



Department of Environmental Protection

*Updated
AMS
10/14/96*

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

State of Florida
Department of Environmental Protection
Notice of Final Permit Amendment

In the Matter of an
Application for Permit Amendment
Mr. Bob Jamison, Vice President
Sunbelt Resources, Inc.
5453 Jug Factory Road
Tuscaloosa, Alabama 35405

DEP File No. AC 37-216863B
(7770068-005-AC)

Enclosed is a letter that amends Permit Number AC 37-216863B. The amendment authorizes operation of this mobile soil thermal treatment facility in 10 additional counties in Florida. Additional language was added to the draft amendment to clarify the periodic public notice requirements for this unit. This permit amendment is issued pursuant to Section 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 14 (fourteen) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT AMENDMENT (including the FINAL permit amendment) was sent by certified mail (*) and copies were mailed by U.S. mail before the close of business on 10-14-96 to the person(s) listed:

Mr. Bob Jamison, Sunbelt*
Mr. Ed Middleswart, NWD
Ms. Wendy Auerbach, K&A

Clerk Stamp

FILING AND ACKNOWLEDGMENT

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

5.16 Construction
9.11 doc. - Robinson
9.13 doc. Ode
9.99 Ode West design

Kuni Akbar 10-14-96
(Clerk) (Date)



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 11, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Permit Amendment No. AC37-216863B (7770068-005-AC)
Mobile Soil Thermal Treatment Facility

Dear Mr. Jamison:

The Department has reviewed Koogler & Associate's August 9 letter requesting the referenced air permit be amended to authorize operation of your mobile soil thermal treatment facility in 10 additional counties in Florida. This request is acceptable and permit No. AC37-216863B (7770068-005-AC) is amended as follows:

FROM

Authorization to construct a 50 TPH mobile soil thermal treatment facility with air pollution controlled by an afterburner and baghouse. Major components of the facility are a contaminated soil feed bin, bin to dryer belt conveyer a 30 MMBtu/hr dryer that is 7 feet in diameter by 34 feet long, a Tarmac Model P830HO 14 MMBtu/hr afterburner operating at 1500°F with approximately 1 second retention time, an air to air cooler, a Tarmac Model P1424BH baghouse, a pugmill, fuel (No. 2 fuel oil, propane, and natural gas) systems, and associated equipment. The facility is equipped with a stack (3.5 ft. diameter by 25 ft. high) that discharges approximately 24,487 acfm of flue gas at 375°F to the atmosphere.

The facility may operate in Polk, Gulf, Okaloosa, Duval, Orange, Dade, Monroe, Wakulla and Escambia Counties. The facility may operate in any other county within Florida after completing the public notice requirement and receiving Department authorization to operate in the county.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General Specific and Conditions.

Mr. Robert D. Jamison
Page Two
October 11, 1996

TO

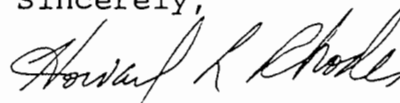
Authorization to construct a 50 TPH mobile soil thermal treatment facility with air pollution controlled by an afterburner and baghouse. Major components of the facility are a contaminated soil feed bin, bin to dryer belt conveyer a 30 MMBtu/hr dryer that is 7 feet in diameter by 34 feet long, a Tarmac Model P830HO 14 MMBtu/hr afterburner operating at 1500°F with approximately 1 second retention time, an air to air cooler, a Tarmac Model P1424BH baghouse, a pugmill, fuel (No. 2 fuel oil, propane, and natural gas) systems, and associated equipment. The facility is equipped with a stack (3.5 ft. diameter by 25 ft. high) that discharges approximately 24,487 acfm of flue gas at 375°F to the atmosphere.

Public notice of operation of the facility has been given in Polk, Gulf, Okaloosa, Duval, Orange, Dade, Monroe, Wakulla, Escambia, Bay, Calhoun, Franklin, Gadsden, Jackson, Jefferson, Leon, Liberty, Madison, and Taylor Counties. The facility may be relocated to any of these counties provided public notice of the proposed operation of the facility had been given within the previous five years pursuant to Rules 62-210.350(1) and 62-210.370, F.A.C. The facility may operate in any other county within Florida after completing the public notice requirement and receiving Department authorization to operate in the county.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General Specific and Conditions.

