



Department of
Environmental Protection

Will's
03/08/96

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 8, 1996

A041-249211 P+, Manatee

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

S.F.L. Therm Services
A022 217505

Mr. David A. Thomas, President
TranSoil Inc.
20711 U.S. Highway 98
Dade City, Florida 33525

7775002-001-AC
NEW KLEENSOIL Moore Haven
7770029

Dear Mr. Thomas:

Re: Transfer of Permits
AO16-231440 and AC16-189522B
7770029 7770029

The Department has reviewed your January 25 and February 7 letters requesting that Anderson Columbia Thermal Systems permit Nos. AO16-231440 (Unit 1) and AC16-189522A (Unit 2) for mobile soil thermal treatment facilities be transferred to KleenSoil International, Incorporated and the expiration date of the permits be clarified. These requests are approved. The relocation notification requirements in Rule 62-210, F.A.C., are also being added to the permits. The reference permits are:

TRANSFERRED (AO16-231440 and AC16-189522B):

From: Anderson Columbia Thermal Systems
Post Office Box 1386
Lake City, Florida 32056-1386

FORMERLY DRE

To: KleenSoil International, Inc.
13838 Harlee Road
Palmetto, Florida 34221

KleenSoil is responsible for any future operation of these units.

EXPIRATION DATES:

July 15, 1998 for AO16-231440 (Unit 1)
November 1, 1996, or 240 days after commencing operation,
whichever occurs first, for AC16-189522B (Unit 2)

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NEW SPECIFIC CONDITION (AO16-231440 and AC16-189522B):

At least 7 days prior to relocating the plant, the permittee shall notify the air program administrator for the Department's District and, if applicable, county air program administrator, of the next site in Florida where the unit will be operated at. The notification will be on DEP Form 62-210.900(3), F.A.C. The notification shall include 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. Unless notified otherwise by an environmental agency, the unit may be relocated and operated at the new site. The Department will notify the permittee of any new restrictions for the facility that will apply while it is operating at the new site (Rule 62-775.700(1), F.A.C.).

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 their receipt of this intent. 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;


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- (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 intent. 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 intent 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.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


Howard L. Rhodes, Director
Division of Air Resources
Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **INTENT TO ISSUE** and all copies were mailed by certified mail before the close of business on 3-8-96 to the listed persons.

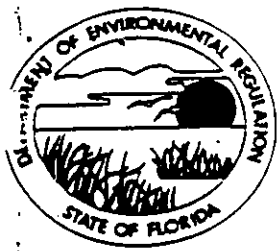
Clerk Stamp

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

Kim Ober 3-8-96
Clerk) Date

Copies furnished to:

Anderson Columbia Thermal Systems
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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
D.R.E. Environmental, Inc.
1644 Blanding Blvd., Suite 2
Jacksonville, Florida 32210

Permit Number: AC 16-187650
Expiration Date: January 1, 1992
County: Mobile Operation
Project: 35 TPH Mobile Soil
Remediation Unit No. 1

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 35 TPH mobile soil remediation unit. The unit consists of a 15 ton bin to receive the contaminated soil, a 24" belt conveyor for transferring up to 35 TPH of wet soil to the kiln, a rotary kiln (5 feet diameter by 28 feet long), a Hauck BH390-8 baghouse, a 98.42% efficient (minimum) Hauck afterburner capable of operating above 1600°F with a 1 second residence time, two propane or natural gas burners (23 MMBtu/hr for kiln and 22 MMBtu/hr for afterburner), a 200 KW generator, and associated controls. The unit is equipped with a stack (3 feet diameter by 30 feet high) that discharges approximately 36,077 acfm at 1600°F to the atmosphere.

The unit may be used throughout the State (all counties) after receiving Department authorization to operate at a 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 Oct. 9, 1990.
2. DER letter dated Oct. 24, 1990.
3. D.R.E. letter dated Oct. 5, 1990.
4. D.R.E. letter dated Nov. 28, 1990.

RECEIVED

MAR 10 1993

A.C.E.

PERMITTEE:
D.R.E. Environmental, Inc.

Permit Numbers: AC 16-187650
AC 16-189522
Expiration Date: January 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 403.151, 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.

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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.

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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.

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GENERAL CONDITIONS:

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.

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 1 second retention time and have a minimum VOC destruction efficiency of 98.42%.

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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 7.4 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 8.6 lbs/hr. Total VOC emissions shall not exceed 22.1 lbs/hr. Compliance shall be determined from 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)). This includes 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.

10. Untreated soil removed from the ground shall be stored under waterproof covers and on an impermeable surface.

11. This unit shall be allowed to operate continuously, 8760 hours per year.

12. Maximum soil charging rate to the unit shall not exceed 35 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.

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SPECIFIC CONDITIONS:

13. Only natural gas or propane shall be used as fuel for the kiln and afterburner. Maximum permitted fuel consumption is 45 MMBtu/hr (500 GPH propane).

14. Only soils contaminated with petroleum products (fuels and lubricants) 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).

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 in the soil, an estimate of the emissions from the unit while processing the soil, and calculations showing that the ambient air

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SPECIFIC CONDITIONS:

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 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:

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

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.

Data in the application shows that, for continuous operation, an emission of 1 gram/sec will have a maximum ambient impact of 6.52×10^{-3} mg/m³ (8 hr. avg). If the

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SPECIFIC CONDITIONS:

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.

$$\text{Maximum Allowable Emissions (g/sec)} = \frac{\text{AAC mg/m}^3}{6.52 \times 10^{-3}}$$

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 must be tested at the maximum process weight rate at which the permittee intends to operate. 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 35 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, 1988, 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, 1988) and soil analysis before and after treatment or other methods as approved by the Department.

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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.
24. This unit shall not be operated at any new site until the permittee has requested authorization to operate at the new site. Whenever the permittee decides it is feasible, the request shall be at least 15 days prior to operation 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 locations and contamination levels of the soils to be treated. The Department shall notify the permittee of any new air pollutant emission conditions the unit must meet within 3 days of the receipt of the relocation notice. This may include requirements for county operation permits and additional restrictions on the operation of this unit.
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 7,776 ppm in the soil or total hydrocarbons above 20,000 ppm indicate a violation of this permit. The soil may be decontaminated by operating at less than the 35 TPH production rate, or other means with prior approval of the Department. The permittee must propose the method of compliance with this permit.
28. Records shall be kept 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. All soil samples taken at the remediation site and exiting the dryer shall be stored in a sealed glass container immediately upon sampling.

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AC 16-189522
Expiration Date: January 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 _____, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtman, Secretary