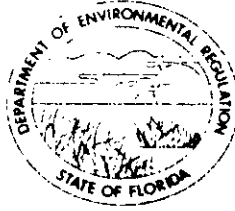


Subj file

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

February 3, 1983

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Dale H. Twachtmann
City of Tampa
McKay Bay Refuse-To-Energy Project
City Hall Plaza, 5N
Tampa, Florida 33602

Dear Mr. Twachtmann:

Attached is one copy of the Technical Evaluation and Preliminary Determination, and proposed letter modifying your permit for the McKay Bay Refuse-To-Energy Project in Tampa, Florida.

Before final action can be taken on your proposed modification, you are required by Florida Administrative Code Rule 17-1.62(3) to publish the attached Notice of Proposed Agency Action in the legal advertising section of a newspaper of general circulation in Hillsborough County no later than fourteen days after receipt of this letter. The department must be provided with proof of publication within seven days of the date the notice is published.

The Preliminary Determination and proposed permit modification constitute a proposed action of the department and is subject to administrative hearing under the provisions of Chapter 120, Florida Statutes, if requested within fourteen days from receipt of this letter. Any petition for hearing must comply with the requirements of Florida Administrative Code Rule 28-5.201 and be filed with the Office of General Counsel, Florida Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to file a request for hearing within fourteen days shall constitute a waiver of your right to a hearing. Filing is deemed complete upon receipt by the Office of General Counsel.

Mr. Dale H. Twachtmann
February 3, 1983
Page Two

Please submit, in writing, any comments which you wish to have considered concerning the department's proposed action to Bill Thomas of the Bureau of Air Quality Management.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/pa

Attachment

cc: Mr. Joe Murdoch, City of Tampa
Mr. Ralph Lee Torrens, Henningson, Durham & Richardson
Mr. Dan Williams, DER Southwest District
Mr. John Egan, Hillsborough County Environmental
Protection Commission

Preliminary Determination
and
Technical Review

Amendment to
McKay Bay Refuse-To-Energy Project
Hillsborough County

Permit Number
AC 29-47277

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

February 1, 1983

Notice of Proposed Agency Action

The Department of Environmental Regulation gives notice of its intent to modify a permit to the City of Tampa to allow the incinerating of infectious waste and waste oil recovered from oil spills by the Port Authority at its McKay Bay Refuse-To-Energy Project in Hillsborough County. A determination of Best Available Control Technology (BACT) was not required.

A person who is substantially affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The application, technical evaluation and Department's intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

DER Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

DER Southwest District
7601 Highway 301 North
Tampa, Florida 33610

Hillsborough County Environmental
Protection Commission
1900 Ninth Avenue
Tampa, Florida 33605

Comments on this action shall be submitted in writing to Bill Thomas of the DER Tallahassee office within thirty (30) days of this notice.

I. Project Description

A. Applicant:

City of Tampa
City Hall Plaza, 5N
Tampa, Florida 33602

B. Project and Location

The applicant's proposed project consists of constructing an infectious waste handling facility to feed this type waste to the resource recovery units. Also permission to burn oil from spills recovered by the Port Authority has been requested. The facility is located in Tampa in Hillsborough County. The universal transverse mercator (UTM) coordinates of the source are zone 17, 360.0 km East and 3091.9 km North.

C. Project Description and Controls

The resource recovery facility will be modified by the addition of an infectious waste loading area at the rear of the facility. The bagged infectious waste will be transferred to portable buckets. The buckets will be wheeled into an elevator and transported to the feed chute for the incinerator, where they will be mechanically discharged into the chute. Workers will not come into direct contact with the waste and no infectious wastes will be discharged directly into the refuse pit.

The facility operation will also be modified by allowing the incineration of waste oil collected by the port authority from the clean up of oil spills. The oil will be delivered to the resource recovery facility by tanker truck or in polyethylene pads packed in fiber drums. Recovered oil from the tanker trucks would be sprayed onto the refuse in the pit. The fiber drums would be placed directly into the combustion train. The facility would accept no more than 15,000 gallons per day of oil from tankers or 10 tons per day of fiber drums. This will increase the heat content of the municipal waste. It is estimated that an average of 10,000 gallons per year will be disposed of by this method.

Since the capacity of the resource recovery units are not being increased, the control equipment will adequately control the emissions generated at the facility. Emission limitations will be the same as those issued previously.

II. Rule Applicability

The proposed project does not meet the definition of a modification as contained in Florida Administrative Code Rule 17-2.100 (102) since actual emissions are not increased.

Therefore, the new source review requirements for nonattainment areas and the new source review requirements for prevention of significant deterioration areas are not applicable.

