



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

September 2, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bob Jamison, Vice President
Sunbelt Resources, Inc.
5453 Jug Factory Road
Tuscaloosa, Alabama 35405

Re: File No. A037-253484

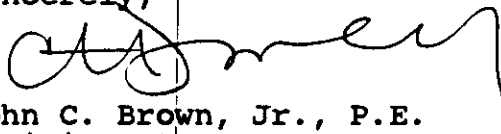
The Department has reviewed your August 12, 1994, response to our request for information to complete your application for permit to operate a mobile soil thermal treatment facility in Florida. We still need additional information to complete this application. Please provide the information requested below.

- 1) Pursuant to Rule 62-297.570(3)(g), F.A.C., a sketch of the duct showing the location of the sampling ports and the distance to the nearest upstream and downstream disturbances from the sampling ports;
- 2) Pursuant to Rule 62-297.570(3)(s), F.A.C., the detailed calculations for one run that relate the collection data to the calculated emission rate;
- 3) An explanation of the contradictory statements on the sixth page of the test report, "The tests for particulate matter emissions from this installation were conducted by the method specified in the Code of Federal Regulations, Title 40, Part 60, Appendix A, Method 5, as modified and adapted by the Alabama Department of Environmental Management. Also, sample recovery procedures were performed as specified in Method 5 of the CFR, as modified and adopted by the Florida Department of Environmental Management". If there were no deviations, please attach a notarized affidavit certifying that there were no modifications to the EPA Method 5 sampling procedures described in Appendix A of 40 CFR 60; and,
- 4) A copy of the observer's certification showing the smoke reader was qualified to perform the EPA Method 9 test in Florida at the time of testing.

Mr. Bob Jamison
September 2, 1994
AO37-253484
Page 2 of 2

If you have any questions about the information requested, please call Ramesh Menon or Willard Hanks at (904) 488-1344. We will resume processing your application after receipt of the requested information.

Sincerely,



for John C. Brown, Jr., P.E.
Administrator
Air Permitting and Standards

JCB/WH/bjb

cc: Ed Middleswart, NWD
Jack Davis, TTL

P 872 562 703



Receipt for Certified Mail

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

PS Form 3800, JUNE 1991

Sent to Mr. Bob Jamison	
Street and No. 5453 Jug Factory Road	
P.O., State and ZIP Code Tuscaloosa, Alabama 35406	
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: 9/7/94 File No. A037-253484	

UNITED STATES POSTAL SERVICE

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SEP 15 1994

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SEP 15 1994

Bureau of Air Regulation

Bureau of Air Regulation

Print your name, address and ZIP Code here

- Patty Adams
- Department of Environmental Protection
- Bureau of Air Regulation - MS 5505
- 2600 Blair Stone Road
- Tallahassee, Florida 32399-2400

Florida Department of
Environmental Protection

Memorandum

To: Willard Hanks

Through: Mike Harley *SH*

From: Ramesh Menon *RM*

Date: August 31, 1994

7770068-NA-A0

Subject: Sunbelt Resources, Inc. - Compliance Test

We have reviewed the additional information submitted by the above referenced company on their initial compliance test. In order to determine the compliance status of the source, we still need the following information:

- 1) Pursuant to Rule 62-297.570(3)(g), F.A.C., a sketch of the duct showing the location of the sampling ports and the distance to the nearest upstream and downstream disturbances from the sampling ports;
- 2) Pursuant to Rule 62-297.570(3)(s), F.A.C., the detailed calculations for one run that relate the collection data to the calculated emission rate;
- 3) An explanation of the contradictory statements in the sixth page of the test report, "The tests for particulate emissions from this installation were conducted by the method specified in the Code of Federal Regulations, Title 40, Part 60, Appendix A, Method 5, as modified and adapted by the Alabama Department of Environmental Management...Also, sample recovery procedures were performed as specified in Method 5 of the CFR, as modified and adopted by the Florida Department of Environmental Management". If there were no deviations, please attach a notarized affidavit certifying that there were no modifications to the EPA Method 5 sampling procedures described in Appendix A of 40 CFR 60; and,
- 4) A copy of the observer's certification showing the smoke reader was qualified to perform the EPA Method 9 test in Florida at the time of testing.

