

BOARD OF COUNTY COMMISSIONERS

DEPARTMENT OF SOLID WASTE MANAGEMENT
2800 110TH AVENUE NORTH
ST. PETERSBURG, FLORIDA 33702
PHONE (813) 825-1565



P.O. BOX 21623
ST. PETERSBURG, FLORIDA 33742-1623

December 10, 1986

COMMISSIONERS

CHARLES E. RAINEY, CHAIRMAN
GEORGE GREER, VICE-CHAIRMAN
JOHN CHESNUT, JR.
BARBARA SHEEN TODD
BRUCE TYNDALL

DER

DEC 11 1986

BAQM

Mr. Clair Fancy, Deputy Chief
Bureau of Air Quality Management
State of Florida
Department of Environment Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

Subject: Pinellas County Resource Recovery Facility -
Dioxin Testing

Dear Mr. Fancy:

A provision of our Power Plant Site Certification (PPSC) requires that air emission tests be performed within ninety (90) days of acceptance. This time frame will expire at the end of December, 1986.

As you are aware, Pinellas County is working with the Department of Environment Regulation to have dioxin tests performed concurrently, and by the same testing company that will perform the required Power Plant Site Certification tests.

Therefore, and in consideration of the dioxin test program status, this is to formalize our request that the Department of Environment Regulation grant an emission test time extension to February 28, 1987.

Your continued cooperation is, as always, appreciated.

Sincerely,

DEPARTMENT OF SOLID WASTE MANAGEMENT

Robert Van Deman, Director

RVD/pmj
726V

cc: Hamilton S. Oven

THOMAS W. REESE
ATTORNEY AT LAW
123 EIGHTH STREET NORTH
ST. PETERSBURG, FLORIDA 33701

(813) 822-4084

Agusut 13, 1986

DER
AUG 10
E.

Steve Smallwood
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Pinellas County Resource Recover Plant #3
PSD Air Permit Application

Dear Steve:

I have not received a reply to my June 2, 1986 letter, a copy of which is attached. Could you please advise me of the status of the PSD permit application and the plans for monitoring the dioxin, furan and lead emissions?

Also, the odors around I-275 adjacent to the resource recovery plant and the Bridgeway Acres/Toytown Landfill complexes are offensive and objectionable. Could you please advise me what DER intends to do about these odors?

Very truly yours,

Thomas W. Reese

TWR/jmt

cc: Claire Fancy



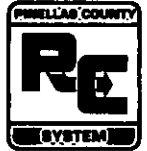
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P.O. BOX 21623
ST. PETERSBURG, FLORIDA 33742-1623



July 8, 1986

DER

JUL 14 1986

BAQM

Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Dear Mr. Fancy:

In accordance with required procedures, please consider the following comments on behalf of Pinellas County regarding the preliminary determination and draft permit for Pinellas County's Resource Recovery Facility Unit 3:

Concerning the "Notice of Prevention of Significant Deterioration (PSD) Draft Permit", be advised that two revisions were made to this document, as discussed and agreed upon by Mr. Ed Svec, State of Florida, Department of Environmental Regulation, on June 19, 1986. The revisions are as follows:

- A. First page, first paragraph, first sentence - The date of application is August 31, 1983, not August 31, 1986 - an apparent typographical error.
- B. Second page, between first and second paragraph - The following paragraph was inserted: "Construction of Unit #3 is currently 98% complete. The boiler was first ignited on April 15, 1986, and is expected to undergo formal testing during August 1986." On June 2, 1986, Pinellas County Staff met with the Department in Tallahassee whereby all parties agreed that the above statement was germane to this permit and that it should be included. However, it was erroneously omitted from the Department's draft notice.

Also, our computer modeling indicates that for sulfur dioxide in the Class II Area the degree of increment consumption that will result from operation of Unit #3 is 18%, not 89% as stated in the

Mr. C. H. Fancy, P.E.
July 8, 1986
Page Two

Departments notice. The total increment consumption due to all PSD sources is 89%.

