce?	
[X] No		
1	on-Title V Source by Virtue of Pre	evious Air Construction Permit?
[X] Yes	[] No	
Construction	n Permit Number/Issue Date:	November 22, 1995
4. One or More	Emission Units Subject to NSPS	?
[] Yes	[X] No	
(D 11: D		11 11 200 1
5. Facility Reg	ulatory Classifications Comment (limit to 200 characters) NA
		<u></u> :
	B. FACILITY SUPPLEME	ENTAL INFORMATION
This subsection	of the Application for Air Permit	form provides supplemental information
		of in provides supplemental information information related to individual emissions unit
		of the form.) Supplemental information must
be submitted as	an attachment to each copy of the	form, in hard-copy or computer-readable form
0 1 11		·
Supplemental F	Requirements for All Application	<u>1S</u>
1. Area Man Sh	nowing Facility Location:	
_	•	Not Applicable [] Waiver Requested
-		
2. Facility Plot		
[] Attach	ed, Document ID: [X]	Not Applicable [] Waiver Requested
3. Process Flov	v Diagram(s):	_
		Not Applicable [X] Waiver Requested
Department has		
	to Prevent Emissions of Unconfine	
		Not Applicable [X] Waiver Requested
Department has	s on me	

8

DEP Form No. 62-210.900(2) - Form

Emissions Unit Information Section (<u>1</u> of <u>1</u>

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A and B) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION

Type of Emissions Unit Addressed in This S	<u>Section</u>				
Check one:					
This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).					
[X] This Emissions Unit Information Section addresses, as a single emissions unit, a collectively-regulated group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.					
[] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.					
Emissions Unit Description and Status					
1. Description of Emissions Unit Addressed in	n This Section (limit to 60 characters):				
50 TPH mobile soil thermal treatment unit with air pollution controlled by an					
afterburner and baghouse.					
2. Emissions Unit Identification Number: [] No Corresponding ID [X] Unknown					
3. Emissions Unit Status Code:	4. Emissions Unit Major Group SIC Code:				
C 16					
5. Emissions Unit Comment (limit to 500 characters):					

Major components of the emissions unit consist of a contaminated soil feed bin, bin to dryer belt conveyor, dryer, baghouse, and an afterburner.

Emissions Unit Information Section (1 of 1)

Emissions Unit Control Equipment

Emissions Unit Information Section (1 of 1)

Emissions Unit Details

1. Initial Startup Date: NA

2. Long-term Reserve Shutdown Date: NA

3. Package Unit:

Manufacturer: Tarmac Equipment Company, Inc. Model Number:

4. Generator Nameplate Rating:

MW

5. Incinerator Information:

Dwell Temperature: 1500 °F Dwell Time: 1.0 seconds

Incinerator Afterburner Temperature: 1500 °F

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate: 30 mmBtu/hr to dryer / 14 mmBtu/hr to afterburner

2. Maximum Incineration Rate: NA

lb/hr

tons/day

3. Maximum Process or Throughput Rate: 50 TPH contaminated soil 220,000 TPY contaminated soil

4. Maximum Production Rate: NA

5. Operating Capacity Comment (limit to 200 characters):

This emissions unit will be synthetically limited based on limiting the annual process rate of contaminated soil and the annual fuel usage rate. The heat input to the dryer is 30 MMBtu/hr and to the afterburner is 14 MMBtur/hr.

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule:

24 hours/day

7 days/week

52 weeks/year

4400 hours/year

DEP Form No. 62-210.900(2) - Form

B. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

This subsection of the Application for Air Permit form provides supplemental information related to the emissions unit addressed in this Emissions Unit Information Section. Supplemental information must be submitted as an attachment to each copy of the form, in hard-copy or computer-readable form.

Supplemental Requirements for All Applications

1.	Process Flow Diagram							
	[] Attached, Document ID: [] Not Applicable [X] Waiver Requested							
D	Department has on file							
2.	Fuel Analysis or Specification							
	[] Attached, Document ID: [] Not Applicable [X] Waiver Requested							
De	epartment has on file							
3.	Detailed Description of Control Equipment							
	[] Attached, Document ID: [] Not Applicable [X] Waiver Requested							
De	epartment has on file							
4.	Description of Stack Sampling Facilities							
	[] Attached, Document ID: [] Not Applicable [X] Waiver Requested							
De	epartment has on file							
5.	Compliance Test Report							
	[X] Attached, Document ID: <u>001</u>							
	[] Previously submitted, Date:							
	[] Not Applicable							
6.	Procedures for Startup and Shutdown							
	[] Attached, Document ID: [X] Not Applicable							
7.	Operation and Maintenance Plan							
	[] Attached, Document ID: [X] Not Applicable							
8.	Other Information Required by Rule or Statute							
	[] Attached, Document ID: [X] Not Applicable							

DOCUMENT 001

Sunbelt Resources did not operate the mobile soil thermal treatment unit in Florida during 1995. Therefore, demonstration of compliance for an inital operating permit is not applicable.

