Check Sheet

Perm PSD	nit Number: AC 37-247 574 J Number: ac 37-247 574 J
A pp □	lication: Initial Application
	Intent to Issue Notice of Intent to Issue Technical Evaluation BACT or LAER Determination Unsigned Permit Correspondence with: □ EPA □ Park Services □ Other Proof of Publication □ Petitions - (Related to extensions, hearings, etc.) □ Waiver of Department Action □ Other
Fina D	Determination: Final Determination Signed Permit BACT or LAER Determination
Post	Permit Correspondence: □ Extensions/Amendments/Modifications □ Other



Department of Environmental Protection

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

Virginia B. Wetherell Secretary

October 31, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Kevin J. Merlo Director of Operations Quality Recycling, Inc. 1320 Ben Franklin Highway, East Douglassville, PA 19518

Dear Mr. Merlo:

Re: DEP File No. AC 37-247574

The Department requested your plan and schedule to complete the referenced application for permit to construct a soil thermal treatment facility in Florida in a letter dated October 10, 1995. This letter acknowledges your October 26, 1995, phone call withdrawing the reference application for the proposed facility.

No air pollution unit may be constructed or operated in Florida without a valid air permit issued pursuant to Rule 62-4.100(1), Florida Administrative Code. Should you wish to operate the proposed unit in Florida in the future, you will need to submit a complete new application for permit to construct to the Department.

Thank you for your cooperation in this matter.

Sincerely,

C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/wh/t

cc: Dr. John Koogler, P.E.

District Air Program Administrators County Air Program Administrators TO:

District Air Program Administrators

County Air Program Administrators

FROM:

Willard Hanks Willard Howhs

DATE:

April 1, 1994

SUBJECT:

Quality Recycling, Inc., AC37-247574

Statewide Mobile Soil Remediation Unit

Attached is an air construction permit application and incompleteness letter for the above referenced project. Please note that some of the drawings submitted with the application are labeled "Proprietary Information." This has been addressed in the incompleteness letter, and the applicant's response will be forwarded to you as soon as we receive it.

WH/pa

Attachments





A VALUE ORIENTED COMPANY

RECEIVED

MAR 2 2 1994

Bureau of Air Regulation

Mr. Preson Lewis
FL Dept. of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road

Tallahassee, FL 32399-2400

Dear Mr. Lewis:

March 18, 1994

Enclosed are four copies of the contruction applications and a check in the amount of \$250.00 to cover the cost of the application fee. If you require additional information, please notify our office.

Sincerely,

Kevin J. Merlo

Director of Operations

Enclosure





QUALITY RECYCLING, INC.

A VALUE ORIENTED COMPANY

RECEIVED

MAR 2 2 1994

Bureau of Air Regulation

March 18, 1994

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FL Dept. of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

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Sincerely,

Kevin J. Merlo

Director of Operations

Enclosure





AC 31-247574

APPLICATION TO SEEEXXE/CONSTRUCT AIR POLLUTION SOURCHAR 2 2 1994

SOURCE TYPE: Mobile Soil Remediation Unit	
APPLICATION TYPE: [X] Construction [] Operat	ion [] Modification Air Regulation
COMPANY NAME: Quality Recycling, Inc.	COUNTY: Statewide
Identify the specific emission point source(s)	addressed in this application (i.e. Lime
Kiln No. 4 with Venturi Scrubber; Peaking Unit	No. 2, Gas Fired) HAVE*System Model SM-1
SOURCE LOCATION: Street Mobile Unit	City
UTM: East	North
Latitude ' 'N	Longitude '' W
APPLICANT NAME AND TITLE: Kevin J. Merlo, Direct	or of Operations
APPLICANT ADDRESS: 1320 Ben Franklin Highway Eas	t, Douglassville, PA 19518
SECTION I: STATEMENTS BY A	PPLICANT AND ENGINEER
A. APPLICANT	•
I am the undersigned owner or authorized rep	resentative* of Quality Recycling, Inc.
I certify that the statements made in this a permit are true, correct and complete to the I agree to maintain and operate the pollu facilities in such a manner as to comply we Statutes, and all the rules and regulations also understand that a permit, if granted be and I will promptly notify the department up establishment.	best of my knowledge and belief. Furth tion control source and pollution cont with the provision of Chapter 403, Flor of the department and revisions thereof. y the department, will be non-transfera
*Attach letter of authorization Signe	d: 1 1 8 f
	John Pfrommer, President Name and Title (Please Type)
Date:	3/14/94 Telephone No. (610) -385-7478
B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA	
This is to certify that the engineering featon been designed examined by me and found to principles applicable to the treatment and depermit application. There is reasonable as:	be in conformity with modern engineer isposal of pollutants characterized in
See Florida Administrative Code Rule 17-2.100(5	7) and (104)
DER Form 17-1.202(1) Effective October 31, 1982 Page 1 of	12
*Hot Air Vapor Extraction	

Described in the constant of the count of th	Inish, if authorized by the owner, the applicant a set of instructions for the propentenance and operation of the pollution control facilities and, if applicable, lution sources. John B. Koogler, Ph.D., P.E. Yame (Please Type)
Const Count Issue Costs for i Infor permi Cost Indica	John B. Koogler, Ph.D., P.E. Vame (Please Type)
Const Count Issue Costs for i Infor permi Cost Indica	Registration No. 12925 Date: 3/2/4 Telephone No. (904) 377-5822 SECTION II: GENERAL PROJECT INFORMATION ribe the nature and extent of the project. Refer to pollution control equipment, expected improvements in source performance as a result of installation. State her the project will result in full compliance. Attach additional sheet if ssary. truction permit application for a 700 ton/batch mobile soil remediation unit. The
Const Count Issue Costs for i Infor permi Cost Indica	Roogler & Associates; Environmental Services Company Name (Please Type) 4014 N.W. 13th Street, Gainesville, FL 32609 Mailing Address (Please Type) Registration No. 12925 Date: 3/2/4 Telephone No. (904) 377-5822 SECTION II: GENERAL PROJECT INFORMATION ribe the nature and extent of the project. Refer to pollution control equipment, expected improvements in source performance as a result of installation. State her the project will result in full compliance. Attach additional sheet if ssary. truction permit application for a 700 ton/batch mobile soil remediation unit. The
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Const Count Issue Sched Start Costs for i Information Cost Information Cost Information Cost	expected improvements in source performance as a result of installation. State her the project will result in full compliance. Attach additional sheet if ssary. truction permit application for a 700 ton/batch mobile soil remediation unit. The
. Sched Start . Costs for i Infor permi Cost	
. Sched Start Costs for i Infor permi Cost	ties in which the plant will operate will be decided at the time of Intent to
Sched Start Costs for i Infor permi Cost	
Start Costs for i Infor permi Cost	e. See page 2a of 12 for additional information.
Start Costs for i Infor permi Cost	
Costs for i Infor permi Cost	dule of project covered in this application (Construction Permit Application Only)
for i Infor permi Cost	t of Construction NA Completion of Construction NA
. Indica	of pollution control system(s): (Note: Show breakdown of estimated costs only individual components/units of the project serving pollution control purposes. mation on actual costs shall be furnished with the application for operation it.)
	of HAVE System SM-1 - \$330,000
	ate any previous DER permits, orders and notices associated with the emission, including permit issuance and expiration dates.
	, including permit issuance and expiration dates.
R Form 1	, including permit issuance and expiration dates.