Regarding the "Preliminary Determination and Draft Permit", dated June 11, 1986, we have numbered the pages of that document sequentially, commencing with the title sheet (including tables) and comment as follows:

1. Page 3, first paragraph, fourth sentence - The generating capacity of the expanded plant, as stated in the Recommended Order for the PPSA, Unit #3 is 79.9 MW (gross), not 72 MW.
2. Page 4, paragraph 7 - The facility may also be a source of beryllium (see comment #3, below).
3. Page 7, top of page, BACT listing for Beryllium - The emission rate of 1.3×10^{-6} lb/ton may be a typical value and was derived from literature review in 1983 by County staff for our August 31, 1983, application for Unit #3. Note that this rate may be below the detection limit for the compliance test for beryllium (EPA Method 104). The February 1984 Conditions of Certification and PSD permit for Unit #3 prepared by the Department do not include an emission limit for beryllium. We believe that this is correct and is due to the Department's recognition of the difference between the typical literature emission rate and minimum detection limits for compliance. There should be no beryllium emission limit for Unit No. 3. It is inappropriate to set an emission limit for which compliance cannot be demonstrated.
4. Page 7, top of page, BACT listing for fluorides - The February 1984 Conditions of Certification and PSD permit for Unit #3 do not contain an emission limit for fluoride. The 0.10 lb/ton rate identified in the August 31, 1983, application is a literature value which may be typical over average annual conditions. Variation from this average is expected. For example, tests conducted on Pinellas Units 1 and 2 in November 1984 reveal that the 99% geometric upper confidence level for fluoride is 0.14 lb/ton. At the Westchester Facility, test results show a 99% geometric upper confidence level of 0.19 lb/ton.

Any emission limit for fluoride must be established based on an upper confidence limit. This is due to the anticipated variability of fluoride precursors in solid waste (e.g. plastics). Therefore, it is Pinellas

Mr. C. H. Fancy, P.E.
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Page Three

County's position that, if a fluoride emission must be established at this time, it should be the equivalent of 0.25 lb/ton. Note that the variability of refuse requires that some allowance be included for this emission, and other emissions which may be regulated by permit. At the stated limit, fluoride is emitted in trace amounts with little, if any, impact on ambient air quality. Our modelling indicates that at the stated emission rate the ambient air impact, based on a 24 hour concentration, is 1.06 ug/m³.

5. Page 7, first paragraph, first sentence - No emission limit is proposed for VOC. Unit #3 is not a significant source for VOC. Also, see comment #17 below, as it regards the date of this PSD review.
6. Page 7, paragraph 3, first sentence - The heat input of 438 million Btu per hour is based on an MSW calorific content of 5000 Btu per pound, not 4500 Btu per pound.
7. Page 7, fourth paragraph - The values in Table II-1 are for Unit #3 only.
8. Page 7, paragraph 5 - Pinellas County never proposed an emission limit for beryllium or fluoride. In our August 31, 1983, application we estimated that, based on literature values, a typical emission rate for beryllium is 1.3×10^{-6} lb/ton and for fluoride, 0.10 lb/ton.
9. Page 7, paragraph 6, 4th sentence - The correct emission limit for SO₂ is 170 pounds per hour. The value of 120 pounds per hour is a typographical error.
10. Page 8, paragraph 2 - The contents of this paragraph are questionable and/or erroneous as they relate to the Pinellas facility. We recommend that the entire paragraph be stricken. As we have stated in comment number 3 above, the emission rate of 1.3×10^{-6} lb/ton may be below the minimum detection limit for compliance tests. Therefore, it is inappropriate to set an emission limit for which compliance cannot be demonstrated.
11. Page 9, first paragraph, last sentence (and in all other portions of this document where the status of Unit #3 construction is described or otherwise referenced) - Note, this is not a "proposed" project. Construction of the facility is 98% complete.

