

Check Sheet

Company Name: SUNBELT Resources, INC.

Permit Number: A037-253484 statewide

PSD Number: _____

Permit Engineer: HANKS

Application:

WITHDRAWN

- | | |
|--|--------------------------|
| <input checked="" type="checkbox"/> Initial Application | Cross References: |
| <input checked="" type="checkbox"/> Incompleteness Letters | <input type="checkbox"/> |
| <input checked="" type="checkbox"/> Responses | <input type="checkbox"/> |
| <input type="checkbox"/> Waiver of Department Action | <input type="checkbox"/> |
| <input type="checkbox"/> Department Response | |
| <input type="checkbox"/> Other | |

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT Determination
- Unsigned Permit
- Correspondence with:
 - EPA
 - Park Services
 - Other
- Proof of Publication
 - Petitions - (Related to extensions, hearings, etc.)
 - Waiver of Department Action
 - Other

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

Memorandum

Florida Department of Environmental Protection

To: Mike Harley
Willard Hanks

Through: Ed Middleswart

From: Carolyn W. Salmon

Date: June 30, 1994

Subject: Sunbelt Resources, Inc., compliance test

*Ed m 6/30
CWS 6/20/94*

Sunbelt Resources, Inc., constructed a mobile soil remediation unit under permit #AC37-216863, APIS# 10PEN37006801. They conducted the initial compliance test March 10, 1994 at a soil remediation site in Port St. Joe. It was submitted to our Panama City Branch Office on April 21, 1994. The inspector assumed that copies had been sent to the District. We obtained the test report June 22.

We have reviewed the test report for completeness of information submitted as required by Section 17-297.570 Florida Administrative Code. The test report does not include the information required in Section 17-297.570(3)d,e,f,g, and t, F.A.C. A copy of our review sheet and the test report are attached. On page 6 of the report, the testing company states that they used EPA method 5 as modified and adapted by the Alabama Department of Environmental Management.

We have notified the permittee that the test report is not complete and that the Department cannot review the test to determine whether it demonstrates compliance until the missing information is submitted. We have asked them to submit the information to Willard.

CWS:css
attachment letter to Sunbelt Resources
test report



Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
June 30, 1994

Virginia B. Wetherell
Secretary

Robert D. Jamison
Vice President
Sunbelt Resources, Incorporated
5453 Jug Factory Road
Tuscaloosa, Alabama 35405

Dear Mr. Jamison:

The Department has reviewed for completeness the compliance test report for the soil remediation unit currently located at Apalachicola Northern Railroad. The test was sent to the Department's Panama City Branch Office rather than the Bureau of Air Regulation as required by Specific Condition 27 of the construction permit. When we became aware that was the only copy submitted to the Department, the District office obtained the test report for initial review.

The test report is not complete; therefore the Department cannot determine whether the tests demonstrate compliance with the construction permit. A copy of our review check list is enclosed indicating the missing information. The report states that the tests for particulate emissions were conducted by EPA method 5, as modified and adapted by Alabama Department of Environmental Management. What are the modifications?

Specific Condition 34 of Construction Permit AC37-216863 requires that an application for an operation permit be submitted to the Bureau of Air Regulation at least 90 days prior to the expiration date of the construction permit or within 45 days after completion of compliance testing, whichever occurs first. The application should include the certificate of completion, fee and test reports. The application should have been submitted no later than April 25.

Please submit the required information and application material immediately to Willard Hanks, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399. His telephone number is (904) 488-1344.

If you have questions about this initial review please contact Carol Melton at (904) 444-8364.

Sincerely,

Ed K. Middleswart, P.E.
Program Administrator
Air Resources Management

EKM:csc

Enclosure

cc: John B. Koogler, Ph.D., P.E.
Willard Hanks, DEP Bureau of Air Regulation

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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SO₂ Thermal Treatment Unit

PM, CO, VE tested

17-297.570 Test Reports.

- (1) The owner or operator of an air pollution source, for which a compliance test is required, shall file a report with the Department on the results of each such test. ✓
- (2) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. *3/10/94 sent to Pen 2/22/94*
- (3) The test report shall provide sufficient detail on the source tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than an EPA or DER Method 9 test, shall provide information on:
 - a. The type, location and designation of the source tested. ✓
 - b. The facility at which the source is located. ✓
 - c. The owner or operator of the source. ✓
 - d. The normal type and amount of fuels used and materials processed and the types and amounts of fuels used and material processed during each test run. NO
 - e. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard. NO
 - f. The type of air pollution control devices installed on the source, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water) and their operating parameters during each test run. NO
 - g. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances. NO
 - h. The date, starting time and duration of each sampling run. ✓
 - i. The test procedures used including any alternative procedures authorized pursuant to Rule 17-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used. ✓
 - j. The number of points sampled and configuration and location of the sampling run. ✓
 - k. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point. ✓

- l. The type, manufacturer and configuration of the sampling equipment used. ✓
- m. Data related to the required calibration of the test equipment. ✓
- n. Data on the identification, processing and weights of all filters used. ✓
- o. Data on the types and amounts of any chemical solutions used. ✓
- p. Data on the amount of pollutant collected from each; the sampling probe, the filters, and the impingers, are reported separately for the compliance test. ✓
- q. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report. ✓
- r. All measured and calculated data required to be determined by each applicable test procedure for each run. ✓
- s. The detailed calculations for one run that relate the collected data to the calculated emission rate. NO
- t. The applicable emission standard, and the resulting maximum allowable emission rate for the source, plus the test result in the same form and unit of measure. NO
- u. A certification that to the knowledge of the owner or his authorized agent, all data submitted is true and correct. ✓

When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

Specific Authority: 403.061, F.S.
Law Implemented: 403.021, 403.031, 403.061, 403.087, F. S.
History: Formerly 17-2.700(8)

Reviewed By CM

← P. 6 used Method 5
as modified and adapted by ADEM.
PM: 2.0% vs 5% allowed
VE: 1.1% vs 1.0% allowed
CO: 13.1 ppm vs 100% allowed
Rate: ?