The proposed project is a significant change to permit specific conditions. Therefore, the public must have opportunity for comment before the amendment can be issued.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

The maximum hourly and the annual emission limitations are unchanged by this proposal. The hourly and annual throughput rates of feed to the incinerator also remain the same. Therefore, the emission limitations previously issued, will not be amended.

B. Air Quality Analysis

Since there is no increase in emissions, an ambient air quality analysis is not required.

IV. Conclusions

Incineration is the preferred method of disposal of infectious waste. The Department of Health and Rehabilitative Services and the Department of Environmental Regulation have issued a joint memorandum which defines infectious waste and recommends incineration.

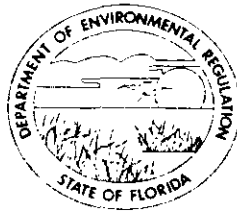
The usual method of disposal of infectious waste is using a pathological incinerator. The information provided with this proposal indicated the residence time of approximately 3.7 seconds at 1800° F will exceed the minimum temperature and residence time requirements for a pathological incinerator which are listed in the EPA document AP-40. Since separate handling procedures and equipment will be added to ensure safe handling of this waste and adequate destruction should be provided by the incinerator, the Department agrees to this change.

The other part of the proposal involves the incineration of oil which has been cleaned up from oil spills and collected by the Port Authority. This oil will be put on the waste in the refuse pit. Thus, the heating value of the municipal waste should increase and aid in its destruction. No increase in emissions is expected from this operation.

The specific conditions should be amended to allow these proposals, since the facility would remain in compliance with all applicable requirements of Chapter 17-2, FAC.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

February 1, 1983

Mr. Dale H. Twachtmann
City of Tampa
McKay Bay Refuse-To-Energy Project
City Hall Plaza, 5N
Tampa, Florida 33602

DRAFT

Dear Mr. Twachtmann:

Re: Modification of Conditions, Permit No. AC 29-47277

We are in receipt of requests for modifications of the permit conditions. The specific conditions are changed as follows:

Specific Condition 2

From: Municipal waste only shall be burned in the facility. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.

To: Municipal waste and infectious waste shall be burned in the facility. Waste oil collected from spills cleaned up by the Port Authority not exceeding 10,000 gallons per day from tanker trucks or 10 tons per day of fiber drums shall also be burned. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

Victoria J. Tschinkel
Secretary

VJT/ks



CITY OF TAMPA

Bob Martinez, Mayor

MCKAY BAY REFUSE-TO-ENERGY PROJECT

November 9, 1982

Mr. Clair Fancy
Department of Environmental Regulation
Bureau of Air Quality
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
NOV 17 1982
EPC

Dear Mr. Fancy:

As you are aware, the City of Tampa has received permits from D.E.R. for construction of the McKay Bay Refuse-to-Energy Facility. The Facility is designed to burn solid waste from the City of Tampa and to simultaneously generate electricity. The City would also like to burn infectious waste in the Facility.

The Department of Health and Rehabilitative Services and D.E.R. have issued a joint memorandum which defines infectious waste and recommends incineration as the preferred method of disposal. While the City of Tampa's application to construct an air pollution source does not prohibit burning of infectious waste, the subject is not specifically addressed. The City therefore requests that your office confirm the acceptability of burning infectious waste in the McKay Bay Refuse-to-Energy Facility.

Special handling procedures and equipment have been added to the operation and construction plans for the Facility to insure safe handling of the infectious waste (see attached). Additionally, the Facility design will allow a residence time of approximately 3.7 seconds, at 1800°F, for all gases (attached). Also, as we have previously discussed, no radioactive waste will be disposed of at the incinerator.

If you have any questions concerning this request, please contact me. Thank you for your time and consideration.