SECTION IIA: PROCESS DESCRIPTION

Quality Recycling, Inc. plans to operate a mobile Hot Air Extraction Unit (HAVE) in the state of Florida. Quality Recycling, Inc. will determine the counties in which to publish a Public Notice at the time the Department publishes the Intent to Issue.

The HAVE system is manufactured by HAVE Systems, Inc. of Olympia, Washington. A general description of each component and a process flow diagram are attached. This patented process entails placing the contaminated soil on and covering the soil with heavy gauge plastic The Hot Air Injection tubes and Vapor Extraction tubes are strategically placed throughout a 700 ton batch of soil and all duct entries are sealed. The trailer mounted "HOT AIR VAPOR EXTRACTION (HAVE) system is situated adjacent to the soil and connected to the Hot Air Injection tubes with flexible ducting. The hot air moves through the contaminated soil vaporizing the contaminants. The contaminants are then carried into the vapor extraction tubing and passed through a thermal oxidizer. Approximately 85 percent of the heated air is recirculated back through the contaminated soil (with 15 percent make-up air) and the remaining 15 percent is exhausted. All exhausted air passes through a Catalytic Reactor bank assuring contaminant emissions below all regulatory guidelines.

The HAVE system will process soils at a batch rate of approximately 700 tons per week. The actual processing rate will depend upon the soil conditions encountered. The thermal oxidizer is designed for a residence time of 0.3 seconds at a temperature of $1800^{\circ}F$. The exhausted air will pass through the catalytic reactor bank.

Once operating, the safety controls and automatic monitors make the operation of the HAVE system relatively uncomplicated. The on-site instrumentation assures the system will operate within strict parameters.

SUMMARY OF THE "HAVE" PROCESS 4 TO 7 DAYS OF "HAVE" SYSTEM OPERATION PER 485 CU. YD. SOIL STACK

The "HAVE" System works very well on all types of soil contaminated with BETX, C6-C24 Petroleum Hydrocarbons (Gasoline, Diesel, Fuel Oil, Jet Fuel, etc.).

The soil stack is place on and covered with heavy gauge (10 mil+) visqueen sheeting with a perimeter berm. All duct entries are carefully sealed. No contaminated vapors escape from the soil stack once the stack is completed and the cover is sealed in place.

After the contaminated soil has been put into a "Stack" with Hot Air Injection & Vapor Extraction Tubes in place, the trailer mounted "HAVE" System is pulled along side the soil stack and connected to the duct system with flexible ducting. 220V, three phase electric power is required for the System. One/two 1,000 gallon propane tanks are required to supply propane, or may be connected to a natural gas fuel source (the burners are "field convertible" between propane and natural gas).

The "Burn Chamber" heat is supplied by two 1.075 MMBTUH propane/natural gas burners.

The air is heated in the "Burn Chamber" and enters the soil at $550^{\circ}F$

The hot air injection tubes within the soil stack are configured so that the hot air must pass through the soil to reach the vapor extraction tubes. As the hot air moves through the contaminated soil, it volatilizes and absorbs the contaminants which are then carried in the air stream and passed through the "Burn Chamber" where approximately 95% of the contaminants are destroyed.

Burner flame area temperatures, through which the vapor must pass, are in the $1800^{\circ}F$ range. Residence time of the air within the confines of the "Burn Chamber" is in excess of 0.3 seconds up to 5426 acfm. Specially designed stainless steel grills within the Burn Chamber create air flow turbulence as well as direct the air flow back into the burner flame area prior to escape from the chamber.

Only 10%-15% of the "clean" air stream is "exhausted" through the "Catalytic Reactor" bank where the remaining contaminants are destroyed prior to release into the atmosphere. The balance of the reheated air stream is sent back through the soil stack to once again pick up contaminants.

When contaminant levels are sufficiently low, the system is shut down. Adequate soil samples are taken for laboratory analysis to verify the soil pile has been cleaned to acceptable clean-up threshold levels. The soil stack is dismantled, hot air and vapor extraction tubes removed and the soil returned to the excavation (or transported from the site as required).

The entire burner, fuel train and control system is Underwriters Laboratories approved. Complete Flame Safeguard systems are in place for safety of the operation at all times. Air temperature settings are automatically controlled by sensors which control the burner output. Numerous system Safeguards automatically shut down the system is any malfunction occurs or if temperatures exceed previously established parameters. The "HAVE" System is safe and simple to operate.

_		
_	f this is a new source or major modification, answer the following quest 'es or No)	ions.
1.	Is this source in a non-attainment area for a particular pollutant?	(1)
	a. If yes, has "offset" been applied?	NA
	b. If yes, has "Lowest Achievable Emission Rate" been applied?	NA
	c. If yes, list non-attainment pollutants.	(1)
2.	Does best available control technology (BACT) apply to this source? If yes, see Section VI.	NO
3.	Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII.	NO
4.	Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source?	NO
5.	Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source?	NO
	"Reasonably Available Control Technology" (RACT) requirements apply this source?	(1)
	a. If yes, for what pollutants?	(1)

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

any information requested in Rule 17-2.650 must be submitted.

(1) The unit is being permitted for statewide operation and could operate in nonattainment areas. The low emission rates expected from the unit (particulate matter, VOC and others) should be considered RACT.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

	Conta	minants	Utilization	1			
Description	Туре	% Wt	Rate - lbs/mr - batch	Relate to Flow Diagram			
Soil	VOC	<1.5%	1,400,000	Attachment 1			
				<u> </u>			
				•			

- B. Process Rate, if applicable: (See Section V, Item 1)
 - 1. Total Process Input Rate (lbs/hr): 1,400,000 lb (700 tons) per batch
 - 2. Product Weight (1bs/hr): 1,4000,000 1b (700 tons) per batch
- C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of	Emiss	sionl	Allowed ² Emission Rate per	Allowable ³ Emission	Poten: Emis:	Relate to Flow		
Contaminant	Maximum lbs/hr	Actual T/yr	Rule 17-2	lbs/hr	lbs/xx hr	T/yr	Diagram	
PM	0.1	0.4	17-296.415	0.1	0.1	0.4		
S02	<0.1	<0.1	NA	Requested	< 0.1	< 0.1	,	
NOx	0.3	1.1	NA .	Requested	0.3	1.1		
СО	0.1	0.5	17-296.415	0.1	0.1	0.5		
voc	1.2	4.8	NA.	Requested	121	483		

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Thermal Oxidizer - HAVE System SM-1	VOC	99%	. NA	Mfg
Catalytic reactor	Voc	(1)	NA .	

