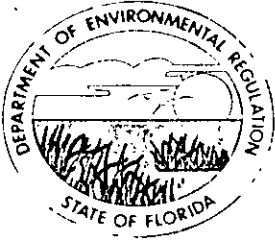


RECEIVED OCT 07 1989



*Florida Department of Environmental Regulation*

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

October 4, 1989

*Gry: Please contact  
Hank & handle*

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Henry E. Andre  
Vice President  
Florida Mining and Materials  
Post Office Box 6  
Brooksville, Florida 34605-0006

Dear Mr. Andre:

Re: Permit Modification to Burn Flolite in Kiln No. 1  
AO 27-89814

This is to provide notice that the following additional information is required for preliminary review of the above application received on September 5, 1989:

1. The original construction permit number for kiln No. 1.
2. An explanation of "B S & W" and "CCR" in the Flolite Specification and the identity and levels of all known metals contained in the Flolite.
3. A list of all known polynuclear aromatic hydrocarbons (PNA's) contained in the Flolite and their levels.

This additional information is required in order to process your application. If you have any questions, please call John Reynolds at (904)488-1344 or write to me at the above address.

Sincerely,

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

CHF/JR/t

cc: G. Richardson, SW District

**ATTACHMENT 1**

STATE OF FLORIDA  
DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR Florida Mining and Materials Corp.  
P.O. Box 23965  
Tampa, Florida 33622

PERMIT NO. AC 27-2255

DATE Dec. 18, 1973

PURSUANT TO THE PROVISION OF SECTION 403.061(16) OF CHAPTER 403, FLORIDA STATUTES, AND CHAPTER 17-4, FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:  
T. E. Bronson, President

FOR THE CONSTRUCTION OF:  
Cement plant rotary kiln, preheater and dryer with dust control unit E-55

LOCATED AT: NW of Brooksville, Hernando Co.  
UTM: 17-356.200E, 3170.367N

IN ACCORDANCE WITH THE APPLICATION DATED June 27, 1973

AND IN CONFORMITY WITH THE STATEMENTS AND SUPPORTING DATA ENTERED THEREIN, ALL OF WHICH ARE FILED WITH THE DEPARTMENT AND ARE CONSIDERED A PART OF THIS PERMIT.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ITS ISSUANCE UNTIL March 1, 1976 AND SHALL BE SUBJECT TO ALL APPLICABLE LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.

T. E. Hunnicutt  
CHIEF, BUREAU OF PERMITTING T. E. HUNNICUTT  
PROFESSIONAL ENGINEER

EXECUTIVE DIRECTOR

STATE OF FLORIDA  
DEPARTMENT OF POLLUTION CONTROL  
CONSTRUCTION PERMIT PROVISOS

AIR POLLUTION SOURCES

Permit No. AC27-2252-AC27-2262

Date: 12/18/73

1. Construction of this installation shall be completed by January 1, 1976.
2. This installation shall be operated by a competent and qualified person. Operations shall be conducted according to the best accepted practices and the recommendations of the Department of Pollution Control.
3. This construction permit is issued with the understanding that the owner may need to comply with county, municipal, or other local regulations prior to construction.
4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Pollution Control for consideration toward the issuance of an operation permit. Notification of the pending completion of this project shall be transmitted in writing to the Department by the engineer approximately two weeks before the completion of construction.
5. This construction permit expires on March 1, 1976 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Pollution Control Board.
6. Detailed plans and specifications for this report shall be available upon request by the Department of Pollution Control.
7. This facility shall be tested for total particulate emissions within 60 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC West Central Florida Regional Office, P.O. Box 9205, Winter Haven, Florida 33880.
8. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the DPC Florida Regional Office,
9. Stack sampling for total particulate or other contaminant emissions shall be conducted if found by the DPC Florida Regional Office to be necessary as a basis for the issuance of an operation permit.
10. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.

- [ ] 11. The following items are required prior to our issuance of an operation permit in addition to the engineer of record's report of inspection:
- (a) An emission report for total particulates and sulfur oxides based upon actual operations.
  - (b) A tabular summary of actual records of frequencies and durations of soot blowing as well as boiler blowdown characteristics and disposal practices.

