

Cindy



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

CERTIFIED MAIL - Return Receipt Requested

July 24, 1996

Mr. Trevor Cook, Vice President
KleenSoil International, Inc.
13838 Harlee Road
Palmetto, Florida 34221

RE: Mobile Soil Remediation Unit #1
FESOP Application #7770029-002-AF

Dear Mr. Cook:

On July 2, 1996 the Department received your application for a FESOP to become a synthetic non-Title V source pursuant to Rule 62-210.300(2)(b), F.A.C. In order to continue processing the application, the Department will need the following additional information:

1. On page 8 of the application, it is stated that "KleenSoil International, Inc. will curtail operations in order to escape Title V applicability." Please explain what is meant by "curtail operations".
2. On pages 9 and 16 of the application, the facility and emission unit SIC codes are listed as 1622 and 16, respectively. SIC code 1622 is for general contractors primarily engaged in the construction of bridges, tunnels, and elevated highways. Please explain why you chose this SIC code instead of SIC code 4953. SIC code 4953 is for establishments primarily engaged in the collection and disposal of refuse by processing or destruction or in the operation of incinerators, etc., and is consistent with the SCC you selected for the emission unit.
3. On page 13, the facility pollutant information is incomplete. All pollutants subject to a limitation at an emission unit need to be listed.
4. On page 14, the requested emissions cap (e.g., 7 TPY total HAPS) and related facility pollutant detail information were not provided. Please complete this section.
5. On page 19, the emissions unit control equipment is described as a direct-flame afterburner. The correct control device or method code for a direct-flame afterburner is 021, but the code for a catalytic afterburner, 019, is listed instead. (019 is also listed on page 29.) Is the control equipment a direct-flame afterburner or a catalytic afterburner?
6. On page 20, there is no model number listed in the emission unit details. Is there a serial number or other type of number on the unit which can be used for identification purposes? Since this is a mobile unit, a unique number would be helpful for a compliance inspector to positively identify the unit.

7. On page 20, the dwell temperature and incinerator afterburner temperature are listed as 1500 °F. The currently permitted temperatures are 1600 °F. Please explain why the temperature is to be lowered, why there is no reported reduction in the control efficiency resulting from the lowered temperature at the same dwell time, and why the maximum heat input needs to remain the same.
8. On page 20, the maximum heat input rate of 1.86 MMBTU/hr to the generator is included with the maximum heat input rate of the kiln/afterburner emission unit. The diesel generator needs to be treated as a separate emission unit and the appropriate additional pages need to be submitted.
9. On page 20, please explain how you will determine the amount of soil that is decontaminated and how you will determine the VOC concentration in the soil. Also, what records will be kept by the owner for compliance assurance?
10. On page 23, please explain why emission point type code "3" was selected. This would seem to be an emission point type "1". Does the generator have a separate exhaust? If so, a separate emission point information page needs to be completed for it.
11. On page 24, please explain how the maximum dry standard flow rate can be calculated from the PM emission limit if, on page 30, the PM emission limit is calculated from the maximum dry standard flow rate.
12. On page 26, please provide the maximum percent sulfur on a weight-percent basis to the nearest 0.1 percent (as required in the application form instructions.)
13. On page 27, if the generator has a separate exhaust, the distillate oil usage for the generator needs to be subtracted and placed on its own segment page.
14. On page 29, please recheck the primary control device codes. The code for PM and PM10 is listed as 018, but listed as 016 on page 18. The primary control device code for the VOC and HAPS is listed as 019, but should be 021 if it is a direct-flame afterburner. Since ethylbenzene (H085) is listed in the vapor profile for gasoline, it should also be included on the pollutant list. The HAPS pollutant regulatory code should be EL if you want to limit the HAP emissions.
15. Soils containing reformulated or oxygenated gasoline probably contain methyl tert butyl ether (MTBE). Please address this with listing on page 29 under emissions unit pollutants, if such soils are being decontaminated. If not, please confirm. The table you used for HAPS in gasoline contains representative amounts of HAPS in normal gasoline.
16. On page 30, the given reference for the emission factor of 0.04 gr/dscf is "process knowledge". Please elaborate. Isn't this just based upon the allowable emission limit in 62-296.415(3)?

17. On page 30, in the calculation of kiln/afterburner PM emissions, please explain how the 21,583 dscfm was obtained. In the calculation of generator PM emissions, please explain how the 0.31 lb-PM/mmBtu emission factor was derived. (The generator should have its own "H. Emission Unit Pollutant Detail Information" pages.)
18. On page 31, please submit the requested allowable emissions and units (0.04 gr/dscf).
19. On page 32, please explain how the 0.95 lb CO/mmBtu emission factor was derived.
20. On page 33, please submit the requested allowable emissions and units (100 ppm).
21. On page 34, please explain how the 0.35 lb VOC/mmBtu emission factor was derived.
22. Please submit Pollutant Detail Information pages for total HAPS, including metals.
23. On page 36, please explain how the 0.29 lb SO₂/mmBtu emission factor was derived.
24. Please explain why the total of the drum/afterburner and generator emissions does not add up to the total potential emissions listed on page 36 and the total equivalent allowable emissions listed on page 37.
25. On page 37, please submit the requested allowable emissions and units (0.3% by wt. avg. sulfur in fuel).
26. Please submit visible emissions information for the generator exhaust..
27. On page 39, please submit the CEM serial number and installation date.
28. Please explain where/how the fuel analysis in Attachment 003 was derived. Please submit an actual fuel analysis as an example.
29. Please submit a justification for why a waiver is requested for the description of stack sampling facilities. Describe the proposed capability to conduct stack sampling.
30. Please submit the most recent stack sampling results as required in specific condition no. 19 of the current operating permit AO16-231440.
31. Please revise the diagram in Attachment 001 to include the generator exhaust (if applicable.)
32. Are all of the PM emissions assumed to be PM10?