Sincerely,

Joseph D. Murdoch
Resource Recovery Management Analyst

JDM/dw

cc John Egan, EPC



Waste Management, Inc.
3003 Butterfield Road • Oak Brook, Illinois 60521

November 5, 1982

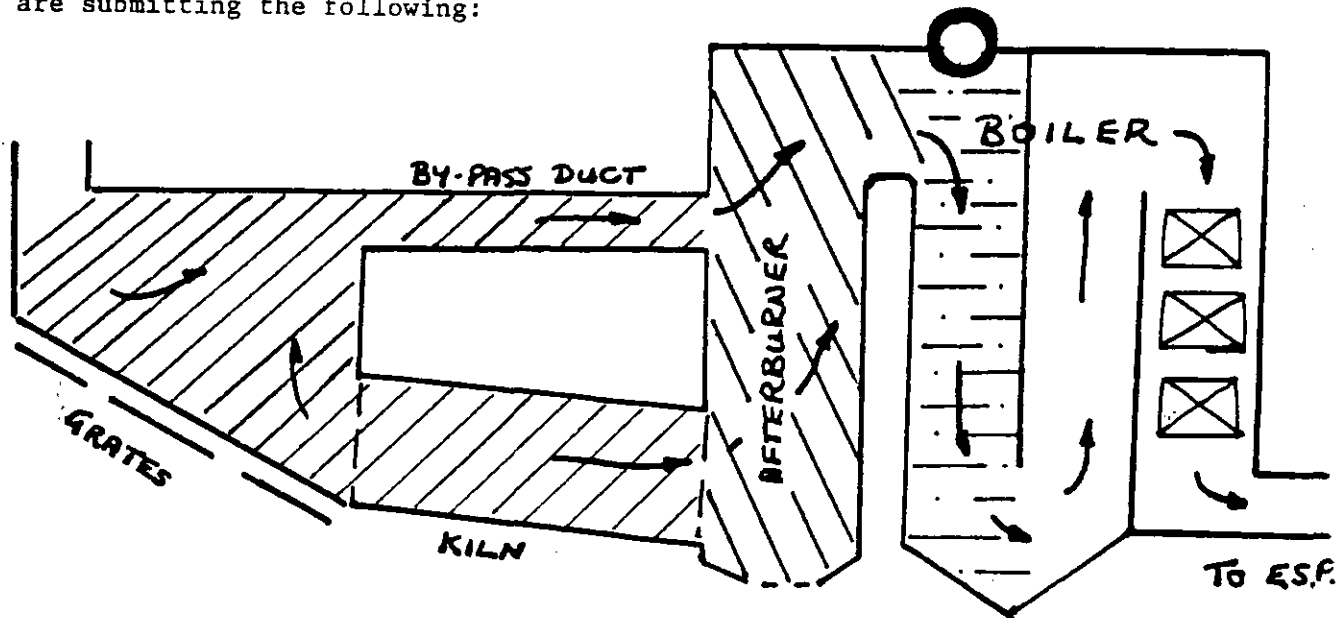
City of Tampa
City Hall Plaza, 5N
Tampa, Florida 33602

Attention: Mr. Joe Murdoch

Subject: System Volund - Gas Residence Time and Temperature

Dear Joe:

In response to your recent request for information concerning odor control and burn-out of gases in the furnace system to be installed at McKay Bay, we are submitting the following:



Zone 1 - Furnace, Rotary Kiln and By-Pass Ducting
Average Temperature 1750°F
Residence Time 2.7 seconds



Zone 2 - Afterburner
Average Temperature 1750°F
Residence Time 0.95 seconds



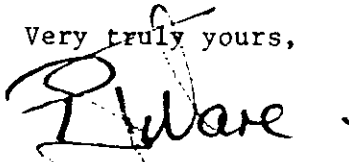
Zone 3 - Boiler - 1st Pass
Average Temperature 1300°F
Residence Time 3.89 seconds

Mr. Joe Murdoch
November 5, 1982
Page 2

It has been Vølund's experience that gas retention for 1 second at or above 1300°F will eliminate any detectable odor in the flue gases.

I hope this information is helpful in your discussions with the appropriate officials.

Very truly yours,

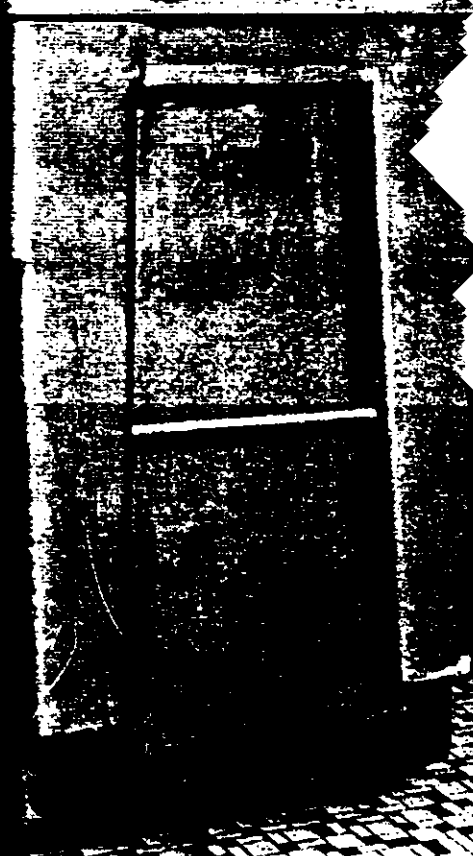
A handwritten signature in black ink that reads "Peter J. Ware". The signature is written in a cursive style with a large initial "P" and a period at the end.

