

Is your 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 we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Thomas Schmittou
Williams Emw. Serv.
2076 W Park Place
Stone Mountain, GA
30087

4a. Article Number
P 230 524 357

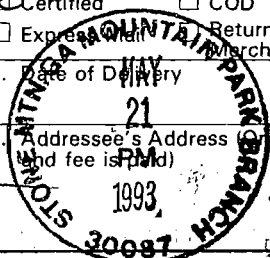
4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
MAY 21 1993

5. Signature (Addressee)
[Signature]

6. Signature (Agent)
[Signature]

8. Addressee's Address (only if requested and fee is paid)
[Redacted]



Thank you for using Return Receipt Service.

PS Form 3811, December 1991. U.S. GPO: 1992-323-402 DOMESTIC RETURN RECEIPT

P 230 524 357



Receipt for Certified Mail
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to
Thomas Schmittou
 Street or Rte.
Williams Emw. Serv
 P.O., State and ZIP Code
Stone Mt. GA

Postage	
Certified Fee	\$
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>5-19-93</i> <i>AC29-191114</i>

PS Form 3800, June 1991



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

May 7, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas Schmittou
Project Development Manager
Williams Environmental Services, Inc.
2076 West Park Place
Stone Mountain, GA 30087

Dear Mr. Schmittou:

Re: Amendment of Permit No. **AC29-191114**
Williams Environmental Services, Inc.

The Department is in receipt of your March 24, 1993, letter requesting that the referenced permit for a mobile soil thermal treatment facility be extended. On December 1, 1992, the recently adopted requirements in F.A.C. Rules 17-296 and 17-297 for soil thermal treatment facilities became effective. As a result of this, the Department is revising your permit to incorporate the new requirements and allowing additional time for you to comply with the new requirements.

This permit replaces permit No. **AC29-191114**.

Sincerely,

Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/WH/plm

Attach: Permit No. **AC29-191114**

cc: District Air Program Administrators
County Air Program Administrators

NOTICE OF PERMIT ISSUANCE
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

In the Matter of an Application
for Permit by:

DER File No. AC29-191114A
Mobile Operation

Williams Environmental Services, Inc.
2076 West Park Place
Stone Mountain, GA 30087

Enclosed is Permit Number No. AC29-191114A to construct a soil thermal treatment facility, issued pursuant to Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-212 and 17-4.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a

copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



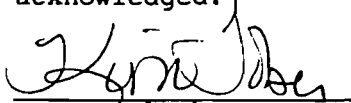
Howard L. Rhodes, Director
Division of Air Resources
Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400
(904) 488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed by certified mail before the close of business on 5-19-93 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

5-19-93
(Date)

Copies furnished to:
District Air Program Administrators
County Air Program Administrators



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

PERMITTEE:
Williams Environmental Services,
Inc.
2076 West Park Place
Stone Mountain, GA 30087

Permit Number: AC29-191114A
Expiration Date: March 1, 1994
County: Mobile Operation
Project: 20 TPH Mobile Soil
Thermal Treatment Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-212 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Authorization to construct a 10 TPH nominal (20 TPH maximum) mobile soil thermal treatment facility. The primary components of the unit are a live bottom contaminated soil hopper, hopper/screw feed system, rotary kiln furnace (5 ft. diameter by 22 ft. long) with a 10.5 MMBtu/hr No. 2 fuel oil burner, cooling screw conveyor, rotary kiln baghouse containing 1,215 square ft. of fabric filters, induced draft fan, an afterburner equipped with a 12.4 MMBtu/hr No. 2 fuel oil burner capable of operating at 1600°F with 2 seconds residence time, three No.2/diesel fuel storage tanks, a 40 kw diesel generator, a 90 HP diesel engine, a 20 HP diesel engine, and a stack which is 2 ft. in diameter, 23.5 ft. in elevation and designed to handle 10,384 acfm of flue gas at 1600°F. The unit is transported to the contaminated soil site on truck trailers.

The unit may operate in Broward, Collier, Dade, Escambia, Hillsborough, Indian River, Lee, Manatee, Martin, Monroe, Palm Beach, Pinellas, St. Lucie, and Sarasota counties. It shall not operate in Hernando County or within 1 mile of this county's boundaries. The unit may be operated in any other county within the State after satisfactorily completing the public notice requirements (F.A.C. Rule 17-210.350) for the county and receiving Department authorization to operate at the new location.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received Jan. 7, 1991.
2. DER letter dated Jan. 17, 1991.
3. WES letter dated Feb. 13, 1991.
4. Pinellas County letter dated May 21, 1991.
5. WES letter dated June 18, 1991.
6. WES letter dated March 24, 1993.

PERMITTEE:
Williams Environmental
Services, Inc.

Permit Number: AC29-191114A
Expiration Date: March 1, 1994

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

PERMITTEE:
Williams Environmental
Services, Inc.

Permit Number: AC29-191114A
Expiration Date: March 1, 1994

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:
Williams Environmental
Services, Inc.

Permit Number: AC29-191114A
Expiration Date: March 1, 1994

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

PERMITTEE:
Williams Environmental
Services, Inc.

Permit Number: AC29-191114A
Expiration Date: March 1, 1994

GENERAL CONDITIONS:

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

Miscellaneous

1. A part of this permit is the attached (14) General Conditions. The following index of the Specific Conditions of this permit is provided for convenience.

<u>Purpose of Specific Conditions</u>	<u>Specific Condition Numbers</u>
Miscellaneous	1
Construction Requirements	2 - 4
Emission Restrictions	5 - 10
Operation Requirements	11 - 22
Compliance Requirements	23 - 26
Administrative Requirements	27 - 32

Construction Requirements

2. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.

3. The stack sampling facilities must comply with Rule 17-297.345, F.A.C.

4. The facility shall be equipped with a means to measure the pressure drop across the particulate matter air pollution control device and continuous emissions monitors and recorders for hot zone temperature and carbon monoxide concentration (Rule 17-296.415(1)(c), F.A.C.).

Emission Restrictions

5. Particulate matter emissions shall not exceed any of the following limits (Based on data in the application and Rule 17-296.415(2)(b), F.A.C.):

- (A) 0.04 grains per dry standard cubic foot.
- (B) 3.6 pounds per hour.
- (C) 8.0 tons in any 12 consecutive month period.

PERMITTEE:
Williams Environmental
Services, Inc.

Permit Number: AC29-191114A
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

6. Carbon monoxide emissions shall not exceed 100 parts per million by volume, dry, during any 60 consecutive minute period (Rule 17-296.415(1)(b), F.A.C.).

7. Visible emissions from the stack shall not exceed 5 percent opacity (Rule 17-296.415(2)(a), F.A.C.).

8. Reasonable precautions shall be taken to minimize uncontrolled particulate matter emissions (Rule 17-296.310, F.A.C.). These provisions are applicable to any source, including vehicular movement, transportation of materials, and industrial related activities such as loading, unloading, storing, and handling. Before and after thermal soil treatment is accomplished, unconfined emissions of particulate matter from the soil shall be controlled by the application of water and/or containment (Rule 296.415(3), F.A.C.).

9. Operation of this facility shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor (Rule 17-296.320, F.A.C.).

10. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 17-296 and 17-297, F.A.C., or any other requirements under federal, state, or local regulations.

Operation Requirements

11. In case of excess emissions resulting from a malfunction, the permittee shall notify the Department District office and Bureau of Air Regulation (BAR) within 1 working day of the cause and duration of the upset. If requested, the permittee shall submit a full written report on the malfunction (Rule 17-210.700, F.A.C.).

12. The facility shall only treat petroleum contaminated soil as defined in Rule 17-775, F.A.C. (Rule 17-296.415, F.A.C.).

13. This facility may not treat PCB contaminated soil.

14. The input rate of petroleum contaminated soil to the facility shall not exceed 20 tons per hour. Material entering the kiln cannot be larger than 2 inches in diameter. The permittee shall have the means of determining feed or production rates of the facility on site.

PERMITTEE:
Williams Environmental
Services, Inc.

Permit Number: AC29-191114A
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

15. Untreated soil removed from the ground at the contaminated site shall be stored under a waterproof cover and on an impermeable surface.

16. The unit shall not be operated at a location or in a manner that may create a nuisance.

17. This unit shall be allowed to operate 24 hours per day, 7 days per week, 52 weeks per year, but not more than 4,500 hours per year.

18. The input of petroleum contaminants into the facility shall not exceed 800 lbs/hr (Data in application). The average daily concentration of benzene in the soil shall not exceed 1,050 ppm.

19. The facility shall use No. 2 fuel oil only. The sulfur content of this fuel oil shall not exceed 0.3 percent sulfur by weight. The fuel heat input to the facility shall not exceed 22.5 million Btu per hour, approximately 175 GPH of No. 2 fuel oil.

20. Contaminated soil shall not be treated by the facility unless the afterburner is operating at a minimum temperature of 1500 degrees Fahrenheit, and a retention time of 1.0 seconds (Rule 17-296.415(1)(a), F.A.C.).

21. All emission monitoring equipment shall be properly installed, calibrated, operated, and maintained in accordance with the manufacturer's requirements for that instrument.

22. Pressure drop across the particulate matter air pollution control device shall be recorded hourly and the temperature and carbon monoxide concentration of the hot zone shall be recorded continuously (Rule 17-296.415(1)(c), F.A.C.).

Compliance Requirements

23. The BAR, District, and County environmental agency that the facility is operating in shall be notified in writing at least 15 days in advance of any formal compliance test to be conducted on this facility. The notification shall give the date, time, place, and contact person for the test (Rule 17-297.340(1)(i), F.A.C.).

24. This facility shall be tested (EPA test methods are specified in 40 CFR 60, Appendix A, revised July 1, 1992) at 90-100% of its permitted process rate within 30 days of placing it in service for:

PERMITTEE:
Williams Environmental
Services, Inc.

Permit Number: AC29-191114A
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

- (A) Particulate matter (PM) emissions by EPA Methods 1, 2, 3, 4, and 5.
- (B) Visible emissions by EPA Method 9.
- (C) Carbon monoxide (CO) emissions by averaging each hour of the readings from the CO continuous emission monitor during the PM test periods.
- (D) Afterburner temperature by averaging each hour of the temperature readings from the continuous temperature monitor during the PM test period.
- (E) Afterburner residence time using the test data collected by EPA Methods 1 and 2.
- (F) Fuel oil sulfur limits based on analysis referenced in 40 CFR 60.17 or other methods after Department approval. A certified analysis by the fuel oil supplier may be acceptable.
- (G) Contaminated soil analysis for volatile organic aromatics (VOA), total recoverable petroleum hydrocarbons (TRPH), polynuclear aromatic hydrocarbons (PAH), volatile organic halocarbons (VOH), and metals as required by Rule 17-775.410, F.A.C.

25. Compliance tests results shall be submitted to the Bureau of Air Regulation and the District that the tests were conducted in within 45 days of the test.

26. When the Department, after investigation, has good reason to believe that any applicable emission standard or condition of this permit is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the plant and to provide a report on the results of said tests to the Department (Rule 17-297.340(2), F.A.C.).

Administrative Requirements

27. The permittee for a mobile unit shall notify the Bureau of Air Regulation, local government (city and/or county), and the Department District office by registered mail at least 3 days prior to moving to a new operating site. The notification shall provide the permit number of the facility, a copy of the last stack test results, the date of the proposed move, the new work site for the facility, the amount of contaminated soil at the new site, and the locations and contamination levels of the soils to be treated. The

PERMITTEE:
Williams Environmental
Services, Inc.

Permit Number: AC29-191114A
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

Department may notify the permittee of new restrictions for the facility that will apply while it is operating at this work site (Rule 17-775.700(1), F.A.C.).

28. The permittee shall maintain a daily log that shows the date, location, operation time, pressure drop across the PM control device, processing rate, type and quantity of fuel consumption in the dryer and afterburner, and operation problems. These records shall be maintained for a minimum of 3 years.

29. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements, all continuous monitoring system performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on these systems or devices, all soil analysis required by Rule 17-775, F.A.C., and all other information required by rule or this permit, recorded in a permanent form suitable for inspection. The file shall be retained for at least 3 years following the date of such measurements, maintenance, reports, and records.

30. The permittee shall submit to the BAR each calendar year, on or before March 1, an annual operation report for this facility for the preceding calendar year containing at least the following information pursuant to Subsection 403.061(13), F.S.:

- (A) Annual amount of material and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Annual hours of operation.
- (D) Any changes in the information contained in the permit.
- (E) All compliance test reports for the preceding year.
- (F) Temperature and CO exceedance reports for the year.

31. The permittee, for good cause, may request that this construction permit be extended. Such request shall be submitted to the BAR prior to 60 days before the expiration of the permit (Rule 17-4.090, F.A.C.).

32. An application for an operation permit must be submitted to the BAR at least 90 days prior to the expiration date of this

PERMITTEE:
Williams Environmental
Services, Inc.

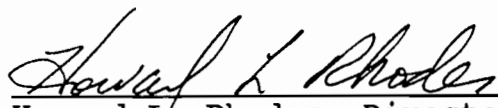
Permit Number: AC29-191114A
Expiration Date: March 1, 1994

SPECIFIC CONDITIONS:

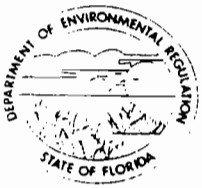
construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (Rule 17-4.220, F.A.C.).

Issued this 19 day
of May, 1993

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Howard L. Rhodes, Director
Division of Air Resources
Management



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Howard L. Rhodes
FROM: Clair Fancy *CF*
DATE: May 6, 1993
SUBJ: Amendment of Permit No. AC29-191114

Attached for your approval is a letter and amended construction permit for a mobile soil thermal treatment facility. I recommend approval.

Williams Environmental Services, Inc. requested that the permit to construct a mobile soil thermal treatment facility be extended because the unit is not operating in Florida at this time.

The Bureau of Air Regulation recommends that the permits be replaced with amended ones that include the recently adopted rule requirements for these facilities.

CF/WH/plm

Attachment

Check Sheet

Company Name: Williams Environmental Services
Permit Number: AC29-19114
PSD Number: _____
Permit Engineer: _____ Mobile soil Remediation
Escambia Co.

Application:

- | | |
|--|--------------------------|
| <input checked="" type="checkbox"/> Initial Application | Cross References: |
| <input checked="" type="checkbox"/> Incompleteness Letters | <input type="checkbox"/> |
| <input type="checkbox"/> Responses | <input type="checkbox"/> |
| <input type="checkbox"/> Waiver of Department Action | <input type="checkbox"/> |
| <input type="checkbox"/> Department Response | |
| <input type="checkbox"/> Other | |

Intent:

- 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

Final

Determination:

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other



March 24, 1993

Mr. Clair Fancy
Bureau Chief
Bureau of Air Regulation
Twin Towers Office Bldg.
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Re: Request for Amendment to Existing Air Permit No: AC 29-191114

Dear Mr. Fancy:

Williams Environmental Services Inc. (Williams) is hereby requesting that the above referenced permit be amended to authorize the operation of our 20 TPH mobile soil remediation unit in Escambia County. Please find enclosed the required amendment fee of \$250.00.

If you should have any questions or need further assistance in this matter, please contact me at (404) 879-4033.

Sincerely,

WILLIAMS ENVIRONMENTAL SERVICES, INC.

Thomas R. Schmittou
Project Development Manager

TRS/ks
Enclosure

cc: Mr. Willard Hanks ✓ 4-12-93 RAM
Engineer, Bureau of Air Regulation

RECEIVED
DER - MAIL ROOM
1993 APR -2 AM 9: 17

WILLIAMS ENVIRONMENTAL SERVICES, INC.



March 24, 1993

Mr. Clair Fancy
Bureau Chief
Bureau of Air Regulation
Twin Towers Office Bldg.
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Re: Request for Amendment to Existing Air Permit No: AC 29-191114

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Williams Environmental Services Inc. (Williams) is hereby requesting that the above referenced permit be amended to authorize the operation of our 20 TPH mobile soil remediation unit in Escambia County. Please find enclosed the required amendment fee of \$250.00.

If you should have any questions or need further assistance in this matter, please contact me at (404) 879-4033.

Sincerely,

WILLIAMS ENVIRONMENTAL SERVICES, INC.

Thomas R. Schmittou
Project Development Manager

WILLIAMS ENVIRONMENTAL SERVICES, INC.

2075 WEST PARK PLACE
STONE MOUNTAIN, GEORGIA 30087



First Union National Bank
of Georgia
Atlanta, Georgia

64-22
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1031 012278
0602
CHECK NO.

03/26/93

DATE

*****250.00

AMOUNT

TWO HUNDRED FIFTY DOLLARS AND 00 CENTS

PAY
TO THE
ORDER
OF

BUREAU OF AIR REGULATION
C/O BUREAU CHIEF FANCY
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE FL 323992400

VOID AFTER 90 DAYS
TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$1000

AUTHORIZED SIGNATURE

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 we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mark Gleri Proj. Mgr.
Williams Env. Serv.
1530 Alabama St.
Auburn, AL
36830

4a. Article Number

P 617 884 167

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

7. Date of Delivery

10-4-91

5. Signature (Addressee)

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

6. Signature (Agent)

Joe Mummert

PS Form 3811, October 1990

☆U.S. GPO: 1990-273-861

DOMESTIC RETURN RECEIPT

P 617 884 167



Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail

(See Reverse)

Send to	
Mark Gleri	
Street & No.	
Williams Env. Serv.	
P.O. State & ZIP Code	
Auburn, AL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	10-2-91
AC 29-19114	

PS Form 3800, June 1990



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

September 25, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Mark A. Fleri, Project Manager
Williams Environmental Services, Inc.
1530 Alabama Street
Auburn, Alabama 36830

Dear Mr. Fleri:

Re: File No. AC 29-191114, 20 TPH SRU

The Department is in receipt of your August 22, 1991, letter requesting the referenced permit be amended to replace the No. 2 fuel oil with LPG and to allow the use of higher capacity process equipment with this unit. These changes will not increase the allowable production or emissions from the unit. This request is acceptable to the Department and construction permit No. AC 29-191114 is changed:

FROM

Description: Authorization to construct a 10 TPH nominal (20 TPH maximum) mobile soil remediation unit. The primary components of the unit are a live bottom contaminated soil hopper, hopper/screw feed system, rotary kiln furnace (5 ft. diameter by 22 ft. long) with a 10.5 MMBtu/hr No. 2 fuel oil burner, cooling screw conveyor, rotary kiln baghouse containing 1,215 square ft. of fabric filters, induced draft fan, an afterburner equipped with a 12.4 MMBtu/hr No. 2 fuel oil burner capable of operating at 1600°F with 2 seconds residence time, three No.2/diesel fuel storage tanks, a 40 kw diesel generator, a 90 HP diesel engine, a 20 HP diesel engine, and a stack which is 2 ft. in diameter, 23.5 ft. in elevation and designed to handle 10,384 acfm of flue gas at 1600°F. The unit is transported to the contaminated soil site on truck trailers.

Specific Condition No. 13: Only No. 2 oil with a maximum of 0.5% sulfur shall be used as fuel for the kiln and afterburner. Maximum permitted fuel consumption is 22.9 MMBtu/hr (175 GPH No. 2).

TO

Description: Authorization to construct a 10 TPH nominal (20 TPH maximum) mobile soil remediation unit. The primary components of the unit are a live bottom contaminated soil hopper, hopper/screw

Mr. Mark A. Fleri
Page 2 of 2

feed system, rotary kiln furnace (5 ft. diameter by 22 ft. long) with a 27 MMBtu/hr LPG burner, cooling screw conveyor, rotary kiln baghouse containing 1,215+ square ft. of fabric filters, induced draft fan, an afterburner equipped with a 36 MMBtu/hr LPG burner capable of operating at 1600°F with 2 seconds residence time, fuel storage tanks, a 90 kw diesel generator, a 90 HP diesel engine, a 20 HP diesel engine, and a stack which is 2 ft. in diameter, 23.5 ft. in elevation and designed to handle 10,384 acfm of flue gas at 1600°F. The unit is transported to the contaminated soil site on truck trailers.

Specific Condition No. 13: Only LPG shall be used as fuel for the kiln and afterburner. Maximum permitted fuel consumption is 690 GPH LPG.

A copy of this letter must be attached to the referenced construction permit and shall become a part of the permit. Because of recent rule revisions, future amendments to this permit may require a processing fee.

Sincerely,



Carol M. Browner
Secretary

CMB/WH/plm

Attach: Williams Environmental Services, Inc. August 22, 1991,
letter

c: District Air Program Administrators
County Air Program Administrators



**Williams
Environmental
Services, Inc.**

Remediation Through Proven Technology

August 22, 1991

Corporate Office

1530 Alabama Street
Auburn, AL 36830
Phone (205) 821-9250
FAX (205) 821-9765

RECEIVED

AUG 26 1991

Division of Air
Resources Management

Mr. Willard Hanks
FLORIDA DER
2600 Blainstone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

Re: File Number AC 29-191114, 20 TPH SRU

Dear Mr. Hanks:

Williams Environmental Services, Inc. (WILLIAMS) is in the process of upgrading our 20 TPH SRU. The upgrades will include a larger primary combustion burner and secondary combustion burner, a larger generator, a larger baghouse and secondary combustion chamber. The changes are being made to accommodate WILLIAMS back log of projects.

The changes are as follows:

	CURRENT	PROPOSED
PRIMARY BURNER	10.5 MM Btu/hr	27 MM Btu/hr
SECONDARY BURNER	12.4 MM Btu/hr	36 MM Btu/hr
GENERATOR	40 KW	90 KW

These changes will not affect throughput nor does WILLIAMS desire to amend the permitted throughput of the SRU. Because of the increase in burner sizes WILLIAMS chose to use a cleaner burning fuel. Both burners will be capable of burning liquid propane gas (LPG). The revised emissions rates for the SRU are in Table 1.

Branch Offices

2076 West Park Place Suite
Stone Mountain, GA 30087
Phone (404) 498-2020
FAX (404) 469-0178

5221 Millia Hill Road
Plymouth Meeting, PA 19462
Phone (215) 825-8877
FAX (215) 825-5623

10795 Mead Road, #1012
Baton Rouge, LA 70816
Phone (504) 291-8079
FAX (504) 293-9617

P.O. Box 6378
Longview, TX 75608
Phone (214) 663-5850
FAX (214) 663-4803

Mr. Willard Hanks
File Number AC 29-191114, 20 TPH SRU
August 21, 1991
Page Two

WILLIAMS is also interested in expanding its permitting area to include the Florida panhandle. WILLIAMS understands that another public comment period will be necessary to operate in any additional county.