A copy of this letter shall be filed with permit No. AC37-216863B (7770253-005-AC) and shall become a condition of that permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/wh/t

Enclosure: Koogler's August 9, 1996 letter



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

December 19, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Mark A. Hagmann
Koogler & Associates
4014 NW Thirteenth Street
Gainesville, Florida 32609

7770068-006-AC

get check

Re: Sunbelt Resources, Inc.
Reissuance of Permit No. AC 37-216863

In response to your December 16 letter, the processing fee for the reissuance and extension of the referenced construction permit for Sunbelt's mobile soil thermal treatment facility is \$250. The previously submitted processing fee for the application for permit to operate this unit, which is being withdrawn, is not refundable.

Please submit the \$250 fee required for the reissuance of this construction permit. The Department will begin processing this request on receipt of the fee.

Sincerely,

A. A. Linero 12/19

A. A. Linero, P.E.
Administrator
New Source Review Section

cc: Mr. Bob Jamison, Sunbelt

RECEIVED

JAN 26 1998

BUREAU OF
AIR REGULATION



ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 532-92-01

September 30, 1996

VIA FEDEX

Mr. Willard Hanks
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Published Notice of Intent to Issue Permit
Mobile Soil Thermal Treatment Facility
File No. AC37-216863B

Dear Mr. Hanks:

Sunbelt Resources, Inc. has published the Notice of Intent to Issue Permit in The Tallahassee Democrat as required for authorization to operate in Bay, Calhoun, Franklin, Gadsden, Jackson, Jefferson, Leon, Liberty, Madison, and Taylor Counties. The Affidavit of Publication is enclosed.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES

Wendy Auerbach

Enc.

c: Mr. Bob Jamison, Sunbelt Resources

RECEIVED
OCT 1 1996
BUREAU OF
AIR REGULATION

RECEIVED
SEP 30 1996
BUREAU OF
AIR REGULATION
OCT 1 1996
BUREAU OF
AIR REGULATION

TALLAHASSEE DEMOCRAT
PUBLISHED DAILY
TALLAHASSEE - LEON - FLORIDA

STATE OF FLORIDA COUNTY OF LEON:
Before the undersigned authority personally
appeared Christie Stephens who on oath says
that she is Legal Advertising Representative
of the Tallahassee Democrat, a daily
newspaper published at Tallahassee in Leon
County, Florida; that the attached copy of
advertising being a Legal Ad in the matter of

PUBLIC NOTICE OF INTENT TO ISSUE
AIR PERMIT AMENDMENT

in the Second Judicial Circuit Court was
published in said newspaper in the issues of:

SEPTEMBER 20, 1996

Affiant further says that the said Tallahassee
Democrat is a newspaper published at
Tallahassee, in the said Leon County, Florida,
and that the said newspaper has heretofore
been continuously published in said Leon
County, Florida, each day and has been
entered as second class mail matter at the
post office in Tallahassee, in said Leon
County, Florida, for a period of one year next
preceding the first publication of the attached
copy of advertisement; and affiant further says
that she has neither paid nor promised any
person, firm or corporation any discount,
rebate, commission or refund for the purpose
of securing this publication in the said
newspaper.

Christie Stephens
CHRISTIE STEPHENS
LEGAL ADVERTISING REPRESENTATIVE

Sworn To And Subscribed Before Me *26*

Day of *September*



Lee Pierce
Notary Public

KOGLER & ASSOCIATES
4014 NW 13TH ST
GAINESVILLE FL 32609

PUBLIC NOTICE OF INTENT TO ISSUE AIR
PERMIT AMENDMENT

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL PROTECTION

DRAFT Permit Amendment No.
AC37-216863B (7770068-005-AC)

Sunbelt Resources Inc.
Mobile Soil Thermal Treatment Unit

The Department of Environmental Protection
(Department) gives notice of its intent to issue an
amendment to the air permit for Sunbelt
Resources Incorporated, 5453 Jug Factory Road,
Tuscaloosa, Alabama 35405.

The permit is for a mobile soil thermal treatment
unit. The unit contains a rotary kiln that is used to
evaporate petroleum products from the soil. Air
emissions are controlled with a baghouse and
afterburner.

The unit is currently permitted to operate in Polk,
Gulf, Okaloosa, Duval, Orange, Dade, Monroe,
Wakulla, and Escambia counties. The
amendment will allow it to operate in Bay,
Calhoun, Franklin, Gadsden, Jackson, Jefferson,
Leon, Liberty, Madison, and Taylor Counties.
This amendment does not require a Best
Available Control (BACT) determination.

The Department will issue the FINAL Permit
Amendment unless a response received in
accordance with the following procedures results
in a different decision or significant change of
terms or conditions.