Mr. C. H. Fancy, P.E.
July 8, 1986
Page Four

12. Page 9, paragraph 6, second sentence - the value of 0.10 lb/ton for fluoride is an average of several literature values and is not based on actual stack test data. As we stated in comment #4 above, actual fluoride emissions may vary above 0.1 lb/ton.
13. Page 10, paragraph 2 - The conclusions of the resultant modeling, when the emission limits requested by Pinellas County are used, are in agreement with the conclusions reached in this paragraph.
14. Page 13, top of page - The draft permit and preliminary determination, transmitted to Pinellas County via Department letter of June 12, 1986, does not contain an "Appendix A".
15. Page 13, second paragraph (beginning "The predicted...."), eighth sentence - This statement is not correct. The nearest lead monitor is site 2260 - 002, Sheriff's station, which is less than two (2) miles from the facility.
16. Page 13, last paragraph - For the Department's information, Pinellas County herein submits ambient monitoring data for the year's 1983, 1984 and 1985. The fact that Pinellas Units 1 & 2 commenced commercial operations in May, 1983, should be noted when reviewing the data which demonstrates that thereafter air quality improved.
17. Page 16, third paragraph, fourth and fifth sentences - The County received written confirmation of the modeling protocol from the Department prior to executing the computer models; this agreed upon protocol did not include the two stated sources (Largo WWTP and Hubert Rutland Hospital). Any statements, such as the referenced sentences, in this draft permit pertaining to any conditions which came into effect after the submittal of the August 31, 1983, application, are inappropriate.
18. Page 18, third paragraph, beginning fourth sentence - Pinellas County agrees that BACT for lead is 0.10 lb/ton, as established by the Department. However, we believe that several statements in this paragraph are erroneous and do not concur with our modeling results, which are submitted herein. Based on our analysis, the maximum predicted quarterly lead concentration resulting from Units 1, 2, and 3 at the facility is 0.113 ug/m³ (see 3rd quarter, inner rings). This maximum was obtained using an emission rate of 0.10

Mr. C. H. Fancy, P.E.
July 8, 1986
Page Five

lb/ton. When the maximum concentration of all three units is added to the background concentration (0.8 ug/m³) the resultant concentration, 0.91 ug/m³, is still significantly less than the AAQS of 1.5 ug/m³. Also note that, as shown in the more recent ambient data submitted per comment #16, background levels have been reduced significantly from the 1982 maximum of 0.8 ug/m³ used in the analysis. Therefore, language from this paragraph must be deleted and/or corrected and Table V-6 should be modified accordingly, including deletion of the footnote at the bottom of the table.

19. Page 20, beginning paragraph five (Section VII) - The statements in this section and, for that matter, the entire basis for the resubmittal of our August 31, 1983, application and this subsequent draft permit and preliminary determination, is based on perceived deficiencies in the Florida Power Plant Siting Act. We have documentation which indicates that these perceived deficiencies (if they ever existed) have been corrected. We recommend that the Department correct this Section accordingly.
20. Page 22, all paragraphs - The Department acknowledges that "A special set of circumstances is applicable to this PSD permit application." Accordingly, we believe that this page should be revised to fit our specific situation. For example, the title on the page states that this document constitutes a permit to construct. As you are aware, the permitted source in question is now 98% complete. Also, Unit #3 will undergo formal testing as soon as August, 1986. Immediately thereafter, commercial operation will begin.
21. Page 23, item 1.a.(1) - The statement "...or 24.9 pounds per hour whichever is more restrictive." must be deleted. While the mass emission rate of 24.9 lb/hr can be calculated to be approximately equivalent to the grain loading of 0.03 gr/dscf-12% CO₂, refuse composition is variable and has an associated variable "f" factor. Regulations dealing with restrictions on particulate emissions for incinerators, including 40 CFR, Part 60, apply an outlet grain loading requirement. This is the preferred reporting method and avoids variability due to the "f" factor. Therefore, the stated limit should be 0.03 grains per dry standard cubic corrected to 12% CO₂.