WILLIAMS hopes that the proposed SRU configuration can be added to the permit via an amendment. If you have any questions concerning the above information please do not hesitate to contact me.

Sincerely,

WILLIAMS ENVIRONMENTAL SERVICES



Mark A. Fleri
Project Manager

MAF:pag

cc: Tom Schmittou
Z.L. Taylor
Permit File

Diesel Emissions for Criteria air pollutants and Revised Emissions for LPG criteria air pollutants for SRU at average fuel consumption of (415gph) and maximum fuel consumption rate (689gph).
 AP-42 Table 1.5-1 Emission Factors for LPG Combustion.
 Emission Factor Rating: C

*97,400 Btu/gal Diesel
 90,500 Btu/gal Propane ←*

Contaminant	CURRENT CONFIGURATION Diesel		PROPOSED CONFIGURATION LPG	
	lb/hr (TPY)*	lb/hr (TPY)*	lb/hr (TPY)*	lb/hr (TPY)*
	90gph (avg)	175gph (max)	415gph (avg)	689gph (max)
Total Sulfar Oxide <i>.09S .014 lb SO₂ / 1000 gal ?</i>	0.0648 (0.1438)	0.1260 (0.2835)	0.006 (0.013)	0.001 <i>0.01 lbs/hr</i> (0.022) ✓
Nitrogen Oxide <i>12.4 - 13.2 lb / 10³ gal</i>	1.8 (4.1)	3.5 (7.895)	5.2 (11.7)	8.6 ✓ (19.3) ✓
Carbon Monoxide <i>3.1 - 3.3 lb / 10³ gal</i>	0.45 (1.013)	0.875 (1.969)	1.29 (2.9)	2.1 ✓ (4.83) ✓

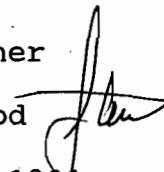
*Tons per year
 TYP Base on 4500 hr/year operation.



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Carol M. Browner
FROM: Steve Smallwood 
DATE: September 25, 1991
SUBJ: Amendment of Permit No. AC 29-191114
Williams Environmental Services, Inc.

Attached for your approval and signature is a letter that will amend the referenced construction permit for a 20 TPH mobile soil remediation unit. The amendment allows higher heat input to the kiln and afterburner in exchange for requiring the use of a clean fuel. Allowable emissions from this facility are not increased by this amendment.

I recommend your approval and signature.

SS/WH/plm

Attachment

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 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 additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery
↑(Extra charge)↑ ↑(Extra charge)↑

3. Article Addressed to: Mr. Mark A. Fleri, Proj. Mgr. William Env. Serv., Inc 1530 Alabama St. Auburn, AL 36830	4. Article Number P 832 538 951 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>Rita Copens</i>	
7. Date of Delivery 9-16-91	


PS Form 3811, Mar. 1987

* U.S.G.P.O. 1987-178-268

DOMESTIC RETURN RECEIPT

P 832 538 951

Certified Mail Receipt
 No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

 UNITED STATES POSTAL SERVICE

Name <i>Mark Fleri</i>	
Street & No. <i>William Env. Serv. Inc</i>	
P.O., State & ZIP Code <i>1530 Alabama St</i>	
Postage <i>Auburn, AL</i>	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date <i>9-12-91</i> <i>AC29-191114</i>	

PS Form 3800, June 1990



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

September 11, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Mark A. Fleri, Project Manager
Williams Environmental Services, Inc.
1530 Alabama Street
Auburn, Alabama 36830

Dear Mr. Fleri:

Re: File No. AC 29-191114, 20 TPH SRU

The Department is in receipt of your August 22, 1991, letter requesting the referenced permit for a mobile soil remediation unit be amended to allow the unit to be operated in northwest Florida and to allow the use of higher capacity process equipment. These requests are being handled separately. This letter addresses the use of the unit in northwest Florida.

Before this unit can be operated in northwest Florida, the public notice requirements of F.A.C. Rule 17-2.220 must be satisfied. This will require that the attached Notice of Intent to Issue be published in a newspaper that has the most circulation in each additional county you intend to operate the unit in.

Note that the specific Florida counties that you are requesting permission to operate in will have to be listed in the Notice of Intent. Proof of publication of the notice must be submitted to the Bureau of Air Regulation. If no substantial objections to this unit's operation in any of the new counties is received by the Department, your construction permit will be amended to authorize the unit to be operated in the new counties covered by the public notice. Because of recent rule revisions, future amendments to this permit may require a processing fee.

Sincerely,

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

CHF/WH/plm

Attachment

c: Ed Middleswart, NWD

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to amend a permit (AC 29-191114) that was issued to Williams Environmental Services, Inc., 1530 Alabama Street, Auburn, Alabama 36830, to allow the operation of a 20 TPH mobile soil remediation unit with air pollution controlled by a baghouse and afterburner in (list counties this public notice will appear). The regulations do not require a Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination for this project. The unit may emit 5.9 lbs/hr (13.3 TPY) particulate, 2.1 lbs/hr (4.8 TPY) carbon monoxide, 8.6 lbs/hr (19.3 TPY) nitrogen oxides, 0.01 lbs/hr (0.02 TPY) sulfur dioxide, and 40 lbs/hr (90 TPY) volatile organic compounds. These emissions will not cause a violation of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment or create a health hazard. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The Preliminary Determination and permit are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Regulation offices located at:

2600 Blair Stone Road, Tallahassee, FL 32399-2400
160 Governmental Center, Pensacola, FL 32501-5794

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.



**Williams
Environmental
Services, Inc.**

Remediation Through Proven Technology

August 22, 1991

Corporate Office

1530 Alabama Street
Auburn, AL 36830
Phone (205) 821-9250
FAX (205) 821-9765

RECEIVED

AUG 26 1991

Division of Air
Resources Management

Mr. Willard Hanks
FLORIDA DER
2600 Blairstone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

Re: File Number AC 29-191114, 20 TPH SRU

Dear Mr. Hanks:

Williams Environmental Services, Inc. (WILLIAMS) is in the process of upgrading our 20 TPH SRU. The upgrades will include a larger primary combustion burner and secondary combustion burner, a larger generator, a larger baghouse and secondary combustion chamber. The changes are being made to accommodate WILLIAMS back log of projects.

The changes are as follows:

	CURRENT	PROPOSED
PRIMARY BURNER	10.5 MM Btu/hr	27 MM Btu/hr
SECONDARY BURNER	12.4 MM Btu/hr	36 MM Btu/hr
GENERATOR	40 KW	90 KW

These changes will not affect throughput nor does WILLIAMS desire to amend the permitted throughput of the SRU. Because of the increase in burner sizes WILLIAMS chose to use a cleaner burning fuel. Both burners will be capable of burning liquid propane gas (LPG). The revised emissions rates for the SRU are in Table 1.

Branch Offices

2076 West Park Place Suite
Stone Mountain, GA 30087
Phone (404) 498-2020
FAX (404) 469-0178

5221 Militia Hill Road
Plymouth Meeting, PA 19462
Phone (215) 825-8877
FAX (215) 825-5623

10795 Mead Road, #1012
Baton Rouge, LA 70816
Phone (504) 291-8079
FAX (504) 293-9617

P.O. Box 6378
Longview, TX 75608
Phone (214) 663-5850
FAX (214) 663-4803



**Williams
Environmental
Services, Inc.**

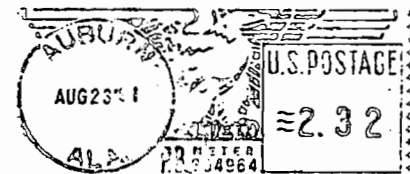
1530 Alabama Street
Auburn, AL 36830

Fold at line over top of envelope to the right
of the return address

CERTIFIED

P 302 784 467

MAIL



MR. WILLARD HANKS
FLORIDA DER
2600 BLAIRSTONE ROAD
TWIN TOWERS OFFICE BUILDING
TALLAHASSEE, FLORIDA 32399-2400



Mr. Willard Hanks
File Number AC 29-191114, 20 TPH SRU
August 21, 1991
Page Two

WILLIAMS is also interested in expanding its permitting area to include the Florida panhandle. WILLIAMS understands that another public comment period will be necessary to operate in any additional county.

WILLIAMS hopes that the proposed SRU configuration can be added to the permit via an amendment. If you have any questions concerning the above information please do not hesitate to contact me.

Sincerely,

WILLIAMS ENVIRONMENTAL SERVICES



Mark A. Fleri
Project Manager

MAF:pag

cc: Tom Schmittou
Z.L. Taylor
Permit File

Diesel Emissions for Criteria air pollutants and Revised Emissions for LPG criteria air pollutants for SRU at average fuel consumption of (415gph) and maximum fuel consumption rate (689gph).

AP-42 Table 1.5-1 Emission Factors for LPG Combustion.

Emission Factor Rating: C

Contaminant	CURRENT CONFIGURATION		PROPOSED CONFIGURATION	
	Diesel		LPG	
	lb/hr (TPY)*	lb/hr (TPY)*	lb/hr (TPY)*	lb/hr (TPY)*
	90gph (avg)	175gph (max)	415gph (avg)	689gph (max)
Total Sulfur Oxide	0.0648 (0.1438)	0.1260 (0.2835)	0.006 (0.013)	0.001 (0.022)
Nitrogen Oxide	1.8 (4.1)	3.5 (7.895)	5.2 (11.7)	8.6 (19.3)
Carbon Monoxide	0.45 (1.013)	0.875 (1.969)	1.29 (2.9)	2.1 (4.83)

*Tons per year

TYP Base on 4500 hr/year operation.

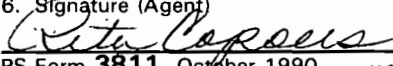
SENDER:

- 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 we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to: Mr. Thomas Schmittou Porject Development Manager Williams Environmental Services 1530 Alabama Street Auburn, Alabama 36830	4a. Article Number P 832 538 669
5. Signature (Addressee)	4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
6. Signature (Agent) 	7. Date of Delivery 8-12-91
	8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, October 1990

☆U.S. GPO: 1990-273-881

DOMESTIC RETURN RECEIPT

P 832 538 669



Certified Mail Receipt

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to	
Mr. Thomas Schmittou, Williams Env. Serv.	
Street & No. 1530 Alabama St.	
P.O., State & ZIP Code Auburn, Alabama 36830	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 8-7-91 Permit: AC 29-191114	

PS Form 3800, June 1990

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DER File No. AC 29-191114
Mobile Operation

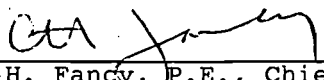
Mr. Thomas Schmittou
Project Development Manager
Williams Environmental Services, Inc.
1530 Alabama Street
Auburn, Alabama 36830

Enclosed is Permit Number AC 29-191114 to construct a 20 TPH mobile soil remediation unit, issued pursuant to Section(s) 403, Florida Statutes. The unit may be operated in the following counties in Florida: Broward, Collier, Dade, Hillsborough, Indian River, Lee, Manatee, Martin, Monroe, Palm Beach, Pinellas, St. Lucie, and Sarasota.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 8-7-91 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.


(Clerk)

8-7-91
(Date)

Copies furnished to:
District Air Program Administrators
County Air Programs
Jimmy Taylor, P.E.
BWC, Reg. Support Section

Final Determination

Williams Environmental Services, Inc.
Auburn, Alabama

20 TPH Mobile Soil Remediation Unit
South Florida Operation

Permit No.: AC 29-191114

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

July 31, 1991

Final Determination

The Technical Evaluation and Preliminary Determination for the permit to construct a 20 TPH mobile soil remediation unit for Williams Environmental Services, Inc. (WES), was distributed on May 10, 1991. The Notice of Intent to Issue was published in Miami Herald (June 24, 1991), Bradenton Herald (June 24, 1991), Tampa Tribune (June 21, 1991), and Sun Sentinel (June 22, 1991). These papers have circulation in most of peninsula Florida. They are circulated in all of the counties that WES now plans to operate in. These counties are Broward, Collier, Dade, Hillsborough, Indian River, Lee, Manatee, Martin, Monroe, Palm Beach, Pinellas, St. Lucie, and Sarasota. The Notice stated that the unit would not operate in Hernando County. The public notice requirements would have to be satisfied and the permit amended prior to allowing WES to operate this unit in any other county. Copies of the evaluation were available for public inspection at all approved county program offices, all Department District offices, and the Bureau of Air Regulation office.

Comments were received from Pinellas County Department of Environmental Management and the applicant. Pinellas County noted that the Acceptable Ambient Concentration (AAC) for toluene is 0.900 mg/m^3 instead of the 1.786 mg/m^3 listed in the Evaluation. A safety factor of 1/100 is used for all chemicals having an Occupational Exposure Level of less than 1000 mg/m^3 . The Department agrees with this comment. Specific Condition No. 16 of the permit does not allow the AAC to be exceeded.

The County also asked what was the basis of the metals content limitations in the permit and what happens to the metals during soil treatment. The metal limits in the permit are from F.A.C. Rule 17-775, Soil Thermal Treatment Facilities, which this unit must also comply with. The Department believes most of the metals remain in the soil during treatment. We are currently requiring a metal balance on similar units to confirm this assumption.

In a letter dated June 18, 1991, the applicant commented that the required minimum 95% afterburner VOC destruction efficiency could be achieved at 1400°F (below the afterburner's capability to operate at 1600°F), the baghouse pressure drop is taken from magnehelic gauges and recorded hourly, and that the unit will not operate in or within 1 mile or in Hernando County.

The Department's response to these comments are that hourly recording of the baghouse pressure drop will comply with the requirements of Specific Condition No. 18, the afterburner temperature that exists during the compliance test will be incorporated in any permit to operate issued for this source, and that the first sheet of the permit has been revised to show what counties in Florida this unit may operate in.

The final action of the Department will be to issue construction permit No. AC 29-191114 as proposed in the Technical Evaluation and Preliminary Determination, except for the change noted above.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

**Williams Environmental Services,
Inc.
1530 Alabama Street
Auburn, Alabama 36830**

**Permit Number: AC 29-191114
Expiration Date: March 1, 1992
County: Mobile Operation
Project: 20 TPH Mobile Soil
Remediation Unit**

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Authorization to construct a 10 TPH nominal (20 TPH maximum) mobile soil remediation unit. The primary components of the unit are a live bottom contaminated soil hopper, hopper/screw feed system, rotary kiln furnace (5 ft. diameter by 22 ft. long) with a 10.5 MMBtu/hr No. 2 fuel oil burner, cooling screw conveyor, rotary kiln baghouse containing 1,215 square ft. of fabric filters, induced draft fan, an afterburner equipped with a 12.4 MMBtu/hr No. 2 fuel oil burner capable of operating at 1600°F with 2 seconds residence time, three No.2/diesel fuel storage tanks, a 40 kw diesel generator, a 90 HP diesel engine, a 20 HP diesel engine, and a stack which is 2 ft. in diameter, 23.5 ft. in elevation and designed to handle 10,384 acfm of flue gas at 1600°F. The unit is transported to the contaminated soil site on truck trailers.

The unit may operate in Broward, Collier, Dade, Hillsborough, Indian River, Lee, Manatee, Martin, Monroe, Palm Beach, Pinellas, St. Lucie, and Sarasota counties. It shall not operate in Hernando County or within 1 mile of this county's boundaries. The unit may be operated in any other county within the State after satisfactorily completing the public notice requirements (F.A.C. Rule 17-2.220) for the county and receiving Department authorization to operate at the new location.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received Jan. 7, 1991.
2. DER letter dated Jan. 17, 1991.
3. WES letter dated Feb. 13, 1991.
4. Pinellas County letter dated May 21, 1991.
5. WES letter dated June 18, 1991.

PERMITTEE:

Williams Environmental Services,
Inc.

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:

**Williams Environmental Services,
Inc.**

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:

Williams Environmental Services,
Inc.

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for

PERMITTEE:

Williams Environmental Services,
Inc.

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

GENERAL CONDITIONS:

continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

Construction Requirements

1. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.
2. The stack sampling facilities must comply with F.A.C. Rule 17-2.700(4).
3. The afterburner shall be capable of operating above 1600°F with a 2 second retention time and have a minimum VOC destruction efficiency of 95%. A minimum afterburner operation temperature, based on the compliance tests data, will be incorporated into any permit to operate issued for this unit.

PERMITTEE:

**Williams Environmental Services,
Inc.**

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

SPECIFIC CONDITIONS:

Emission Restrictions

4. Particulate matter emissions from the afterburner stack shall neither exceed 0.08 grains/dscf corrected to 50% excess air nor 5.9 lbs/hr. Visible emissions from any part of the process shall not exceed 5% opacity.

5. Benzene emissions from the afterburner stack shall not exceed 2.1 lbs/hr. Total VOC emissions shall not exceed 40 lbs/hr. Compliance shall be determined by a material balance using soil analysis, production rate, and the afterburner destruction efficiency.

6. The operation of this source shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor pursuant to F.A.C. Rule 17-2.600(c)2.

Operation Requirements

7. The system shall be properly operated and maintained (F.A.C. Rule 17-2.210(2)). No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly (F.A.C. Rule 17-2.240).

8. Reasonable precautions shall be used to minimize unconfined emissions of particulate matter generated by this operation (F.A.C. Rule 17-2.610(3)). For this facility, reasonable precautions shall be defined as wetting the treated soil and keeping the work areas wet where the soil is being removed and treated.

9. The unit shall not be operated at a location or in a manner that may create a nuisance. The unit shall only be operated at the site where the soil was contaminated or at a collection site having a valid permit issued under F.A.C. Rule 17-775.

10. Untreated soil removed from the ground shall be stored under waterproof covers to control unconfined emissions.

11. This unit shall be allowed to operate 24 hours per day, 7 days per week, but not more than 4,500 hours per year.

12. Maximum soil charging rate to the unit shall not exceed 20 TPH. The soil entering the kiln cannot be larger than 2 inches in diameter. The permittee shall have means to determine the feed or production rate on site.

PERMITTEE:

Williams Environmental Services,
Inc.

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Expiration Date: March 1, 1992

SPECIFIC CONDITIONS:

13. Only No. 2 oil with a maximum of 0.5% sulfur shall be used as fuel for the kiln and afterburner. Maximum permitted fuel consumption is 22.9 MMBtu/hr (175 GPH No. 2).

14. Only soils contaminated with gasoline, No. 2 type oils, and motor oils shall be treated in this unit unless otherwise approved by the Bureau of Air Regulation.

Hazardous waste as defined in 40 CFR 261.3 shall not be processed by this unit.

Metals in the untreated soil shall not exceed the following:

<u>Metals</u>	<u>Maximum Concentration</u>	
	<u>TCLP(mg/L)</u>	<u>Total(mg/Kg)</u>
Arsenic	5.0	55
Barium	100.0	2750
Cadmium	1.0	55
Chromium	5.0	275
Lead	5.0	77
Mercury	0.2	17
Selenium	1.0	165
Silver	5.0	165

Total Volatile Organic Aromatics (VOA) constituent in the soil shall not exceed the concentrations that have the potential to exceed the acceptable ambient air concentration or the VOC emission limit for this unit (see Specific Conditions Nos. 5, 17, and 27).

To show compliance with this condition, the permittee shall analyze composite samples of the contaminated soil (see Specific Condition No. 16) by the EPA SW 846 Methods, Test Method for Evaluating Solid Waste Physical/Chemical, for VOA (EPA Method 5030/8020), TRPH (EPA draft Method 9073), and Metals (EPA Method 1311, 3050, 6010, 7040, 7041, 7060, 7061, 7080, 7130, 7131, 7190, 7191, 7420, 7421, 7471, and 7760). All soil samples taken at the remediation site and exiting the dryer shall be stored in a sealed glass container immediately upon sampling.

15. The permittee may request, in writing, permission to treat "off-spec" material. The request shall include the history of the site to be treated, an analysis of the contaminants suspected to be

PERMITTEE:

Williams Environmental Services,
Inc.

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SPECIFIC CONDITIONS:

in the soil, an estimate of the emissions from the unit while processing the soil, and calculations showing that the ambient air impact from the unit will not exceed the acceptable ambient air concentration for any toxic pollutant. The Department will approve or deny each request in writing, after a public notice for the specific project, on a case-by-case basis.

16. Sampling and analysis of the contaminated soil at each site, based on the procedures prescribed in SW-846, shall be conducted prior to remediation. Minimum number of composite samples for analysis at each site prior to remediation shall be as follows:

<u>Soil Quantity (yards³)</u>	<u>No. of Composite Samples</u>
Less than 100	1
100 to 500	3
500 to 1000	5
Each additional 500 yds	1 additional sample

17. Unless the Department has determined other concentrations are required to protect public health and safety, predicted ambient air impact of any toxic pollutant, as determined by the PTPLU 6 model or other DARM approved models, shall not exceed the concentration calculated by the following formula:

$$AAC = \frac{40}{X} \cdot \frac{1}{\text{safety factor}} \cdot (\text{OEL})$$

where,

AAC = acceptable ambient concentration

Safety Factor = 100 for category A substances and
50 for category B substances

X = 40 or the hours/week of actual operation,
whichever is larger

OEL - Occupational exposure level such as the TWA-TLV
published by the ACGIH, OSHA, and NIOSH published
standards for toxic materials.

TWA-TLV is the threshold limit value (8 hrs/day,
40 hrs/wk) maximum exposure concentration considered
safe for workers by the ACGIH.

PERMITTEE:

Williams Environmental Services,
Inc.

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SPECIFIC CONDITIONS:

Data in the application shows that, for continuous operation, an emission of 1 gram/sec will have a maximum ambient impact of $26.8 \times 10^{-3} \text{ mg/m}^3$ (8 hr. avg). If the stack parameters are different than the values listed in the application, the permittee must determine and use the actual impact factor calculated by the EPA Approved Screen - 1.1 Model.

$$\text{Maximum Allowable Emissions (g/sec)} = \frac{\text{AAC } \text{mg/m}^3}{26.8 \times 10^{-3}}$$

18. Pressure drop across the baghouse shall be recorded hourly and temperature of the afterburner shall be recorded continuously during operations. The instruments used to obtain these measurements shall be properly calibrated, maintained, and in operation any time the unit is in service.