(1) No efficiency assumed.

Ε.	F	uc	ls

	Consu	mption*			
Type (Be Specific)	avg/hr	mex./hr	Maximum Heat Input (MMBTU/hr)		
Propane	12 gal/hr	15 gal/hr	2.15		
Natural Gas	1650 ft ³ /hr	2050 ft ³ /hr	2.15		
					

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:	Propane/Natural Gas				
Percent Sulfur:_	Nil/Nil	· · · · · · · · · · · · · · · · · · ·	Percent Ash:	Nil/Nil	-
Density: 5.0/	'NA	lbs/gal	Typical Percent	Nitrogen: Nil/Nil	
Heat Capacity: _	19,500/NA	BTU/15	(97,500/gal)(l	050/ft ³)	_ BTU #gra t
Other Fuel Conta	minants (which may ca	use air p	ollution):	None	
					
F. If applicable	e, indicate the perce	nt of fue	l used for space	heating.	~.

							•			
G.	Indicate	liquid or	solid	wastes	generated	and	method	o f	disposal.	

- •			 3 		 	-	
	None						
				· · · · · · · · · · · · · · · · · · ·		_	

Maximum _

Annual Average NA

	jht:	16			ft.	Stack	Diamet	er:0.33	3
Gas Flow R	late: _	400	ACFH	275	_DSCFM	Gas E	xit Tem;	erature:	250
later Vapo	r Conte	ent:	8		%	Veloc	ity:	78.0	
			SECT	ION IV:	INCINEF T APPLI		IFORMAT]	CON	
Type of Maste						ige) (Pa			Type VI (Solid By-prod
Actual lb/hr Inciner- ated									
Uncon- trolled (1bs/hr)									
	F W					<u> </u>	•		
otal Weigh oproximate	t Incin	erat	Hours of O)	per day	Desi	ign Cap	acity (lbs/	/hr)
otal Weigh oproximate anufacture	t Incin	erat	ed (lbs/hr	peration	per day	Oesi	ign Cap: _ day/\	acity (lbs,	
otal Weigh oproximate anufacture	t Incin	of	ed (lbs/hr	peration	per day	Oesi	ign Cap: _ day/\	acity (lbs/	wks/yr
otal Weigh oproximate anufacture	nt Incin	of	ed (1bs/hr Hours of O	peration .	per day	Desi	ign Cap: _ day/i	acity (lbs/	Wks/yr
otal Weigh	Number	of	ed (1bs/hr Hours of O	peration .	per day	Desi	ign Cap: _ day/i	acity (lbs/	Wks/yr
otal Weigh oproximate anufacture ate Constr	e Number ucted amber	of	ed (1bs/hr Hours of 0	peration Heat Re (BTU/	Per day	Desi	fuel	BTU/hr	Wks/yr
otal Weigh oproximate anufacture ate Constr	e Number ucted mber Chamber	of	ed (1bs/hr Hours of 0 Volume (ft) ³	peration Heat Re (BTU/	Per day	Oesi	fuel	BTU/hr Stack T	Temperature (°F)
proximate snufacture ate Constructure constructure constructure ate Constructure ack Heigh s Flow Ras	amber Chamber t:	s per	ed (1bs/hr Hours of 0 Volume (ft) ³	peration Heat Re (BTU/	per day Hode lease hr) ter:	Type Design	Fuel SCFM* V	BTU/hr Stack Telocity:	Temperature (°F)

DER Form 17-1.202(1) Effective November 30, 1982 Page 6 of 12

Brief des	scription	of	oper	rating (charact	eristi	cs of	control	devi	ces:			
		_						,					
Ultimate ash, etc.		of	any	effluen	t other	than	that	emitted	from	the	stack	(scrubber	water,
													
						-							
								_					

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

(SEE FOLLOWING PAGES)
Please provide the following supplements where required for this application.

- 1. Yotal process input rate and product weight -- show derivation [Rule 17-2.100(127)]
- 2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
- Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
- 4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
- 5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
- 6. An & 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
- 7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
- 8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

SECTION V SUPPLEMENTAL INFORMATION

1. Processing Rate

The soil is batch processed in 700 ton batches over a four to seven day period. This results in an equivalent processing rate of 4.2 to 7.3 tons per hour.

2/3. Controlled and Uncontrolled Emissions

Recirculating air flow = 5 cfm per cubic yd @ 550°F (temperature entering soil stack)

= 5 cfm/yd x 485 yd

= 2425 cfm @ 550°F

Discharge air flow = $400 \text{ cfm } @ 250^{\circ}\text{F}$ and 8% moisture

= 275 dscfm

<u>Particulate Matter</u> (Controlled and Uncontrolled)

= 275 dscfm x 0.04 gr/dscf x 1/7000

x 60 min/hr

 $= 0.1 \, lb/hr$

x 8000/2000

= 0.4 tpy

<u>Sulfur Dioxide</u> (Controlled and Uncontrolled)

@ 0.02 lb/1000 gal

= 0.02/1000 lb/gal x 15 gal/hr

= <0.1 lb/hr

x 8000/2000

= <0.1 tpy

Nitrogen Oxides (Controlled and Uncontrolled)

- @ 19 1b/1000 gal
- = 19/1000 lb/gal x 15 gal/hr
- $= 0.3 \, lb/hr$
 - x 8000/2000
- = 1.1 tpy

Carbon Monoxide (Controlled and Uncontrolled).

- @ 100 ppm, dry basis
- = 275 dscfm x 60 min/hr x 100 ppm/1,000,000
 - \times 28/385 1b CO/ft³
- = 0.1 lb/hr
 - x 8000/2000
- = 0.5 tpy

VOC

Uncontrolled - Assume 700 tons of soil with 14,500 ppm VOC with treatment time of seven days

- = $700 \text{ tons } \times 2000 \text{ lb/ton } \times 14,500 \text{ ppm/1,000,000}$
 - \times 1/(7 days \times 24 hr/day)
- = 120.8 1b/hr
 - x 8000/2000
- = 483 tpy

Controlled @ 99% (Assume efficiency with burn chamber temperature at 1800°F for 0.3 sec.)