Peter J. Ware
Director
Technical Development

PJW:mat

Rubbermaid

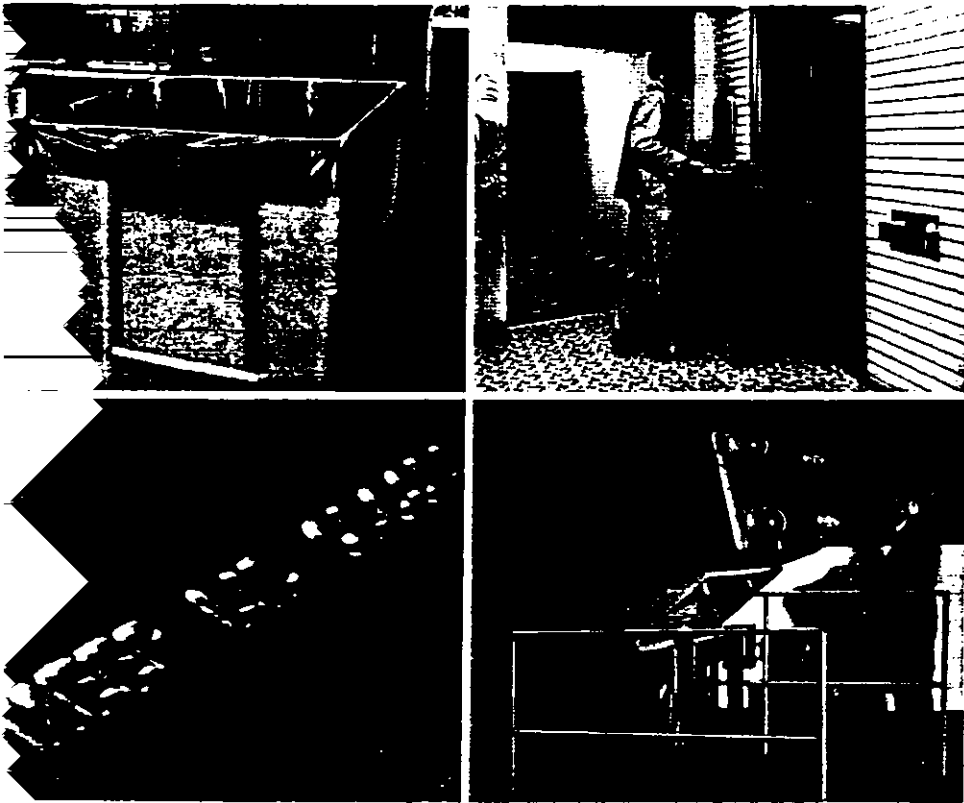
in/terior service Tote



**A safety-first system for collecting and
automatically dumping all types of building trash.**

Building trash can now be collected, transported and automatically dumped in stationary compactors more efficiently; with greatly reduced risk of employee injury.

Collecting, transporting and dumping the wide variety of trash generated within a typical commercial building or plant presents many problems - but, a Rubbermaid in/terior service Toter system can solve most of them! For example:



1. Safer trash handling and dumping.

Back strain and fall related injuries are the two most obvious dangers of handling and dumping trash - Rubbermaid in/Toter systems feature automatic, remote-controlled dumpers to help avoid these potential employee hazards. The special electric - hydraulic dumping units eliminate the need to lift or hand-dump trash into compactors or other transfer containers. The employee simply hooks the in/Toter then actuates the dumper from a safe, remote location. Along with reducing injury risk - the system can also save on insurance costs, workmen's compensation settlements, plus absenteeism. And, of course, improved working conditions mean better employee morale!

2. Color-coding and signage for better management...and looks!

Each department, floor section, or 'special activity', can have its own color-coded and/or custom-imprinted carts. This provides better inventory control and color harmony to your building decor.

3. Easier on your building!

The smooth, rounded edges. The less abrasive material. The more controlled - maneuverability...and the compact, trim-line design of both carts cuts down on damage to interior walls, floors and doors.