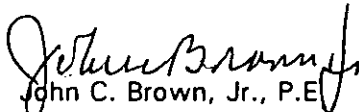
Page 4 of 4
KleenSoil #7770029-002-AF
July 24, 1996

For your future reference, the following comments are offered:

- A. On page 5 of the application, the correct choice under Category II is "Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source." because this is the first request for a FESOP.
- B. On page 7, only the first two paragraphs of the P.E. certification statement are applicable. The last paragraph should not have been checked. The FESOP is not being requested because of a newly constructed or modified emission unit.
- C. On page 11 and page 21, the FDEP core list is a list of rules to which all Title V sources are presumptively subject. This entire list does not apply to a synthetic non-title V source. In addition, 62-296.415, and 62-204, F.A.C. do apply and should be listed.
- D. On page 33, the method of compliance is EPA Method 10 which is adopted by reference in 62-204.800, F.A.C. Rule 62-297.500, F.A.C., has been repealed.
- E. On page 34, there appears to be a typographical error in the second equation for the calculation of VOC emissions from the soil. It would seem that the first term in the equation should be 14.0 lbs/hr VOC, not 14.0 tons/hr VOC.
- F. On page 35, the method of compliance is a soil analysis per Rule 62-775, F.A.C. Rule 62-297.410, F.A.C., has been repealed.
- G. On page 36, there appears to be a typographical error in the first equation for the calculation of SO₂ emissions from the drum/afterburner. It would seem that the first term in the equation should be 0.319 1000 gal/hr, not 0.319 gal/hr.
- H. On page 43, Document 005-DEP MEMO is not an applicable requirement. It is a clarification memo.

Please have your professional engineer submit a signed and sealed written response to these questions to this office. If you have any questions, please call me at (904)488-1344.

Sincerely,


John C. Brown, Jr., P.E.
Administrator, Title V Section
Bureau of Air Regulation

JCB/p
c: John B. Koogler, Ph.D., P.E.

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):

1. Addressee's Address
2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Trevor Cook, Vice President
 KleenSoil International, Inc.
 13838 Harlee Road
 Palmetto, Florida 34221

4a. Article Number
 Z 392 940 859

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

7. Date of Delivery

5. Signature (Addressee)

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

6. Signature (Agent)

PS Form 3811, December 1991 U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 392 940 859



Receipt for Certified Mail

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

PS Form 3800, March 1993

Sent to <i>Vice Pres. KleenSoil International</i> <i>Trevor Cook, Inc.</i>	
Street and No. <i>13838 Harlee Rd.</i>	
P.O., State and ZIP Code <i>Palmetto, FL 34221</i>	
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	

Mailed 7-24-96
SL

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

CERTIFIED

Z 392 940 859

MAIL

REMOVE TO EXPOSE ADHESIVE REMOVE TO EXPOSE ADHESIVE REMOVE TO EXPOSE ADHESIVE

UNITED STATES POSTAL SERVICE

Official Business



PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300



REMOVE TO EXPOSE ADHESIVE REMOVE TO EXPOSE ADHESIVE REMOVE TO EXPOSE ADHESIVE REMOVE TO EXPOSE ADHESIVE REMOVE TO EXPOSE ADHESIVE REMOVE TO EXPOSE ADHESIVE REMOVE TO EXPOSE ADHESIVE REMOVE TO EXPOSE ADHESIVE

Print your name, address and ZIP Code here.

DEPARTMENT OF ENVIRONMENTAL PROTECTION
 DIVISION OF AIR RESOURCES MANAGEMENT
 BUREAU OF AIR REGULATION - TITLE V
 2600 BLAIR STONE ROAD
 TALLAHASSEE, FLORIDA 32399-2400
MS 5505

CP

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.

3. Article Addressed to:

Mr. Trevor Cook, Vice President
 KleenSoil International, Inc.
 13838 Harlee Road
 Palmetto, Florida 34221

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

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

4a. Article Number

Z: 392 940 859

4b. Service Type

- Registered Insured
- Certified COD
- Express Mail Return Receipt for Merchandise

7. Date of Delivery

2/26/94

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

5. Signature (Addressee)

Trevor Cook

6. Signature (Agent)

PS Form 3811, December 1991 U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

PS Form 3800 March 1993

Sent to <i>Vice Pres / Return Receipt Requested</i>	
<i>Trevor Cook</i>	
Street and No.	<i>13838 Harlee Rd.</i>
P.O., State and ZIP Code	<i>Palmetto, FL 34221</i>
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?	



Receipt for Certified Mail

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

Z 392 940 859