- = 120.8 lb/hr x (1 0.99)
- = 1.2 lb/hr
 - x 8000/2000
- = 4.8 tpy

4. Control Equipment

Burn chamber volume = 28 ft^3 Burn chamber temperature = 1800°F

Flow rate at 1800°F

- = 2425 cfm((1800 + 460)/(550 + 460))
- = 5426 cfm

Residence Time

- = 28/(5426/60)
- = 0.31 sec > 0.3; OK
- 5. VOC control efficiency of 99% based on compliance with Rule 17-296.415, F.A.C.
- 6. Flow Diagram See Attachment 1
- 7. Location Map NA
- 8. Site Plan See Attachment 2 for typical plan
- 9. Fee \$250
- 10. NA

9.	The appropriate	application fee in accordance with Rule 17-4.05.	The check should be
	made payable to	the Department of Environmental Regulation.	

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

	SECTION VI:	BEST AVAILABLE CONTROL TECHNOLOGY						
Α.	NOT APPLICABLE Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?							
	[] Yes [] No							
	Contaminant	Rate or Concentration						
_								
_		· · · · · · · · · · · · · · · · · · ·						
8.	Has EPA declared the best avai	lable control technology for this class of sources (If						
	yes, attach copy)							
	[] Yes [] No							
	Contaminant	Rate or Concentration						
_	- ,							
с.	What emission levels do you prop	ose as best available control technology?						
	Contaminant	Rate or Concentration						
		· · · · · · · · · · · · · · · · · · ·						
		~.						
Ο.	Describe the existing control an	d treatment technology (if any).						
	1. Control Device/System:	2. Operating Principles:						
	3. Efficiency:*	4. Capital Costs:						
# E x 1	plain method of determining							
	Form 17-1.202(1) ective November 30, 1982	Page 8 of 12						

	5. Useful Life:			6.	Operating Costs:	
-	7. Energy:			8.	Maintenance Cost:	
9	9. Emissions:					
	Contam	inant			Rate or Concentrat	ion
				-		
. 1	lO. Stack Paramet	ers				
	ı. Height:		ft.	ь.	Diameter:	ft.
	:. Flow Rate:		ACFH	d.	Temperature:	۰۶.
	. Velocity:		FPS			
	•	nl and treatmen		0100	y available (As many types	es ennlingble
	se additional page				y available (no many types	as applicable
1	•					
. 8	. Control Device:	, :		ь.	Operating Principles:	
c	. Efficiency: ¹			d.	Capital Cost:	
e	. Useful Life:			f.	Operating Cost:	•
9	• Energy: 2			h.	Maintenance Cost:	
i .	. Availability of	construction #	aterial	s an	d process chemicals:	
5 -	• Applicability t	o manufacturing	proces	ses:		
k.	 Ability to cons within proposed 		trol dev	/ice	, install in available space	e, and operate
2.	•	•			·	
8.	. Control Device:			b.	Operating Principles:	
	. Efficiency:			d.	Capital Cost:	
c.				f.	Operating Cost:	
c. e.	. Useful Life:	•		٠.		
	- 2	•		h.,	Maintenance Cost:	

DER Form 17-1.202(1) Effective November 30, 1982

Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: 3. Control Device: Operating Principles: я. Efficiency: 1 d. Capital Cost: Useful Life: f. Operating Cost: Energy: 2 Maintenance Cost: Availability of construction materials and process chemicals: Applicability to manufacturing processes: Ability to construct with control device, install in available space, and operate within proposed levels: 4 -Control Device: Operating Principles: Efficiency: 1 Capital Costs: c. Useful Life: Operating Cost: e. Energy: 2 h. Maintenance Cost: g. Availability of construction materials and process chemicals: i. Applicability to manufacturing processes: j. Ability to construct with control device, install in available space, and operate within proposed levels: Describe the control technology selected: 2. Efficiency: 1 Control Device: 1. 3. 4 -Useful Life: Capital Cost: Energy: 2 5. Operating Cost: Manufacturer: Maintenance Cost: Other locations where employed on similar processes: (1) Company: (2) Mailing Address: (4) State: (3) City: ¹Explain method of determining efficiency. ²Energy to be reported in units of electrical power - KWH design rate. DER Form 17-1.202(1)

Page 10 of 12

Effective November 30, 1982

(5) Environmental Manager:	
(6) Telephone No.:	
(7) Emissions: 1	
Contaminant	Rate or Concentration
	<u> </u>
	<u> </u>
(8) Process Rate: 1	•
b. (1) Company:	
(2) Mailing Address:	
(3) City:	(4) State:
(5) Environmental Manager:	
(6) Telephone No.:	
(7) Emissions: 1	
Contaminant	Rate or Concentration
<u> </u>	<u> </u>
(8) Process Rate: 1	
10. Reason for selection and description	n of systems:
lApplicant must provide this information whe available, applicant must state the reason(s	
available, applicant must state the reason(,, ,,,,
SECTION VII - PREVENTION O	F SIGNIFICANT DETERIORATION
A. Company Monitored Data NOT APPLICABLE	
1no. sites TSP _	() SO ² * Wind spd/dir
Period of Monitoring / month d	/ to // ay year month day year
Other data recorded	
Attach all data or statistical summaries	
wergen all data of Statistical sommaties	to this application.
Specify bubbler (B) or continuous (C).	
DER Form 17-1.202(1)	11 at 12
ffective November 30, 1982 Page	11 of 12

	2.	Instrumentation,	Fleld and Labo	ratory					
	a.	Was instrumentati	on EPA referen	ced or its e	quivalent?	[] Yes	s [] N	lo	
	ь.	Was instrumentati	on calibrated .	in accordanc	e with Dep	artment p	rocedur	es?	
		[] Yes [] No	[] Unknown						
в.	Met	eorological Data U	sed for Air Qu	ality Modeli	ng				
	1.	Year(s) of	data from	/ / n day year	to month	/ / day yea	r		
	2.	Surface data obta	ined from (loca	ation)				<u>.</u>	
	3.	Upper air (mixing	height) data o	btained fro	m (locatio	1)		·	
	4.	Stability wind ro	se (STAR) data	obtained fr	om (locatio	on)			
c.	Comt	puter Models Used					•	•	
	1.			· .	Modified?	If yes,	attach	description	n.
	2.				Modified?	If yes,	attach	description	n.
	3.								
	4.	•							
	cipl	ach copies of all f le output tables.	inal model run	s showing ir					
D.	Appl	licants Maximum All	owable Emissio	n Data					
	Poll	lutant	Emissio	n Rate				•	
	T	TSP			gra	ms/sec			
	S				gra	ms/sec			
Ξ.	Emis	ssion Data Used in	Modeling						
	Atta	ch list of emissio	n sources. Emi	ission data	required i	s source	name, d	escript i on	o f