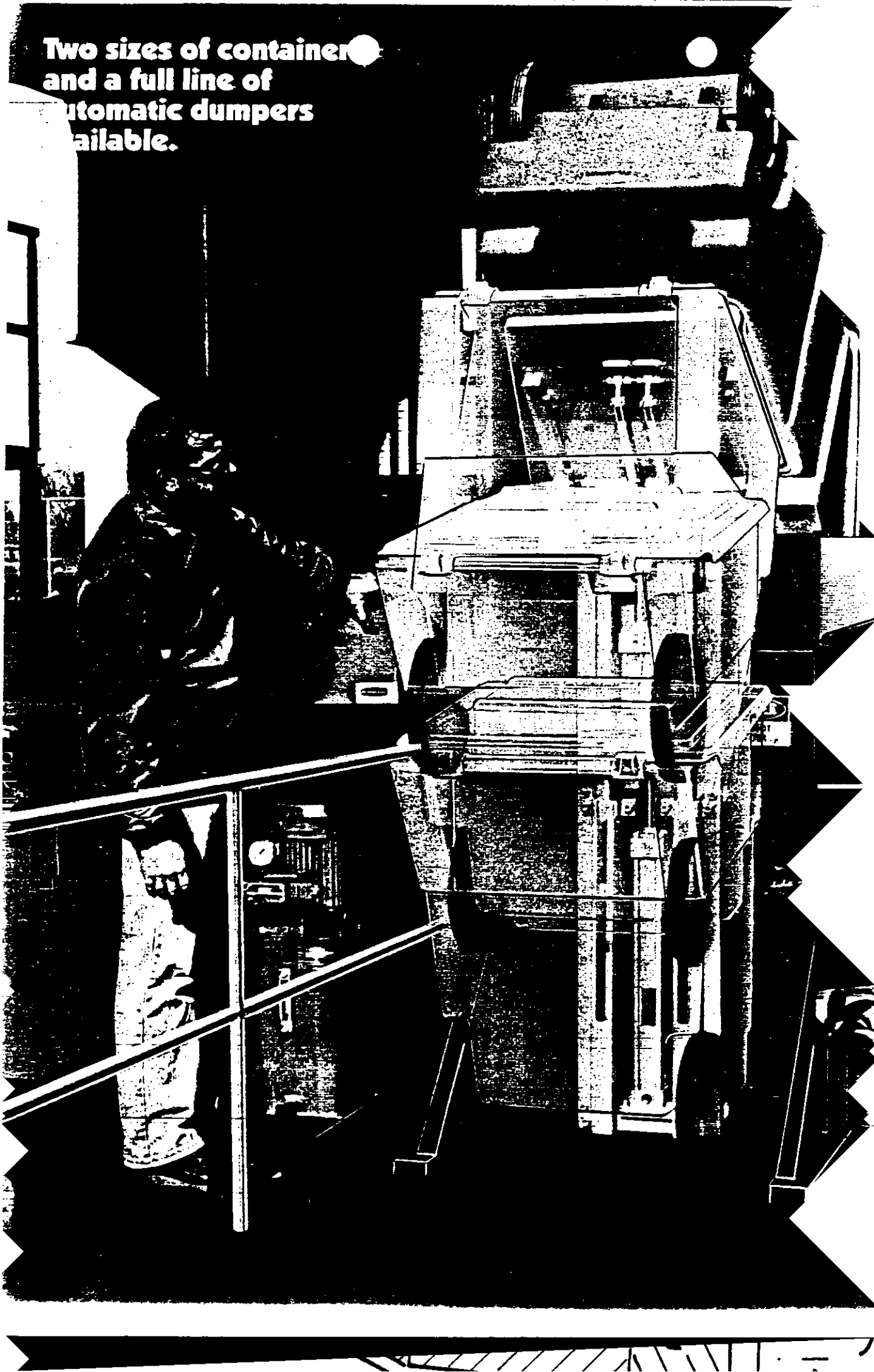
4. A versatile one-source answer!

Rubbermaid in/Toters can handle all types of normal building refuse including wet trash. Our container walls are virtually impervious and special liners are available.