Compliance Requirements

19. This unit shall be tested at a process weight rate of 18 to 20 TPH. All compliance tests shall meet the requirements listed in F.A.C. Rule 17-2.700. The unit shall not operate above the maximum permitted rate of 20 TPH.

20. When the Department, after investigation, has good reason (such as complaints, increased visible emissions, or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Chapter 17-2, F.A.C., or in this permit is being violated, it may require the owner or operator of the unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the Department.

21. The exhaust stack for this process must be tested concurrently for particulate matter and visible emissions by EPA Methods 5 and 9 pursuant to 40 CFR 60, Appendix A, revised as of July 1, 1990, within 5 days after placing the unit in commercial operation under this permit and annually thereafter. Operation at each subsequent site requires an EPA Method 9 test to be performed within 3 days of placing the unit in service.

22. The unit destruction efficiency, benzene, and VOC emissions shall be established by a material balance using a Method 18, or 25 test (40 CFR 60, Appendix A, revised as of July 1, 1990) and soil analysis before and after treatment or other methods as approved by the Department.

PERMITTEE:

**Williams Environmental Services,
Inc.**

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

SPECIFIC CONDITIONS:

Administrative Requirements

23. The permittee shall furnish the available information listed in Specific Condition No. 24 prior to operating the portable rotary kiln/afterburner system at its initial site. This permit requires compliance with any applicable local (county) regulations. This may include requirements for county operation permits and additional restrictions on the operation of this unit.

24. This unit shall not be operated at any new site until the permittee has requested authorization to operate at the new site. The permittee shall notify the BAR, local government (city and/or county), and Department District office by registered mail at least 3 days prior to moving to the new site. The notification shall provide the permit number of the unit, a copy of the last stack test results, the date of the proposed move, the new site for the unit, and the location and contamination levels of the soil to be treated. The Department shall notify the permittee of any new air pollutant emission conditions the unit must meet after the receipt of the relocation notice.

25. The permittee shall maintain a log that shows the unit's operation time during the preceding 12 months. All required records must be available for inspection at the job site for the unit within 3 working days of a request by the Department.

26. The BAR shall be notified in writing at least 15 days in advance of any annual compliance test to be conducted on this source.

27. Any analysis required by Specific Condition No. 16 which indicates a violation of any condition in this permit shall be reported as soon as feasible to BAR. An average concentration of benzene above 1,050 ppm in the soil or total hydrocarbons above 20,000 ppm is a potential violation of this permit. The soil may be decontaminated by operating at less than the 20 TPH production rate, or by other means, with prior approval of the Department. The permittee must propose the method of compliance with this permit.

28. Records shall be kept by the permittee on the location, date, time, and number of samples taken for each composite sample. Soil analysis results shall be available for Department inspection during the clean up of the site and for 3 years thereafter.

PERMITTEE:
Williams Environmental Services,
Inc.

Permit Number: AC 29-191114
Expiration Date: March 1, 1992

SPECIFIC CONDITIONS:

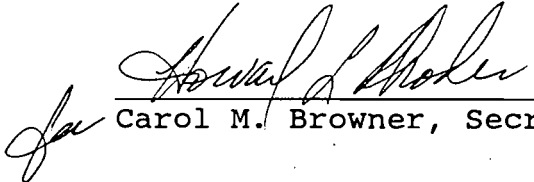
29. Stack test results from PM and VOC shall be submitted to the Department within 45 days of the test.

30. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAR prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

31. An application for an operation permit must be submitted to the BAR at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this 6 day
of August, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Carol M. Browner, Secretary



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Carol Browner
FROM: Steve Smallwood *JS*
DATE: July 31, 1991
SUBJ: Approval of Construction Permit AC 29-191114
Williams Environmental Services, Inc.

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to construct a 20 TPH mobile soil remediation unit that will operate in the southern half of peninsula Florida.

Comments were submitted on the proposed permit. The only change made to the proposed permit in response to the comments was to limit the counties within the State that the unit may operate in.

I recommend your approval and signature.

CF/WH/plm

Attachments

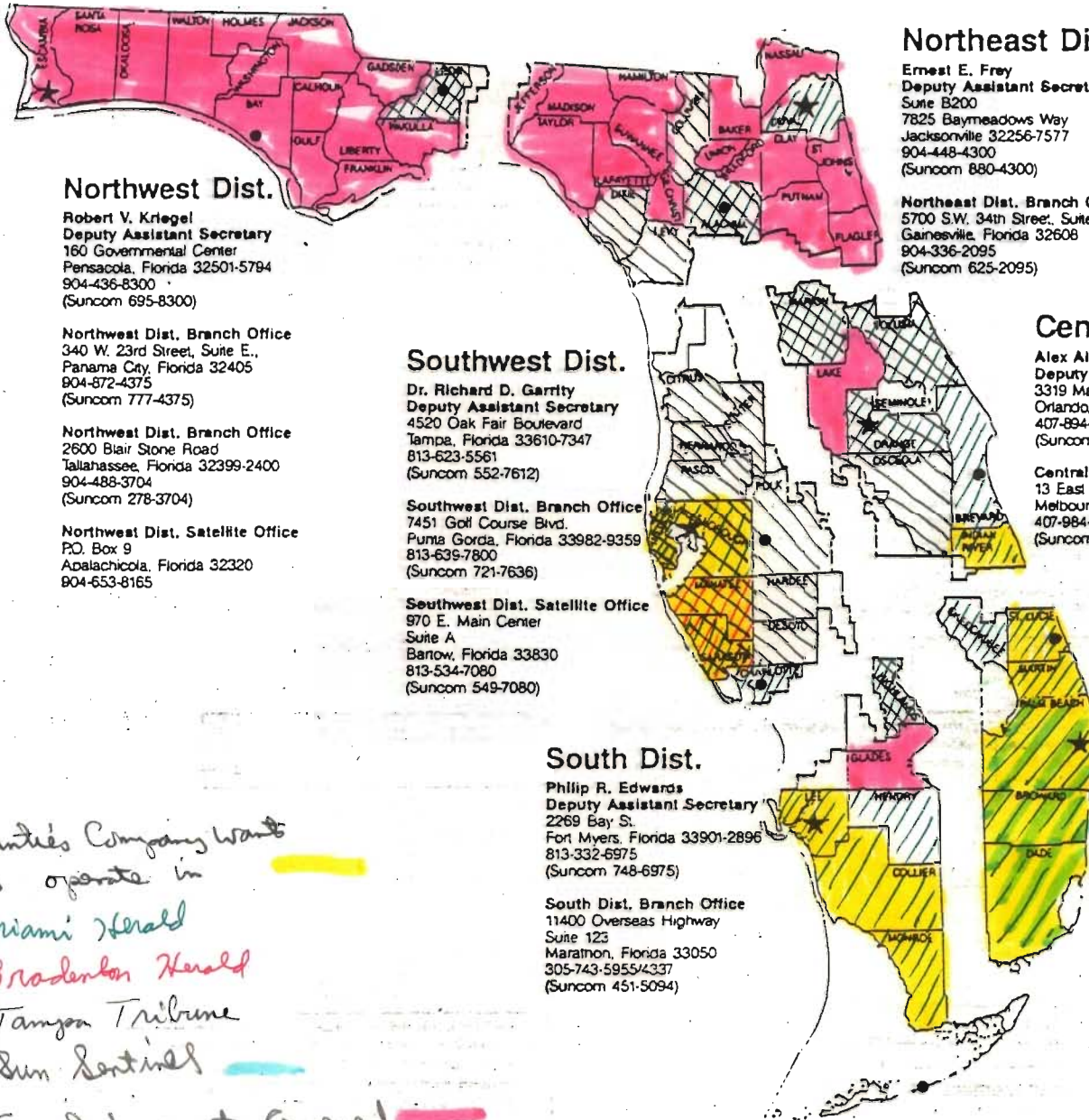
Offices of the Florida Department of Environmental Regulation

Carol M. Browner Secretary

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

(904) 488-4805

*Williams Environmental
Services, Inc.*



Northwest Dist.

Robert V. Krieger
Deputy Assistant Secretary
160 Governmental Center
Pensacola, Florida 32501-5794
904-436-8300
(Suncom 695-8300)

Northwest Dist. Branch Office
340 W. 23rd Street, Suite E.,
Panama City, Florida 32405
904-872-4375
(Suncom 777-4375)

Northwest Dist. Branch Office
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
904-488-3704
(Suncom 278-3704)

Northwest Dist. Satellite Office
P.O. Box 9
Apalachicola, Florida 32320
904-653-8165

Southwest Dist.

Dr. Richard D. Garrity
Deputy Assistant Secretary
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347
813-623-5561
(Suncom 552-7612)

Southwest Dist. Branch Office
7451 Golf Course Blvd.
Punta Gorda, Florida 33982-9359
813-639-7800
(Suncom 721-7636)

Southwest Dist. Satellite Office
970 E. Main Center
Suite A
Barrow, Florida 33830
813-534-7080
(Suncom 549-7080)

South Dist.

Philip R. Edwards
Deputy Assistant Secretary
2269 Bay St.
Fort Myers, Florida 33901-2896
813-332-6975
(Suncom 748-6975)

South Dist. Branch Office
11400 Overseas Highway
Suite 123
Marathon, Florida 33050
305-743-5955/4337
(Suncom 451-5094)

Northeast Dist.

Ernest E. Frey
Deputy Assistant Secretary
Suite B200
7825 Baymeadows Way
Jacksonville 32256-7577
904-448-4300
(Suncom 880-4300)

Northeast Dist. Branch Office
5700 S.W. 34th Street, Suite 1204
Gainesville, Florida 32608
904-336-2095
(Suncom 625-2095)

Central Dist.

Alex Alexander
Deputy Assistant Secretary
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767
407-894-7555
(Suncom 325-1011)

Central Dist. Satellite Office
13 East Melbourne Ave.
Melbourne, Florida 32901
407-984-4800
(Suncom 350-4800)

Southeast Dist.

Scott Benyon
Deputy Assistant Secretary
1900 S. Congress Ave., Suite A
West Palm Beach, Florida 33406
407-433-2650
(Suncom 232-2650)

Southeast Dist. Branch Office
2745 S.E. Morningside Blvd.
Port St. Lucie, Florida 34952
407-878-3890/335-4310
(Suncom 221-5053)

Environmental Regulation Commission

Thomas W. Sansbury,
Chairman
9406 Okeechobee Boulevard
West Palm Beach, Florida 33411
407-790-7921

A. L. "Jack" Buford, Vice Chairman
Post Office Box 13878
Tallahassee, Florida 32317
904-385-7202

Phyllis P. Saarnen
400 Gulf Brook Circle #206
Longwood, Florida 32779
407-869-7781

Steven B. Gold
1001 13th Avenue East
Bradenton, Florida 34208
813-747-4461

Nancy Roen
26015 South Bayshore Drive
Miami, Florida 33133
305-350-1200

Kenneth W. Wright
20 N. Orange Avenue, Suite 1000
Orlando, Florida 32801-0540
407-423-3200

Joe R. Williams
Post Office Box 100
Live Oak, Florida 32060
904-362-3158



Williams Environmental Services, Inc.

Remediation Through Proven Technology

July 12, 1991

Corporate Office

1530 Alabama Street
Auburn, AL 36830
Phone (205) 821-9250
FAX (205) 821-9765

RECEIVED
JUL 15 1991
Division of Air
Resources Management

Mr. Clair Fancy
FLORIDA DER
2600 Blairstone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

RE: Notice of Intent to Issue
File No. AC 29-19114

Dear Mr. Fancy:

Williams Environmental Services, Inc. (WILLIAMS) submitted affidavits of publication for the Miami Herald, Bradenton Herald and Tampa Tribune on July 9, 1991. As of that date, the affidavit from the fourth newspaper, the Sun Sentinel of Ft. Lauderdale, had not been received.

WILLIAMS is now submitted the affidavit to be included with the previous submission. WILLIAMS has been in contact with Mr. Willard Hanks and he is aware of our situation.

If you have any questions concerning this matter, please contact me at (205) 821-9250.

Sincerely,

WILLIAMS ENVIRONMENTAL SERVICES

Mr. Thomas R. Schmittou, EIT
Project Development Manager

TRS:pag

Enclosure

Branch Offices

2076 West Park Place Suite
Stone Mountain, GA 30087
Phone (404) 498-2020
FAX (404) 469-0178

5221 Militia Hill Road
Plymouth Meeting, PA 19462
Phone (215) 825-8877
FAX (215) 825-5623

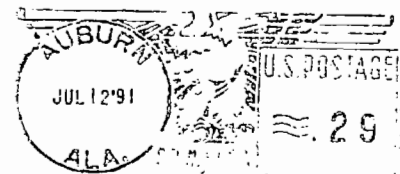
10795 Mead Road, #1012
Baton Rouge, LA 70816
Phone (504) 291-8079
FAX (504) 293-9617

P.O. Box 6378
Longview, TX 75608
Phone (214) 663-5850
FAX (214) 663-4803

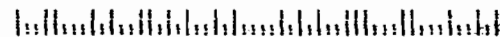


**Williams
Environmental
Services, Inc.**

*1530 Alabama Street
Auburn, AL 36830*



MR. CLAIR FANCY
FLORIDA DER
2600 BLAIRSTONE ROAD
TWIN TOWERS OFFICE BUILDING
TALLAHASSEE, FLORIDA 32399-2400



FORT LAUDERDALE NEWS/SUN-SENTINEL

Published Daily
Fort Lauderdale, Broward County, Florida
Boca Raton, Palm Beach County, Florida

STATE OF FLORIDA
COUNTY OF BROWARD/PALM BEACH

Before the undersigned authority personally appeared _____
_____ who on oath says that he is _____
_____ of the Fort Lauderdale News/Sun-Sentinel, Daily
newspapers published in Broward/Palm Beach County, Florida that the attached
copy of advertisement, being a _____
in the matter of _____
_____ in the _____ Court,
was published in said newspaper in the issues of _____

Affiant further says that the said Fort Lauderdale News/Sun-Sentinel are newspapers published in said Broward/Palm Beach County, Florida, and that the said newspapers have heretofore been continuously published in said Broward/Palm Beach County, Florida, each day, and have been entered as second class matter at the post office in Fort Lauderdale, in said Broward County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me

this _____ day of _____

A.D. 19 _____

J. J. ...
Notary Public, State of Florida

(SEAL) My Commission Expires Aug. 22, 1992

Bonded Thru Troy Fain - Insurance Inc.

PA: State of Florida
Department of
Environmental
Regulation
Notice of Intent
to Issue
The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to (AC 29-191114) to Williams Environmental Services, Inc., 1530 Alabama Street, Auburn Alabama 36830, to construct a 20 TPH mobile soil remediation unit with air pollution controlled by a baghouse and afterburner. The unit may operate in any county in Florida after completion of the public notice requirements for that county. (below) The regulations do not require a Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination for this project. The unit may emit 5.9 lbs/hr (13.3 TPY) particulate, 0.9 lbs/hr (2.0 TPY) carbon monoxide, 3.5 lbs/hr (7.9 TPY) nitrogen oxides, 12.4 lbs/hr (29.1 TPY) sulfur dioxide, and 40 lbs/hr (90 TPY) volatile organic compounds. These emissions will not cause a violation of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment or create a health hazard. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.
A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any

right such person may have to request an administrative (hearing) under Section 120.57, Florida Statutes. The petition shall contain the following information:
(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
(d) A statement of the material facts disputed by the Petitioner, if any;
(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer, upon motion filed pursuant to Rule 28-5.207, F.A.C.
The applications are available for public inspection during business hours.

8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Regulation offices located at:
2600 Blair Stone Road, Tallahassee, FL 32399-2400
3319 Maguire Blvd., Suite, 232, Orlando, FL 32803-3767
160 Governmental Center, Pensacola, FL 32501-5794
4520 Oak Fair Boulevard, Tampa, FL 33610-7347
2269 Bay Street, Fort Myers, FL 33901-2896
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Avenue, Suite A, West Palm Beach, FL 33408
and County environmental offices located at:
621 South Andrews Avenue, Fort Lauderdale, FL 33310
801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130
421 West Church Street, Suite 412, Jacksonville, FL 32202
1410 North 21st Street, Tampa, FL 33605
901 E. Evernia Street, West Palm Beach, FL 33402
315 Court Street, Clearwater, FL 34616
1301 Cattleman Road, Bldg. B, Sarasota, FL 43232-6299
Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.
* THE UNIT WILL NOT OPERATE IN HERNANDO COUNTY OR WITHIN ONE MILE OF ITS BOUNDARIES
June 22, 1991



**Williams
Environmental
Services, Inc.**

Remediation Through Proven Technology

July 9, 1991

Corporate Office

1530 Alabama Street
Auburn, AL 36830
Phone (205) 821-9250
FAX (205) 821-9765

RECEIVED

JUL 11 1991

Division of Air
Resources Management

Mr. Clair Fancy
FLORIDA DER
2600 Blairstone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

Re: Notice of Intent to Issue
File No. AC29-19114, 20 TPH SRU

Dear Mr. Fancy:

Williams Environmental Services, Inc. (WILLIAMS) is applying for a permit to operate in the following counties:

Manatee	Martin	Hillsboro
Dade	St. Lucie	Pineilas
Broward	Indian River	Sarasota
Palm Beach	Lee	
Monroe	Collier	

In the future, WILLIAMS may request that the permit to operate be amended to include additional counties, contingent upon completion of the public notification requirements. WILLIAMS does not intend to operate in Hernando County.

Please find enclosed affidavits of publication as provided by the Miami Herald, Bradenton Herald, and Tampa Tribune. The intent to issue was also published in the Sun Sentinel of Fort Lauderdale, however, as of the date of this letter their affidavit has not been received.

Branch Offices

2076 West Park Place Suite
Stone Mountain, GA 30087
Phone (404) 498-2020
FAX (404) 469-0178

5221 Militia Hill Road
Plymouth Meeting, PA 19462
Phone (215) 825-8877
FAX (215) 825-5623

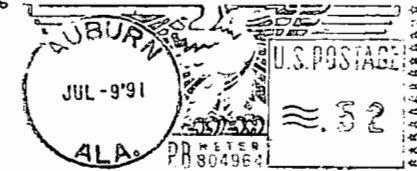
10795 Mead Road, #1012
Baton Rouge, LA 70816
Phone (504) 291-8079
FAX (504) 293-9617

P.O. Box 6378
Longview, TX 75608
Phone (214) 663-5850
FAX (214) 663-4803



**Williams
Environmental
Services, Inc.**

1530 Alabama Street
Auburn, AL 36830



MR. CLAIR FANCY
FLORIDA DER
2600 BLAIRSTONE ROAD
TWIN TOWERS OFFICE BUILDING
TALLAHASSEE, FLORIDA 32399-2400

File No. AC29-19114 Florida DER

Mr. Clair Fancy

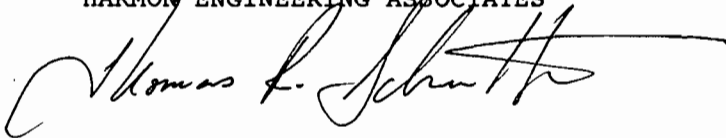
July 9, 1991

Page Two

WILLIAMS will forward the remaining affidavit upon receipt. If you have any questions or I may be of further assistance, please call me at (205) 821-9250.

Sincerely,

HARMON ENGINEERING ASSOCIATES

A handwritten signature in cursive script, appearing to read "Thomas R. Schmittou". The signature is written in black ink and is positioned below the typed name.

Thomas R. Schmittou, E.I.T.
Project Development Manager

TRS:pag

Enclosures

cc: W. Hanks

STATE OF FLORIDA COUNTY OF DADE:

Before the undersigned authority personally appeared

Ann Martula

who on oath says that he/she is

Custodian Of Records

of The Miami Herald, a daily newspaper published at Miami in Dade County, Florida; that the attached copy of advertisement was published in said newspaper in the issues of

June 24, 1991

Affiant further says that the said The Miami Herald is a newspaper published at Miami, in the said Dade County, Florida and that the said newspaper has heretofore been continuously published in said Dade County, Florida, each day and has been entered as second class mail matter at the post office in Miami, in said Dade County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Ann Martula

Sworn to and subscribed before me this 25th

day of June A.D. 1991

My commission expires *Edmund [Signature]*

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP. MAR. 18, 1995
BONDED THRU GENERAL INS. UND.



State of Florida Department of Environmental Regulation Notice of Intent to Issue

The Department of Environmental Regulation gives notice of its intent to issue a permit to (AC 29-191114) to Williams Environmental Services, Inc., 1530 Alabama Street, Auburn, Alabama 36830, to construct a 20 TPH mobile soil remediation unit with air pollution controlled by a baghouse and air scrubber. The unit may operate in any county in Florida after completion of the public notice requirements for that county. The unit will not operate in Hernando County or within one mile of its boundaries. The regulations do not require a Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination for this project. The unit may emit 5.9 lbs/hr (13.3 TPY) particulate, 0.9 lbs/hr (2.0 TPY) carbon monoxide, 3.5 lbs/hr (7.9 TPY) nitrogen oxides, 12.4 lbs/hr (29.1 TPY) sulfur dioxide, and 40 lbs/hr (90 TPY) volatile organic compounds. These emissions will not cause a violation of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment or create a health hazard. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below, and must be filed (received) in the Office of General Counsel at the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative (hearing) under Section 120.57, Florida Statutes.

The petition shall contain the following information:
(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
(d) A statement of the material facts disputed by the petitioner, if any;
(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to intervene in the proceeding. The petition for conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 26-5.207, F.A.C.

The application is 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 Department of Environmental Regulation offices located at:

- 2600 Blair Stone Road Tallahassee, Florida 32399-2400
- 3319 Maguire Blvd., Suite 232, Orlando, FL 32803-3767
- 160 Governmental Center, Pensacola, FL 32501-5794
- 4520 Oak Fair Boulevard Tampa, Florida 33610-7347
- 2269 Bay Street, Fort Myers, FL 33801-2896
- 7825 Baymeadows Way, Suite B2000, Jacksonville, FL 32256-7577

1900 S. Congress Avenue, Suite A, West Palm Beach, Florida 33406

and County environmental offices located at:
621 South Andrews Avenue, Fort Lauderdale, FL 33310

801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130

421 West Church Street, Suite 412, Jacksonville, FL 32202

1410 North 21st Street, Tampa, FL 33605

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

315 Court Street, Clearwater, FL 34616

1301 Cattleman Road, Bldg. B, Sarasota, FL 43232-8289

2002 E. Michigan Avenue, Orlando, FL 32806

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.



