

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

November 19, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Daniel E. Strobridge
Associate
Camp Dresser & McKee, Inc.
One Tampa City Center, Suite 1750
Tampa, Florida 33602

Dear Mr. Strobridge:

Re: City of Tampa Waste to Energy Facility Issues Regarding Waste Oil Firing

The Department has reviewed your August 24, 1992, letter, which requested that a federally enforceable condition, a restriction of firing only waste oil cleaned up by the Port Authority, be deleted from an air operation permit, No. AO 29-206279. Pursuant to Florida Administrative Code Rules 17-212.400(6)(b) and 17-212.500(8)(d), the operation permit shall include all operating conditions and provisions required in the construction permit. Therefore, the condition has to be deleted from the affected construction permit and cannot be processed under the current request. If this is what you desire, please submit the following information and the Department will, again, consider the issue:

o An application for a modification shall be submitted to the Department's Bureau of Air Regulation and the Environmental Protection Commission of Hillsborough County (EPCHC) under a Florida registered Professional Engineer's seal; also, the application package must be accompanied with the appropriate processing fee.

o Besides the Port Authority, identify all of the other potential sources of waste oil that the facility desires to process.

o As part of the application package, propose a protocol that shall be followed for every potential situation where the facility might be involved with the firing of waste oil. Minimally, the protocol shall include the following:

- o the source of the waste oil (i.e., ship's bilge, spill, etc.);
- o the address of the owner/operator of the source of the waste oil;
- o the identity and permit number of the storage tank that will receive the waste oil prior to firing;
- o the quantity of waste oil to be fired;

Mr. Daniel E. Strobbridge
Tampa WTE Facility: AO 29-206279
November 19, 1992
Page 2 of 2

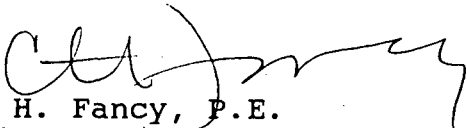
- o an ultimate analysis of the waste oil to be fired, which shall include the Btu content, grade, percent sulfur content (by weight), metals (Cd, Hg, Pb, Cr, etc.), asphaltenes, and volatiles (benzene, toluene, ethyl-benzene, and xylene); and,
- o the name and address of the laboratory that will be used for the analyses.

NOTE: Since the facility is not permitted to process any hazardous waste, the waste oil shall not exceed the limitations established in 40 CFR 266.

Once the above information and appropriate processing fee are received, the Department, the EPCHC, the U.S. EPA, and the U.S. Department of Interior's National Park Service will review the request for completeness and issue their findings. Once a complete application package has been received, a notice of complete application and the Department's Intent will each have to be placed on Public Notice. With or without an administrative hearing, the Department will issue a final determination (i.e., issue or deny).

If there are any questions, please call Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,


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

CHF/BM/rbm

Attachment

cc: B. Thomas, SWD
J. Campbell, EPCHC
G. Kissel, EPCHC
D. Beason, Esq., DER

Attachment



environmental engineers, scientists,
planners, & management consultants

August 24, 1992

8/27
Proston
pls advise
Clem

CAMP DRESSER & MCKEE INC.

One Tampa City Center, Suite 1750
Tampa, Florida 33602
813 221-2833 Fax 813 221-2279

RECEIVED
AUG 27 1992

Division of Air
Resources Management

Bruce
What do you
think
Prosto
8/28

Mr. Claire Fancy
State of Florida
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-2400

Re: City of Tampa DER File No: AO29-206279

Dear Mr. Fancy:

Several weeks ago you and I discussed several aspects of the pending City of Tampa Refuse to Energy Facility permit application.

Among the concerns I raised was one dealing with the authorization to incinerate waste oil from spills cleaned up by the Port of Tampa. My concern was that limiting such disposal to wastes cleaned up by a given entity was unnecessarily restrictive and had no bearing on the environmental impact of incinerating the waste material.

It was my understanding that you concurred with the concept that the words "by the Port of Tampa" could be stricken from this permit. It is my further understanding that you indicated that Jerry Campbell could give you a call to confirm our conversation.

If I have misunderstood or misconstrued your meaning, please advise me at your earliest convenience.

As always, it is a pleasure to work with you on these and other issues.

Sincerely,

CAMP DRESSER & MCKEE, INC.

Daniel E. Strobridge
Associate

cc: Nancy McCann, City of Tampa
Jerry Campbell, EPC

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. Preston
- 2.
- 3.
- 4.

Remarks:

Based on discussions with Willard, it seems appropriate to request the following:

- ① Source of the waste oil (i.e., bilge, ~~etc.~~ etc.);
- ② Grade, if known - to be determined by analysis ~~of the waste oil~~ (see below);
- ③ Volume to be burned (worst case)
- ④ Waste storage: source; volume; and,
- ⑤ Analysis (single and/or composite)
 - ⓐ Btu content and grade (#1, #2 etc.)
 - ⓑ Sulfur content, by weight
 - ⓒ Metals (Cd, Hg, etc.)
 - ⓓ Asphaltic
 - ⓔ Volatiles
 - ① Benzene
 - ② Toluene
 - ③ Ethyl-benzene
 - ④ Xylene

From:

Bruce

Date

9-4-92

Phone

BEST AVAILABLE COPY

CAMP DRESSER & McKEE INC.

One Tampa City Center, Suite 1750
 Tampa, Florida 33602
 813 221-2833, Fax 813 221-2279

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Daniel E. Strobridge
 Associate

cc: Nancy McCann, City of Tampa
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Department of Environmental Regulation
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