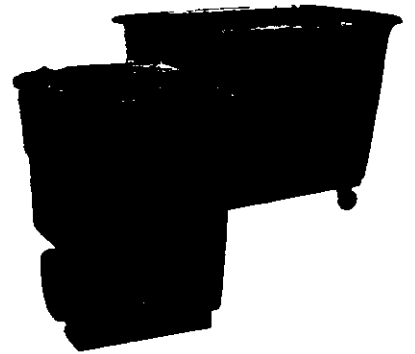
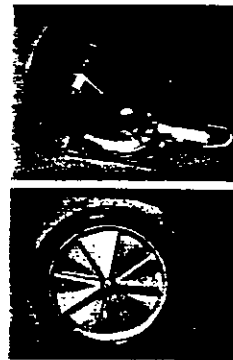
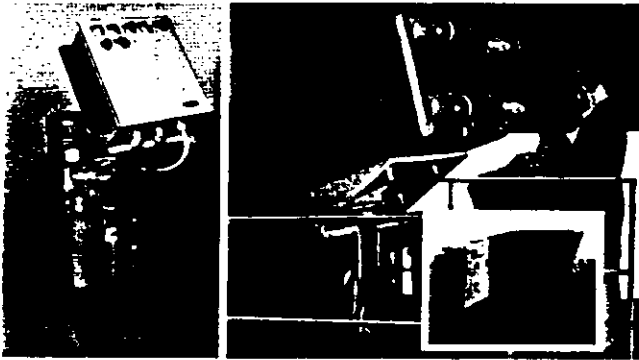
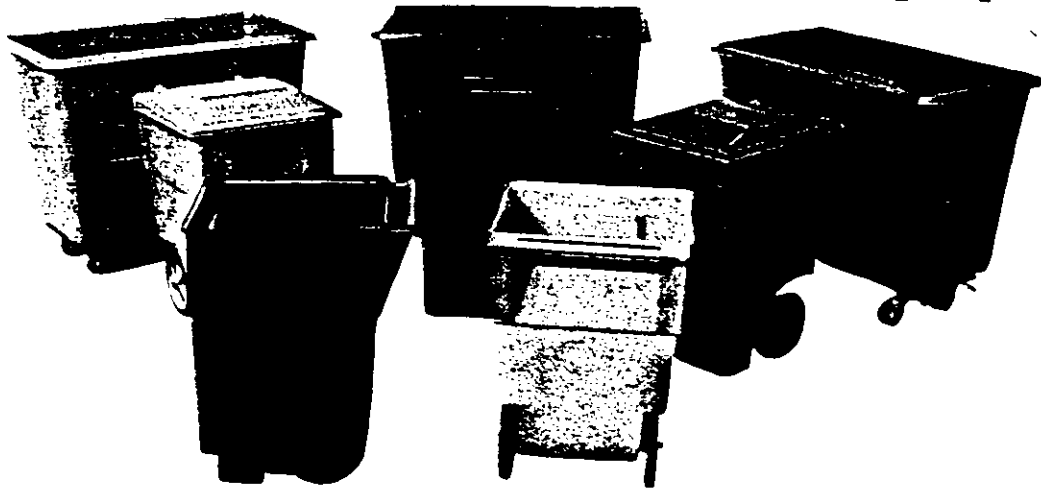
5. Efficiency and cost-control

Easy-rolling, maneuverable Rubbermaid in/Toters come in two hi-capacity sizes to help achieve faster trash collection. This can significantly reduce manpower costs!

Two sizes of container
and a full line of
automatic dumpers
available.



Traditional Rubbermaid Product Integrity.



Hydraulic Dumper SPECIFICATIONS

Electro-hydraulic dumpers available for most dock level and ground level stationary compactors. **NOTE:** 1.0 cu. yd. Dumper will dump both sizes of in/Toters.

POWER:	3ph./60cy./220-440V	1/2 cu. yd.	1.0 cu. yd.
	Totally enclosed, fan-cooled motor. All electrical components are UL listed.	2 hp	3 hp
HYDRAULICS:	1300psi; Built-in fluid filter and flow control valves. Meets all J.I.C. and I.S.O. Standards.	2 gpm 5 gal. reservoir	3 gpm 10 gal. reservoir

CONTROLS: Key - - operated ON/OFF with manual directional "deadman" valve.

INSTALLATION: Dumpers are specified and custom -installed by exclusive in/Toter™ distributors, to work with most stationary compactor models.

This equipment conforms to all applicable ANSI Z245.1-1975 Safety Standards. Pictures in this brochure are illustrative only. Products must be installed in conformity with ANSI Z245.1 as well as any applicable codes and regulations. Products must be used with safe practices and in accordance with said regulations and standards.

Paul Reilly Company of Illinois, Inc.
1319 Howard St.
Elk Grove Village, IL 60007
(312) 364-1960

in/Toter™ SPECIFICATIONS

	1/2 cu. yd.	1.0 cu. yd.
DIMENSIONS:	32"Lx29"Wx41 1/2"H	55 1/2"Lx33 1/2"Wx44 1/2"H
WEIGHT:	37 lbs.	98 lbs.
in/Toter Lid	5 lbs.	11 lbs.
CAPACITY:	200 lbs., 11 cu. ft.	500 lbs., 1.0 cu. yd.
WHEELS:	2-12"x1.75" Semi-pneumatic	2-5" Swivel Casters 2-5" Locking Casters
MATERIAL:	Specially compounded high density polyethylene	
COLORS:	Brown, Blue, Red, Orange, Yellow	
IMPRINTING:	Permanent hot stamped imprinting optional. Examples: "SOILED LINEN", "KITCHEN"	
LINER:	Gray or red poly-bag liners available.	

Specifications subject to change without notice.

A safety-engineered system manufactured and distributed exclusively by:



RUBBERMAID APPLIED PRODUCTS INC.