The Department will accept written comments
concerning the DRAFT Permit Amendment
issuance action for a period of 14 (fourteen) days
from the date of publication of this NOTICE.
Written comments should be provided to the
Department's Bureau of Air Regulation, 2600
Blair Stone Road, Mail Station 5505, Tallahassee,
Florida 32399-2400. Any written comments filed
shall be made available for public inspection. If
written comments received result in a significant
change in the DRAFT Permit Amendment, the
Department shall issue a Revised DRAFT Permit
Amendment and require, if applicable, another
Public Notice.

In addition, any 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
(F.S.). The petition must contain the information
set forth below and must be filed (received) in the
Office of General Counsel of the Department at
3900 Commonwealth Boulevard, MS 35,
Tallahassee, Florida 32399-3000, within 14 days
of publication of this notice. 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,
F.S.

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; (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
Notice. Persons whose substantial interests will
be affected by any decision of the Department
with regard to the application/request 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 publication of this
notice 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 60Q-2.010, Florida
Administrative Code.

The complete project file is available for public
inspection during normal business hours, 8:00
a.m. to 5:00 p.m., Monday through Friday, except
legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
FAX: 904/922-6979

Department of Environmental Protection
160 Governmental Center
Pensacola, Florida 32401-5794
Telephone: 904/444-8300
FAX: 904/444-8417

The complete project file includes the Draft
Permit Amendment, the application, and the
information submitted by the responsible
official, exclusive of confidential records under
Section 403.111, F.S. Interested persons may
contact the Bureau of Air Regulation, New
Source Review Section, at 111 South Magnolia
Drive, Suite 4, Tallahassee, Florida 32301, or call
904/488-1344, for additional information.

SEPTEMBER 20, 1996

042857



Will's

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 12, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Jamison:

Re: Permit Amendment No. AC37-216863B (7770068-005-AC)
Mobile Soil Thermal Treatment Unit

Enclosed is one copy of the DRAFT Permit Amendment for changes to the air permit for your mobile soil thermal treatment facility. The Intent to Issue and the "PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT AMENDMENT" are also included.

The "PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT AMENDMENT" must be published within 30 (thirty) days of receipt of this letter. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in denial of the permit.

Please submit any comments you may wish to have considered concerning the Department's proposed action to the Bureau of Air Regulation, New Source Review Section, at the above address. If you have any questions, please call Willard Hanks at (904) 488-1344.

Sincerely,

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

CHF/wh/t

Enclosure

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of an
Application for Permit
Amendment By:

DEP File No. AC37-216863B
(7770068-005-AC)
Mobile Soil Thermal
Treatment Unit

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

INTENT TO ISSUE AIR PERMIT AMENDMENT

The Department of Environmental Protection gives notice of its intent to issue an air permit amendment (copy of DRAFT Permit Amendment enclosed) for the changes to the permit as detailed in the application specified above, for the reasons stated below.

The applicant, Sunbelt Resources, Inc., applied on August 12, 1996, to the Department of Environmental Protection for an amendment to a previously issued air permit for their mobile soil thermal treatment unit. The requested amendment is to allow operation of this unit in 10 additional counties in Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-212, Florida Administrative Code (F.A.C.). This source amendment is not exempt from permitting procedures. The Department has determined that a permit amendment is required to operate the facility as proposed.

The Department intends to issue this Permit Amendment based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely affect air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT". The

Mr. Robert D. Jamison
Sunbelt Resources, Inc.
Intent to Issue

notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400, (Telephone: 904/488-1344; FAX 904/922-6979) within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit modification.

The Department will issue the FINAL Permit Amendment in accordance with the conditions of the enclosed DRAFT Permit Amendment unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of "PUBLIC NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Amendment the Department shall issue a Revised DRAFT Permit Amendment and require, if applicable, another Public Notice.

In addition, any 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, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, (Telephone: 904/488-9730; FAX 904/487-4938). 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 publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. 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, F.S.

Mr. Robert D. Jamison
Sunbelt Resources, Inc.
Intent to Issue

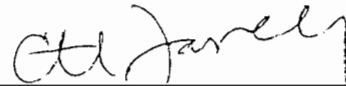
The Petition shall contain the following information;

- (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;
- (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/request 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 60Q-2.010, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



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

Mr. Robert D. Jamison
Sunbelt Resources, Inc.
Intent to Issue

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE AIR PERMIT AMENDMENT (including the PUBLIC NOTICE and the DRAFT permit amendment) was sent by certified mail(*) and copies were mailed by U.S. mail before the close of business on 9-13-96 to the person(s) listed:

Mr. Robert D. Jamison, V.P.*

Mr. Ed Middleswart, NWD

Ms. Wendy Auerbach, Koogler & Assoc.