Mr. C. H. Fancy, P.E.
July 8, 1986
Page Six

22. Page 23, item 1.a.(2) - Delete the word "EPA" and substitute "DER" in its place. It is our understanding that the EPA has delegated day to day permit administration to the DER. This change will also conform to the State Conditions of Certification for Unit No. 3.
23. Page 23, general comment on Section 1. "Emission Limitations" - We note that there is no emission limit proposed for sulfuric acid mist. Likewise, no sulfuric acid mist limits are in our February, 1984, Conditions of Certification and PSD permit. If the Department must set a sulfuric acid mist emission limit, then Pinellas County would accept an emission limit of 20.6 lb/hr which is equivalent to 0.047 lb/MMBTU recently determined for Broward County, Florida. Our modelling indicates that at the stated emission rate the ambient air quality impact, based on a 24 hour concentration, is 1.98 ug/m³.
24. Page 23, item 1.a.(5) - The words ", or 1.8 lb/ton, whichever is more restrictive" must be deleted. To establish an emission limit based on pounds of pollutant per ton of refuse fired, one must not only measure the quantity of pollutant in the stack gases, but must also accurately characterize the precise amount of refuse fired during the stack sampling regimen. Stack test methods are established by the EPA. However, no such agreed upon protocol exists for determining the weight of refuse fired. The impossibility of the "per ton" requirement is apparent when you consider the inherent lag time between charging the boiler with refuse and the time when the charge is burned resulting in emissions and actual measurement of gases in the stack. Exact measurement of tons burned is further complicated, if not prohibited, by the "orange peel" crane grapples inability to measure the weight of refuse charged.
25. Page 23, item 1.a.(7) - Pursuant to comment #4 and #24, the emission limit for fluoride must be changed to 10.94 lb/hr.
26. Page 23, item 1.a.(8) - Pursuant to comment #3, the emission limit for beryllium must be deleted.
27. Page 23, item 1.a.(10) - The statement does not apply to operation of Unit #3 and must be deleted. Unit #3 is equipped with an ash discharge system whereby residue from the boiler is completely immersed in water

Mr. C. H. Fancy, P.E.
July 8, 1986
Page Seven

(quenched) to provide the boiler negative pressure seal and prevent dust. Thereafter, a material recovery system separates boiler residue into sellable components. "Ash" is not loaded into trucks.

28. Page 24, item 1.b.(1) - Unit #3 is 98% complete with construction. Formal testing may occur as early as August, 1986. The time frames for compliance testing stipulated in 40 CFR 60.8 as applied to this permit and unique situation, need clarification. In view of this fact, and to avoid possible noncompliance with meeting these deadlines, a modification of both paragraphs is required. Our Powerplant Site Certification is specific as to test notification and timing. These requirements are in compliance with 40 CFR, Part 60. The requirement to test at a "time...as specified by EPA" may be in conflict with the Florida permit requirement. Certainly, the permittee should not be caused to be in non-compliance merely because of a procedural disagreement between EPA and DER. The Conditions of Certification allow orderly and cost effective planning and reporting of compliance and monitoring information as a result of the Florida permit having been structured for Units 1, 2 and 3 in compliance with Florida Administrative Code and 40 CFR, Part 60. Essentially the same concern and problem solution is contained in our comment #22, #28, #35 and #36. We request that both paragraphs under section 1.b.(1) be deleted and replaced with these -

Compliance tests for particulate matter shall be conducted in accordance 40 CFR, 60.8 (a), (b), (d), (e) and (f). The compliance tests for opacity will be conducted simultaneously during each compliance test run for particulate matter. An annual test for particulate matter is required.

Initial compliance tests for SO₂, nitrogen oxides, CO, fluorides, mercury and sulfuric acid mist shall be conducted within 90 days of the date of issuance of the PSD approval.

The permittee shall coordinate, notify, make records available as may be necessary to determine the conditions of compliance and performance tests, and submit all reports and monitoring information required by this permit to the DER, Southwest Florida District Office.

Mr. C. H. Fancy, P.E.