DEPARTMENT OF

Health & Rehabilitative Services

Bob Graham, Governor

1317 WINEWOOD BOULEVARD

TALLAHASSEE, FLORIDA 32301

PDHEC (904/488-2905, SC278-2905)

January 25, 1982
INFORMATION

SUBJECT: Guidelines for Hospitals, Renal Dialysis Centers,
Nursing Homes and Laboratories for the Classification
and Handling of Disposable Infectious Waste

TO: District Administrators
Attention: Health Program Supervisors
County Health Unit Directors
All Licensed Hospitals

Attached are guidelines (minimum standards) for hospitals, renal dialysis centers, nursing homes, and laboratories for the classification and handling of disposable infectious waste. These guidelines were developed following a meeting of representatives from the Department of Health and Rehabilitative Services, Department of Environmental Regulation, Centers for Disease Control, County Health Units, Hospital Infection Control Specialists, and Waste Disposal Industry (June 29, 1981 - list of attendees available upon request). The guidelines in draft form were distributed to all meeting attendees for comment.

These guidelines are intended to aid hospitals, renal dialysis centers, nursing homes, and laboratories in classifying and handling disposable infectious waste in preparation for collection and ultimate disposal in the environment. They are not intended to be all encompassing recommendations for handling human tissues/waste specimens (or materials in contact with such specimens) within hospitals. Hospitals and other institutions should develop additional internal policies for the protection of employees from contact with potentially infectious material and for the proper sterilization of reusable items. We feel, and the Department of Environmental Regulation (DER) concurs, that these guidelines are not in conflict with DER Administrative Code, Chapter 17-7.02, Definition of Infectious Waste, since that definition uses permissive language in determining what waste materials are infectious waste, i.e. "...waste which may consist of...". Once materials are classified as infectious, they shall be disposed of in accordance with DER Administrative Code, Chapter 17-7.04. It is, therefore, obvious that the enforcement of these guidelines (or when they are incorporated

into F.A.C.) will have to take place at the source (hospital, etc.) and will not be enforceable by examining materials in landfills (unless they are in an infectious waste bag).

We hope that any local ordinances pertaining to this subject will be based on these guidelines. We plan to incorporate them, in principle, into the Florida Administrative Code pertaining to hospitals (Chapter 10D-28) and nursing homes (Chapter 10D-29) and therefore, additional comments are appreciated.



ROBERT A. GUNN, M.D., M.P.H.
State Epidemiologist
Epidemiology/Communicable Disease
Health Program Office



JAMES T. HOWELL, M.D., M.P.H.
Acting Staff Director
Health Program Office

RAG/JTH/sb

Attachment

cc: All Meeting Attendees
OPHLS (Hr. Hartwig) (for distribution)
OPLC (Ms. Beamer) (for distribution to nursing homes)
PDPA (Ms. Selesky)
Dr. Joel Ehrenkranz
Mr. Spero Moutsatsos, Florida Endstage Renal
Disease Network (for distribution)
Mr. Robert J. Constantine, Director
Mental Health Program Office (for distribution)
OPIRM (for distribution)



STATE OF FLORIDA

DEPARTMENT OF

Health & Rehabilitative Services

Bob Graham, Governor

1317 WINEWOOD BOULEVARD

TALLAHASSEE, FLORIDA 32301

February 1, 1982

GUIDELINES (MINIMUM STANDARDS) FOR HOSPITALS, RENAL DIALYSIS CENTERS, NURSING HOMES, AND LABORATORIES FOR THE CLASSIFICATION AND HANDLING OF DISPOSABLE "INFECTIOUS WASTE"

A. Definitions - for the purposes of these guidelines the following definitions are used:

1. Solid Waste - All solid material emanating from patient care which includes, but is not limited to, the following disposables: linens, gowns, intravenous (I.V.) material, catheters, syringes, needles, clinical laboratory specimen containers, tubes, drainage systems, renal dialyzers and accessories, and other disposable items which may be contaminated with urine, feces, blood, secretions or other bodily fluids.
2. Liquid Waste - All material emanating from patient care that may be and is routinely placed into the sewage system, which includes, but is not limited to, urine, feces, blood, secretions, drainage fluids and other bodily fluids.

B. Infectious Waste

The following materials are classified as infectious waste:

1. Patients Under Isolation Orders - All solid wastes from patients under strict or respiratory isolation as defined in Isolation Techniques for Use in Hospitals, Second Edition (or more recent edition), 1975, U.S. Department of Health and Human Services, Centers for Disease Control.
2. Patients Under Precautions Orders - All solid wastes from patients pertaining to the maintenance of enteric, wound/skin, discharge (secretion and excretion) and blood precautions as defined in Isolation Techniques for Use in Hospitals, Second Edition (or more recent edition), 1975, U.S. Department of Health and Human Services, Centers for Disease Control.

3. All unautoclaved microbiologic waste derived from processing clinical specimens which includes, but is not limited to, all cultures and disposable items that may be contaminated with culture organisms.
4. All solid tissue specimens
5. Class IV Viral Agents - Waste from patients (or waste from laboratory experiments) infected with Centers for Disease Control (CDC) Class IV viral agents (Appendix A) shall include all solid waste in addition to all liquid waste which may contain the infecting agent.