Clerk Stamp

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

Kim J. J. J. 9-13-96
Clerk Date

**NOTICE TO BE PUBLISHED
IN THE NEWSPAPER**

PUBLIC NOTICE OF INTENT TO ISSUE
AIR PERMIT AMENDMENT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DRAFT Permit Amendment No. AC37-216863B (7770068-005-AC)

Sunbelt Resources Inc.
Mobile Soil Thermal Treatment Unit

The Department of Environmental Protection (Department) gives notice of its intent to issue an amendment to the air permit for Sunbelt Resources Incorporated, 5453 Jug Factory Road, Tuscaloosa, Alabama 35405.

The permit is for a mobile soil thermal treatment unit. The unit contains a rotary kiln that is used to evaporate petroleum products from the soil. Air emissions are controlled with a baghouse and afterburner.

The unit is currently permitted to operate in Polk, Gulf, Okaloosa, Duval, Orange, Dade, Monroe, Wakulla, and Escambia counties. The amendment will allow it to operate in Bay, Calhoun, Franklin, Gadsden, Jackson, Jefferson, Leon, Liberty, Madison, and Taylor Counties. This amendment does not require a Best Available Control (BACT) determination.

The Department will issue the FINAL Permit Amendment unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the DRAFT Permit Amendment issuance action for a period of 14 (fourteen) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the DRAFT Permit Amendment, the Department shall issue a Revised DRAFT Permit Amendment and require, if applicable, another Public Notice.

In addition, any 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 (F.S.). The petition must contain the information set forth below and must be filed (received) in the

**NOTICE TO BE PUBLISHED
IN THE NEWSPAPER**

Notice of Intent to Issue
Page Two
Sunbelt Resources, Inc.

Office of General Counsel of the Department at 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, within 14 days of publication of this notice. 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, F.S.

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; (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 Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/request 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 publication of this notice 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 60Q-2.010, Florida Administrative Code.

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

**NOTICE TO BE PUBLISHED
IN THE NEWSPAPER**

Notice of Intent to Issue
Page Three
Sunbelt Resources, Inc.

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
FAX: 904/922-6979

Department of Environmental Protection
160 Governmental Center
Pensacola, Florida 32401-5794
Telephone: 904/444-8300
FAX: 904/444-8417

The complete project file includes the Draft Permit Amendment, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Bureau of Air Regulation, New Source Review Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

DRAFT

October XX, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Permit Amendment No. AC37-216863B (7770068-005-AC)
Mobile Soil Thermal Treatment Unit

Dear Mr. Jamison:

The Department has reviewed Koogler & Associate's August 9 letter requesting that the referenced air permit be amended to authorize operation of your mobile soil thermal treatment unit in 10 additional counties in Florida. This request is acceptable and permit No. AC37-216863B (7770068-005-AC) is amended as follows:

FROM

Authorization to construct a 50 TPH mobile soil thermal treatment facility with air pollution controlled by an afterburner and baghouse. Major components of the facility are a contaminated soil feed bin, bin to dryer belt conveyer a 30 MMBtu/hr dryer that is 7 feet in diameter by 34 feet long, a Tarmac Model P830HO 14 MMBtu/hr afterburner operating at 1500°F with approximately 1 second retention time, an air to air cooler, a Tarmac Model P1424BH baghouse, a pugmill, fuel (No. 2 fuel oil, propane, and natural gas) systems, and associated equipment. The facility is equipped with a stack (3.5 ft. diameter by 25 ft. high) that discharges approximately 24,487 acfm of flue gas at 375°F to the atmosphere.

The facility may operate in Polk, Gulf, Okaloosa, Duval, Orange, Dade, Monroe, Wakulla and Escambia Counties. The facility may operate in any other county within Florida after completing the public notice requirement and receiving Department authorization to operate in the county.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General Specific and Conditions.

Mr. Robert D. Jamison
Page Two
October XX, 1996

DRAFT

TO

Authorization to construct a 50 TPH mobile soil thermal treatment facility with air pollution controlled by an afterburner and baghouse. Major components of the facility are a contaminated soil feed bin, bin to dryer belt conveyer a 30 MMBtu/hr dryer that is 7 feet in diameter by 34 feet long, a Tarmac Model P830HO 14 MMBtu/hr afterburner operating at 1500°F with approximately 1 second retention time, an air to air cooler, a Tarmac Model P1424BH baghouse, a pugmill, fuel (No. 2 fuel oil, propane, and natural gas) systems, and associated equipment. The facility is equipped with a stack (3.5 ft. diameter by 25 ft. high) that discharges approximately 24,487 acfm of flue gas at 375°F to the atmosphere.