The Bradenton Herald

102 MANATEE AVE. WEST, P.O. BOX 921
BRADENTON, FLORIDA 34206
TELEPHONE (813) 748-0411

PUBLISHED DAILY
BRADENTON, MANATEE COUNTY, FLORIDA

STATE OF FLORIDA COUNTY OF MANATEE:

Before the undersigned authority personally appeared Linda L. Rikke, who on oath says that she is the Legal Advertising Clerk and the official representative of the Publisher of The Bradenton Herald, a daily newspaper published at Bradenton in Manatee County, Florida, with the express, limited authority to execute this affidavit for the purpose of establishing proof of publication of the public or legal notice and advertisement in the form attached hereto; that the attached copy of advertisement, being a legal advertisement in the matter of

Notice of Intent to Issue

in the _____ Court,

was published in said newspaper in the issues of _____
6/24, '91

Affiant further says that the said The Bradenton Herald is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Bradenton, Manatee County, Florida, each day and has been entered as second class mail matter at the post office in Bradenton, in said Manatee County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and the affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this

26th day of June

A.D. 1991

(SEAL) Notary Public

Notary Public, State of Florida at Largo
My Commission Expires May 30, 1995

RECEIVED
JUL 5 1991
HARMON ASSOCIATES

STATE OF FLORIDA Department of Environmental Regulation Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (AC 29-191114) to Williams Environmental Services, Inc., 1530 Alabama Street, Auburn, Alabama 36830, to construct a 20 TPH mobile soil remediation unit with air pollution controlled by a baghouse and afterburner. The unit may operate in any county in Florida after completion of the public notice requirements for that county. The unit will not operate in Hernando County or within one mile of its boundaries. The regulations do not require a Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination for this project. The unit may emit 5.9 lbs/hr (13.3 TPY) particulate, 0.9 lbs/hr (2.0 TPY) carbon monoxide, 3.5 lbs/hr (7.9 TPY) nitrogen oxides, 12.4 lbs/hr (29.1 TPY) sulfur dioxide, and 40 lbs/hr (90 TPY) volatile organic compounds. These emissions will not cause a violation of an ambient air quality standard or Prevention of Significant Deterioration (PSD) increment or create a health hazard. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 34399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Regulation offices located at:
2600 Blair Stone Road
Tallahassee, FL 32399-2400
3319 Maguire Blvd., Ste 232
Orlando, FL 32803-3767
160 Governmental Center
Pensacola, FL 32501-5794
4520 Oak Fair Boulevard
Tampa, FL 33610-7347
2269 Bay Street
Fort Myers, FL 33901-2896
7825 Baymeadows Way, #B200
Jacksonville, FL 32256-7577
1900 S Congress Ave, Ste A
West Palm Beach, FL 33406
and County environmental offices located at:
621 So Andrews Avenue
Ft Lauderdale, FL 33310
801 SW 3rd Avenue, 2nd Floor
Miami, FL 33130
421 W Church Street, Ste 412
Jacksonville, FL 32202
1410 No 21st Street
Tampa, FL 33605
901 E Evernia Street
West Palm Beach, FL 33402
315 Court Street
Clearwater, FL 34616
1301 Callheman Road, Bldg B
Sarasota, FL 43232-6299
2002 E Michigan Avenue
Orlando, FL 32806
Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.
6/24, '91



The Bradenton Herald

821-9250 Harmon Engineering Services

Thomas Schmitt

June	27	193 Lines Notice of Intent	142	89
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Paid 6/21/91 J.

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough } ss.

Before the undersigned authority personally appeared
R. Putney, who on oath says that he is Accounting Manager of The Tampa
Tribune, a daily newspaper published at Tampa in Hillsborough County, Flori-
da; that the attached copy of advertisement being a

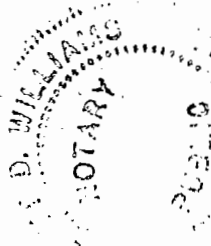
LEGAL NOTICE

in the matter of

INTENT TO ISSUE

was published in said newspaper in the issues of
June 21, 1991

Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has here-
tofore been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first pub-
lication of the attached copy of advertisement; and affiant further says that he has
neither paid nor promised any person, firm, or corporation any discount, rebate, com-
mission or refund for the purpose of securing this advertisement for publication in the
said newspaper.



Notary Public, State of Florida
My Commission Expires Sept. 9, 1993
Bonded Thru Troy Fain - Insurance Inc.

Sworn to and subscribed before me, this 22 day
of June, A.D. 1991

Signature of R. Putney and Notary Seal

(SEAL)

State of Florida
Department of
Environmental Regulation
Notice of Intent to Issue

The Department of Environ-
mental Regulation hereby
gives notice of its intent to
issue a permit (AC 29-19114)
to Williams Environmental Ser-
vices, Inc., 1530 Alabama
Street, Auburn, Alabama
36830, to construct a 20 TPH
mobile soil remediation unit
with air pollution controlled
by a baghouse and
afterburner. The unit may op-
erate in any county in Florida
after completion of the public
notice requirements for that
county. The unit will not oper-
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within one mile of its bounda-
ries. The regulations do not
require a Best Available Con-
trol Technology (BACT) or
Lowest Achievable Emission
Rate (LAER) determination
for this project. The unit may
emit 5.9 lbs/hr (13.3 TPY)
particulate, 0.9 lbs/hr (2.0
TPY) carbon monoxide, 3.5
lbs/hr (7.9 TPY) nitrogen
oxides, 12.4 lbs/hr (29.1 TPY)
sulfur dioxide, and 40 lbs/hr
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compounds. These emissions
will not cause a violation of
any ambient air quality stan-
dard or Prevention of signifi-
cant Deterioration (PSD)
increment or create a health
hazard. The Department is is-
suing this intent to issue for
the reasons stated in the Tech-
nical Evaluation and Prelimi-
nary Determination.

A person whose substantial
interests are affected by the
Department's proposed per-
mitting decision may petition
for an administrative proceed-
ing (hearing) in accordance
with Section 120.57, Florida
Statutes. The petition must
contain the information set
forth below and must be filed
(received) in the Office of Gen-
eral Counsel of the Depart-
ment at 2600 Blair Stone Road,
Tallahassee, Florida 32399-2400,
within fourteen (14) days of
publication of this notice.
Petitioner shall mail a copy of
the petition to the applicant at
the address indicated above
at the time of filing. Failure to
file a petition within this time
period shall constitute a waiver
of any right such person
may have to request an admin-
istrative determination
(hearing) under Section 120.57,
Florida Statutes.
The Petition shall contain the
following information:
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petitioner, the applicant's
name and address, the Depart-

ment Permit File Number and
the county in which the proj-
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(b) A statement of how and
when each petitioner received
notice of the Department's ac-
tion or proposed action;
(c) A statement of how each
petitioner's substantial
interests are affected by the
Department's action or pro-
posed action;
(d) A statement of the materi-
al facts disputed by
Petitioner, if any;
(e) A statement of facts
which petitioner contends
warrant reversal or modifica-
tion of the Department's ac-
tion or proposed action;
(f) A statement of which
rules or statutes petitioner
contends require reversal or
modification of the Depart-
ment's action or proposed ac-
tion; and
(g) A statement of the relief
sought by petitioner, stating
precisely the action petitioner
wants the Department to take
with respect to the Depart-
ment's action or proposed ac-
tion.
If a petition is filed, the ad-
ministrative hearing process
is designed to formulate agency
action. Accordingly, the
Department's final action may
be different from the position
taken by it in this Notice. Per-
sons whose substantial
interests will be affected by
any decision of the Depart-
ment with regard to the appli-
cations have the right to
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the proceeding. The petition
must conform to the require-
ments specified above and be
filed (received) within 14 days

of publication of this notice in
the Office of General Counsel
at the above address of the
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petition within the allowed
time frame constitutes a waiver
of any right such person
has to request a hearing
under Section 120.57, F.S., and
to participate as a party to
this proceeding. Any
subsequent intervention will
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presiding officer upon motion
filed pursuant to Rule 28-5.207,
F.A.C.
The applications are avail-
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to 5:00 p.m., Monday through
Friday, except legal holidays,
at the Department of Environ-
mental Regulation offices lo-

cated at:
2600 Blair Stone Road, Tallahassee, FL 32399-2400
3319 Maguire Blvd., Suite 232, Orlando, FL 32803-3767
160 Governmental Center, Pensacola, FL 32501-5794
4520 Oak Fair Boulevard, Tampa, FL 33610-7347
2269 Bay Street, Fort Myers, FL 33901-2896
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Avenue, Suite A, West Palm Beach, FL 33406
and County environmental offices located at:
621 South Andrews Avenue, Fort Lauderdale, FL 33310
801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130
421 West Church Street, Suite 412, Jacksonville, FL 32202
1410 North 21st Street, Tampa, FL 33605
901 E. Evernia Street, West Palm Beach, FL 33402
315 Court Street, Clearwater, FL 34616
1301 Cottlerman Road, Bldg. B, Sarasota, FL 43232-6299
2002 E. Michigan Avenue, Orlando, FL 32806
Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.
3195 6/21/91



Williams Environmental Services, Inc.

Remediation Through Proven Technology

June 18, 1991

RECEIVED

JUN 20 1991

Division of Air
Resources Management

Corporate Office

1530 Alabama Street
Auburn, AL 36830
Phone (205) 821-9250
FAX (205) 821-9765

Mr. Clair Fancy
Florida DER
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

Re: AC 29-191114, 20 TPH SRU
Technical Evaluation and Preliminary Determination

Dear Mr. Fancy:

Williams Environmental Services, Inc. (WILLIAMS) has completed the review of the above-referenced material received May 13, 1991. Everything appears to be in order, however, WILLIAMS would like to clarify the following points:

- 1) The permit specifies an operating temperature of 1600°F and two-second residence time in the afterburner. WILLIAMS offered these figures as maximum operating conditions and feel that the minimum VOC destruction efficiency of 95 percent can be achieved with an operating temperature of 1400°F and one-second retention time.
- 2) Item 18 of the specific conditions requires hourly recording of the pressure drop across the baghouse. WILLIAMS presently monitors and records the pressure drop manually with the use of magnehelic gauges.
- 3) WILLIAMS has entered into an agreement with Hernando County specifying the unit will not be operated in Hernando County or within one mile of its boundaries. WILLIAMS has agreed that this will be expressly stated in any such permit as a specific condition thereto.

WILLIAMS has submitted the notification of intent to four South Florida newspapers and is currently awaiting proof of publication. The notification has been amended to include a statement pertaining to item 3 above. Proof of publication will be forwarded to your office pending receipt of notification affidavits.

If you have any questions or need further assistance, please contact me at (205) 821-9250.

Sincerely,

WILLIAMS ENVIRONMENTAL SERVICES

Thomas R. Schmittou, E.I.T.
Project Development Manager

TRS:ps

cc: St. Dennis

Branch Offices

2076 West Park Place Suite
Stone Mountain, GA 30087
Phone (404) 498-2020
FAX (404) 469-0178

5221 Militia Hill Road
Plymouth Meeting, PA 19462
Phone (215) 825-8877
FAX (215) 825-5623

10795 Mead Road, #1012
Baton Rouge, LA 70816
Phone (504) 291-8079
FAX (504) 293-9617

P.O. Box 6378
Longview, TX 75608
Phone (214) 663-5850
FAX (214) 663-4803

COMMISSION
PHYLLIS BUSANSKY
JOE CHILLURA
PAM IORIO
SYLVIA KIMBELL
JAN KAMINIS PLATT
JAMES D. SELVEY
ED TURANCHIK

FAX (813) 272-5157



ROGER P. STEWART
EXECUTIVE DIRECTOR
ADMINISTRATIVE OFFICES
AND
WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960
AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530
WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788
ECOSYSTEMS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

June 3, 1991

Mr. Barry Andrews
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: AC29-191114, Williams Environmental Services, Inc.
Soil Remediation Unit

Dear Mr. Andrews:

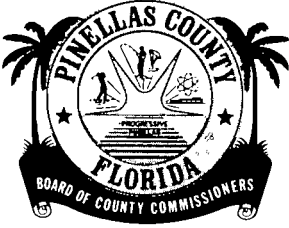
I have reviewed the above permit. In my opinion it is a purposeful
and functional permit.

Sincerely,

Ben Kalra
Air Permit Engineer

bm

cc: Willard Hanks, DER-Tallahassee



BOARD OF COUNTY COMMISSIONERS

PINELLAS COUNTY, FLORIDA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AIR QUALITY DIVISION
16100 FAIRCHILD DR. - SUITE V-102
CLEARWATER, FL 34622

RECEIVED

MAY 28 1991

Division of Air
Resources Management

COMMISSIONERS

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

May 21, 1991

Mr. Barry Andrews
FDER/DERM
2600 Blair Stone Rd.
Tallahassee, FL
32399-2400

RE: AC29-191114 - Williams Environmental Svcs., Inc.

Mr. Andrews:

Upon review of the Technical Evaluation and Preliminary Determination and proposed permit to construct a 20 TPH mobile soil remediation unit, the Air Quality Division provides the following comments:

The Acceptable Ambient Concentration (AAC) for toluene should be 0.900, not 1.786 as stated in the document. It appears that a safety factor of 1/50 was used instead of 1/100. All compounds with an OEL of less than 1000 mg/m³ are considered Category A compounds (safety factor 1/100) and those with an OEL of 1000 mg/m³ or more are considered Category B compounds (safety factor 1/50). Please contact John Glunn for a copy of the most recent FLATWG working list of AAC's.

It is also noted that there are limits for metals contained in untreated soils. Are these limits used for calculating ambient impacts or are the metals assumed to remain in a non volatilized state and be captured along with the particulate matter. If metals are volatilized, limits on the concentration should be placed that reflect the plume impact from the unit.

If you have any questions contact this office at (813) 530-6522.

Sincerely,

Gary Robbins, Environmental Program Manager
Air Quality Division

cc: RF, PE
W. Adams

"PINELLAS COUNTY IS AN EQUAL OPPORTUNITY EMPLOYER"

Member-Pinellas Partnership for a Drug Free Workplace

0520B

printed on recycled paper

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 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 additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Thomas Schmittou Project Development Manager Williams Environmental Services 1530 Alabama Street Auburn, Alabama 36830	4. Article Number P 407 852 681
	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
	Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>L. Mummert</i>	
7. Date of Delivery <i>5-13-91</i>	

PS Form 3811, Apr. 1989

* U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

P 407 852 681
RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

U.S.G.P.O. 1989-234-555 PS Form 3800, June 1985	Sent to Mr. Thomas Schmittou, Williams	
	Street and No. 1530 Alabama St. Environmen	
	P.O., State and ZIP Code Auburn, AL 36830	
	Postage	S
	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	S
Postmark or Date Mailed: 5-10-91 Permit: AC 29-191114		



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 8, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Thomas Schmittou
Project Development Manager
Williams Environmental Services, Inc.
1530 Alabama Street
Auburn, Alabama 36830

Dear Mr. Schmittou:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to construct a 20 TPH mobile soil remediation unit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

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

CHF/WH/plm

Attachments

c: Don Ehlenbeck, BWC
District Air Program Administrators
County Air Programs
Jimmy Taylor, P.E.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Williams Environmental Services, Inc. DER File No. AC 29-191114
1530 Alabama Street
Auburn, Alabama 36830

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue an air construction permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Williams Environmental Services, Inc., applied on January 7, 1991, to the Department of Environmental Regulation for a permit to construct a 20 TPH mobile soil remediation unit for operation throughout Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under

Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

Don Ehlenbeck, BWC
District Air Program Administrators
County Air Programs
Jimmy Taylor, P.E.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 5-10-91.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statute, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.


Clerk

5-10-91
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (AC 29-191114) to Williams Environmental Services, Inc., 1530 Alabama Street, Auburn, Alabama 36830, to construct a 20 TPH mobile soil remediation unit with air pollution controlled by a baghouse and afterburner. The unit may operate in any county in Florida after completion of the public notice requirements for that county. The regulations do not require a Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination for this project. The unit may emit 5.9 lbs/hr (13.3 TPY) particulate, 0.9 lbs/hr (2.0 TPY) carbon monoxide, 3.5 lbs/hr (7.9 TPY) nitrogen oxides, 12.4 lbs/hr (29.1 TPY) sulfur dioxide, and 40 lbs/hr (90 TPY) volatile organic compounds. These emissions will not cause a violation of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment or create a health hazard. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the applications have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The applications are available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Regulation offices located at:

2600 Blair Stone Road, Tallahassee, FL 32399-2400
3319 Maguire Blvd., Suite, 232, Orlando, FL 32803-3767
160 Governmental Center, Pensacola, FL 32501-5794
4520 Oak Fair Boulevard, Tampa, FL 33610-7347
2269 Bay Street, Fort Myers, FL 33901-2896
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Avenue, Suite A, West Palm Beach, FL 33406

and County environmental offices located at:

621 South Andrews Avenue, Fort Lauderdale, FL 33310
801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130
421 West Church Street, Suite 412, Jacksonville, FL 32202
1410 North 21st Street, Tampa, FL 33605
901 E. Evernia Street, West Palm Beach, FL 33402
315 Court Street, Clearwater, FL 34616
1301 Cattleman Road, Bldg. B, Sarasota, FL 43232-6299
2002 E. Michigan Avenue, Orlando, FL 32806

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Williams Environmental Services, Inc.
Auburn, Alabama

20 TPH Mobile Soil Remediation Unit
Statewide Operation

File No.: AC 29-191114

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

May 8, 1991

I. General Information

A. Applicant

Williams Environmental Services, Inc.
1530 Alabama Street
Auburn, Alabama 36830

B. Request

On January 7, 1991, Williams Environmental Services, Inc. (WES) submitted an application for a permit to construct a 20 TPH mobile soil remediation unit (rotary kiln with a baghouse and afterburner) which would be operated throughout the state. The application was considered complete on receipt (February 18, 1991) of WES' letter dated February 13, 1991.

C. Project

The applicant is requesting permission to construct a 20 TPH mobile soil remediation unit (SIC 1629) for operation throughout the state. The unit contains a contaminated soil hopper, screw conveyor system, rotary kiln, treated soil cooling system, baghouse, afterburner, No. 2 oil fuel system, and associated equipment. The unit is to be used to decontaminate soils containing gasoline, No. 2 diesel fuels, and "on-spec" motor oils.

D. Emissions

The unit will emit particulate matter (PM), including lead compounds, volatile organic compounds (VOC), and the products of combustion (SO₂, NO_x, and CO).

A 99.9% efficient baghouse will be used to control PM emissions. The applicant estimates the maximum particulate matter emissions will be 1.7 lbs/hr. The baghouse will meet the particulate matter emissions standard of 0.08 grain/dscf corrected to 50% excess air (F.A.C. Rule 17-2.600(1)(c)1.) that the Department will impose on this unit. Approximately 8,600 dscfm @ 50% EA flow through the baghouse and afterburner resulting in an allowable PM emission of up to 5.9 lbs/hr. As the unit may operate 4,500 hours per year, the maximum PM emissions from the afterburner stack will be 13.3 TPY.

The VOC evaporates from the contaminated soil in the kiln and passes through the baghouse to the afterburner. The applicant estimates that up to 800 lbs/hr of VOC will enter the afterburner and, after 95% destruction, 40 lbs/hr of VOC will be discharged to the atmosphere. Based on 4,500 hours per year operation, this is equivalent to 90 TPY VOC emissions from the afterburner stack.

The unit will burn No. 2 oil (175 GPH) for a maximum heat input of 22.9 MMBtu/hr. The normal products of combustion are produced during the burning of this fuel. Assuming that the

hydrocarbons evaporated from the soil will offset an equal quantity of No. 2 fuel oil, the products of combustion emissions are estimated to be:

Pollutant		CO	NO _x	SO ₂
Emissions from	lbs/hr	0.9	3.5	12.4
175 GPH No. 2 Oil	TPY	2.0	7.9	29.1

At the low emission rates proposed, there should be no visible emissions from this source.

Reasonable precautions will be required to control the unconfined emissions from decontaminated soil. This will involve wetting the dried material, covering storage piles, and hauling of the material in covered trucks.

II. Rule Applicability

The proposed project, construction and operation of a 20 TPH portable rotary kiln/afterburner system, is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code.

The source may be operated in areas designated nonattainment for particulate matter, ozone, and sulfur dioxide (F.A.C. Rule 17-2.410), unclassifiable for particulate matter and sulfur dioxide (F.A.C. Rule 17-2.430), attainment for all criteria pollutants (F.A.C. Rule 17-2.420), and maintenance for ozone (F.A.C. Rule 17-2.460).

The unit is a minor source (F.A.C. Rule 17-2.100) because emissions of any single pollutant are less than 100 TPY. The proposed source is not subject to the preconstruction review requirements of F.A.C. Rule 17-2.500(5) and F.A.C. Rule 17-2.510(4) because permit restrictions will prohibit the unit from emitting 100 TPY of any pollutant.

The source is subject to F.A.C. Rule 17-2.520, which pertains to sources not subject to PSD or nonattainment review. The unit is classified as an incinerator. Allowable particulate matter emissions are limited to 0.08 grains/dscf corrected to 50% excess air (F.A.C. Rule 17-2.600(1)(c)1.) and the emissions cannot cause objectionable odors (F.A.C. Rule 17-2.600(1)(c)2.). Chapter 17-2, F.A.C., does not have an applicable RACT standard for particulate matter, sulfur dioxide or volatile organic compounds (VOC) that would apply to an incinerator. Organic (VOC) emissions will be regulated under F.A.C. Rule 17-2.620, General Pollutant Emission Limiting Standards, which restricts emissions to control by systems deemed necessary by the Department. The Department deems 95% destruction of the VOC air pollutants is a minimum standard for this unit. The discharge of pollutants shall not cause an objectionable odor or an exceedance of an acceptable ambient air concentration (AAC) or risk for toxic pollutants.

Prior to issuance of the proposed construction permit, the applicant must provide the Department's Bureau of Air Regulation with a list of all counties that the soil dryer will be operated in and certified proof of publication of the Notice of Application and Notice of Intent from a newspaper of general circulation in each county on the list (F.A.C. Rule 17-2.220).