The permittee must furnish the above information in order for us to complete the test review and have assurance that the source is in compliance. If you have any questions, please call me at GIC: 266 or SC: 278-1344.

cc: C. Fancy
C. Salmon



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 14, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bob Jamison, Vice President
Sunbelt Resources, Inc.
5453 Jug Factory Road
Tuscaloosa, Alabama 35405

Dear Mr. Jamison:

Re: File No. AO37-253484

The Department is in receipt of your Certificate of Completion of Construction, the March 1994 test report, and an application fee for your 50 TPH mobile soil thermal treatment facility. Please provide the following additional information which is needed before your application for permit to operate can be processed:

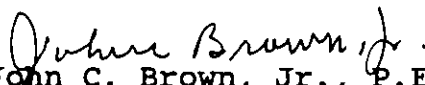
1. The March 1994 test report must address all of the information required under F.A.C. Rule 17-297.570, Test Reports. The test report must be acceptable to the Department and show compliance with all permit and regulation requirements before a permit to operate can be issued (F.A.C. Rule 17-297.340(1)).
2. What modifications were made to EPA Method 5 as described in 40 CFR 60, Appendix A, for the test on your facility? F.A.C. Rule 17-297.620 requires the permittee to obtain approval of any alternate sampling procedure from the Department. Please provide a copy of the Department's Order that approved these modifications.
3. Provide a copy of the hot zone temperature recording during the test along with the calibration data or factory certification on this system.
4. Explain the statement made on the Certificate of Completion that the carbon monoxide (CO) certification test was not conducted in accordance with 40 CFR 60, Appendix B, Performance Specification 4.
5. Provide a copy of the soil analysis required by F.A.C. Rule 17-775. This will be an analysis of the soil before and after treatment.
6. What reasonable precautions will be used in the future to minimize fugitive emissions from the treated soil?

Mr. Bob Jamison
July 14, 1994
Page Two

7. What type of fuel was used in your facility at this site and what was its sulfur content?
8. Provide a copy of the Operation Log showing the pressure drop across the baghouse during the Method 5 test.
9. Provide a copy of the qualified observer certification showing the smoke reader was qualified to perform the EPA Method 9 test in Florida.
10. Provide the source layout sketch, the observation date, the observer's name and certification number, and the process equipment on an EPA (or equivalent) visible emission form. Guidance on completing the form is in the EPA publication titled "Quality Assurance Handbook for Air Pollution Measurement Systems: Volume III. Stationary Source Specific Methods."

The Department will resume processing your application for permit to operate after the requested information is received. If you have any questions on this matter, please write to me or call Ramesh Menon on the stack test report or Willard Hanks on the application for permit to operate at (904) 488-1344.

Sincerely,


John C. Brown, Jr., P.E.
Administrator
Air Permitting and Standards

JCB/WH/plm

cc: Ed Middleswart, NWD
John Koogler, P.E.

P 872 563 647



Receipt for Certified Mail

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

PS Form 3800, JUNE 1991

Sent to	
Mr. Bob Jamison, Sunbelt	
Street and No. Resources, Inc.	
5453 Jug Factory Rd.	
P.O., State and ZIP Code	
Tuscaloosa, AL 35405	
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: 7-19-94	
Permit: AO 37-253484	

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. Bob Jamison, Vice President
 Sunbelt Resources, Inc.
 5453 Jug Factory Road
 Tuscaloosa, AL 35405

4a. Article Number
 P 872 563 647

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

5. Signature (Addressee)
Marine Mann

7. Date of Delivery
 7/25/94

6. Signature (Agent)

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

Thank you for using Return Receipt Service.

Florida Department of
Environmental Protection

Memorandum

To: Ed Middleswart

Through: Mike Harley 

From: Ramesh K. Menon 

Date: July 12, 1994

Subject: Sunbelt Resources, Inc. - Compliance Test

We have reviewed the above mentioned compliance test report and we concur with your findings. The decision on acceptance of the compliance test results can be made only after the company furnishes the requested information about the modified EPA Method 5 particulate sampling. Pursuant to Rule 17-297.620, F.A.C., the owner or the operator of the company should have obtained prior approval of an alternate sampling procedure from the Department in order to modify an adopted EPA test method. Failure to obtain prior approval of an alternate sampling procedure through the Division of Air Resources Management's Emissions Monitoring Section should result in rejection of the test.

EPA Method 9 should be performed by a qualified smoke reader certified in the State of Florida and the copies of the certificate should be attached to the test report. The company failed to record various important information in the visible emission observation form such as a source layout sketch, the observation date, the observer's name, and the process equipment. The Department recommends the use of the EPA form to record EPA Method 9 observations and the use of EPA publication "Quality Assurance Handbook for Air Pollution Measurement Systems: Volume III. Stationary Source Specific Methods" as a guidance for completing the form. The Department requires all of the information requested in the form to assess the visible emissions.

We will wait until we receive a reply from the company on additional information requested before we determine the compliance status of the source. If you have any questions, please call me at SC: 278-1344 or (904) 488-1344.

cc: C. Salmon
W. Hanks