The facility may operate in Polk, Gulf, Okaloosa, Duval, Orange, Dade, Monroe, Wakulla, Escambia, Bay, Calhoun, Franklin, Gadsden, Jackson, Jefferson, Leon, Liberty, Madison, and Taylor Counties. The facility may operate in any other county within Florida after completing the public notice requirement and receiving Department authorization to operate in the county.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General Specific and Conditions.

A copy of this letter shall be filed with permit No. AC37-216863B (7770253-005-AC) and shall become a condition of that permit.

Sincerely,

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/wh/t

Enclosure: Koogler's August 9, 1996 letter



KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ■ FAX 377-7158

KA 532-96-01

August 9, 1996

RECEIVED
AUG 12 1996
BUREAU OF
AIR REGULATION

Mr. Willard Hanks
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Sunbelt Resources, Inc.
Mobile Soil Thermal Treatment Facility
File No. AC37-216863B

Dear Mr. Hanks:

The Department issued the subject air construction permit to Sunbelt Resources on November 27, 1995. This permit allows the facility to operate in Polk, Gulf, Okaloosa, Duval, Orange, Dade, Monroe, Wakulla and Escambia counties.

On behalf of Sunbelt Resources, we would like to request that the permit be amended to authorize the facility to operate in Bay, Calhoun, Franklin, Gadsden, Jackson, Jefferson, Leon, Liberty, Madison and Taylor counties as well. Enclosed is a check for \$250.00 for the minor permit modification.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES

Wendy Auerbach
Wendy Auerbach

c: Mr. Bob Jamison, Sunbelt Resources

8011

KOGLER & ASSOCIATES

4014 N.W. 13TH ST., 377-5822
GAINESVILLE, FL 32609

63-2/63
0033

Aug 9 19 96

PAY TO THE ORDER OF

Florida Dept of Environmental Protection

\$ 250 00

Two Hundred Fifty and 00/100

DOLLARS  Security feature not included. Details on back.

FIRST UNION

First Union National Bank
of Florida
Gainesville, Florida
24 Hour Information Service
1-800-735-1012

FOR

Sunbelt Resources, Inc.

David Lee Jones



BOUNDARY & SAFETY



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

October 23, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

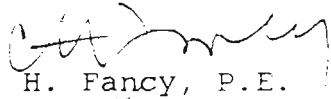
Dear Mr. Jamison:

Enclosed for your action and publication, is a copy of the Notice of Intent to Issue an amended permit to Sunbelt Resources, Inc. Also included is a copy of the Intent to Issue and a draft of the amended permit. When issued, the amendment will allow this mobile soil thermal treatment facility to operate in a total of nine counties in Florida.

Polk's being added

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. A. A. Linero of the Bureau of Air Regulation. If you have any questions regarding this matter, please write to me or call Willard Hanks at (904) 488-1344.

Sincerely,


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

CHF/wh/t

Enclosures

cc: District Air Program Administrators
County Air Program Administrators
Roy Harwood, Polk Co.
John Koogler, P.E.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an
Application for Permit by:

DEP File No. AC 37-216863B

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

INTENT TO ISSUE

The Department of Environmental Protection hereby gives notice of its intent to amend a construction permit (copy attached) for the proposed project, as detailed in the file specified above, for the reasons stated below.

The applicant, Sunbelt Resources, Inc., applied on July 22, 1992, to the Department of Environmental Regulation for a permit to construct a 50 TPH mobile soil thermal treatment facility for operation within Florida.

The permit that was issued on December 23, 1992, and amended on September 11, 1995, to restrict the facility to operating in Gulf, Dade, Okaloosa, Duval, Orange, Monroe, Wakulla and Escambia Counties. The permit allowed operation in other counties in Florida after completion of the public notice requirements. The permittee is now requesting and the Department is proposing to amend this construction permit to authorize operation in Polk County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a construction permit amendment is required for the proposed action.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in each area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper

meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

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, F.S.. 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 publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. 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, F.S.

The Petition shall contain the following information;

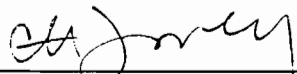
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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**




C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
904-488-1344

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 10-24-95 to the listed persons.