These items are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC \_\_\_\_\_  
Florida Regional Office, \_\_\_\_\_

---

- [xx] 12. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- xxx] 13. All fugitive dust generated at this site shall be adequately controlled.
- (X) 14. A network for monitoring total suspended particulates around the plant site shall be installed at least three months prior to plant startup. The number and location of monitors shall be approved by the Department.
- (X) 15. All equipment shall be maintained so as to minimize air pollutant emissions from the plant. The control equipment maintenance schedule shall be reviewed and approved by the Department before an operating permit is issued.
- (X) 16. If air quality standards are violated as a result of this cement plant's operation as specified in the permit application, stack heights shall be increased to reduce ambient air pollution to acceptable levels.

**ATTACHMENT 2**

RECEIVED OCT 25 1989



INTERNATIONAL PETROLEUM CORPORATION

October 25, 1989

Cross/Tessitore & Associates, P.A.  
Attn: Mr. Greg Gonzales  
4763 South Conway Road, Suite F  
Orlando, Florida 32812

Subject: International Petroleum Corporation "Flolite"

Dear Mr. Gonzales:

Our "Flolite" product is a blend of "on-specification" re-refined oil and virgin fuel oils. We do not sell any off specification product. The precise formulation is proprietary information; however, virgin fuel normally constitutes less than 50% of the blended product. I am attaching a release from the Federal E.P.A. which states their position that our finished product is equivalent to virgin fuel oils.

The feedstock for our finished product is predominantly used motor oils. This feedstock undergoes four filtration steps, an atmospheric distillation process and a vacuum distillation process.

A copy of a certified analysis of our finished product is attached and is indicative of our typical specifications for finished product.

A copy of the D.E.R. approval for use of our product is also attached.

The following comments are in response to your specific questions.

1. "Flolite" is "on-spec" product and has the physical characteristics of # 5 oil.
2. "BS&W" refers to "Bottom Sediment and Water". This is a normal test for fuel oils. Product is usually heavily discounted if it exceeds 1.0% because it provides less BTU/gallon and is more difficult to burn. The lowest percentage is the best product. "CCR" is an abbreviation for "Conradson Carbon Residue". This is a frequently used test where a specific amount of fuel is heated and burned for a specified time. The unburned portion is the carbon residue. Most # 5 oils run in the 7 - 12% range. The lowest % is the best product.

105 South Alexander Street, Plant City, Florida 33566  
Area Code (813) 229-1739 Fla WATS 800-282-9585



INTERNATIONAL PETROLEUM CORPORATION

Cross/Tessitore & Associates, P.A.

Page 2

3. PNA's are present in all fuel oils at varying levels. The cost of the test to determine precise percentages is very expensive and requires very elaborate, complex equipment and highly trained personnel. Heavy hydro-treating, which is sometimes used in processing oils, reduces but does not eliminate PNA's. These hydro-treated oils usually become lubricating oils and make up part of our feedstock. Our distillation processes remove the more volatile materials and a high percentage of aromatics which causes the PNA content of our re-refined product to be lower than virgin oils.

Sincerely,

Don Van Sickle  
Director of Marketing

DVS:pw

Encl.



**ATTACHMENT 3**



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

January 23, 1989

Mr. A. M. Malatino, President  
International Environmental Services, Inc.  
105 S. Alexander Street  
Plant City, Florida 33566

Dear Mr. Malatino:

In reference to the analysis (enclosed) on the re-refined oil submitted on January 13, I do not have any objections to the use of this product as a phosphate flotation oil.

Phosphate companies using this re-refined oil annually would not be required to register with the Department as a used oil collection and recycling facility. Also, annual reports and recordkeeping would not be required of them.

If you have any further questions or comments, please let me know.