III. Technical Evaluation

This unit is restricted to processing soils contaminated with only virgin petroleum products (gasoline, No. 2 oils, and motor oils) and "on-spec" used oils (motor oils) unless prior approval is obtained to treat other material. It cannot be authorized to treat hazardous material as defined in 40 CFR 261.3 (revised as of July 1, 1988) nor materials that are corrosive, reactive, EP toxic or ignitable.

Chapter 17-775, F.A.C., Soil Thermal Treatment Facilities, regulates some aspects pertaining to the operation of this source. Some of these requirements are incorporated in the air permit. They include soil sampling specifications and pretreatment soil analysis. Also, requirements that the soil be stored on an impermeable surface or liner (to prevent contamination of other soils or water) and covered with a secured plastic cover until treatment (to minimize fugitive emissions) is included in the proposed permit.

Up to 20 TPH contaminated soil must be reduced to clumps that are a maximum of 2 inches in diameter prior to being fed into the kiln. The soil is heated in the 10.5 MMBtu/hr kiln to evaporate the petroleum products. These vapors flow through a 99+% efficient baghouse, which removes the particulate matter, and into proposed 95% (minimum) destruction efficiency 12.4 MMBtu/hr afterburner to burn the petroleum vapors. The afterburner has a minimum design temperature of 1600°F and a minimum residence time of over 2 seconds. Higher temperatures and/or residence time may be needed to achieve this destruction efficiency. The minimum allowable afterburner temperature will be based on the compliance test results and included in any permit to operate issued for this source.

At an allowable particulate matter standard of 0.08 gr/dscf corrected to 5% excess air (EA), the unit is allowed to emit 5.9 lbs/hr. The proposed permit will limit particulate matter emissions to this value.

With 20 TPH of soil containing 1% hydrocarbons being processed, the VOC emissions from the 95% efficient afterburner are estimated to be 40 lbs/hr.

The guidance used by the Department to determine acceptable ambient concentrations (AAC) of hazardous pollutants is based on the following formula:

$$\text{Acceptable Ambient Concentration (AAC)} = \frac{40}{(\text{hrs per week operation})} \times \frac{1 \times (\text{OEL})}{\text{Safety factor}}$$

The safety factors are 100 for category A substances and 50 for category B substances.

OEL - Occupational Exposure Level such as ACGIH, OSHA, and NIOSH published standards for toxic materials.

TWA-TLV values are published by the American Conference of Governmental Industrial Hygienists (ACGIH). The values for the pollutants expected to be encountered in the proposed operation are as follows:

Pollutant	OEL	AAC (24 hr/day operation)
	mg/m ³	mg/m ³
Benzene	3	0.0071
Toluene	375	1.786
Ethyl Benzene	435	1.036
Xylene	435	1.036

Calculations, using the EPA approved Screen - 1.1 Model (updated PTPLU 6 Model) and the stack parameters listed in the application, show that an emission rate of 1 gram/sec will have maximum ambient air impacts of 26.8×10^{-3} mg/m³ (8 hr. avg.).

If the stack parameters change from 23.5 feet stack height, 2.0 feet stack diameter, 55 feet/second stack gas velocity, and 1600°F stack gas temperature, the impact of the emission will change. The model would need to be rerun with the correct parameters and the following calculations repeated.

The maximum emissions that can occur without exceeding the AAC can be determined by the following relationship:

$$\text{AAC} = \text{Impact of Unit} \times \text{Emissions.}$$

With this relationship and data, the Department can estimate the maximum emissions of a pollutant from the proposed unit that can occur without exceeding the AAC. Also, by knowing the process weight for the unit (20 TPH), assuming all VOC in the contaminated soil is evaporated in the kiln, and that 95% of this VOC is destroyed by the afterburner, the maximum content of the pollutants in the soil that can exist without the potential to exceed the AAC can be determined. The Department has made these calculations for benzene. The emissions of the other BTEX compounds could be higher without exceeding the AAC. The results are summarized in the following table:

Pollutant	Maximum Emissions		Maximum Soil Concentration PPM
	grams/second	lbs/hr	
Benzene	0.26	2.1	1,050

Using a similar procedure, it can be shown that the maximum VOC content of the untreated soil cannot exceed 20,000 PPM when the emissions from the afterburner are 40 lbs/hr VOC.

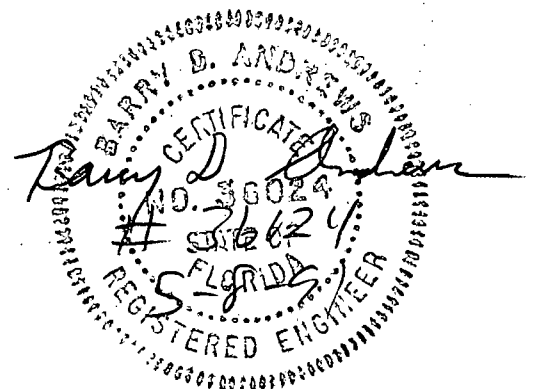
The Department has chosen to regulate benzene and total VOC only for soils contaminated with virgin petroleum products and "on-spec" used oil. For soil contaminated with other petroleum product components and derivatives, the applicant will be required to submit calculations showing the AAC or other concentrations required to protect public health and safety will not be exceeded before the soil can be treated in this unit.

IV. Air Quality Analysis

By restricting the benzene and VOC content of the soil, the Department has reasonable assurance that the operation of the portable rotary kiln/afterburner system will not create a health hazard or cause/contribute to an ambient air quality violation.

V. Conclusion

Based on the information provided by Williams Environmental Services, Inc., the Department has reasonable assurance that the proposed construction/operation of the 20 TPH mobile rotary kiln/afterburner system, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

**Williams Environmental Services,
Inc.
1530 Alabama Street
Auburn, Alabama 36830**

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

County: Mobile Operation

**Project: 20 TPH Mobile Soil
Remediation Unit**

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Authorization to construct a 10 TPH nominal (20 TPH maximum) mobile soil remediation unit. The primary components of the unit are a live bottom contaminated soil hopper, hopper/screw feed system, rotary kiln furnace (5 ft. diameter by 22 ft. long) with a 10.5 MMBtu/hr No. 2 fuel oil burner, cooling screw conveyor, rotary kiln baghouse containing 1,215 square ft. of fabric filters, induced draft fan, an afterburner equipped with a 12.4 MMBtu/hr No. 2 fuel oil burner capable of operating at 1600°F with 2 seconds residence time, three No.2/diesel fuel storage tanks, a 40 kw diesel generator, a 90 HP diesel engine, a 20 HP diesel engine, and a stack which is 2 ft. in diameter, 23.5 ft. in elevation and designed to handle 10,384 acfm of flue gas at 1600°F. The unit is transported to the contaminated soil site on truck trailers.

The unit may be operated in any county within the State after satisfactorily completing the public notice requirements (F.A.C. Rule 17-2.220) for the county and receiving Department authorization to operate at the new location.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received Jan. 7, 1991.
2. DER letter dated Jan. 17, 1991.
3. WES letter dated Feb. 13, 1991.

PERMITTEE:

**Williams Environmental Services,
Inc.**

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:

Williams Environmental Services,
Inc.

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:

Williams Environmental Services,
Inc.

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for

PERMITTEE:

Williams Environmental Services,
Inc.

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

GENERAL CONDITIONS:

continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

Construction Requirements

1. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.
2. The stack sampling facilities must comply with F.A.C. Rule 17-2.700(4).
3. The afterburner shall be capable of operating above 1600°F with a 2 second retention time and have a minimum VOC destruction efficiency of 95%. A minimum afterburner operation temperature, based on the compliance tests data, will be incorporated into any permit to operate issued for this unit.

PERMITTEE:

**Williams Environmental Services,
Inc.**

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

SPECIFIC CONDITIONS:

Emission Restrictions

4. Particulate matter emissions from the afterburner stack shall neither exceed 0.08 grains/dscf corrected to 50% excess air nor 5.9 lbs/hr. Visible emissions from any part of the process shall not exceed 5% opacity.

5. Benzene emissions from the afterburner stack shall not exceed 2.1 lbs/hr. Total VOC emissions shall not exceed 40 lbs/hr. Compliance shall be determined by a material balance using soil analysis, production rate, and the afterburner destruction efficiency.

6. The operation of this source shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor pursuant to F.A.C. Rule 17-2.600(c)2.

Operation Requirements

7. The system shall be properly operated and maintained (F.A.C. Rule 17-2.210(2)). No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly (F.A.C. Rule 17-2.240).

8. Reasonable precautions shall be used to minimize unconfined emissions of particulate matter generated by this operation (F.A.C. Rule 17-2.610(3)). For this facility, reasonable precautions shall be defined as wetting the treated soil and keeping the work areas wet where the soil is being removed and treated.

9. The unit shall not be operated at a location or in a manner that may create a nuisance. The unit shall only be operated at the site where the soil was contaminated or at a collection site having a valid permit issued under F.A.C. Rule 17-775.

10. Untreated soil removed from the ground shall be stored under waterproof covers to control unconfined emissions.

11. This unit shall be allowed to operate 24 hours per day, 7 days per week, but not more than 4,500 hours per year.

12. Maximum soil charging rate to the unit shall not exceed 20 TPH. The soil entering the kiln cannot be larger than 2 inches in diameter. The permittee shall have means to determine the feed or production rate on site.

PERMITTEE:

Williams Environmental Services,
Inc.

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

SPECIFIC CONDITIONS:

13. Only No. 2 oil with a maximum of 0.5% sulfur shall be used as fuel for the kiln and afterburner. Maximum permitted fuel consumption is 22.9 MMBtu/hr (175 GPH No. 2).

14. Only soils contaminated with gasoline, No. 2 type oils, and motor oils shall be treated in this unit unless otherwise approved by the Bureau of Air Regulation.

Hazardous waste as defined in 40 CFR 261.3 shall not be processed by this unit.

Metals in the untreated soil shall not exceed the following:

Metals	Maximum Concentration	
	TCLP(mg/L)	Total(mg/Kg)
Arsenic	5.0	55
Barium	100.0	2750
Cadmium	1.0	55
Chromium	5.0	275
Lead	5.0	77
Mercury	0.2	17
Selenium	1.0	165
Silver	5.0	165

Total Volatile Organic Aromatics (VOA) constituent in the soil shall not exceed the concentrations that have the potential to exceed the acceptable ambient air concentration or the VOC emission limit for this unit (see Specific Conditions Nos. 5, 17, and 27).

To show compliance with this condition, the permittee shall analyze composite samples of the contaminated soil (see Specific Condition No. 16) by the EPA SW 846 Methods, Test Method for Evaluating Solid Waste Physical/Chemical, for VOA (EPA Method 5030/8020), TRPH (EPA draft Method 9073), and Metals (EPA Method 1311, 3050, 6010, 7040, 7041, 7060, 7061, 7080, 7130, 7131, 7190, 7191, 7420, 7421, 7471, and 7760). All soil samples taken at the remediation site and exiting the dryer shall be stored in a sealed glass container immediately upon sampling.

15. The permittee may request, in writing, permission to treat "off-spec" material. The request shall include the history of the site to be treated, an analysis of the contaminants suspected to be

PERMITTEE:

Williams Environmental Services,
Inc.

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

SPECIFIC CONDITIONS:

in the soil, an estimate of the emissions from the unit while processing the soil, and calculations showing that the ambient air impact from the unit will not exceed the acceptable ambient air concentration for any toxic pollutant. The Department will approve or deny each request in writing, after a public notice for the specific project, on a case-by-case basis.

16. Sampling and analysis of the contaminated soil at each site, based on the procedures prescribed in SW-846, shall be conducted prior to remediation. Minimum number of composite samples for analysis at each site prior to remediation shall be as follows:

<u>Soil Quantity (yards³)</u>	<u>No. of Composite Samples</u>
Less than 100	1
100 to 500	3
500 to 1000	5
Each additional 250 yds	1 additional sample

17. Unless the Department has determined other concentrations are required to protect public health and safety, predicted ambient air impact of any toxic pollutant, as determined by the PTPLU 6 model or other DARM approved models, shall not exceed the concentration calculated by the following formula:

$$AAC = \frac{40}{X} \cdot \frac{1}{\text{safety factor}} \cdot (\text{OEL})$$

where,

AAC = acceptable ambient concentration

Safety Factor = 100 for category A substances and
50 for category B substances

X = 40 or the hours/week of actual operation,
whichever is larger

OEL - Occupational exposure level such as the TWA-TLV published by the ACGIH, OSHA, and NIOSH published standards for toxic materials.

TWA-TLV is the threshold limit value (8 hrs/day, 40 hrs/wk) maximum exposure concentration considered safe for workers by the ACGIH.

PERMITTEE:

Williams Environmental Services,
Inc.

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

SPECIFIC CONDITIONS:

Data in the application shows that, for continuous operation, an emission of 1 gram/sec will have a maximum ambient impact of $26.8 \times 10^{-3} \text{ mg/m}^3$ (8 hr. avg). If the stack parameters are different than the values listed in the application, the permittee must determine and use the actual impact factor calculated by the EPA Approved Screen - 1.1 Model.

$$\text{Maximum Allowable Emissions (g/sec)} = \frac{\text{AAC } \text{mg/m}^3}{26.8 \times 10^{-3}}$$

18. Pressure drop across the baghouse shall be recorded hourly and temperature of the afterburner shall be recorded continuously during operations. The instruments used to obtain these measurements shall be properly calibrated, maintained, and in operation any time the unit is in service.

Compliance Requirements

19. This unit shall be tested at a process weight rate of 18 to 20 TPH. All compliance tests shall meet the requirements listed in F.A.C. Rule 17-2.700. The unit shall not operate above the maximum permitted rate of 20 TPH.

20. When the Department, after investigation, has good reason (such as complaints, increased visible emissions, or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Chapter 17-2, F.A.C., or in this permit is being violated, it may require the owner or operator of the unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the Department.

21. The exhaust stack for this process must be tested concurrently for particulate matter and visible emissions by EPA Methods 5 and 9 pursuant to 40 CFR 60, Appendix A, revised as of July 1, 1990, within 5 days after placing the unit in commercial operation under this permit and annually thereafter. Operation at each subsequent site requires an EPA Method 9 test to be performed within 3 days of placing the unit in service.

22. The unit destruction efficiency, benzene, and VOC emissions shall be established by a material balance using a Method 18, or 25 test (40 CFR 60, Appendix A, revised as of July 1, 1990) and soil analysis before and after treatment or other methods as approved by the Department.

PERMITTEE:

**Williams Environmental Services,
Inc.**

Permit Number: AC 29-191114

Expiration Date: March 1, 1992

SPECIFIC CONDITIONS:

Administrative Requirements

23. The permittee shall furnish the available information listed in Specific Condition No. 24 prior to operating the portable rotary kiln/afterburner system at its initial site. This permit requires compliance with any applicable local (county) regulations. This may include requirements for county operation permits and additional restrictions on the operation of this unit.

24. This unit shall not be operated at any new site until the permittee has requested authorization to operate at the new site. The permittee shall notify the BAR, local government (city and/or county), and Department District office by registered mail at least 3 days prior to moving to the new site. The notification shall provide the permit number of the unit, a copy of the last stack test results, the date of the proposed move, the new site for the unit, and the location and contamination levels of the soil to be treated. The Department shall notify the permittee of any new air pollutant emission conditions the unit must meet after the receipt of the relocation notice.

25. The permittee shall maintain a log that shows the unit's operation time during the preceding 12 months. All required records must be available for inspection at the job site for the unit within 3 working days of a request by the Department.

26. The BAR shall be notified in writing at least 15 days in advance of any annual compliance test to be conducted on this source.

27. Any analysis required by Specific Condition No. 16 which indicates a violation of any condition in this permit shall be reported as soon as feasible to BAR. An average concentration of benzene above 1,050 ppm in the soil or total hydrocarbons above 20,000 ppm is a potential violation of this permit. The soil may be decontaminated by operating at less than the 20 TPH production rate, or by other means, with prior approval of the Department. The permittee must propose the method of compliance with this permit.

28. Records shall be kept by the permittee on the location, date, time, and number of samples taken for each composite sample. Soil analysis results shall be available for Department inspection during the clean up of the site and for 3 years thereafter.

PERMITTEE:
Williams Environmental Services,
Inc.

Permit Number: AC 29-191114
Expiration Date: March 1, 1992

SPECIFIC CONDITIONS:

29. Stack test results from PM and VOC shall be submitted to the Department within 45 days of the test.

30. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAR prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

31. An application for an operation permit must be submitted to the BAR at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this _____ day
of _____, 1991

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

Carol M. Browner, Secretary

FAX TRANSMITTAL

**Harmon
Engineering
Associates**

Consulting Engineers & Scientists



**Williams
Environmental
Services**

Environmental Contractors

Comprehensive Analytical, Engineering & Site Remediation Services

Corporate Office
1550 Pumphrey Avenue
Auburn, Alabama 36830

Phone: 205 / 821-9250

FAX: 205 / 821-9765

To: Mr. Willard Hanks

Company: Florida DER


FAX: (904) 922-6979

From: Thomas Schmitt

Date: 5-7-91

Time: 1500

Pages (including cover): 6

Message: 

HERE IS THE LETTER WE DISCUSSED.
AN ADDITIONAL COPY IS BEING MAILED TODAY
FOR YOUR FILES.

Branch Offices:

◆ Atlanta ◆ Mobile ◆ Birmingham ◆ Philadelphia ◆ Houston ◆



Williams Environmental Services, Inc.

Remediation Through Proven Technology

Corporate Office

1530 Alabama Street
Auburn, AL 36830
Phone (205) 821-9250
FAX (205) 821-9765

April 2, 1991

Mr. Clair Fancy
FLORIDA DER
2600 Blainstone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

RE: Notice of Application
File No. AC 29-191114, 20 TPH SRU

Dear Mr. Fancy:

Please find enclosed affidavits of publication as provided by the Miami Herald, Bradenton Herald, Tampa Tribune and Sun Sentinel.

Williams Environmental Services, Inc. (WILLIAMS) is applying for permit to operate in the following counties:

Manatee	Martin	Hillsboro
Dade	St. Lucie	Pineillas
Broward	Indian River	Sarasota
Palm Beach	Lee	
Monroe	Collier	

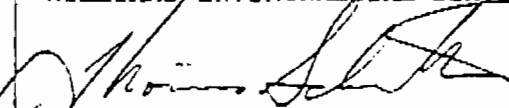
In the future, WILLIAMS may request that the permit to operate be amended to include additional counties contingent upon completion of the Public Notification requirements.

Please note that WILLIAMS does not presently intend to operate this unit in Hernando County.

If you should have any questions please call me at (205) 821-9250.

Sincerely,

WILLIAMS ENVIRONMENTAL SERVICES


Thomas R. Schmittou, EIT
Project Development Manager

TRS:clh

Enclosure

Branch Offices

2076 West Park Place
The Mountain, GA 30087
Phone (404) 498-2020
FAX (404) 462-0178

5221 Millie Hill Road
North Merburg, PA 19462
Phone (215) 825-8877
FAX (215) 825-5623

795 Mead Road, #1012
Baton Rouge, LA 70816
Phone (504) 291-8079
FAX (504) 293-9617

P.O. Box 6378
Longview, TX 75608
Phone (214) 663-5850
FAX (214) 663-4803

P.O. Box 467
Gibson City, IL 60936
1-800-736-2699
FAX (217) 784-8520

General
Florida Permit
TR 5
MAF
NPD

BEST AVAILABLE COPY

FORT LAUDERDALE NEWS/SUN-SENTINEL
PUBLISHED DAILY
FORT LAUDERDALE, BROWARD COUNTY, FLORIDA
BOCA RATON, PALM BEACH COUNTY, FLORIDA
MIAMI, DADE COUNTY, FLORIDA

RECEIVED
MAR 7 1991
HARMON ASSOCIATES

STATE OF FLORIDA
COUNTY OF BROWARD/PALM BEACH/DADE
BEFORE THE UNDERSIGNED AUTHORITY PERSONALLY
APPEARED WHO ON
OATH SAYS THAT HE/SHE IS A DULY AUTHORIZED
REPRESENTATIVE OF THE CLASSIFIED DEPARTMENT OF
THE FORT LAUDERDALE NEWS/SUN-SENTINEL, DAILY
NEWSPAPERS PUBLISHED IN BROWARD/PALM BEACH/DADE
COUNTY, FLORIDA THAT THE ATTACHED COPY OF
ADVERTISEMENT, BEING A

NOTICE
IN THE MATTER OF
MOBILE SOIL REMED.

IN THE CIRCUIT COURT, WAS PUBLISHED IN SAID
NEWSPAPER IN THE ISSUES OF
C/3/2/1X

AFFIANT FURTHER SAYS THAT THE SAID FORT
LAUDERDALE NEWS/SUN-SENTINEL ARE NEWSPAPERS
PUBLISHED IN SAID BROWARD/PALM BEACH/DADE
COUNTY, FLORIDA, AND THAT THE SAID NEWSPAPERS
HAVE HERETOFORE BEEN CONTINUOUSLY PUBLISHED IN
SAID BROWARD/PALM BEACH/DADE COUNTY, FLORIDA,
EACH DAY, AND HAVE BEEN ENTERED AS SECOND
CLASS MATTER AT THE POST OFFICE IN FORT
LAUDERDALE, IN SAID BROWARD COUNTY, FLORIDA,
FOR A PERIOD OF ONE YEAR NEXT PRECEDING THE
FIRST PUBLICATION OF THE ATTACHED COPY OF
ADVERTISEMENT; AND AFFIANT FURTHER SAYS THAT
HE/SHE HAS NEITHER PAID NOR PROMISED ANY PERSON,
FIRM OR CORPORATION ANY DISCOUNT, REBATE,
COMMISSION OR REFUND FOR THE PURPOSE OF
CURING THIS ADVERTISEMENT FOR PUBLICATION
IN SAID NEWSPAPERS.