Clerk Stamp

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



Clerk
10/24/95
Date

Copies furnished to:

cc: District Air Program Administrators
County Air Program Administrators
John Koogler, P.E.
Roy Harwood, Polk County

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO AMEND PERMIT

AC 37-216863B

The Department of Environmental Protection gives notice of its intent to issue an amended construction permit to Sunbelt Resources, Inc., 5453 Jug Factory Road, Tuscaloosa, Alabama 35405, for a 50 TPH mobile soil thermal treatment facility with air pollution controlled by a baghouse and afterburner. The amended permit will authorize operation in Polk County in addition to previously authorized operation in Gulf, Duval, Orange, Dade, Okaloosa, Monroe, Escambia and Wakulla counties. The regulations did not require a Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination. The unit has the potential to emit 3.9 lbs/hr (8.6 TPY) particulate matter, 12.8 lbs/hr (28.2 TPY) sulfur dioxide, 6.3 lbs/hr (13.8 TPY) nitrogen oxides, 5.0 lbs/hr (11.0 TPY) volatile organic compounds, and 5.0 lbs/hr (11.0 TPY) carbon monoxide. These emissions will not cause a violation of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment. The Department is issuing this Intent to Issue for the reasons stated in the Intent to Issue.

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 (F.S.). 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, within 14 days of publication of this notice. 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, F.S.

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; (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 Notice. 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 publication of this notice 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, Florida Administrative Code.

The proposed amendment is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

2600 Blair Stone Road, Tallahassee, Florida 32399-2400
8407 Laurel Fair Circle, Tampa, Florida 33610

and the Polk County Public Works office located at:

4177 Ben Durrance Road, Bartow, Florida 33830

Any person may send written comments on the proposed action to Administrator, New Source Review Section, at the Department of Environmental Protection, Bureau of Air Regulation, Mail Station 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.



Department of Environmental Protection

DUVAL

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

Permit Number: AC37-216863B
Expiration Date: July 1, 1996
County: Mobile Operations
Project: 50 TPH Mobile Soil
Thermal Treatment Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-210, 212, 272, 275, 196, and 297; and 62-4, Florida Administrative Code (F.A.C.). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto and specifically described as follows:

Authorization to construct a 50 TPH mobile soil thermal treatment facility with air pollution controlled by an afterburner and baghouse. Major components of the facility are a contaminated soil feed bin, bin to dryer belt conveyor, a 30 MMBtu/hr dryer that is 7 feet in diameter by 34 feet long, a Tarmac Model P830HO 14 MMBtu/hr afterburner operating at 1500°F with approximately 1 second residence time, an air to air cooler, a Tarmac Model P1424BH baghouse, a pugmill, fuel (No. 2 fuel oil, propane, and natural gas) systems, and associated equipment. The facility is equipped with a stack (3.5 ft. diameter by 25 ft. high) that discharges approximately 24,487 acfm of flue gas at 375°F to the atmosphere.

This facility may operate in **Polk, Gulf, Okaloosa, Duval, Orange, Dade, Monroe, Wakulla and Escambia Counties**. The facility may operate in any other county within Florida after completing the public notice requirement and receiving Department authorization to operate in the county.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General Specific Conditions.

Attachments are listed below:

1. Application received July 22, 1992.
2. DER letter dated August 7, 1992.
3. Koogler's letter dated September 9, 1992.
4. DER letter dated September 30, 1992.
5. Koogler's letter dated October 5, 1992.
6. Koogler's letter dated November 19, 1992.
7. Koogler's letter dated March 17, 1995.
8. Koogler's letter dated April 6, 1995.
9. Sunbelt Resources, Inc.'s letter dated July 26, 1995.
10. Koogler's letter dated September 19, 1995.

Page 1 of 10

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

DRAFT

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

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 403.161, 403.727, or 403.859 through 403.861, F.S. 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), F.S., 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 F.S. and Department rules, unless specifically authorized by an order from the Department.

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.

DRAFT

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

GENERAL CONDITIONS:

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.

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 F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

DRAFT

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120, 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.
- 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.

DRAFT

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

GENERAL CONDITIONS:

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:

Miscellaneous

1. This permit replaces permit No. AC 37-216863A. A part of this permit is the attached (14) General Conditions. The following index of the specific conditions of this permit is provided for convenience.