point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

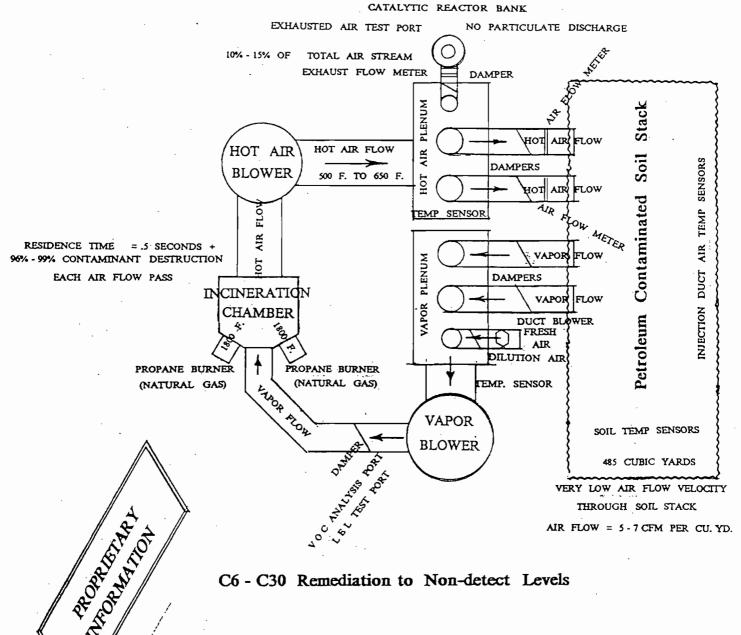
- F. Attach all other information supportive to the PSD review.
- Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.).
 assessment of the environmental impact of the sources. Include
- Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT 1

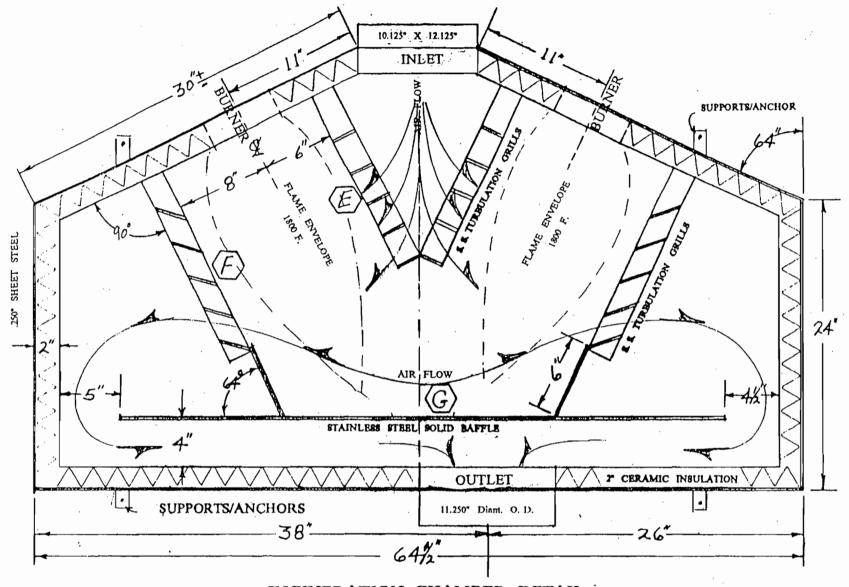


"HAVE SYSTEM"

Process Flow Diagram (Hot Air Vapor Extraction) Patent Pending



C6 - C30 Remediation to Non-detect Levels



INCINERATION CHAMBER DETAIL Patent Pending

28 Cu.Ft. Volume .5 sec. Residence Time To 3360 CFM

PORTEGIANO X

N

SCHEDULE "A" EQUIPMENT

"HAVE SYSTEM" MODEL SM-I (485 Cu. Yds.)

DESCRIPTION AND SPECIFICATIONS

DETAILED COMPONENT LIST

1. TRANSPORT SYSTEM:

The "HAVE SYSTEM" is mounted in an enclosed 8' X 8'6" X 25' tandem axle trailer. (W/ Capacity to transport complete inventory of stack ducting and misc. materials.) (Trailer VIN Number and HAVE SYSTEM Serial Number furnished approximately three weeks prior to delivery of System.)

- 2. HOT AIR BLOWER SYSTEM: (Capacity = 3345 CFM at 4" SP)
 - 1 High Pressure Dayton Blower W/ 7.5 H.P. 3-Phase 230V Motor.
 Equipped W/ Heat Slinger/ Heat Shield = Rated at 650 F. Air Temp. Capacity.
 Mounted on 6 Floor Mounted Vibration Isolators.
- 3. VAPOR AIR BLOWER SYSTEM: (Capacity = 3360 CFM at 1/4" SP: 3600 CFM at 1/8" SP)
 - 1 Low Pressure Dayton Blower W/ 1 H.P. 3-Phase 230V Motor. Rated at 250 F. Air Temp. Handling Capacity. Mounted on 4 - Floor Mounted Vibration Isolators.
- 4. GAS SUPPLY FUEL TRAIN: (Propane and Natural Gas W/ Field Conversion)
 - 1 Dual Burner Fuel Train Complete W/ Exterior Hook-up, Valves and Safety Controls. (All U. L. Approved) (Simple field conversion between Propane & Natural Gas)
 - 1 Propane Vaporizer System complete.
- 5. BURNER SYSTEM: (Total Capacity = 2,150,000 BTUH)
 - 2 Power Flame Model J30A-10 1,075,000 BTUH Propane/Natural Gas fired Burners. W/ Combustion Air Fans, Automatic Purge System, Electronic Ignition, Flame Sensors and Automatic "Shut-down" Controls.

 (All Underwriter Laboratories Approved)

6. INCINERATION / BURN CHAMBER:

Steel jacketed, Ceramic lined Burn Chamber W/ Stainless Steel Baffles and Turbulation Grills, Inlet / Outlet connections and 2 Burner Mounts.
 28 Cubic Feet of Air Volume Capacity provides
 Air Residence Time of .5 + seconds up to 3360 CFM Air Flow.

7. <u>EXHAUSTED AIR TREATMENT</u>:

- 1 Catalytic Reactor Bank through which ALL EXHAUSTED AIR must pass PRIOR to release into the atmosphere.
- 1 Post Catalytic Reactor Bank exhaust air port with cooling line to Control Booth for instrumental analysis of exhausted air stream.