.....
AUTHORIZED REPRESENTATIVE

BORN TO AND SUBSCRIBED BEFORE ME
THIS 02 DAY OF MARCH
1991

Carolita A. Tinsley
.....
NOTARY PUBLIC
My Commission Expires June 30, 1992

Notice of Application
The Department of Environmental Regulation announces receipt of an application for permit to construct a mobile soil remediation unit from Williams Environmental Services, Inc., 1530 Alabama Street, Auburn, Alabama 36830. The unit will evaporate and incinerate petroleum products (fuels and lubricants) from soils contaminated by leaking fuel tanks, spills, etc. This mobile unit may be operated in any county that this Notice appears in.
The application is being processed at the Department of Environmental Regulation, B.A.R., 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Copies of the application 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 Department of Environmental Regulation offices located at:
2600 Blair Stone Road, Tallahassee, FL 32399-2400
160 Governmental Center, Pensacola, FL 32501-5794
4520 Oak Fair Blvd., Tampa, FL 33610-7347
2269 Bay Street, Fort Myers, FL 33801-2898
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406
and County environmental offices located at:
621 S. Andrews Ave., Ft. Lauderdale, FL 33301
801 S.W. 3rd Ave., 2nd Floor, Miami, FL 33130
421 West Church St., Suite 412, Jacksonville, FL 32202-4111
1410 N. 21st St., Tampa, FL 33605
901 E. Evernia St., W. Palm Beach, FL 33402
315 Court St., Clearwater, FL 34618
1301 Cattleman Road, Bldg. B, Sarasota, FL 34232-6289
2002 E. Michigan Ave., Orlando, FL 32806
Written comments on this application may be submitted to Mr. Barry Andrews at the Department's Tallahassee address.
March 2, 1991



The Bradenton Herald

102 MANATEE AVE WEST, P.O. BOX 921
BRADENTON, FLORIDA 34206
TELEPHONE (813) 748-0411

PUBLISHED DAILY

BRADENTON, MANATEE COUNTY, FLORIDA

STATE OF FLORIDA COUNTY OF MANATEE:

Before the undersigned authority personally appeared Linda L. Rikke, who on oath says that she is the Legal Advertising Clerk and the official representative of the Publisher of The Bradenton Herald, a daily newspaper published at Bradenton in Manatee County

Florida, with the express, limited authority to execute this affidavit for the purpose of establishing proof of publication of the public or legal notice and advertisement in the form attached hereto; that the attached copy of advertisement, being a legal advertisement in the matter of Notice of Application

_____ in the _____ Court,

as published in said newspaper in the issues of _____ /14, '91

Affiant further says that the said The Bradenton Herald is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published at Bradenton, Manatee County, Florida, each day and has been entered as second class mail matter at the post office in Bradenton, in Manatee County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and the affiant further says that she has neither paid nor promised any per cent to any firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Subscribed and sworn to and subscribed before me this 21st day of March

19 91
Linda L. Rikke

Notary Public

NOTICE OF APPLICATION

The Department of Environmental Regulation announces receipt of an application for permit to construct a mobile soil remediation unit from Williams Environmental Services, Inc., 1530 Alabama Street, Auburn, Alabama 36830. The unit will evaporate and incinerate petroleum products (fuels and lubricants) from soils contaminated by leaking fuel tanks, spills, etc. This mobile unit may be operated in any county in Florida where this Notice appears in.

The application is being processed at the Department of Environmental Regulation, BAR, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Copies of the application 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 Department of Environmental Regulation offices located at:
2600 Blair Stone Road
Tallahassee, FL 32399-2400
140 Governmental Center
Pensacola, FL 32501-5794
4320 Oak Park Boulevard
Tampa, FL 33616-7347
2269 Bay Street
Fort Meyers, FL 33901-2896
7825 Baymeadows Way
Suite B200

Jacksonville, FL 32256-7577
1900 S Congress Avenue, Ste A
West Palm Beach, FL 33406
and County environmental offices located at:
621 S. Andrew Avenue
Ft. Lauderdale, FL 33301
801 SW 3rd Avenue, 2nd Floor
Miami, FL 33130
421 W Church Street, Ste 412
Jacksonville, FL 32202-4111
1410 North 21st Street
Tampa, FL 33605
901 East Evernia Street
West Palm Beach, FL 33402
315 Court Street
Clearwater, FL 34616
1301 Cameman Road, Bldg B
Sarasota, FL 34237-4297
2002 East Michigan Avenue
Orlando, FL 32806

Written comments on this application may be submitted to Mr. Barry Andrews at the Department's Tallahassee address.
3/14/91

PUBLISHED DAILY
MIAMI - DADE - FLORIDA

STATE OF FLORIDA
COUNTY OF DADE:

Before the undersigned authority personally appeared

ANN MARTULA

who on oath says that he/she is

CUSTODIAN OF RECORDS

of The Miami Herald, a daily newspaper published at Miami in Dade County, Florida; that the attached copy of advertisement was published in said newspaper in the issues of Dade, Broward, Palm Beach, Monroe, Martin, St. Lucie, Indian River, Lee and Collier Counties.

MARCH 27, 1991

Affiant further says that the said The Miami Herald is a newspaper published at Miami, in the said Dade County, Florida and that the said newspaper has heretofore been continuously published in said Dade County, Florida, each day and has been entered as second class mail matter at the post office in Miami, in said Dade County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Ann Martula

Sworn to and subscribed before me this 27
day of March A.D. 1991
My commission expires June 1, 1992

Notice of Application
The Department of Environmental Regulation announces receipt of an application for permit to construct a mobile soil remediation unit from Williams Environmental Services, Inc., 1630 Alabama Street, Auburn, Alabama 36830. The unit will evaporate and incinerate petroleum products (fuels and lubricants) from soils contaminated by leaking fuel tanks, spills, etc. This mobile unit may be operated in any county that this notice appears in.
The application is being processed at the Department of Environmental Regulation, RAR, 2600 Blair Stone Road, Tallahassee, Florida 32398-2400. Copies of the application are available for public inspection during normal hours, 8:00 a.m. to 5:00 p.m. - Monday through Friday, except legal holidays, at the Department of Environmental Regulation offices located at:
2600 Blair Stone Road, Tallahassee, FL 32398-2400
100 Governmental Center, Pensacola, FL 32601-8794
4620 Oak Fair Blvd., Tampa, FL 33610-7347
1268 Bay Street, Fort Myers, FL 33901-2888
7825 Baymeadows Way, Suite B700, Jacksonville, FL 32264-7877
1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406
and County environmental offices located at:
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1410 North 2 1st Street, Tampa, FL 33608
901 E. Vernie Street, West Palm Beach, FL 33402
316 Court Street, Clearwater, FL 34616
1301 Centimen Road, Bldg. B, Sarasota, FL 34231-6288
2002 E. Michigan Avenue, Orlando, FL 32806
Written comments on this application may be submitted to Mr. Barry Andrews at the Department's Tallahassee address.

95
HARMON-MILLER
2 205 656 0771
25-03-91 14:27



Williams Environmental Services, Inc.

Remediation Through Proven Technology

General
Florida Permit
TRS
MAF
NPD

Corporate Office

1530 Alabama Street
Auburn, AL 36830
Phone (205) 821-9250
FAX (205) 821 9765

April 2, 1991

Mr. Clair Fancy
FLORIDA DER
2600 Blainstone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

RE: Notice of Application
File No. AC 29-191114, 20 TPH SRU

Dear Mr. Fancy:

Please find enclosed affidavits of publication as provided by the Miami Herald, Bradenton Herald, Tampa Tribune and Sun Sentinel.

Williams Environmental Services, Inc. (WILLIAMS) is applying for permit to operate in the following counties:

Manatee	Martin	Hillsboro
Dade	St. Lucie	Pineillas
Broward	Indian River	Sarasota
Palm Beach	Lee	
Monroe	Collier	

In the future, WILLIAMS may request that the permit to operate be amended to include additional counties contingent upon completion of the Public Notification requirements.

Please note that WILLIAMS does not presently intend to operate this unit in Hernando County.

If you should have any questions please call me at (205) 821-9250.

Sincerely,

WILLIAMS ENVIRONMENTAL SERVICES

Thomas R. Schmittou, EIT
Project Development Manager

TRS:clh

Enclosure

Branch Offices

2076 West Park Place
Stone Mountain, GA 30087
Phone (404) 498-2020
FAX (404) 469-0178

5221 Militia Hill Road
Plymouth Meeting, PA 19462
Phone (215) 825-8877
FAX (215) 825-5623

10795 Mead Road, \$1012
Baton Rouge, LA 70816
Phone (504) 291-8079
FAX (504) 293-9617

P.O. Box 6378
Longview, TX 75608
Phone (214) 663-5850
FAX (214) 663-4803

P.O. Box 467
Gibson City, IL 60936
1-800-736-2699
FAX (217) 784-8620

RECEIVED
MAY 13 1991
Division of Air
Resources Management

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida }
County of Hillsborough } ss.

Before the undersigned authority personally appeared R. Putney, who on oath says that he is Accounting Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of

APPLICATION

was published in said newspaper in the issues of
March 1, 1991

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa, in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me, this 3 day
of March, A.D. 1991

Scott D. Williams

(SEAL)

Notice of Application
The Department of Environmental Regulation announces receipt of an application for permit to construct a mobile soil remediation unit from Williams Environmental Services, Inc., 1530 Alabama Street, Auburn, Alabama 36830. The unit will evaporate and incinerate petroleum products (fuels and lubricants) from soils contaminated by leaking fuel tanks, spills, etc. This mobile unit may be operated in any county that this Notice appears in.
The application is being processed at the Department of Environmental Regulation, BAR, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Copies of the application 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 Department of Environmental Regulation offices located at:
2600 Blair Stone Road, Tallahassee, FL 32399-2400
160 Governmental Center, Pensacola, FL 32501-5794
4520 Oak Fair Blvd., Tampa, FL 33610-7347
2269 Bay Street, Fort Myers, FL 33901-2896
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406
and County environmental offices located at:
621 S. Andrew Ave., Ft. Lauderdale, FL 33301
801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130
421 West Church St., Suite 412, Jacksonville, FL 32202-4111
1410 North 21st Street, Tampa, FL 33605
901 E. Evernla Street, West Palm Beach, FL 33402

315 Court Street, Clearwater, FL 34616
1301 Cattleman Road, Bldg. B, Sarasota, FL 4232-6299
2002 E. Michigan Avenue, Orlando, FL 32806
Written comments on this application may be submitted to Mr. Barry Andrews at the Department's Tallahassee address.
1755 3/1/91



The Bradenton Herald

102 MANATEE AVE. WEST, P.O. BOX 921
BRADENTON, FLORIDA 34206
TELEPHONE (813) 748-0411

PUBLISHED DAILY
BRADENTON, MANATEE COUNTY, FLORIDA

STATE OF FLORIDA COUNTY OF MANATEE:

Before the undersigned authority personally appeared Linda L. Rikke, who on oath says that she is the Legal Advertising Clerk and the official representative of the Publisher of The Bradenton Herald, a daily newspaper published at Bradenton in Manatee County, Florida, with the express, limited authority to execute this affidavit for the purpose of establishing proof of publication of the public or legal notice and advertisement in the form attached hereto; that the attached copy of advertisement, being a legal advertisement in the matter of

Notice of Application

_____ in the _____ Court,

was published in said newspaper in the issues of _____
3/14, '91

Affiant further says that the said The Bradenton Herald is a newspaper published at Bradenton, in said Manatee County, Florida, and that the said newspaper has heretofore been continuously published in said Bradenton, Manatee County, Florida, each day and has been entered as second class mail matter at the post office in Bradenton, in said Manatee County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and the affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this
21st day of March

A.D. 19 91
Linda L. Rikke

(SEAL) Notary Public

Notary Public, State of Florida at Large
My Commission Expires May 30, 1993

NOTICE OF APPLICATION

The Department of Environmental Regulation announces receipt of an application for permit to construct a mobile soil remediation unit from Williams Environmental Services, Inc., 1530 Alabama Street, Auburn, Alabama 36830. The unit will evaporate and incinerate petroleum products (fuels and lubricants from soils contaminated by leaking fuel tanks, spills, etc. This mobile unit may be operated in any county that this Notice appears in.

The application is being processed at the Department of Environmental Regulation, BAR, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Copies of the application 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 Department of Environmental Regulation offices located at:
2600 Blair Stone Road
Tallahassee, FL 32399-2400
160 Governmental Center
Pensacola, FL 32501-5794
4520 Oak Fair Boulevard
Tampa, FL 33610-7347
2269 Bay Street
Fort Meyers, FL 33901-2896
7825 Baymeadows Way
Suite B200
Jacksonville, FL 32256-7577
1900 S Congress Avenue, Ste A
West Palm Beach, FL 33406
and County environmental offices located at:
621 S. Andrew Avenue
Ft. Lauderdale, FL 33301
801 SW 3rd Avenue, 2nd Floor
Miami, FL 33130
421 W Church Street, Ste 412
Jacksonville, FL 32202-4111
1410 North 21st Street
Tampa, FL 33605
901 East Evernia Street
West Palm Beach, FL 33402
315 Court Street
Clearwater, FL 34616
1301 Cattlemen Road, Bldg B
Sarasota, FL 43232-6299
2002 East Michigan Avenue
Orlando, FL 32806
Written comments on this application may be submitted to Mr. Barry Andrews at the Department's Tallahassee address.
3/14/91

The Miami Herald

PUBLISHED DAILY
MIAMI — DADE — FLORIDA

STATE OF FLORIDA
COUNTY OF DADE:

Before the undersigned authority personally appeared

ANN MARTULA

who on oath says that he/she is

CUSTODIAN OF RECORDS

of The Miami Herald, a daily newspaper published at Miami in Dade County, Florida; that the attached copy of advertisement was published in said newspaper in the issues of Dade, Broward, Palm Beach, Monroe, Martin, St. Lucie, Indian River, Lee and Collier Counties.

MARCH 27, 1991

Affiant further says that the said The Miami Herald is a newspaper published at Miami, in the said Dade County, Florida and that the said newspaper has heretofore been continuously published in said Dade County, Florida, each day and has been entered as second class mail matter at the post office in Miami, in said Dade County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Ann Martula

Sworn to and subscribed before me this 27

day of March, A.D. 1991

My commission expires Linda L. Prohazka

Notice of Application

The Department of Environmental Regulation announces receipt of an application for permit to construct a mobile soil remediation unit from Williams Environmental Services, Inc., 1630 Alabama Street, Auburn, Alabama 36830. The unit will evaporate and incinerate petroleum products (fuels and lubricants) from soils contaminated by leaking fuel tanks, spills, etc. This mobile unit may be operated in any county that this Notice appears in.

The application is being processed at the Department of Environmental Regulation, BAR, 2600 Blair Stone Road, Tallahassee, Florida 32398-2400. Copies of the application are available for public inspection during normal hours, 8:00 a.m. to 5:00 p.m. - Monday through Friday, except legal holidays, at the Department of Environmental Regulation offices located at:

2600 Blair Stone Road,
Tallahassee, FL
32398-2400
160 Governmental Center,
Pensacola, FL
32501-5754
4820 Oak Fair Blvd.,
Tampa, FL 33610-7347
2269 Bay Street,
Fort Myers, FL
33901-2898
7825 Baymeadows Way,
Suite 8200,
Jacksonville, FL
32256-7577
1900 S. Congress Ave.,
Suite A,
West Palm Beach, FL
33408

and County environmental offices located at:
621 S. Andrews Ave.,
Ft. Lauderdale, FL 33301
901 S.W. 3rd Avenue,
2nd Floor,
Miami, FL 33130
421 West Church St.,
Suite 412,
Jacksonville, FL
32202-4111
1410 North 21st Street,
Tampa, FL 33605
901 E. Everette Street,
West Palm Beach, FL
33402
318 Court Street
Clearwater, FL 34616
1301 Cattleman Road,
Bldg. B,
Sarasota, FL
43232-6299
2002 E. Michigan Avenue,
Orlando, FL 32806

Written comments on this application may be submitted to Mr. Barry Andrews at the Department's Tallahassee address.

FORT LAUDERDALE NEWS/SUN-SENTINEL
PUBLISHED DAILY
FORT LAUDERDALE, BROWARD COUNTY, FLORIDA
BOCA RATON, PALM BEACH COUNTY, FLORIDA
MIAMI, DADE COUNTY, FLORIDA

RECEIVED
MAR 7 1991
HARMON ASSOCIATES

STATE OF FLORIDA
COUNTY OF BROWARD/PALM BEACH/DADE
BEFORE THE UNDERSIGNED AUTHORITY PERSONALLY
APPEARED WHO ON
OATH SAYS THAT HE/SHE IS A DULY AUTHORIZED
REPRESENTATIVE OF THE CLASSIFIED DEPARTMENT OF
THE FORT LAUDERDALE NEWS/SUN-SENTINEL, DAILY
NEWSPAPERS PUBLISHED IN BROWARD/PALM BEACH/DADE
COUNTY, FLORIDA THAT THE ATTACHED COPY OF
ADVERTISEMENT, BEING A -

NOTICE
IN THE MATTER OF
MOBILE SOIL REMED.

IN THE CIRCUIT COURT, WAS PUBLISHED IN SAID
NEWSPAPER IN THE ISSUES OF
C/3/2/1X

AFFIANT FURTHER SAYS THAT THE SAID FORT
LAUDERDALE NEWS/SUN-SENTINEL ARE NEWSPAPERS
PUBLISHED IN SAID BROWARD/PALM BEACH/DADE
COUNTY, FLORIDA, AND THAT THE SAID NEWSPAPERS
HAVE HERETOFORE BEEN CONTINUOUSLY PUBLISHED IN
SAID BROWARD/PALM BEACH/DADE COUNTY, FLORIDA,
EACH DAY, AND HAVE BEEN ENTERED AS SECOND
CLASS MATTER AT THE POST OFFICE IN FORT
LAUDERDALE, IN SAID BROWARD COUNTY, FLORIDA,
FOR A PERIOD OF ONE YEAR NEXT PRECEDING THE
FIRST PUBLICATION OF THE ATTACHED COPY OF
ADVERTISEMENT; AND AFFIANT FURTHER SAYS THAT
HE/SHE HAS NEITHER PAID NOR PROMISED ANY PERSON,
FIRM OR CORPORATION ANY DISCOUNT, REBATE,
COMMISSION OR REFUND FOR THE PURPOSE OF
SECURING THIS ADVERTISEMENT FOR PUBLICATION
IN SAID NEWSPAPERS.

.....
AUTHORIZED REPRESENTATIVE

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 02 DAY OF MARCH
A.D. 1991

.....
(SEAL) Notary Public, State of NOTARY PUBLIC
My Commission Expires Aug. 20, 1992
Based on Title Insurance Inc.

Notice of Application
The Department of Environmental Regulation announces receipt of an application for permit to construct a mobile soil remediation unit from Williams Environmental Services, Inc., 1530 Alabama Street, Auburn, Alabama 36830. The unit will evaporate and incinerate petroleum products (fuels and lubricants) from soils contaminated by leaking fuel tanks, spills, etc. This mobile unit may be operated in any county that this Notice appears in.
The application is being processed at the Department of Environmental Regulation, BAR, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Copies of the application 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 Department of Environmental Regulation offices located at:
2600 Blair Stone Road, Tallahassee, FL 32399-2400
160 Governmental Center, Pensacola, FL 32501-5794
4520 Oak Fair Blvd., Tampa, FL 33610-7347
2269 Bay Street, Fort Myers, FL 33901-2896
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406
and County environmental offices located at:
621 S. Andrews Ave., Ft. Lauderdale, FL 33301
801 S.W. 3rd Ave., 2nd Floor, Miami, FL 33130
421 West Church St., Suite 412, Jacksonville, FL 32202-4111
1410 N. 21st St., Tampa, FL 33605
901 E. Evernia St., W. Palm Beach, FL 33402
315 Court St., Clearwater, FL 34616
1301 Cattleman Road, Bldg. B, Sarasota, FL 34232-6299
2002 E. Michigan Ave., Orlando, FL 32806
Written comments on this application may be submitted to Mr. Barry Andrews at the Department's Tallahassee address.
March 2, 1991

OERTEL, HOFFMAN, FERNANDEZ & COLE, P. A.

ATTORNEYS AT LAW

SUZANNE BROWNLESS
M. CHRISTOPHER BRYANT
R. L. CALEEN, JR.
C. ANTHONY CLEVELAND
TERRY COLE
ROBERT C. DOWNIE, II
MARTHA J. EDENFIELD
SEGUNDO J. FERNANDEZ
KENNETH F. HOFFMAN
KENNETH G. OERTEL
HAROLD F. X. PURNELL
PATRICIA A. RENOVITCH
SCOTT SHIRLEY
THOMAS G. TOMASELLO
W. DAVID WATKINS

SUITE C
2700 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

MAILING ADDRESS:
POST OFFICE BOX 6507
TALLAHASSEE, FLORIDA 32314-6507

TELEPHONE (904) 877-0099
FACSIMILE (904) 877-0981

JOHN H. MILLICAN
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

J. P. SUBRAMANI, PH. D., P. E.
ENVIRONMENTAL CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

RECEIVED

March 14, 1991

MAR 19 1991

DER-BAQM

3-19

CERTIFIED MAIL P 064 357 115
RETURN RECEIPT REQUESTED

Mr. Thomas Schmittou
Williams Environmental Services, Inc.
1530 Alabama Street
Auburn, Alabama 36830

Clair
~~Bobby~~ BA
~~Shirley~~ 3/28
Patty (file)

FYI

RE: Mobile Soil Remediation Unit; Notice of Application in Tampa Tribune dated March 1, 1991.

PA

Dear Mr. Schmittou:

Our law firm serves as special counsel to Hernando County on environmental matters. On behalf of the Hernando Board of County Commissioners, I am writing to seek clarification of your current or future plans to operate mobile soil remediation unit(s) in the vicinity of or within Hernando County. The citizens of Hernando County and the Board are concerned about the operation of mobile soil remediation units and their potential threat to air and groundwater contamination in Hernando County. The County Commissioners have specifically requested us and the County Planning Department to carefully evaluate the design and operational features as well as problems associated with the operation of mobile soil remediation units in Hernando County.

Following the newspaper notice of your application which was published in the March 1, 1991 Tampa Tribune, we have reviewed your application submitted to DER on January 7, 1991. Your application indicates that you propose to operate a mobile soil remediation unit in Broward, Manatee, Hillsborough and their surrounding counties covered by the general newspaper circulation. Hernando County is included in the general area of circulation covered by the Tampa Tribune.


Mr. Thomas Schmittou
March 14, 1991
Page Two

CERTIFIED MAIL P 064 357 115

We would like to know if Williams Environmental Services has any current or future plans to operate in the vicinity of or within the Hernando County. If you do not have current or future plans to operate in Hernando County, we request that you notify us and DER promptly so that a condition can be added to any permit that may issue as a result of your application, indicating that the unit is not authorized to operate in Hernando County. If you have plans to operate in the County either now or in the future, I request that this law firm be notified in writing at the time of submission of your original permit application or permit modification request to DER, but in no case later than sixty (60) days prior to any planned operation in Hernando County, so that we and the County Planning Department staff would have adequate time to review the application and make the necessary recommendations.