Purpose of Specific Conditions	Specific Condition Numbers
Miscellaneous	1
Construction Requirements	2 - 5
Emission Restrictions	6 - 11
Operation Requirements	12 - 24
Compliance Requirements	25 - 28
Administrative Requirements	29 - 34

Construction Requirements

2. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.
3. The stack sampling facilities must comply with Rule 62-297.345, F.A.C.
4. The facility shall be equipped with a means to measure the pressure drop across the particulate matter air pollution control device and continuous emissions monitors and recorders for hot zone temperature and carbon monoxide concentration, (Rule 62-296.415(1)(c), F.A.C.).
5. The facility shall be equipped with instruments to measure the process feed rate of contaminated soil to the dryer.

Emission Restrictions

6. Particulate matter emissions shall not exceed any of the following limits (Based on data in the application and, Rule 62-296.415(2)(b), F.A.C.):

DRAFT

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

SPECIFIC CONDITIONS:

- (A) 0.04 grains per dry standard cubic foot.
 - (B) 3.9 pounds per hour
 - (C) 8.6 tons in any 12 consecutive month period based on 4,400 hours/year operation time.
7. Carbon monoxide emissions shall not exceed 100 parts per million by volume, dry, during any 60 consecutive minute period (Rule 62-296.415(1)(b), F.A.C.).
8. Visible emissions from the stack shall not exceed 5 percent opacity (Rule 62-296.415(2)(a), F.A.C.).
9. Reasonable precautions shall be taken to minimize uncontrolled particulate matter emissions (Rule 62-296.310, F.A.C.). These provisions are applicable to any source, including vehicular movement, transportation of materials, and industrial related activities such as loading, unloading, storing, and handling. Before and after thermal soil treatment is accomplished, unconfined emissions of particulate matter from the soil shall be controlled by the application of water and/or containment (Rule 62-296.415(3), F.A.C.).
10. Operation of this facility shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor (Rule 62-296.320, F.A.C.).
11. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local regulations.

Operation Requirements

12. In case of excess emissions resulting from a malfunction, the permittee shall notify the Department's District office and the Bureau of Air Regulation (BAR) within 1 working day of the cause and duration of the upset. If requested, the permittee shall submit a full written report on the malfunction. (Rule 62-210.700, F.A.C.).
13. The facility shall only treat petroleum contaminated soil as defined in Rule 62-775, F.A.C. (Rule 62-296.415, F.A.C.).
14. This facility shall not treat PCB contaminated soil.

DRAFT

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

15. The input rate of petroleum contaminated soil to the facility shall not exceed 50 tons per hour. Material entering the kiln shall not be larger than 2 inches in diameter. The permittee shall have the means of determining feed or production rates of the facility on site.
16. Untreated soil removed from the ground at the contaminated site shall be stored under a waterproof cover and on an impermeable surface.
17. The unit shall not be operated at a location or in a manner that creates a nuisance. The unit shall observe any local noise ordinances.
18. This unit shall be allowed to operate 24 hours per day, 7 days per week, 52 weeks per year, but not more than 4,400 hours per year in Florida.
19. The input of petroleum contaminants in the soil into the facility shall not exceed 500 pounds per hour, daily average (data per application).
20. The dryer shall use virgin No. 2 fuel oil, natural gas, propane or LPG fuels only. The sulfur content of this fuel shall not exceed 0.2 percent sulfur by weight. The fuel heat input to the dryer shall not exceed 30 million Btu per hour (approximately 214 GPH of No. 2 fuel).
21. The afterburner shall burn virgin No. 2 fuel oil, natural gas, or propane or LPG fuels only. The sulfur content of the virgin No. 2 fuel oil shall not exceed 0.2 per cent sulfur by weight (daily average). The fuel heat input to the afterburner shall not exceed 14.0 million Btu per hour (approximately 100 GPH No. 2 fuel oil, 140 GPH propane, or 14.0 mcfh of natural gas).
22. Contaminated soil shall not be treated by the facility unless the afterburner is operating at a minimum temperature of 1500°F and a retention time above 1.0 seconds (Rule 62-296.415(1)(a), F.A.C.).
23. All emission monitoring equipment shall be properly installed, calibrated, operated, and maintained in accordance with the manufacturer's requirements for that instrument.
24. Pressure drop across the particulate matter air pollution control device shall be recorded hourly and the temperature and carbon monoxide concentration of the hot zone shall be recorded continuously (Rule 62-296.415(1)(c), F.A.C.).

47,000,000 Btu/hr
17
1020 BTU
M.M.C.R.
1/10/96

0.043



PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

Compliance Requirements

25. The Bureau of Air Regulation, District and county environmental agency that the facility is operating in shall be notified in writing at least 15 days in advance of any formal compliance test to be conducted on this facility. The notification shall give the date, time, place, and contact person for the test (Rule 62-297.340(1)(i), F.A.C.).