Sincerely,

David H. Kelley  
Environmental Specialist  
Bureau of Waste Planning  
and Regulation

DHK/ps

Enclosure

cc: Clabe Polk



# INTERNATIONAL ENVIRONMENTAL SERVICES, INC.

105 South Alexander St. • Plant City, Florida 33586 • (813) 754-2373  
Tampa (813) 229-0879 • Miami Office 1-800-537-9875 • FAX (813) 754-3789  
Florida Wats 1-800-762-1104

## CERTIFIED ANALYSIS

TO: INTERNATIONAL ENVIRONMENTAL SERVICES PROJECT NO. IES #5 OIL  
ATTN: MR. TONY MALATINO  
105 SOUTH ALEXANDER STREET  
PLANT CITY, FL. 33566

SAMPLED BY: IES

DATE COLLECTED: 1-04-89

IDENTIFICATION: RE-REFINED OIL

DATE COMPLETED: 1-10-89

API GRAVITY AT 60 DEGREES F	25-28
SULFUR	0.50%
VISCOSITY SSU AT 100 DEGREES F	240
POUR POINT, DEGREES F	0 DEGREES F
ASPHALTINES	<1.0%
SEDIMENT BY EXTRACTION	TRACE
WATER BY DISTILLATION %	TRACE
TOTAL BOTTOM SEDIMENT AND WATER	1.0% MAX
CADMIUM PPM	<0.3
LEAD PPM (LEACHABLE) BY E. P. TOXICITY	<5.0
ARSENIC PPM	<1.0
CHROMIUM PPM	<1.3
POLYCHLORINATED BIPHENYLS (PCB'S)	BDL*
FLASHPOINT	150 DEGREES MIN

\* BELOW DETECTION LIMIT (1.0 PPM)

Results expressed in  mg/l (ppm)  ug/l (ppb)  
 mg/kg (ppm)  ug/kg (ppb)

State of Florida Certification: EB4180 and HRS 84308

**METHODS:**

"Standard Methods for the Examination of Water and Wastewater", Latest Edition, APHA, AWWA, and WPCF and/or other EPA approved methods which meet FDER protocol, unless otherwise designated.

**QUALITY CONTROL:**

Quality Assurance Project Plan No. 870318G.  
Quality Assurance Quality Control No. 87319G.

Certified by: *Anthony M. Malatino*  
Chemist

**ATTACHMENT 4**

NOTE NEXT TO LAST PARAGRAPH  
ON PAGES 2 AND 3. *Q*

INFORMATION BULLETIN FOR PUBLIC RELEASE:  
EPA CONCERNS ABOUT THE USED OIL RECYCLING SYSTEM

The Environmental Protection Agency (EPA) is becoming increasingly concerned about disruptions in the used oil recycling system that are occurring because of the fall in virgin fuel oil prices and because of misunderstanding and confusion about EPA's regulations.

There are only a few presently effective requirements for used oil management. Used oil generators should not mix spent solvents with used oils. These mixtures must be managed as hazardous wastes. Used oil fuel dealers must register with EPA. They may sell off-specification used oil fuels (used oil fuels with high metals concentrations) only to industrial burners. On-specification used oil fuels may be sold to anyone. Off-specification used oil burners must register with the Agency.

Background

In 1980 and 1984 Amendments to the Resource Conservation and Recovery Act (RCRA), Congress directed EPA to consider regulating used oils to protect human health and the environment. At the same time, however, EPA must consider the impacts of regulations on used oil recycling, on small businesses, and small generators. EPA has divided the used oil regulatory program into three stages.

(1) EPA has begun regulation of used oil recycling with a rule to

- discourage mixing hazardous wastes, such as spent solvents, into used oils; and
- ban the combustion of used oil fuels with high metals concentrations in non-industrial facilities, such as schools and apartments.

This rule was proposed on January 11, 1985; promulgated on November 29, 1985; and became fully effective on May 29, 1986.

*withers*  
*EPA*  
*11/86*  
(2) We have also begun the next stage of regulating the used oil system with the proposed listing and management standards published on November 29, 1985. EPA is now evaluating the many public comments received in response to this notice (and a supplementary March 10, 1986 notice). We expect to make final decisions this fall. These final rules will be effective six months after publication.

*delayed*  
(3) In a final stage, EPA expects to control combustion devices that burn used oil fuels with high metals content. The rules are expected to be proposed this fall, at the earliest. Final decisions should be completed by the end of 1987. Again, final rules will be effective six months after that.