If you have any questions or want to discuss this matter, please call me or Mr. Christopher Bryant.

Sincerely,


for Segundo J. Fernandez

SJF:gg

cc: Mr. Charles Hetrick
Mr. Larry Jennings
Ms. Kathy Liles
Mr. Clair Fancy, DER



**Williams
Environmental
Services, Inc.**

Remediation Through Proven Technology

RECEIVED

FEB 18 1991

DER-BAQM

Corporate Office

1530 Alabama Street
Auburn, AL 36830
Phone (205) 821-9250
FAX (205) 821-9765

February 13, 1991

Mr. Clair Fancy
FLORIDA DER
2600 Blairstone Road
Twin Towers Office Building
Tallahassee, FL 32399-2400

RE: File Number AC 29-191114, 20 TPH SRU

Dear Mr. Fancy:

Williams Environmental Services, Inc. (WILLIAMS) is pleased to provide the attached information as requested by your office. An error was discovered in emission calculations provided with the original permit application and revised values have been included here. A copy of the original calculations identifying the error has been provided.

WILLIAMS is currently pursuing the Notice of Application requirements for this project. If you have any questions or if I may be of further assistance, please contact me at (205) 821-9250.

Sincerely,

WILLIAMS ENVIRONMENTAL SERVICES

Thomas R. Schmittou, EIT

TRS:dme

Attachments

cc: *W. Ronder*

Branch Offices

2076 West Park Place Suite
Stone Mountain, GA 30087
Phone (404) 498-2020
FAX (404) 469-0178

5221 Militia Hill Road
Plymouth Meeting, PA 19462
Phone (215) 825-8877
FAX (215) 825-5623

10795 Mead Road, #1012
Baton Rouge, LA 70816
Phone (504) 291-8079
FAX (504) 293-9617

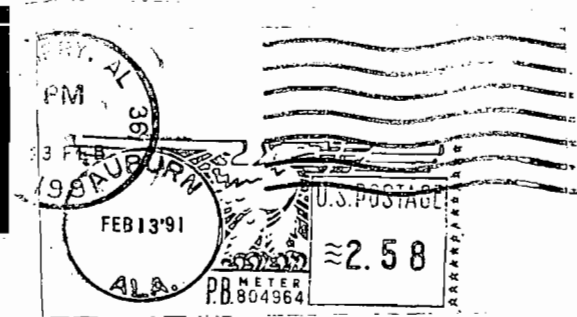
P.O. Box 6378
Longview, TX 75608
Phone (214) 663-5850
FAX (214) 663-4803



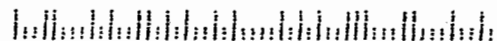
**Williams
Environmental
Services, Inc.**

10795 Mead Road, #1012
Baton Rouge, LA 70816

CERTIFIED
P 483 727 164
MAIL



MR CLAIR FANCY
FLORIDA DER
2600 BLAIRSTONE ROAD
TWIN TOWERS OFFICE BUILDING
TALLAHASSEE FL 32399-2400



I T E M I

Fuel consumption (GPH) and VOC emissions (lb/hr and TDY)
from the auxiliary diesel engines

SOURCE	Fuel Consumption (GPH)	*Emission Factor (lb/10 ³ gal)	VOC Emissions	
			(lb/hr)	(TPV)
40 kw Diesel Generator	2.8	37.5	0.105	0.236
90 HP Diesel Engine	2.1	37.5	0.079	0.177
20 HP Diesel Engine	.9	37.5	0.034	0.076

*AP-42, Table 3.3-1 Emission Factors for Gasoline and Diesel
Powered Industrial Equipment, Emission Factor Rating: C

I T E M 2

Corrected maximum emissions of criteria air pollutants
from this unit at the average fuel consumption rate (9 gph)
and maximum fuel consumption rate (175 gph).

CONTAMINANT	*Emission Factor (lb/1000 gal)	Emissions @90 gph		Rates @175 gph	
		(lb/hr)	(TPY)	(lb/hr)	(TPY)
Sulfur Dioxide	142 x S	.0639	.1438	.1243	.2796
Sulfur Trioxide	2 x S	.0009	.0020	.0017	.0039
Total Sulfur Oxides	144 x S	.0648	.1458	.1260	.2835
Nitrogen Oxides	20	1.8	4.1	3.5	7.895
Carbon Monoxide	5	.450	1.013	.875	1.969

*AP-42, Table 1.31. Uncontrolled Emission Factors for Fuel Oil
Consumption Emission Factor Rating: A

Based on 4,500 hr/year operation
S = Percent Sulfur by Weight

NOTE: An error was discovered in air emission estimates provided in the permit application. Corrected values for the 90 gph fuel consumption rate have been provided here. See the attached copy of air emission estimate calculations.

I T E M 3

Calculations Used to Determine Residence Time in After Burner

Gas Exit Temperature.....1600 degrees F
Gas Flow Rate.....10384 ACFM

AFTERBURNER DIMENSIONS

Volume.....634 ft³
Length.....16 feet
Cross-Sectional Area.....39.63 ft²

STACK DIMENSIONS

Length.....12 feet
Cross Sectional.....3.14 ft²

GAS VELOCITY

Afterburner.....10384 cfm divided by 39.63 ft² divided by
60 sec/min =.....4.63 ft/sec
Stack.....10384 cfm divided by 3.14 ft² divided by
60 sec/min =.....55 ft/sec

RESIDENCE TIME

Afterburner.....16 ft divided by 4.36 ft/sec =3.7 sec
Stack.....12 ft divided by 55 ft/sec =0.22 sec
Total.....3.92 sec

AIR EMISSION ESTIMATES

- BASED ON:
- 1) THE AP-42 TABLE
 - 2) 90 gallon/hr No. 2 FUEL OIL
 - 3) 4,500 hr/year OPERATION

SULFUR DIOXIDE: → 142.5

$$1,425 \frac{\text{lb}}{1000 \text{ gallon}} \text{ --- } \rightarrow 1.425 \frac{\text{lb}}{\text{gallon}}$$

$$1.425 \frac{\text{lb}}{\text{gallon}} \times .5\% \text{ SULFUR CONTENT} = .0071 \frac{\text{lb}}{\text{gallon}}$$

$$.0071 \frac{\text{lb}}{\text{gallon}} \times 90 \frac{\text{gallon}}{\text{hr}} = .641 \frac{\text{lb}}{\text{hr}}$$

SULFUR TRIOXIDE: → 2.5

$$25 \frac{\text{lb}}{1000 \text{ gallon}} \text{ --- } \rightarrow .025 \frac{\text{lb}}{\text{gallon}}$$

$$.025 \frac{\text{lb}}{\text{gallon}} \times .5\% \text{ SULFUR CONTENT} = .00013 \frac{\text{lb}}{\text{gallon}}$$

$$.00013 \frac{\text{lb}}{\text{gallon}} \times 90 \frac{\text{gallon}}{\text{hr}} = .0117 \frac{\text{lb}}{\text{hr}}$$

TOTAL SULFUR OXIDES:

$$.641 \frac{\text{lb}}{\text{hr}} + .0117 \frac{\text{lb}}{\text{hr}} = .653 \frac{\text{lb}}{\text{hr}}$$

$$.653 \frac{\text{lb}}{\text{hr}} \times 4,500 \frac{\text{hr}}{\text{year}} = 2,938.5 \frac{\text{lb}}{\text{year}} \text{ SO}_x$$

$$= \underline{\underline{1.47 \frac{\text{Tons}}{\text{yr}} \text{ SO}_x}}$$

NITROGEN OXIDES:

$$20 \frac{\text{lb}}{1000 \text{ gallon}} \text{ --- } \rightarrow .02 \frac{\text{lb}}{\text{gallon}}$$

$$.02 \frac{\text{lb}}{\text{gallon}} \times 90 \frac{\text{gallon}}{\text{hr}} = 1.8 \frac{\text{lb}}{\text{hr}}$$

$$1.8 \frac{\text{lb}}{\text{hr}} \times 4500 \frac{\text{hr}}{\text{yr}} = 8,100 \frac{\text{lb}}{\text{yr}} = \underline{\underline{4.1 \frac{\text{Tons}}{\text{yr}} \text{ NO}_x}}$$



STATE OF FLORIDA
DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

DISTRICT IX

ESE - PBCPHU

Date: February 4, 1991

C. H. Fancy
Chief, Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-8241

RECEIVED
FEB 11 1991
DER-BAQM

Re: Permit #AC48-191024 for Thermotech Systems Corporation's
and Permit #AC29-191114 for Williams Environmental
Services, Inc.'s Portable Soil Remediation Units

Dear Mr. Fancy:

The Palm Beach County Public Health Unit received the above
referenced applications on 1-30-91, and offers the following
comments:

- Previous DER "Intent to Issue" documents have classified
soil remediation units as incinerators.
- As such, applicants should be required to complete Section
IV of the DER permit application.
- This section contains information on primary/secondary
parameters, design capacity, stack height, waste types,
control equipment, etc.
- Many applications for these units, including these, ignore
this data.

Sincerely,

For the Divisional Director
Environmental Science and Engineering

Jeffery J. Koerner
Jeffery F. Koerner
Engineer II, PBCPHU

FJG/JFK

cc: Willard Hanks }
Stephanie Brooks } 2-13-91
BA/CHF }



STATE OF FLORIDA
DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

RECEIVED
FEB 1 1991
DER-BAQM

January 22, 1991

Mr. Clair Fancy
Florida Department of Environmental
Regulations
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

In reviewing the application for construction Air Permit #AC29-191114 for Williams Environmental Services, Inc., I would like the following added to the permit.

To comply with the Manatee County Article I, Air Pollution Rules, referring to the Construction Permit Section III:E (fuels), the No. 2 Fuel Oil or any fuel must be of 1% sulfur content or less. A fuel analyst must be kept with equipment for inspection by Manatee County.

Section II:E Hours of Operation, we would like it noted on the permit that hours of operation and site location. In the event it is to operate at a site located adjacent to a residential neighborhood that the hours of operation be of normal working hours of 10 hours or less.

I would also like to included in all of the soil remediation units permits, now permitted in Florida, and in the future to comply with the following:

1. Fifteen (15) days prior to a project to begin in Manatee County, please notify this office by written notification the following:
 - a. Name and address of Company doing the project.
 - b. Person in charge of the actual soil reclamation project.
 - c. When it will be in Manatee County.
 - d. Location of Project.
 - e. Notify Pollution Control of any changes in scheduling.
 - f. A copy of the actual permit to be on site.

If you have any questions of my concerns, please contact me at the office.

Respectfully,

Jack A. Bruens
Engineer

JAB/maa

DISTRICT SIX
HRS MANATEE COUNTY PUBLIC HEALTH UNIT
410 SIXTH AVENUE EAST, BRADENTON, FLORIDA 34208-1986

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 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 additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to:
 Mr. Thomas Schmittou
 Project Development Manager
 Williams Environmental Services
 1530 Alabama Street
 Auburn, Alabama 36830

4. Article Number
 P 407 852 928

Type of Service:
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

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

5. Signature — Addressee
 X

6. Signature — Agent
 X *John Capers*

7. Date of Delivery
 1-22-91

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

PS Form 3811, Apr. 1989

*U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

P 407 852 928

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

*U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

Sent to Mr. Thomas Schmittou.	
Street and No. Williams Environmental 1530 Alabama St.	
P.O., State and ZIP Code Auburn, Alabama 36830	
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 Mailed: 1-18-91 Permit: AC 29-191114	



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 17, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Thomas Schmittou
Project Development Manager
Williams Environmental Services, Inc.
1530 Alabama Street
Auburn, Alabama 36830

Dear Mr. Schmittou:

Re: File No. AC 29-191114, 20 TPH SRU

The Department received your application for permit to construct a 20 TPH mobile soil remediation unit on January 7, 1991. Before this application can be processed, we need the following information:

1. What is the fuel consumption (GPH) and VOC emissions (lbs/hr and TPY) from the 40 kw diesel generator? 80 HP hydraulic diesel engine? 20 HP drive diesel engine?
2. What is the maximum emissions (lbs/hr and TPY) of the criteria air pollutants from this unit at the maximum fuel consumption rate (175 GPH No. 2 fuel oil)?
3. Please provide a copy of the calculations used to determine the residence time of the flue gases in the afterburner.

Applicants for permits to construct soil remediation units are required to publish a Notice of Application on submittal of a complete application for permit to construct. Your application will be considered substantially complete on responding satisfactorily to the questions in this letter. Your Notice of Application is enclosed. You must publish the Notice in a newspaper having circulation in each county you intend to operate in and provide the Bureau of Air Regulation (BAR) with proof of each publication. You will also be required to publish a Notice of Intent to Issue in the same newspapers 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 will have to satisfy the public notice requirements for that county and have your permit amended to

Mr. Thomas Schmittou
Page 2 of 2

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

We will resume processing your application after we receive the requested information. If you have any questions on this matter, please write to me or call Willard Hanks at 904-488-1344.

Sincerely,



C. H. Fancy, P.E.
Chief

Bureau of Air Regulation

CHF/WH/plm

c: District Air Program Administrators
County Air Program Administrators
Jimmy Taylor, P.E.

Notice of Application

The Department of Environmental Regulation announces receipt of an application for permit to construct a mobile soil remediation unit from Williams Environmental Services, Inc., 1530 Alabama Street, Auburn, Alabama 36830. The unit will evaporate and incinerate petroleum products (fuels and lubricants) from soils contaminated by leaking fuel tanks, spills, etc. This mobile unit may be operated in any county that this Notice appears in.

The application is being processed at the Department of Environmental Regulation, BAR, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Copies of the application 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 Department of Environmental Regulation offices located at:

2600 Blair Stone Road, Tallahassee, FL 32399-2400
160 Governmental Center, Pensacola, FL 32501-5794
4520 Oak Fair Blvd., Tampa, FL 33610-7347
2269 Bay Street, Fort Myers, FL 33901-2896
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406

and County environmental offices located at:

621 S. Andrew Ave., Ft. Lauderdale, FL 33301
801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130
421 West Church St., Suite 412, Jacksonville, FL 32202-4111
1410 North 21st Street, Tampa, FL 33605
901 E. Evernia Street, West Palm Beach, FL 33402
315 Court Street, Clearwater, FL 34616
1301 Cattleman Road, Bldg. B, Sarasota, FL 43232-6299
2002 E. Michigan Avenue, Orlando, FL 32806

Written comments on this application may be submitted to Mr. Barry Andrews at the Department's Tallahassee address.

*** SCREEN-1.1 MODEL RUN ***
*** DRAFT VERSION XXXXX ***

WILLIAMS ENVIRONMENTAL SERVICES

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = 1.000
STACK HEIGHT (M) = 7.16
STK INSIDE DIAM (M) = .61
STK EXIT VELOCITY (M/S) = 16.76
STK GAS EXIT TEMP (K) = 1144.00
AMBIENT AIR TEMP (K) = 293.00
RECEPTOR HEIGHT (M) = .00
IOPT (1=URB,2=RUR) = 2
BUILDING HEIGHT (M) = .00
MIN HORIZ BLDG DIM (M) = .00
MAX HORIZ BLDG DIM (M) = .00

BUOY. FLUX = 11.37 M**4/S**3; MOM. FLUX = 6.69 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
1.	.0000	0	.0	.0	.0	.0	.0	.0	
100.	10.17	3	10.0	10.0	3200.0	20.4	12.7	7.8	NO
200.	38.22	4	20.0	20.0	5000.0	13.0	15.7	8.7	NO
300.	34.23	4	15.0	15.0	4800.0	15.5	22.8	12.4	NO
400.	29.32	4	10.0	10.0	3200.0	20.4	29.7	15.7	NO
500.	26.23	4	8.0	8.0	2560.0	23.7	36.5	18.9	NO
600.	23.45	4	8.0	8.0	2560.0	23.7	43.0	21.7	NO
700.	20.76	4	5.0	5.0	1600.0	33.7	49.8	25.2	NO
800.	19.60	4	5.0	5.0	1600.0	33.7	56.1	27.8	NO
900.	18.18	4	5.0	5.0	1600.0	33.7	62.3	30.4	NO
1000.	16.72	4	4.0	4.0	1280.0	40.3	68.8	33.5	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:

210.	38.35	4	20.0	20.0	5000.0	13.0	16.5	9.1	NO
------	-------	---	------	------	--------	------	------	-----	----

DWASH= MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

$$I_{(1hr)} = 38.35 \times 0.7 = 26.8 \frac{\mu g}{m^3}$$

$$= 26.8 \times 10^{-3} \text{ mg}/m^3$$

 *** SUMMARY OF SCREEN MODEL RESULTS ***

$$I = E F$$

$$E_{\text{BZ}} = I/F = \frac{0.0071 \frac{\text{mg}}{\text{m}^2}}{2.68 \times 10^{-3} \frac{\text{mg}}{\text{m}^2}} = 0.2649 \text{ g/s} \cdot \frac{1563600 \text{ sec}}{4546 \text{ hr}} = 2.1 \text{ lbs/hr}$$

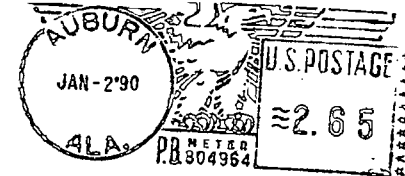
$$\text{Max BZ in soil} = \frac{2.1 \text{ lbs OUT}}{\text{hr}} \left| \frac{100 \# \text{ IN}}{5 \# \text{ OUT}} \right| = \frac{42 \text{ lbs BZ}}{\text{hr}} \text{ IN SOIL}$$

$$\text{PPM BZ IN SOIL} = \frac{42 \text{ lbs BZ}}{\text{hr}} \frac{\text{hr}}{40,000 \text{ lbs soil}} \times 10^6 = 1050 \text{ PPM BZ}$$

$$E_{\text{tower}} = \frac{1.786}{2.68 \times 10^{-2}} = 66.6 \text{ g/s} \approx 529 \text{ lbs/hr}$$

$$E_{\text{EB}} = \frac{1.036}{2.68 \times 10^{-2}} = 38.66 \text{ g/s} = 307 \text{ lbs/hr}$$

FIRST CLASS



From

HARMON ENVIRONMENTAL SERVICES, INC.
ENVIRONMENTAL CONTRACTORS

1530 ALABAMA STREET, AUBURN, AL 36830
tel. (205) 821-9253 fax. (205) 821-9765

TO

CLAIR FANCY
FLORIDA DER
2600 BLAIRSTONE ROAD
TWIN TOWERS OFFICE BUILDING
TALLAHASSEE FLORIDA 32399-2400

Fold at line over top of envelope to the right
of the return address.

CERTIFIED

P 483 727 187

MAIL

FIRST CLASS



**Williams
Environmental
Services, Inc.**

Remediation Through Proven Technology

RECEIVED
DER - MAIL ROOM

1991 JAN -7 PM 12:05

Corporate Office

1530 Alabama Street
Auburn, AL 36830
Phone (205) 821-9250
FAX (205) 821-9765

January 2, 1991

Mr. Clair Fancy
FLORIDA DER
2600 Blairstone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

RECEIVED

JAN 7 1991

DER - BAQM

RE: Resubmission of Permit Application for Construction/
Operation of a Mobile Thermal Treatment Unit

Dear Mr. Fancy:

Williams Environmental Services, Inc. (WILLIAMS) submitted a construction permit application for our Mobile Thermal Processing Unit on December 7, 1990. The application, sent by certified mail, has not been received as of today's date. WILLIAMS is therefore resubmitting a copy of the original application package complete with original signatures and new permit fee. Should the original application be received, please return it unprocessed. Payment has been stopped on the original permit fee.

I have been in contact with Mr. Willard Hanks and he is aware of the situation. If you have any questions or I may be of further assistance, please call me at (205) 821-9250.

Sincerely,

WILLIAMS ENVIRONMENTAL SERVICES

Thomas R. Schmittou, E.I.T.
Project Development Manager

TRS:clh

Enclosure

Branch Offices

2076 West Park Place Suite
Stone Mountain, GA 30087
Phone (404) 498-2020
FAX (404) 469-0178

5221 Militia Hill Road
Plymouth Meeting, PA 19462
Phone (215) 825-8877
FAX (215) 825-5623

10795 Mead Road, #1012
Baton Rouge, LA 70816
Phone (504) 291-8079
FAX (504) 293-9617

P.O. Box 6378
Longview, TX 75608
Phone (214) 663-5850
FAX (214) 663-4803

001031

HARMON ENVIRONMENTAL SERVICES, INC.

1550 PUMPHREY AVE 821-9253
AUBURN, AL 36830

NO

2249

61-335
822

January 2 19 91

PAY TO THE ORDER OF Florida DER (Air Division)

\$ 1,000.00

One thousand Dollars & 00/100

DOLLARS

First
Alabama
Bank
Auburn, Alabama 36830

[Handwritten signature]



M. W. V. HARLAND NO. 802



Williams Environmental Services, Inc.

Remediation Through Proven Technology

Corporate Office

1530 Alabama Street
Auburn, AL 36830
Phone (205) 821-9250
FAX (205) 821-9765

December 7, 1990

Mr. Clair Fancy
FLORIDA DER
2600 Blairstone Road
Twin Towers Office Building
Tallahassee, Florida 32399-2400

RE: Construction Permit Application for
Mobile Thermal Destruction Unit

Dear Mr. Fancy:


Williams Environmental Services, Inc. (WILLIAMS) is pursuing a permit to construct and operate a mobile thermal destruction unit (MTDU) in the State of Florida. The unit is a 20 ton per hour, rotary kiln incinerator designed specifically for the remediation of petroleum contaminated soils. The unit is currently permitted or has permits pending in several states. Therefore, WILLIAMS does not intend to operate the unit exclusively in the State of Florida. An estimated operation schedule of 4,500 hours per year has been used in the construction permit application.

This application for permit is initially intended for Manatee, Broward, Hillsborough and adjacent counties as covered by the public notification requirement. In the future WILLIAMS may request that the permit to operate be extended to additional counties contingent upon completion of the public notification requirement.

Please find the enclosed check made out to the Florida DER in the amount of \$1,000, the completed construction permit, a process description and calculating for emission estimates. If you have any questions or need further assistance, please call me at (205) 821-9250.