8. SYSTEM INTERIOR AIR HANDLING COMPONENTS:

A. 1 - STAINLESS STEEL HOT AIR PLENUM W/ High Temperature Insulation.

Plenum equipped with High Temperature Limit sensor for shut-down switch.

Plenum equipped with Temperature Sensor for automatic burner adjustment control.

2 - 12" Duct "Stack Air" Outlets and 1 - 6" Duct "Exhaust Air" Outlet.

All outlets equipped with Electrically Operated Duct Dampers.

All outlets equipped with Air Flow Indicators.

Plenum tapped W/ Pipe run to Control Booth for Vapor Contaminant Analysis.

- B. 1 STAINLESS STEEL VAPOR AIR PLENUM. (No Insulation)
 Plenum water tight W/ Tapped in drain line, condensate pump W/ sealed mercury
 float switch. Also by-pass manual drain valve. (From plenum low-point)
 (For removal of condensate from Soil Stack Vapor Air.)
 - 1 12" Duct "Stack Vapor" Inlet. (Elect. Operated Duct Damper.) (S.S.)
 - 1 12" Duct "Interstitial Vapor" Inlet. (Elect. Operated Duct Damper.) (S.S.)
 - 1 6" Duct W/In Line Duct fan (Fresh Dilution Air). (Elect. Op.Damper.) (S.S.)
- C. 1 STAINLESS STEEL DUCT (Vapor Blower to Burn Chamber.)

W/ Electrically Operated Damper. (Stainless Steel)
Tapped W/ Pipe run to Control Booth for Stack Vapor Contaminant Analysis.

9. OPERATOR CONTROL BOOTH COMPARIMENT: Equipped with:

- A. Main Electric Breaker Panel.
- B. Rotary Phase Converter. (15 H.P. Capacity) (Single phase to 3 phase)
- C. Main Control Panel W/ All Duct Damper controls, Temperature Sensor Indicators, Blower Controls, Burner Controls, Stack Soil and Duct Air Temperature Monitors.
- D. Captain's Type Swivel Stool at Operator's Station.
- E. Base Cabinet W/ Stainless Steel Sink W/ Fresh Water tap.
- F. Under-counter Refrigerator.
- G. Microwave Oven Unit.
- H. Wall Cabinets above counter for misc. storage.
- I. 110 V Electric Automatic Coffee Maker.
- J. Fold-up Writing Desk/Counter top.
- K. Wall mounted Electric Heater.
- L. Sliding Glass Observation Window. (On Duct hook-up & Soil Stack Side.)
- M. 110 V Wall Exhaust/Vent Fan.
- N. 48" Double Tube Fluorescent light fixture.
- O. Vapor Analysis Instrumentation. (See Item # 21.)

10. REST ROOM FACILITIES:

Rest Room W/ Stool and Lavatory. Running water. (RV Type Fixtures)

- 1 "Black Water" Sewage Holding Tank W/ RV type Drain/Dump gate. (50 gal. cap. +/-)
- 1 "Grey Water" Sewage Holding Tank W/ RV type Drain/Dump gate. (50 gal. cap. +/-)
- 1 Fresh Water Holding Tank W/ Demand type Pressure Pump. (45 gal. cap. +/-)
- 1 110 V Wall Exhaust/Vent Fan.

11. STORAGE: (Misc.)

- 2 Enclosed stowage locker compartments for Flexible Ducting and Duct Fittings.
- 1 Tool Stowage locker.

12. STACK DUCTING STORAGE:

Removable crossbar supports to provide adequate stowage for stack ducting. Front Compartment Swing-up "Screen" Gate. (Load Shift Prevention)

the water through the

MODEL SM-I STACK DIMENSIONS & DUCTING

化异氯甲酰胺 化原流

SOIL STACK BASE DIMENSIONS = 23' 4" X 91' 0" = 485 cubic yards.

13. HOT AIR DISTRIBUTION AND MAIN VAPOR COLLECTION DUCTING:

4 Runs (Levels) of 12" Diam. Stack Hot Air Distribution Ducts W/ 4" "T"s - 24" O.C. (Insulation is furnished for all 12" Hot Air Distribution Ducting.)

```
Level # 1 = 88' W/ Center of Stack "T" Assembly (44 - 4" \text{ "T"} \text{ Connectors and End Caps.})

Level # 2 = 86' W/ Center of Stack "T" Assembly (43 - 4" \text{ "T"} \text{ Connectors and End Caps.})

Level # 3 = 80' W/ Center of Stack "T" Assembly (40 - 4" \text{ "T"} \text{ Connectors and End Caps.})

Level # 4 = 78' W/ Center of Stack "T" Assembly (39 - 4" \text{ "T"} \text{ Connectors and End Caps.})
```

1 - 12" Main Vapor Collection Duct W/ 4" "T"s - 24" O.C. (Interstitial Space Vapor) Vapor Collection Duct = 76' W/ 2 - Center of Stack 12" "T"s, 38 - 4" "T" Connectors. 1 - 4" "T" Connector in each end cap.

14. HOT AIR INJECTION DUCTING: (4" Perforated Aluminum)

```
Level # 1 = 44 - 4" X 20' ducts W/ 18'drilled @ 16 holes per lin. ft.

Level # 2 = 43 - 4" X 17' ducts W/ 15' " " " " " "

Level # 3 = 40 - 4" X 13.5' " W/ 11.5' " " " " " " "

Level # 4 = 39 - 4" X 9.5' " W/ 7.5' " " " " " "
```

(Each "HAVE SYSTEM" will include these replacement "Extra Ducts": (As Listed above)

```
4 - Level # 1 - (20'); 2 - Level # 2 - (17');
1 - Level # 3 - (13.5'); 1 - Level # 4 - (9.5'):
```

15. INTERSTITIAL VAPOR COLLECTION DUCTING: (4" Rigid/Flexible)

```
38 - 4" X 8' Perforated Aluminum Ducts W/ Welded angle section.
```

- 38 4" X 12' Perforated Flexible ducts with perforated end caps.
- 2 4" X 20' Perforated Flexible ducts with perforated end caps.

16. "EXTRA" SET OF STACK DUCTING: Includes all items listed in # 13, 14 & 15 above)

(AVAILABLE AS OPTIONAL PACKAGE)

17. DISTRIBUTION DUCTING SUPPORT FRAMES:

(For Use in Soil Stack during Duct Assembly and Stack Formation.)

32 - Steel support frames. (For three levels of 12" Distribution Ducts).