The attached compliance report was originally submitted in March of 1994. Sunbelt Resources is resubmitting this report in lieu of a current compliance test report. As a condition of the operating permit we are suggesting that compliance be demonstrated upon operating in Florida.

EMISSION STUDIES PARTICULATE, OPACITY, AND CARBON MONOXIDE

BAGHOUSE STACK

SUNBELT RESOURCES PORT ST. JOE, FLORIDA

TTL, Inc. PRACTICING IN THE

SUMMARY OF TEST RESULTS

Table 1 is a summary of the results of the tests performed March 10, 1994, on the baghouse stack effluent gas from Sunbelt Resources located in Port St. Joe, Florida.

The particulate concentrations were 0.0095, 0.0125 and 0.0108 gr/dscf during the test, for an average concentration of 0.0109 gr/dscf.

The particulate mass emission rates were 1.12, 1.54 and 1.26 lb/hr during the test, for an average mass emission rate of 1.31 lb/hr.

Table 2 is a summary of the visible emission monitoring performed on the baghouse stack. During these test, no set of 24 points of monitoring exceed 5% opacity limit for this discharge stack. Results of each set of data is enclosed in the appendix along with a statistical evaluation of the raw data.

Table 3 is summary of the carbon monoxide (CO) monitoring during the method 5 sampling of the effluent gas. The results showed the average concentration of CO was 13.1 ppm. The carbon monoxide concentration never exceeded the permit standard of 100 ppm at any time during the 3 hours of particulate sampling.

During the test, the average characteristic of the discharge stack were as follows:

Temperature Moisture Velocity Flow 254.7°F 14.79% 88.393 fps 22,098 ACFM

TTL, Inc.

Jack E. Davis, CIH Vice President

James C. Bambarger, P.E.

President

Table 1: Summary of Particulate Test

Run No.	#1	#2	#3	Average	
Stack Gas Temperature (F)	262.7	246.6	248.4	254.7	
Moisture Content (% by Volume)	15.16	14.43	15.66	14.79	
Stack Gas Velocity (actual ft/sec)	88.360	89.998	86.819	88.393	
Volume Flow Rate (actual cfm)	22090	22500	21705	22098	
Volumetric Flow Rate (dscfm)	13721	14417	13673	13937	
Particulate Concentration (gr/dscf)	0.0095	0.0125	0.0108	0.0109	
Particulate Concentration Adjusted to 12% CO ₂ (gr/dscf)	0.0162	0.0408	0.0167	0.0245	
Particulate Concentration Adjusted to 50% Excess Air (gr/dscf)	0.0159	0.0452	0.0186	0.0266	
Particulate Emission Rate (lb/h)	1.12	1.54	1.26	1.31	
% Isokinetic	100.25	98.31	99.31	99.29	

Table 2: Summary of Average Opacity

	Set Number	Run #1	Run #2	Run #3
	1	0.00	0.00	1.46
	2	0.00	0.00	2.29
	3	0.00	0.00	2.92
	4	0.00	0.00	3.13
	5	0.00	0.00	1.67
	6	0.00	0.00	1.25
	7	0.00	0.00	1.67
	8	0.00	0.00	3.54
	9	0.00	0.00	3.13
	10	0.00	0.00	2.71
Average		0.00	0.00	2.38
Average		0.00	0.00	2.30
Maximum		0:00	0.00	3.54
Minimum		0.00	0.00	1.25