## Current Problems

There are two major problems in the used oil recycling system. First, generators are confused about the status of used oil. Many are surprised that they often must pay to have used oil hauled away. Second, industrial burners are confused about the status of used oil. Many have stopped burning used oil.

### Used Oil Generators

Used oil is commonly produced from engine, machine, and vehicle maintenance. Used oils are typically recycled -- usually as fuel, either on-site or after sale to used oil collectors. In the past, generators were paid as much as forty cents per gallon for used oil (in mid-1985, twenty cents per gallon was most typical). The price paid to generators was high because virgin fuel prices were high. The recent fall in virgin fuel prices has depressed used oil prices. Because of this, some generators are now paying for used oil pickups.

The only Federal rule that currently applies to used oil generators is the prohibition on mixing hazardous wastes, such as spent solvents, with used oil. The resulting mixture (regardless of halogen concentrations) is regulated as a hazardous waste, and the facility has to comply with hazardous waste generator regulations. Used oil itself is not currently listed as a Federal hazardous waste. There are no other used oil rules that apply to used oil generators.

### Used Oil Collectors, Processors, and Marketers

Used oil businesses have greater responsibilities under EPA's regulatory framework. When these facilities sell (or use) as fuel used oil that contains toxic metals, they are responsible for sending it to the proper type of burner. These "off-specification" used oils may be sold only to industrial burners. Used oil may be off-specification because of arsenic, cadmium, chromium, lead, inorganic halogens, or flashpoint. Facilities selling off-spec used oils must notify EPA.

Used oil fuels that are on-specification are essentially equivalent to virgin fuels. Under the used oil rules, on-spec oil is totally exempt from regulation. Facilities that are the first to claim that used oil fuels meet the specification must also notify the Agency.

Because these used oil businesses control the quality and destinations of recycled used oils, EPA's upcoming regulatory strategy focuses on these facilities. We have proposed specific requirements for these facilities. The Agency is evaluating the comments received on the proposal.

### Used Oil Burners

The final rule of November 29 required industrial facilities that wished to burn off-specification used oil to notify the Agency. We wanted to establish some accountability and a means of tracking the sale of off-specification fuels to the proper facilities. The notification is merely a one-time requirement that serves the limited purpose of aiding in implementation of the ban on burning off-specification used oil fuels in non-industrial boilers. By notifying, burners do not indicate that they are burning hazardous waste. Nor does notification bind burners to follow any particular standards for burning or storing the used oil fuel. For our convenience, we suggested that facilities notify the Agency using a modified hazardous waste notification form (Form 8700-12). Our intent was not to suggest that off-specification used oil fuels were hazardous wastes, nor that these facilities were hazardous waste facilities. Facilities are free to notify using other means, provided that all required information is provided.

The only Federal requirements from the November 29 final rule that apply to burners who purchase or receive off-specification used oil fuel are limited "paperwork" standards, namely:

1. to notify the Agency as an off-specification used oil burner (§266.44(b))(a one-time requirement),
2. to inform used oil suppliers that the burner has notified the Agency, and will burn off-spec oil in an industrial device only (§266.44(c)), and
3. to keep invoices of shipments received (§266.44(e)).

At this time, there are no other Federal requirements that apply. Used oil is not now a Federally-listed hazardous waste. The November 29 final rule does not impose any Federal storage requirements for used oils. EPA does not require used oil facilities to obtain liability insurance for storage or burning of used oil. The November 29 final rule does not require facilities burning off-spec used oil fuel to have air pollution control devices.

~~Used~~ <sup>deral</sup> Used oil fuels that meet the fuel specifications are totally exempt from regulation. Burners of on-spec oil need not notify the Agency. We judge specification used oil fuels to be essentially equivalent to virgin fuel oils. There are no plans to change this finding.

### For Further Information

EPA is concerned about the current state of the used oil recycling system. We will continue to consider impacts on used oil recycling in our deliberations. If you have additional questions, please contact the RCRA/Superfund Hotline (800/424-9346 or 202/382-3000).