18. STACK DUCT DISMANILING TOOL:

3 - Steel "Duct Gripper" Tools, complete with cable rigging, for extracting 4" Aluminum ducting during dismantling of Soil Stacks.

19. "HAVE SYSTEM" TO SOIL STACK DUCTING - CONNECTION COMPONENTS:

- 1 12" HIGH Temp. Flexible Duct X 6' length W/ End Adapters. (Levels #1 & #2)
- 1 12" HIGH Temp. Flexible Duct X 12' Length W/ End Adapters. (Levels #3 & #4)

 (HIGH TEMPERATURE Flexible Ducting rated for 800 Degrees F.)
- 2 12" LOW Temperature Flexible Ducts X 14' Length W/ End Adapters. (For Connecting to Interstitial (Stack) Vapor Collection Ducts.)

(IOW Temperature Flexible Ducting rated for 250 Degrees F.)

20. FIRE SAFETY EQUIPMENT:

1 - 10 lb. "Dry Chemical" Fire Extinguisher.

21. INSTRUMENTATION:

- 1 DUAL STANDALONE F.I.D. (Flame Ionization Detector)
- 1 DUAL CHANNEL STRIP RECORDER

Monitors TPH content of Incoming Stack Vapor (PRE-Treatment)
Monitors TPH content of Outgoing Vapor (POST-Treatment)
(Provides accurate determination of remediated level of Soil Stack.)

BIOSYSTEMS, Inc. PhD INSTRUMENT.
 W/ Computer Link & Software
 W/ Calibration Kit, Sample Draw Pump (Continuous)

Monitors Combustible Gases (LEL) of Incoming Stack Vapor Monitors Oxygen content of Incoming Stack Vapor Monitors CO (Carbon Monoxide) levels of EXHAUSIED Air Monitors CO (Carbon Monoxide) levels of PRE-Exhaust Vapor

22. EXTERIOR NIGHT LIGHTING:

2 - 300 WATT EXTERIOR FLOOD LIGHTS. (Mounted on Front and Rear stack side corners of Trailer roof) (Quickly detachable for safe stowage) Control Booth Switching.

NOTE: HAVE SYSTEMS, Inc. reserves the right to make changes and or modifications in these component specifications without prior notice.

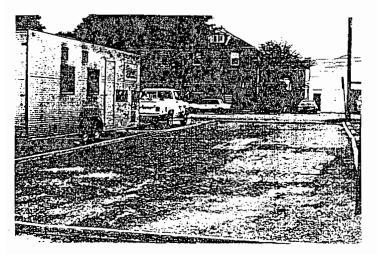
ATTACHMENT 2



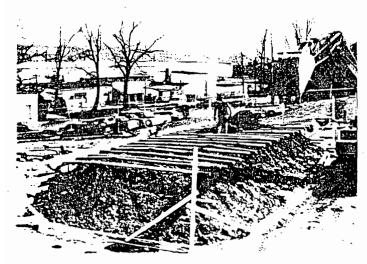
QUALITY RECYCLING, INC.

HOT AIR VAPOR EXTRACTION

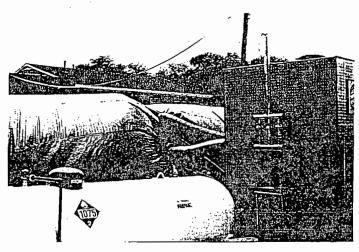
Timely, Environmentally Conscious, and Economical.



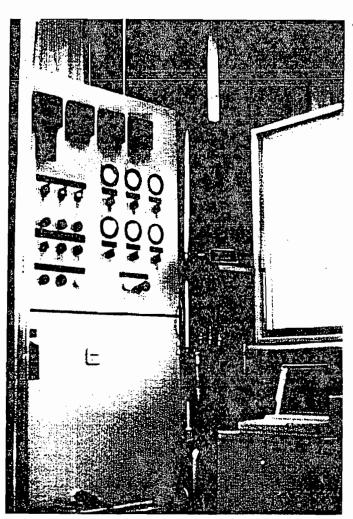
TREATMENT CELL OUTLINE



LEVELS #1 & #2 Complete. Level #3 Ducting in Place.

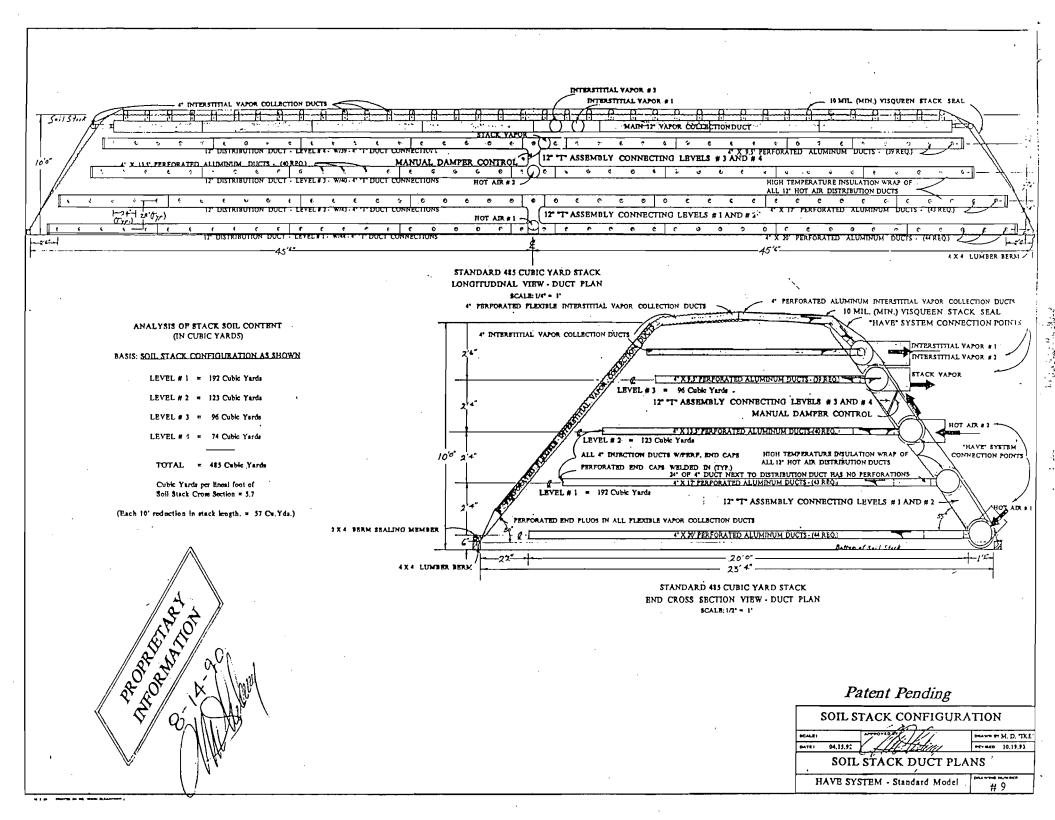


SOIL STACK COMPLETED— Stack Sealing secured.