Table 3: SUMMARY CARBON MONOXIDE MONITORING

10:20 AM		13 ppm
10:30 AM		15 ppm
10:40 AM		8 ppm
10:50 AM		16 ppm
11:00 AM		12 ppm
11:10 AM		9 ppm
11:20 AM		13 ppm
11:30 AM		17 ppm
11:40 AM		11 ppm
11:50 AM		9 ppm
12:00 PM		9 ppm
12:10 PM		8 ppm
12:20 PM		8 ppm
12:30 PM		8 ppm
12:40 PM		8 ppm
12:50 PM		8 ppm
1:00 PM		12 ppm
1:10 PM		13 ppm
1:20 PM		16 ppm
1:30 PM		20 ppm
1:40 PM		24 ppm
1:50 PM		18 ppm
2:00 PM		18 ppm
2:10 PM		11 ppm
2:20 PM		13 ppm
2:30 PM		12 ppm
2:40 PM		12 ppm
2:50 PM		19 ppm -
3:00 PM		15 ppm
3:10 PM		18 ppm
3:20 PM		.13 ppm
-	Average	13.1 ppm
	Standard Deviation	4.14 ppm
	Variance	17.2 ppm
	Maximum	24 ppm
	Minimum	8 ppm



RECEIVED

FEB 1 5 1994

Bureau of

5453 Jug Factory Road

Tuscaloosa, Alabama 35405 (205).758-36Air Regulation (205) 349-4288

February 8, 1994

Mr. Willard Hanks Department of Environmental Protection Twin Towers Office Building 2600 Blair Stone Road Tallahassee, FL 32399-2400

Dear Mr. Hanks,

Sunbelt Resources, Inc. hereby notifies you in writing that, under our state of Florida Mobile Soil Remediation Unit Permit No. AC37-216863, we will be conducting our formal compliance test on this facility. The test will be conducted at 8:00 a.m. EST on Wednesday, March 2, 1994 at the Apalachicola Northern Railroad Co. property on avenue "A" in Port St. Joe, FL. The contact person for the test is Mr. Gary Pearson with TTL, Inc. in Tuscaloosa, AL. His phone number is 205-345-0816.

If you have any questions regarding this test, please do not hesitate to give us a call.

Very Truly Yours,

Robert D. Jamison Vice President

Mr. Henry Hernandez CC:

Mr. Clair Fancy

Gary Pearson, TTL, Inc.

Wayne Murphy, Alvarez, Lehman, & Associates, Inc.



5453 Jug Factory Road Tuscaloosa, Alabama 35405



Mr. Willard Hanks
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

32399-2400

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STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF FINAL PERMIT (REISSUE)

In the Matter of an Application for Permit

Mr. Bob Jamison, Vice President Sunbelt Resources, Inc. 5453 Jug Factory Road Tuscaloosa, Alabama 35405 DEP File No. 7770068-006-AC AC 37-216863B

Enclosed is the FINAL Permit Number 7770068-006-AC. This permit is issued for a 50 TPH mobile soil thermal treatment facility pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

C.H. Fancy, P.E., Chief Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 3-10-95 to the person(s) listed:

Mr. Robert Jamison, Sunbelt Resources, Inc. *
District Air Program Administrators
County Air Program Administrators

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk)

(Date)

FINAL DETERMINATION

Sunbelt Resources Inc. Permit No.7770068-006-AC 50 TPH Mobile Soil Thermal Treatment Facility

The original Intent to Issue an air construction permit for Sunbelt Resources, Inc. mobile soil thermal treatment facility was distributed on December 23, 1992. The Public Notice of Intent to Issue the original air construction permit and modifications to authorize operations in additional areas were published in the News Journal on January 27, 1993, the Ft. Walton Beach Daily News on January 28, 1993, the Panama City Journal on January 28, 1993, the Miami Herald on July 12, 1995, the Orlando Sentinel on July 11, 1995, the Citizen on July 12, 1995, the Wakulla News on July 13, 1995, and the Florida Times-Union on July 10, 1995, the Polk Democrat on October 30, 1995, and the Tallahassee Democrat on September 20, 1996. The only comments submitted in response to all the public notices was that a county license may be required by some counties.

The applicant built this unit, operated it at a site in the Northwest District, had compliance tests conducted on the unit, and submitted a certificate of completion for an operation permit. There were minor technical problems with the compliance tests. The application for an operation permit was held incomplete until the permittee could obtain another job in Florida and repeat the tests. Although the permittee has amended the construction permit several times to authorize operation at sites he was bidding on, he has been unsuccessful to date in obtaining another project in Florida. As a result of this situation, the ARMS entry shows we have been waiting for additional information to complete the application for permit to operate for nearly 2 years.

The permittee has agreed to withdraw the application for permit to operate provided the construction permit is extended to allow him to operate at a site in Florida long enough to repeat the compliance tests. Reissuing and extending the construction permit seems to be a better procedure to handle this situation.

The final action of the Department will be to reissue the permit as noted above.