July 8, 1986

Page Eight

29. Page 25, item 1.b.(2)g. - The following sentence must be added: "In addition, Method 8 may also be used". Method 8 is also an acceptable method for measuring SO₂.
30. Page 25, item 1.b.(2)m. - Delete beryllium test method and add sulfuric acid mist test method as follows:
m. Method 8 (modified with a prefilter to remove inorganic sulfate interferences) for sulfuric acid mist. One sample constitutes one test run.
31. Page 25, item 1.b(3) - This statement should be revised to read: "The stack tests shall be performed at +/- 10% of the maximum steam rate of 250,000 pounds per hour."
32. Page 25, item 5 - This statement must be deleted. It is not germane to Unit #3 as the project is now 98% constructed.
33. Page 26, Delete item #6 at the top of the page and modify item #10 (same page) to read as follows: The Resource Recovery Facility shall utilize refuse such as garbage and trash (as defined in Chapter 17-7, FAC), but not sludge or other process-related products from sewage treatment plants, as its fuel. Use of alternate fuels would necessitate application for a modification to this permit.
34. Page 26, item 9 - This section should be retitled "Reporting Frequency" and in both sub-section a. and b. the addressee should be the DER, Southwest Florida District Office. This is in accordance with comment #28 herein.
35. Page 26, item 11 - Revise the first line to state "Addresses for submitting reports and notices as required by this permit are:". This identifies correct mailing addresses for information to be submitted by the permittee and acknowledges that the permit specifies, item by item, the receiving agency. Comments #22 and #28 herein further substantiate the need for this revision.
36. Page 28, item 3 - Delete the word "EPA" and substitute "DER" in its place. The need for this substitution is substantiated by comments #22, #28 and #35 herein.

Mr. C. H. Fancy, P.E.
July 8, 1986
Page Nine

As stated in the required public notice, the draft permit and preliminary determination are to reflect the best available control technology as of August 31, 1983 (the date Pinellas County submitted its application). However, agency review appears to reflect a continued reliance by EPA and DER staff on 1986 technology, standards, criteria, etc. Furthermore, based on the construction status of the two projects, it is with some considerable consternation that we note both EPA and DER chose to process Hillsborough County's application/reapplication prior to Pinellas County's reapplication. We respectfully urge both DER and EPA to depart from 1986 permit processing format in consideration of the unique circumstances pertaining to this reapplication for both legal and equitable reasons. Toward that end we are submitting, in addition to these comments, a revised preliminary determination and draft permit which reflects our concerns and understandings and respectfully urge DER and EPA approval of same without substantive additions, modifications, or deletions.

Very truly yours,


Bob Van Deman, Director
Solid Waste Management

cc: Bruce Miller
Jewell Harper

Enclosures

1. 1983, 1984, 1985 ambient air modeling data
2. Air quality impact modeling results
3. Draft permit as prepared by Pinellas County

THOMAS W. REESE
ATTORNEY AT LAW
123 EIGHTH STREET NORTH
ST. PETERSBURG, FLORIDA 33701

(813) 822-4064

June 2, 1986

Steve Smallwood
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Pinellas County Resource Recovery Plant #3
PSD Air Permit

Dear Steve:

I represent the Meadowlawn Civic Association and make these comments on their behalf. The Meadowlawn Civic Association is composed of residents of St. Petersburg who live approximately one mile to the south of the Pinellas County Resource Recovery Plant near I-275 and Roosevelt Boulevard.

The Meadowlawn Civic Association requests DER to require Pinellas County as a condition of their PSD air permit to monitor for dioxin, furan and lead emissions. The State of California is still interested in monitoring the Pinellas County facility free of charge for dioxin and furan emissions. The permit should specifically require such monitoring.

Very truly yours,


Thomas W. Reese

TWR/jmt

cc: Victoria J. Tschinkel
Dr. Richard Garrity
Mark Popp
Fred Marquis

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

358

ACTION DUE DATE

9-5-86

1. TO: (NAME, OFFICE, LOCATION)

Clair

Initial

Date

2.