C. Needles/Sharps ("sharps")

All material with sharp or jagged edges ("sharps"), which includes, but is not limited to, needles, syringes, scalpels, lancets, and pipettes shall be placed in rigid disposable containers. They may be disposed of in regular waste unless classified as infectious waste as per Section B; however, if the regular waste disposal system uses a trash compacter and the integrity of the container is in doubt, such container should be handled as infectious waste. It is also recommended that needles and syringes not be dismantled or destroyed after use but that they be placed intact directly into a rigid container.

D. Handling

Infectious waste shall be placed in double impervious plastic bags (color-coded - usually red) and each single bag shall be at least two mills in thickness. A bag, when full, should not exceed 25 pounds. All bags should be securely closed and a tag, which reads "INFECTIOUS WASTE" and identifies the hospital, dialysis center, laboratory, or nursing home from which the waste is being removed, shall be attached to the bag in a conspicuous manner. As an alternative to tagging, the information which is required to be placed on the tags may be printed in a conspicuous manner on the bag itself.

E. Storage and Removal

Bags of infectious waste shall be transported and stored in receptacles which are conspicuously marked "INFECTIOUS WASTE". Infectious waste shall be held for pick-up in specially-marked non-metal containers separate from regular waste and shall be secured from unauthorized persons, birds, and animals and, if possible, rain/storm water. Infectious waste bags should not be removed by mechanical or compaction equipment. Broken or leaking

APPENDIX A - CENTERS FOR DISEASE CONTROL (CDC)
CLASSIFICATION OF ETIOLOGIC AGENTS

Class 4

Agents that require the most stringent conditions for their containment because they are extremely hazardous to laboratory personnel or may cause serious epidemic disease. This class includes Class 3 agents from outside the United States when they are employed in entomological experiments or when other entomological experiments are conducted in the same laboratory area.

Alastrun, Smallpox, Monkey pox and Whitepox, when used for transmission or animal inoculation experiments

Hemorrhagic fever agents, including Critmean hemorrhagic fever (Congo), Junin, and Machupo viruses, and others as yet undefined

Herpesvirus simiae (Monkey B virus)

Lassa virus

Marbug Virus

Tick-borne encephalitis virus complex, including Russian spring-summer encephalitis, Kyasanur forest disease. Omsk hemorrhagic fever, and Central European encephalitis viruses.

Venzuelan equine encephalitis virus, epidemic strains, when used for transmission or animal inoculation experiments

Yellow fever virus - wild, when used for transmission or animal inoculation experiments



CITY OF TAMPA

Bob Martinez, Mayor

MCKAY BAY REFUSE-TO-ENERGY PROJECT

December 29, 1982

DER
JAN 3 1983
BAQM

Mr. Clair Fancy
Department of Environmental Regulation
Bureau of Air Quality
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Permit #PSD-FL-086, AC29-47277

Dear Mr. Fancy:

As you are aware, the City of Tampa has received permits from D.E.R. for construction of the McKay Bay Refuse-to-Energy Facility. The Facility is designed to burn solid waste from the City of Tampa and to simultaneously generate electricity. The City has previously requested to modify its permits to Construct an Air Pollution Source to allow burning of infectious waste in the Facility (letter of November 9, 1982). Recently, the City received a request from a Tampa Port Authority group to provide facilities for disposal of oil recovered from oil spills occurring at the Port of Tampa.

Oil would be delivered to the Facility by tanker truck or in polyethylene pads packed in fiber drums. The Facility would accept no more than 15,000 gallons per day from tanker trucks which would spray the oil onto the garbage in the pit. The Facility would accept up to 10 tons per day of fiber drums which would be placed directly into the combustion train. Disposal will only be available for oil spilled at the Port of Tampa. Such spills have resulted in an average of approximately 10,000 gallons of oil being recovered each year. The only major spill in the Port of Tampa released approximately 30,000 gallons of oil in 1979. No additional air emissions are expected from the burning of recovered oil.

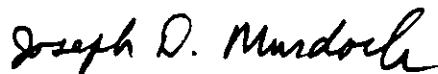
The City therefore requests to have its permits to Construct an Air Pollution Source (PSD FL-086, AC29-47277)

Mr. Clair Fancy
Page 2
December 29, 1982

modified to allow burning of the above-mentioned quantities of recovered oil. Additionally, we request modification of these permits to allow burning of infectious waste as described in our letter of November 9, 1982.

If you have any questions concerning these requests, please contact my office. Thank you.

Very truly yours,



Joseph D. Murdoch
Resource Recovery
Management Analyst

JDM/dw

cc Rick Garrity
John Egan