Department of Environmental Protection

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

Virginia B. Wetherell Secretary

PERMITTEE:

Sunbelt Resources, Inc. 5453 Jug Factory Road Tuscaloosa, Alabama 35405

Authorized Representative: Mr. Robert D. Jamison Vice President Permit No.

7770068-006-AC

Expires:

March 1, 1999

Facility:

Soil Thermal Treatment

Facility

LOCATED AT:

Relocatable Facility
50 TPH Mobile Soil. Thermal Treatment Facility
Standard Industrial Classification Code (SIC): 1629

Name of Counties this Permit is Valid:

Bay, Calhoun, Dade, Duval, Escambia, Franklin, Gadsden, Gulf, Jackson, Jefferson, Leon, Liberty, Madison, Monroe, Okaloosa, Orange, Polk, Taylor, and Wakulla.

The valid counties are based on the public notices advertised in the following newspapers on the date noted:

News Journal on January 27, 1993, the Ft. Walton Beach Daily News on January 28, 1993, the Panama City Journal on January 28, 1993, the Miami Herald on July 12, 1995, the Orlando Sentinel on July 11, 1995, the Citizen on July 12, 1995, the Wakulla News on July 13, 1995, and the Florida Times-Union on July 10, 1995, the Polk Democrat on October 30, 1995, and the Tallahassee Democrat on September 20, 1996.

This facility may operate in any county covered by a notice of intent to issue air permit published within 5 years of the proposed relocation and at any construction or industrial sites listed on the Notification of Intent to Relocate Air Pollutant Emitting Facility provided a permit for this facility has been issued or amended to authorize operation in the county. It may operate in other counties within the state provided that the public notice requirements have been met in the counties and the unit's permit has been amended to authorize operation in the other counties.

STATEMENT OF BASIS:

This construction permit is reissued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. This action reissues the construction permit which expired on July 1, 1997. The above named permittee is authorized to operate the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached appendices and Tables made a part of this permit:

Appendix GC Appendix CSC Construction Permit General Conditions Emission Unit(s) Common Specific Conditions

> Howard L. Rhodes, Director Division of Air Resources

Management

AIR CONSTRUCTION PERMIT 7770068-006-AC SECTION I. SPECIFIC CONDITIONS

- 1. This permit supersedes permit AC 37-216863 dated February 26, 1993 and its revisions dated November 8, 1993, February 17, 1994, March 8, 1995, September 11, 1995, November 27, 1995, June 21, 1996, and October 14, 1996.
- 2. The provisions of the air construction permit AC 37-216863 dated February 26, 1993 and the revisions to that permit listed above are incorporated into this air construction permit except for the changes to the expiration date.
- 3. The expiration date of the construction permit is changed from July 1, 1997 to July 1, 1999.

EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

Subsection 1.0 Construction Requirements

Applicable Regulations: Unless otherwise indicated in this permit, the construction and operation of the subject emission unit(s) shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S and Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-210, 62-212, 62-213, 62-296, 62-297; and the applicable requirements of the Code of Federal Regulations Section 40, Part 60, adopted by reference in the Florida Administrative Code regulation [Rule 62-204.800 F.A.C.]. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]

SUBSECTION 2.0 EMISSION LIMITING STANDARDS

2.1 General Particulate Emission Limiting Standards. General Visible Emissions Standard: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density if which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). [Rule 62-296-320(4)(b)1, F.A.C.]

2.2 Unconfined Emissions of Particulate Matter [Rule 62-296.320(4)(c), F.A.C.]

- (a) The owner or operators shall not cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any source whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.
- (b) Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
- (c) Reasonable precautions include the following:
 - Paving and maintenance of roads, parking areas and yards.
 - Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
 - Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
 - Removal of particulate matter from roads and other paved areas under the control of the owner
 or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent
 particulate from becoming airborne.

EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

- Landscaping or planting of vegetation.
- Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.

<u>NOTE</u>: Facilities that cause frequent, valid complaints may be required by the Regulating Authority to take these or other reasonable precautions. In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

2.3 General Pollutant Emission Limiting Standards: [Rule 62-296.320, F.A.C.]

- (a) The owner or operator shall not store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems.
- (b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

<u>NOTE</u>: An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [F.A.C. 62-210.200(198)]

SUBSECTION 3.0 OPERATION AND MAINTENANCE

- 3.1 <u>Changes/Modifications</u>: The owner or operator shall submit to the Regulating Authority(s), for review any changes in, or modifications to: the method of operation; process or pollution control equipment; increase in hours of operation; equipment capacities; or any change which would result in an increase in potential/actual emissions. Depending on the size and scope of the modification, it may be necessary to submit an application for, and obtain, an air construction permit prior to making the desired change.