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

*Prepare response you
Signature*

*This was
answered
9/30/86
+ marked off
log -*

*Good -
please put
in file*

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

SSm

DATE

8-25

PHONE

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Initial *HCO*
Date *12/15/86*

Buck Owen

2.

Initial
Date

Dr Devereaux

3.

Initial
Date

4.

Initial
Date

RECEIVED
DEC 15 1986

REMARKS:

The Interoffice memorandum is being sent from Clair thru you to Al Devereaux. Underneath this is a letter for Al Devereaux to sign approving the emissions testing time extension to Feb 28, 1987 for Pirellas RRF Unit 3

Office of the Secretary

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

Cave H. Wadley

DATE

12 Dec

PHONE

8-1344

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____ Locn: _____
To: _____ Locn: _____
To: _____ Locn: _____
From: _____ Date: _____

TO: Al Devereaux
THRU: Hamilton S. Owen *HsO*
FROM: Clair Fancy *Clair Fancy*
DATE: December 12, 1986
SUBJ: Pinellas County Resource Recovery Unit No. 3
Emissions Testing Time Extension Request

This letter for your signature is an approval of an emissions testing time extension request for Pinellas County Resource Recovery Unit No. 3 from 90 days after start of operation (late December, 1986) to February 28, 1987. This is to allow concurrent testing of dioxins, furans, and heavy metals using California funds and by the same testing company that will perform the required Power Plant Site Certification Tests. California has \$50,000 worth of funds for the testing of dioxin, furans, and heavy metals. They chose Pinellas County Resource Recovery Facility for the site of these tests; and they, the department, Pinellas County, and Signal Environmental have agreed to have the tests done by February 28, 1987.

CHF/CH/s

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

December 12, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert Van Deman, Director
Department of Solid Waste Management
2800 110th Avenue North
St. Petersburg, Florida 33702

Dear Mr. Van Deman:

Re: Pinellas County Resource Recovery Facility, Unit No. 3
Emissions Testing

The department has received your request to grant an emission test time extension to February 28, 1987, for Unit No. 3. This is to allow Pinellas County to have dioxin tests performed concurrently and by the same testing company that will perform the required Power Plant Site Certification Tests. A condition of Power Plant Site Certification No. PA 83-13 for Pinellas County Resource Recovery facility requires that air emission tests be performed within ninety (90) days of the start of operation. This time frame is due to expire at the end of December, 1986.

The department is in agreement with the request for the time extension and the following shall be changed in the Conditions of Certification.

Condition of Certification XIV.A.3.C.

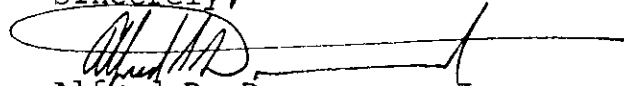
From: The permittee shall have a sampling test of the stack emissions performed by a commercial testing firm within 90 days of the start of operation of the boilers and annually from the date of testing thereafter.

To: The permittee shall have a sampling test of the stack emissions performed by a commercial testing firm by February 28, 1987, and annually from the date of testing thereafter.

Mr. Robert Van Deman
Page Two
December 12, 1986

This letter must be attached to Power Plant Site Certification, PA 83-18, Pinellas County Resource Recovery Facility and shall become a part of that Certification.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Alfred B. Devereaux, Jr.', is written over a horizontal line. The signature is stylized and includes a large, circular flourish on the left side.

Alfred B. Devereaux, Jr.
Assistant Secretary

AD/ks

cc: H. Oven
C. Fancy

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.
 Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.
 2. Restricted Delivery.

3. Article Addressed to:
 Mr. Robert Van Deman
 Dept. of Solid Waste
 2800 110th Aven. North
 St. Petersburg, FL 33702

4. Type of Service: <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured <input type="checkbox"/> COD	Article Number P 408 530 593
--	--	---------------------------------

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
 X *R. Van Deman*

6. Signature - Agent
 X

7. Date of Delivery
 DEC 29 1986

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

P 408 530 593

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. Robert Van Deman	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date 12/22/86	

PS Form 3800, Feb. 1982