Sincerely,

WILLIAMS ENVIRONMENTAL SERVICES


Thomas R. Schmittou, E.I.T.
Project Development Manager

TRS:clh

Enclosure

Branch Offices

2076 West Park Place Suite
Stone Mountain, GA 30087
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FAX (504) 293-9617

P.O. Box 6378
Longview, TX 75608
Phone (214) 663-5850
FAX (214) 663-4803

STATE OF FLORIDA BEST AVAILABLE COPY
DEPARTMENT OF ENVIRONMENTAL REGULATION

\$1,000 pt
1-7-90
Receipt #151233

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



AC 29-19114

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: 20' TPH Mobile Incinerator New Existing

APPLICATION TYPE: Construction Operation Modification

COMPANY NAME: Williams Environmental Services, Inc. (WES) COUNTY: Manatee, Broward, Hillsborough *

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) Single Source

SOURCE LOCATION: Street Variable (Mobile Unit) City _____

UTM: East _____ North _____

Latitude _____ "N Longitude _____ "W

APPLICANT NAME AND TITLE: Thomas Schmittou, Project Development Manager

APPLICANT ADDRESS: 1530 Alabama Street, Auburn, Alabama 36830

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

*And all adjacent counties covered by public notification requirements.

I am the undersigned owner or authorized representative* of WES

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: [Signature]

Thomas Schmittou, Project Development Manager
Name and Title (Please Type)

Date: 1/2/91 Telephone No. (205) 821-9250

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed Jimmy H. Taylor
Jimmy H. Taylor, P.E.
Name (Please Type)

Harmon Engineering Associates, Inc.
Company Name (Please Type)

1550 Pumphrey Avenue, Auburn, Alabama 36830
Mailing Address (Please Type)

Florida Registration No. 0032773 Date: 1/12/89 Telephone No. (205).821-9250



SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

The trailer mounted unit is designed for on-site remediation of petroleum contaminated soils. The unit consists of a 20 ton per hour rotary kiln followed by a baghouse and afterburner. See attachments for more complete process description.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction Now Completion of Construction _____

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

None

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: This unit will be permitted to
operate in several states and therefore we do not anticipate operating more than
4,500 hours per year in the State of Florida.

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? Yes
 - a. If yes, has "offset" been applied? No
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? No (<100 tons/yr)
 - c. If yes, list non-attainment pollutants. Particulates, Ozone
2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. No (<100 tons/yr)
3. Does the State "Prevention of Significant Deterioration" (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
- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? No
 - a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

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

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

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

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Virgin Petroleum Contaminated Soil	TPH *	2	40,000	

*Total Petroleum Hydrocarbons

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 40,000

2. Product Weight (lbs/hr): 40,000

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
VOC	40	90	min 95% Dest	40	800	1,800	
Particulates	1.71	3.85	.08 gr/dscf	1.71	240	540	
SOx	0.653	1.47	.5% by wt.	0.653	0.653	1.47	
NOx	1.80	4.1	N/A (<100 tons)	N/A	1.80	4.1	
CO	0.45	1.01	N/A (<100 tons)	N/A	.45	1.01	

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)
Afterburner	VOCs	95%	N/A	
Baghouse	Particulate	.08 gr/dcsf	Site Dependent	

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
No.2 Fuel Oil	90 gal/hour	175	22.5

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

Fuel Analysis:

Percent Sulfur: <.5% Percent Ash: 0
 Density: 7.01 lbs/gal Typical Percent Nitrogen: N/A
 Heat Capacity: 18,400 BTU/lb 129,000 BTU/gal
 Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

None. Processed soil to be disposed of as clean fill pending laboratory results.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 23.5 ft. Stack Diameter: 2.0 ft.
 Gas Flow Rate: 10384 ACFM DSCFM Gas Exit Temperature: 1600 °F.
 Water Vapor Content: Variable % Velocity: 55 FPS

SECTION IV: INCINERATOR INFORMATION

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: The mobile thermal processing unit is equipped with baghouse and afterburner. See Attachment.

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

Processed soil will be disposed of as clean fill.

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

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total 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.
3. 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 8 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.

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

A. 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

B. Has EPA declared the best available control technology for this class of sources (if yes, attach copy)

Yes No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.
- b. Diameter: ft.
- c. Flow Rate: ACFM
- d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:

- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(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

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir _____

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? Yes No
- b. Was instrumentation calibrated in accordance with Department procedures?
 Yes No Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
- 2. Surface data obtained from (location) _____
- 3. Upper air (mixing height) data obtained from (location) _____
- 4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

- 1. _____ Modified? If yes, attach description.
- 2. _____ Modified? If yes, attach description.
- 3. _____ Modified? If yes, attach description.
- 4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
ISP	_____ grams/sec
SO ²	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of 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.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. 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.

Process Description of Mobile Thermal Destruction Unit (MTDU)

The rotary kiln is capable of handling ten (10) tons of soil contaminated with petroleum products with 20 percent moisture. The system is comprised of a primary combustion chamber with a 10.5 million Btu per hour burner. A hopper/screw feed system, dry ash handling, process gas heat recovery, process gas fabric filtration system, an induced draft fan, an afterburner with operating temperatures exceeding 1200^oF, and an exhaust stack. See Figure 1 for a Process Flow Schematic of the MTDU and Figure 2 for a Flat Plan. Details of each system component follow:

Feed System

The feed system consists of a live bottom hopper and a screw feed conveyor. Feed rates may be varied from zero to more than 10 tons per hour by varying the rotational speed of the live bottom screw.

Primary Combustion Chamber

The primary combustion chamber consists of a 5-foot inside diameter by 22-foot-long rotary kiln furnace. The kiln is a rugged version of a standard concurrent cylindrical design which provides for soil residence times of fifteen to ninety minutes. The primary combustion chamber includes a 10.5 million Btu per hour multi-fuel burner located on the kiln shield. Gas phase operating temperatures can be varied from below 200 degrees F to over 2,800 degrees F, depending upon the characteristics of the specific waste being processed. The kiln can physically handle from two tons per hour to twenty (20) tons per hour by varying the kiln rotational speed and feed rate to the system.

Processed Soil Handling

Treated soil from the thermal process falls from the discharge end of the kiln into a cooling screw conveyor where it is cooled by indirect heat transfer. The cooled soil can be transferred to containers for disposal off site or returned for use on site after analysis.

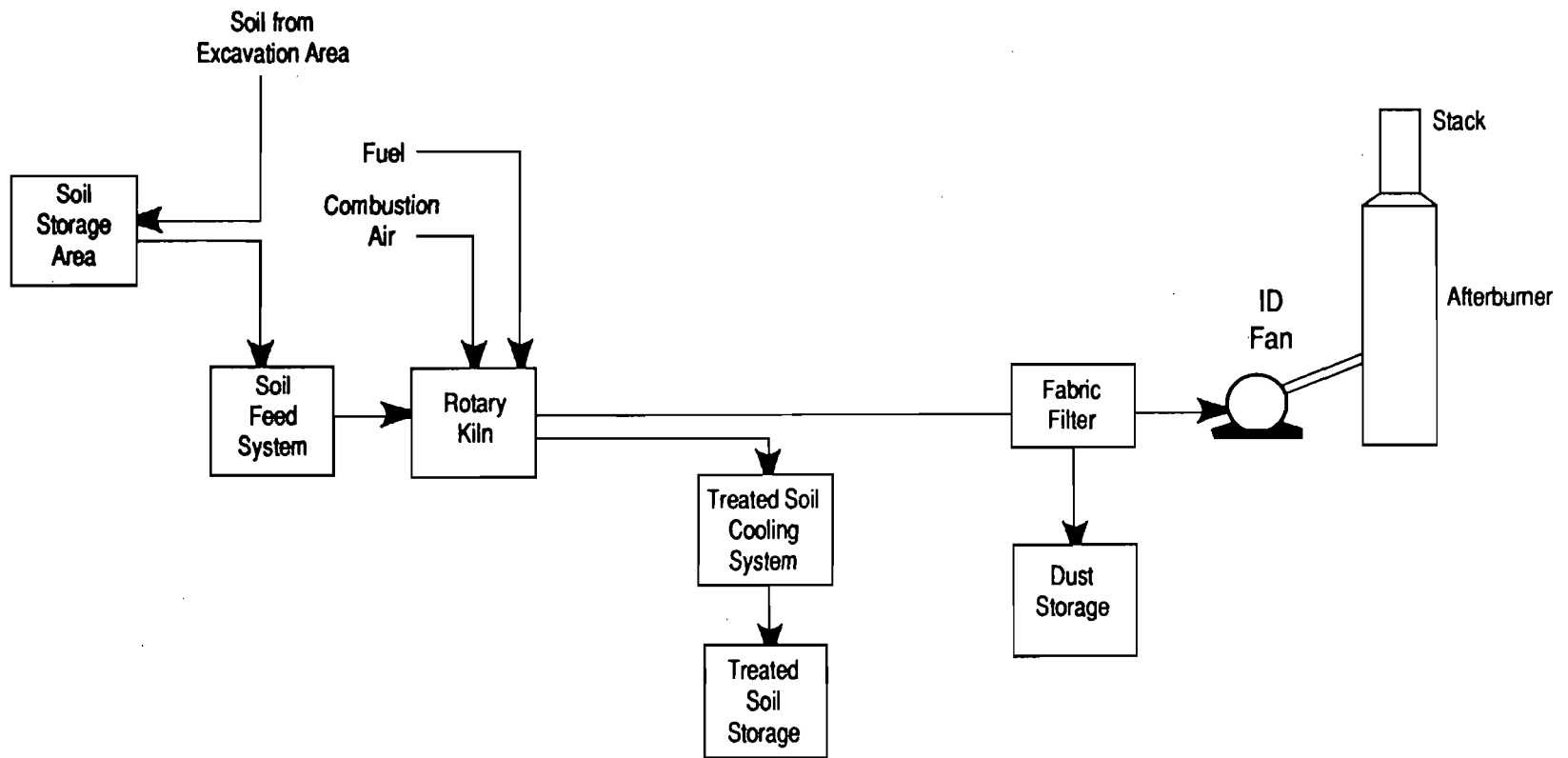


Figure 1 - Mobile Thermal Destruction Unit Process Flow Schematic

WILLIAMS ENVIRONMENTAL SERVICES, INC.

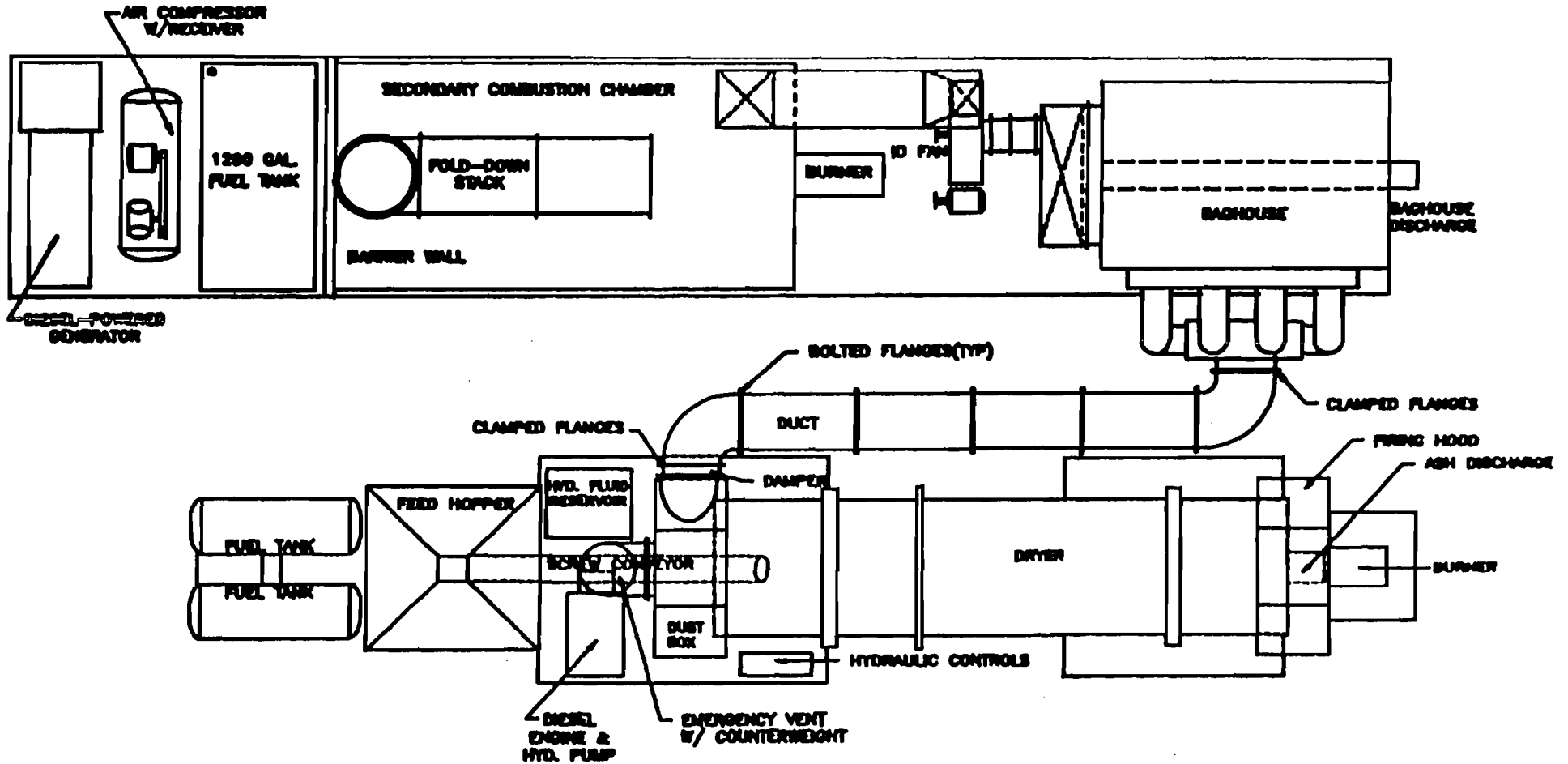


FIGURE 2 - PLAT PLAN FOR THE MOBILE ROTARY KILN

Fabric Filter

The fabric filter is designed to reduce particulate emissions to less than 0.04 grains per dry standard cubic foot of exhaust gas using P-84 synthetic bag filters. To prevent acid (moisture) condensation in the fabric filter, the unit is insulated and heat traced. Special high temperature acid resistant coatings have been used to further resist corrosion.

The filter bags are cleaned by forced jet triggered by increased pressure drop across the baghouse. Collected particulate matter is then fed into the dry ash handling system via an enclosed screw conveyor. The particulates are mixed with the processed soil and exit under a water overspray. (See Table 1.)

Exhaust Gas System

A centrifugal, carbon steel induced draft fan has been provided as the prime gas mover in the system. The induced draft fan is located directly after the fabric filter and handles gas at 200 to 300 degrees F. The process gas is blown through the afterburner and exists through the stack.

Afterburner

The afterburner is located in a horizontal position at the base of the stack. This section has a 12.4 million Btu per hour burner and a residence time of over two seconds for destruction of hydrocarbons. A two-foot diameter stack is attached to the top of the afterburner with test ports. (See Table 1.)

Miscellaneous

The MTDU is equipped with a 40-kW diesel generator for power supply to process control equipment. An 80-hp diesel engine drives the hydraulic pump and a 20-hp diesel engine drives the feed processing equipment.

Table 1
Control Equipment Specifications

1. DUST COLLECTOR (BAGHOUSE)			
Number of Bags:	129	Size of Bags:	6"x6'
Total Bag Area (ft ²):	1215	Maximum Capacity (acfm):	6700
Bag Fabric:	P-84	Fabric Weight (oz.):	14
Weave:	Felt	Finish:	Singed
Efficiency:	99.9%	Air-to-Cloth Ratio:	4:1
Maximum Bag Temperature Capability (°F):	500		
Temperature of Inlet (°F):	400		
Moisture Content of Inlet (%):	Variable		
Method of Bag Cleaning:	Pulse Jet		
<i>* Pressure drop across baghouse is monitored continuously.</i>			
2. AFTERBURNER			
Primary Fuel:	#2 Diesel		
Minimum Gross Heat Input (Btu/hr):	8 million		
Minimum Chamber Temperature (°F):	1400		
Minimum Response Time in Afterburner (seconds):	2		
Air Supply to Afterburner (acfm)	10,400		
O ₂ Content in Exhaust (% O ₂)	10		

AIR EMISSION ESTIMATES

- BASED ON:
- 1) THE AP-42 TABLE
 - 2) 90 gallon/hr No. 2 FUEL OIL
 - 3) 4,500 hr/year OPERATION

SULFUR DIOXIDE :

$$1.425 \text{ lb}/1000 \text{ gallon} \text{ --- } \rightarrow 1.425 \text{ lb}/\text{gallon}$$

$$1.425 \text{ lb}/\text{gallon} \times .5\% \text{ SULFUR CONTENT} = .0071 \text{ lb}/\text{gallon}$$

$$.0071 \text{ lb}/\text{gallon} \times 90 \text{ gallon}/\text{hr} = .641 \text{ lb}/\text{hr}$$

SULFUR TRIOXIDE :

$$25 \frac{\text{lb}}{1000 \text{ gallon}} \text{ --- } \rightarrow .025 \text{ lb}/\text{gallon}$$

$$.025 \text{ lb}/\text{gallon} \times .5\% \text{ SULFUR CONTENT} = .00013 \text{ lb}/\text{gallon}$$

$$.00013 \text{ lb}/\text{gallon} \times 90 \frac{\text{gallon}}{\text{hr}} = .0117 \text{ lb}/\text{hr}$$

TOTAL SULFUR OXIDES :

$$.641 \frac{\text{lb}}{\text{hr}} + .0117 \frac{\text{lb}}{\text{hr}} = .653 \frac{\text{lb}}{\text{hr}}$$

$$.653 \frac{\text{lb}}{\text{hr}} \times 4,500 \frac{\text{hr}}{\text{year}} = 2,938.5 \text{ lb}/\text{year } \text{SO}_x$$

$$= \underline{\underline{1.47 \frac{\text{Tons}}{\text{yr}} \text{SO}_x}}$$

NITROGEN OXIDES :

$$20 \text{ lb}/1000 \text{ gallon} \text{ --- } \rightarrow .02 \text{ lb}/\text{gallon}$$

$$.02 \text{ lb}/\text{gallon} \times 90 \text{ gallon}/\text{hr} = 1.8 \text{ lb}/\text{hr}$$

$$1.8 \text{ lb}/\text{hr} \times 4500 \frac{\text{hr}}{\text{yr}} = 8,100 \text{ lb}/\text{yr} = \underline{\underline{4.1 \frac{\text{Tons}}{\text{yr}} \text{NO}_x}}$$

AIR EMISSIONS (CONT.)

CARBON MONOXIDE :

$$5 \frac{\text{lb}}{1000 \text{ gallon}} \longrightarrow .005 \frac{\text{lb}}{\text{gallon}}$$

$$.005 \frac{\text{lb}}{\text{gallon}} \times 90 \frac{\text{gallon}}{\text{hr}} = .45 \frac{\text{lb}}{\text{hr}}$$

$$.45 \frac{\text{lb}}{\text{hr}} \times 4500 \frac{\text{hr}}{\text{yr}} = 2,025 \frac{\text{lb}}{\text{yr}}$$

$$= \underline{\underline{1.01 \text{ ton/yr CO}}}$$

PARTICULATES :

1) BASED ON $12 \frac{\text{lb}}{\text{ton}}$ (DEPENDENT ON SOIL TYPE)

UNCONTROLLED

$$20 \frac{\text{ton}}{\text{hr}} \times 12 \frac{\text{lb}}{\text{ton}} = 240 \frac{\text{lb}}{\text{hr}}$$

$$240 \frac{\text{lb}}{\text{hr}} \times 4,500 \frac{\text{hr}}{\text{yr}} = \underline{\underline{540 \frac{\text{ton}}{\text{yr}}}}$$

CONTROLLED

$$.075 \frac{\text{sr}}{\text{dscf}} \times 2500 \frac{\text{scfm}}{\text{hr}} \times 60 \frac{\text{min}}{\text{hr}} = 12,000 \frac{\text{sr}}{\text{hr}}$$

$$12,000 \frac{\text{sr}}{\text{hr}} \times \frac{1 \text{ lb}}{7000 \text{ sr}} = 1.71 \frac{\text{lb}}{\text{hr}}$$

$$1.71 \frac{\text{lb}}{\text{hr}} \times 4,500 \frac{\text{hr}}{\text{yr}} = 7,695 \frac{\text{lb}}{\text{yr}}$$

$$= \underline{\underline{3.85 \frac{\text{ton}}{\text{yr}}}}$$

AIR EMISSIONS (CONT.)

PARTICULATES EVALUATED @ 50% EXCESS AIR

BASED ON

- * THEORETICAL VOLUME OF AIR FOR COMPLETE COMBUSTION OF FUEL OIL
 $= \frac{9,220 \text{ dsct}}{10^6 \text{ BTU}}$

- ACTUAL AIR INFLOW RATE = 2500 scfm
 (AND NEGLECTING AMBIENT MOISTURE)

$$\frac{90 \text{ gallon}}{\text{hr}} \times \frac{129,000 \text{ BTU}}{\text{gallon}} = 11,610,000 \frac{\text{BTU}}{\text{hr}}$$

$$= 193,500 \frac{\text{BTU}}{\text{min}}$$

$$\frac{2500 \text{ dsct}}{\text{min}} \cdot \frac{\text{min}}{193,500 \text{ BTU}} = .01292 \frac{\text{dsct}}{\text{BTU}}$$

$$= \frac{12,920 \text{ dsct}}{10^6 \text{ BTU}}$$

$$\frac{12,920}{9,220} = 1.4 \text{ (i.e. 40% EXCESS AIR)}$$

CORRECTING TO 50% EXCESS AIR,

$$.07 \frac{\text{gr}}{\text{dsct}} \left[\frac{1.5}{1.4} \right] = \underline{\underline{.08 \frac{\text{gr}}{\text{dsct}} @ 50\% \text{ EXCESS AIR}}}$$

* FROM TABLE C-2, F-FACTORS FOR VARIOUS FUELS,
CONTINUOUS AIR POLLUTION SOURCE MONITORING SYSTEMS,
 EPA, JUNE 1979.