 Routine maintenance of equipment will not constitute a modification of this permit. [Rule 62-4.030, 62-210.300 and 62-4.070(3), F.A.C.]
- 3.2 <u>Plant Operation Problems</u>: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the owner or operator shall notify the Regulating Authority as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any

EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]

- 3.3 <u>Circumvention</u>: The owner or operator shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rules 62-210.650, F.A.C.]
- 3.4 Excess Emissions Requirements [Rule 62-210.700, F.A.C.]
 - (a) Excess emissions resulting from start-up, shutdown or malfunction of these emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the Regulating Authority office for longer duration. [Rule 62-210.700(1), F.A.C.]
 - (b) Excess emissions that are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
 - (c) In case of excess emissions resulting from malfunctions, the owner or operator shall notify Regulating Authority within one (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the problem; and the corrective actions being taken to prevent recurrence. [Rule 62-210.700(6), F.A.C.]
- Operating Procedures: Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.]

SUBSECTION 4.0 MONITORING OF OPERATIONS

4.1 Determination of Process Variables

- (a) The permittee shall operate and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- (b) Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weigh hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C]

EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

SUBSECTION 5.0 TEST REQUIREMENTS

- Test Performance Within 60 days after achieving the maximum production rate at which these emission units will be operated, but not later than 180 days after initial startup and annually thereafter, the owner or operator of this facility shall conduct performance test(s) pursuant to 40 CFR 60.8, Subpart A, General Provisions and 40 CFR 60, Appendix A. No other test method shall be used unless approval from the Department has been received in writing. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emission unit(s) operating at permitted capacity pursuant to Rule 62-297.310(2), F.A.C. [Rules 62-204.800, 62-297.310, 62-297.400, 62-297.401, F.A.C.]
- 5.2 <u>Test Procedures</u> shall meet all applicable requirements of the Florida Administrative Code Chapter 62-297. [Rule 62-297.310, F.A.C.]
- Test Notification: The owner or operator shall notify the Regulating Authority in writing at least (30) days (initial) and 15 days (annual) prior to each scheduled compliance test to allow witnessing. The notification shall include the compliance test date, place of such test, the expected test time, the facility contact person for the test, and the person or company conducting the test. The (30) or (15) day notification requirement may be waived at the discretion of the Department. Likewise, if circumstances prevent testing during the test window specified for the emission unit, the owner or operator may request an alternate test date before the expiration of this window. [Rule 62-297.310 and 40 CFR 60.8, F.A.C.]
- Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rule 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Regulating Authority. [Rule 62-297.310(7)(b), F.A.C.]
- 5.5 Stack Testing Facilities: The owner or operator shall install stack testing facilities in accordance with Rule 62-297.310(6), F.A.C.
- Exceptions and Approval of Alternate Procedures and Requirements: An Alternate Sampling Procedure (ASP) may be requested from the Bureau of Air Monitoring and Mobile Sources of the Florida Department of Environmental Protection in accordance with the procedures specified in Rule 62-297.620, F.A.C.
- 5.7 Operating Rate During Testing: Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new

EMISSION UNIT(S) COMMON SPECIFIC CONDITIONS

test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2) and (3), F.A.C.]

SUBSECTION 6.0 REPORTS AND RECORDS

- 6.1 <u>Duration</u>: All reports and records required by this permit shall be kept for at least (5) years from the date the information was recorded. [Rule 62-4.160(14)(b), F.A.C.]
- 6.2 Emission Compliance Stack Test Reports:
 - (a) A *test report* indicating the results of the required compliance tests shall be filed with the Regulating Authority and the appropriate regulating agency as soon as practical, <u>but no later than 45 days</u> after the last sampling run is completed. [Rule 62-297.310(8), F.A.C.]
 - b) The *test report* shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department and the appropriate regulating agency to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in **Rule 62-297.310(8)**, **F.A.C.**
- 6.3 Excess Emissions Report: If excess emissions occur, the owner or operator shall notify the Regulating Authority and the appropriate regulating agency within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the New Source Performance Standards, excess emissions shall also be reported in accordance with 40 CFR 60.7, Subpart A. [Rules 62-4.130 and 62-210.700(6), F.A.C.]
- 6.4 <u>Annual Operating Report for Air Pollutant Emitting Facility</u>: Before March 1st of each year, the owner or operator shall submit to the Permitting Authority this required report [DEP Form No. 62-210.900(5)], which summarizes operations for the previous calendar year. [Rule 62-210.370(3), F.A.C.]