ON-SITE INSTRUMENTATION— Continuous monitoring.

1320 Ben Franklin Hwy., East • Douglassville, PA 19518 Phone: (215) 385-7478 • FAX: (215) 385-7040



<u>۾</u>	SENDER:		
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completed	Director of Operations	4b. Service Type	Ret
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2		and fee is paid)	ă
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ž	PS Form 3811, December 1991 *U.S. GPO: 1992-323	1402 DOMESTIC RETURN RECEIPT	

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Restricted Delivery Fee						
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PS Form **3800**, JUNE 1991



Florida Department of Environmental Protection

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

Virginia B. Wetherell Secretary

April 1, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Kevin J. Merlo Director of Operations Quality Recycling, Inc. 1320 Ben Franklin Highway, East Douglassville, PA 19518

Dear Mr. Merlo:

Re: File No. AC 37-247574

The Department has reviewed your application for permit to construct a mobile soil remediation unit in Florida. We need additional information to process this application. Please provide the following:

- 1. What is the maximum operation temperature of the plastic sheet used to cover the contaminated soil?
- 2. How does your operation maintain the temperature of the circulating gas below the maximum operation temperature of the plastic sheet?
- 3. Please provide a drawing or drawings of the general arrangement of the HAVE*System that does not contain proprietary information. These drawings are needed for public review.
- 4. Please provide proof of publication of the attached Notice of Application.

Applicants for permits to construct soil remediation units are required to publish a Notice of Application in a newspaper having circulation in each county you intend to operate and provide the Department with proof of each publication. A proposed Notice of Application is enclosed. You will also be required to publish a Notice of Intent to Issue in the same newspaper(s) should the Department approve your application. Any construction permit issued will limit you to operating in these counties. To operate in any other county, you must satisfy the public notice requirements for that county, and have your permit amended to

Printed on recycled paper.

Mr. Kevin J. Merlo April 1, 1994 Page Two

authorize operation there. The public will have an opportunity to comment or petition for an administrative hearing in response to any public notice for your unit.

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

Sincerely,

John C. Brown, Jr., P.E. Administrator

Air Permitting and Standards

JCB/WH/bjb

Enclosure

cc: John Koogler, P.E.

District Air Program Administrators County Air Program Administrators

NOTICE OF APPLICATION

The Department of Environmental Protection announces receipt of an application for a permit from Quality Recycling, Inc. The application is to construct a mobile soil remediation unit that will evaporate and incinerate petroleum fuels and lubricants from soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: (applicant fill in prior to publication).

The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00am - 5:00pm, Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located at:

111 S. Magnolia Drive, Tallahassee, FL 32301

160 Governmental Center, Pensacola, FL 32501-5794

3804 Coconut Palm Drive, Tampa, FL 33619-8218

2295 Victoria Avenue, Suite 364, Fort Myers, FL 33901

7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577

3319 Maguire Boulevard, Suite 232, Orlando, FL 32803-3767

1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406

and county offices located at:

218 SW First Avenue, Ft. Lauderdale, FL 33301

33 S.W. 2nd Avenue, Suite 9-223, Miami, FL 33130

421 W. Church St., Suite 412, Jacksonville, FL 32202-4111

1410 North 21st Street, Tampa, FL 33605

901 E. Evernia Street, West Palm Beach, FL 33402

300 S. Garden Avenue, Clearwater, FL 34616

1301 Cattleman Road, Bldg. B, Sarasota, FL 34232-6299

2002 E. Michigan Avenue, Orlando, FL 32806

202 6th Avenue East, Bradenton, FL 34208

330 W. Church Street, Bartow, FL 33830

RETURN ADDRESS completed on the reverse side?	SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that return this card to you. • Attach this form to the front of the mailpiece, or on the back it does not permit. • Write "Return Receipt Requested" on the mailpiece below the article The Return Receipt will show to whom the article was delivered and delivered. 3. Article Addressed to Complete the	de number. de number. de date 4a. Art 4b. Ser Regi Perti Expr 7. Date	1. Addressee's Address 2. Restricted Delivery Consult postmaster for fee. icle Number 1. Addressee's Address 2. Addressee's Address 2. Addressee's Address 4. Addressee's Address 5. Address 6. Address 6. Addressee's Address 6. Address 6. Address 6. Addressee's Address 6.	Thank vou for using Return Receipt Service.
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No Insurance Coverage Provided Do not use for International Mail
(See Reverse)

Seption Of The Code Of The Code



Department of Environmental Protection

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

Virginia B. Wetherell Secretary

October 10, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Kevin J. Merlo Director of Operations Quality Recycling, Inc. 1320 Ben Franklin Highway, East Douglassville, Pennsylvania 19518

Dear Mr. Merlo:

Re: DEP File No. AC 37-247574

The Department received an application for permit to construct a soil thermal treatment facility from you on March 22, 1994. Quality Recycling, Incorporated has not responded to the Department's April 1 and April 15, 1994, request for additional information on this project.

Please let the Department know within 30 days of receipt of this letter if you still have a plan and schedule to obtain a permit to construct and operate this unit in Florida. If your plans have changed, we request you withdraw the application for permit. The Department will deny this permit if you do not withdraw the application, respond to April 1 and 15 requests, or respond to this letter in a timely manner.

If you have any questions on this matter, please write to me or call Willard Hanks, review engineer, at (904) 488-1344.

Sincerely,

A. A. Linero, P.E.

Administrator

New Source Review Section

AL/wh/t

cc: Mr. John Koogler, P.E.

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that return this card to you. • Attach this form to the front of the mailpiece, or on the back if does not permit. • Write "Return Receipt Requested" on the mailpiece below the article of the mailpiece below the article was delivered and delivered. B. Article Addressed to the provided of the mailpiece below the article was delivered and delivered. B. Article Addressed to the provided of the mailpiece below the article was delivered and delivered. B. Article Addressed to the provided of the mailpiece below the article was delivered and delivered. B. Article Addressed to the provided of the mailpiece below the article was delivered and delivered. B. Article Addressed to the provided of the mailpiece below the article was delivered and delivered. B. Article Addressed to the provided of the mailpiece below the article was delivered and delivered. B. Article Addressed to the provided of the mailpiece below the article was delivered and delivered. B. Article Addressed to the provided of the pro	space 1. Addressee's Address
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