SUBSECTION 7.0 OTHER REQUIREMENTS

7.1 <u>Waste Disposal</u>: The owner or operator shall treat, store, and dispose of all liquid, solid, and hazardous wastes in accordance with all applicable Federal, State, and Local regulations. This air pollution permit does not preclude the permittee from securing any other types of required permits, licenses, or certifications.

Florida Department of Environmental Protection

TO:

Howard L. Rhodes

THRU:

Clair Fancy (The Clair Fancy

Al Linero

FROM:

Willard Hanks Lumb

DATE:

March 5, 1998

SUBJECT:

Sunbelt Resources, Inc.

Mobile Soil Thermal Treatment Facility

Air ID: 7770068-006-AC

(Kim)

RECEIVED

MAR 09 1998

BUREAU OF AIR REGULATION

Attached for your approval and signature are documents that will reissue construction permit number AC37-216863 for a mobile soil thermal treatment facility.

The applicant built this unit, operated it at a site in the Northwest District, had compliance tests conducted on the unit, and submitted a certificate of completion for an operation permit. There were minor technical problems with the compliance tests. The application for the operation permit was held incomplete until the permittee could obtain another job in Florida and repeat the tests. Although the permittee has amended the construction permit several times to authorize operation at sites he was bidding on, he has been unsuccessful to date in obtaining another project in Florida. As a result of this situation, the ARMS entry shows the Bureau has been waiting for additional information to complete the application for permit to operate for nearly 2 years.

The permittee has agreed to withdraw the application for permit to operate provided the construction permit is extended to allow him to operate at a site in Florida long enough to repeat the compliance tests. Reissuing and extending the construction permit seems to be a better procedure to handle this situation.

I recommend your approval and signature of the reissued construction permit.

Attachments

/wh

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Department of Environmental Protection

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

Virginia B. Wetherell Secretary

December 19, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Mark A. Hagmann Koogler & Associates 4014 NW Thirteenth Street Gainesville, Florida 32609

1110068-006

Re: Sunbelt Resources, Inc.

Reissuance of Permit No. AC 37-216863

In response to your December 16 letter, the processing fee for the reissuance and extension of the referenced construction permit for Sunbelt's mobile soil thermal treatment facility is \$250. The previously submitted processing fee for the application for permit to operate this unit, which is being withdrawn, is not refundable.

Please submit the \$250 fee required for the reissuance of this construction permit. The Department will began processing this request on receipt of the fee.

Sincerely,

A. A. Linero, P.E.

Administrator

New Source Review Section

cc: Mr. Bob Jamison, Sunbelt

RECEIVED

JAN 26 1998

BUREAU OF AIR REGULATION

Protect, Conserve and Manage Florida's Environment and Natura

Printed on recycled caper

SUNBELT RESOURCES, INC.

Ph 205-758-3657
P.O. Box 2703
Tuscaloosa, Al 35403

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Department of Environmental Protection

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

Virginia B. Wetherell Secretary

December 5, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bob Jamison, Vice President Sunbelt Resources, Inc. 5453 Jug Factory Road Tuscaloosa, Alabama 35405

Dear Mr. Jamison:

Re: Air Construction/Operation Permit

Facility ID 7770068

The Department records show your Florida air permit to construct a 50 TPH mobile soil thermal treatment facility expired on July 1, 1997. Your application for a permit to operate this facility remains incomplete.

Your construction permit will need to be reissued and updated to comply with current air regulations before this facility can be operated in Florida. Florida regulations now limit operation of permitted relocatable facilities to areas that have been covered by a public notice for the facility within the preceding 5 years of moving the facility to the area. A discretionary public notice can be required by the District or County each time the facility is move to a new site in Florida.

To complete the application for the permit to operate, the Department needs the test data required by the original construction permit to confirm the facility can operate in compliance with the rules and permit. If you are unable to provide this data by February 1, 1998, we request you withdraw this application for permit to operate Otherwise, the Department may deny the operation permit.

Please advise the Department of the plans and status of this facility. If you have any questions on this matter, please write or call Willard Hanks at 850/488-1344.

Sincerely,

A. A. Linero, P.E. Administrator

New Source Review Section

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