26. This facility shall be tested (EPA test methods are specified in 40 CFR 60, Appendix A, revised July 1, 1992) within 30 days of placing it in service for and annually thereafter for:

- (A) Particulate matter (PM) emissions by EPA Methods 1, 2, 3, 4, and 5.
- (B) Visible emissions by EPA Method 9.
- (C) Carbon monoxide (CO) emissions by averaging each hour of the readings from the CO continuous emission monitor during the PM test periods.
- (D) Afterburner temperature by averaging each hour of the temperature readings from the continuous temperature monitor during the PM test period.
- (E) Afterburner residence time using the test data collected by EPA Methods 1 and 2.
- (F) Fuel oil sulfur limits based on analysis referenced in 40 CFR 60.17 or other methods after Department approval. A certified analysis by the fuel oil supplier may be acceptable.
- (G) Contaminated soil analysis for volatile organic aromatics (VOA), total recoverable petroleum hydrocarbons (TRPH), polynuclear aromatic hydrocarbons (PAH), volatile organic halocarbons (VOH), and metals as required by Rule 62-775.410, F.A.C.

27. Testing of emissions shall be conducted with the emission unit operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then emission units may be tested at less than 90 percent of the maximum operating rate allowed by the permit. In this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing

DRAFT

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

to regain the permitted capacity in the permit. Compliance tests results shall be submitted to the Bureau of Air Regulation within 45 days of the test.

28. When the Department, after investigation, has good reason to believe that any applicable emission standard or condition of this permit is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the plant and to provide a report on the results of said tests to the Department, (Rule 62-297.340(2), F.A.C.).

Administrative Requirements

29. The permittee for a mobile unit shall notify the Bureau of Air Regulation, local government (city and/or county), and the Department District office by registered mail at least 7 days prior to moving to a new operating site. The notification with DEP Form 62-210.900(3), F.A.C., shall provide 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. A county permit may be required prior to relocation of the unit to a new site. The Department or county may notify the permittee of new restrictions for the facility that will apply while it is operating at this work site (Rule 62-210.900, F.A.C.).

30. The permittee shall maintain a daily log that shows the date, location, operation time, pressure drop across the PM control device, processing rate, type and quantity of fuel consumption in the dryer and afterburner, and operation problems. These records shall be maintained for a minimum of 3 years.

31. The permittee shall maintain a file of all measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements, all continuous monitoring system performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on these systems or devices, all soil analysis required by Rule 62-775, F.A.C., and all other information required by rule or this permit, recorded in a permanent form suitable for inspection. The file shall be retained for at least 3 years following the date of such measurements, maintenance, reports, and records.

32. The permittee shall submit to Bureau of Air Regulation each calendar year, on or before March 1, an annual operation report for this facility for the preceding calendar year containing at least the following information pursuant to Subsection 403.061(13), F.S.:

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

- (A) Annual amount of material and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Annual hours of operation.
- (D) Any changes in the information contained in the permit.
- (E) All compliance test reports for the preceding year.
- (F) Temperature and CO exceedance reports for the year.

33. The permittee, for good cause, may request that this construction permit be extended. Such request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (Rule 62-4.090, F.A.C.).

34. An application for an operation permit must be submitted to the Bureau of Air Regulation 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 (Rule 62-4.220, F.A.C.).

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Howard L. Rhodes, Director
Division of Air Resources
Management



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

June 19, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Jamison:

Re: Amendment of Construction Permit No. AC37-216863B

The Department has reviewed Koogler & Associate's May 31 letter requesting a 2 year extension of the expiration date of the permit for your mobile soil thermal treatment facility permit that is referenced above. The additional time is needed to obtain a soil reclamation job in Florida, complete the tests required by the construction permit, and apply for a permit to operate. The Department is granting a 1 year extension. The expiration date of permit No. AC37-216863B is changed from July 1, 1996 to July 1, 1997.

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, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Blvd., Tallahassee, Florida 32399-3000. 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 publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. 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, F.S.

The Petition shall contain the following information;

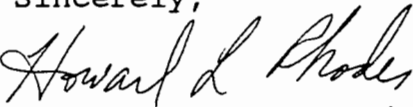
(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

Mr. Bob Jamison
Page Two
June 19, 1996

- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (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/request 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 60Q-2.010, F.A.C.

A copy of this letter shall be filed with the referenced permit and shall become a part of that permit.

Sincerely,

Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/wh/t

Enclosure: Koogler & Assoc. May 31, 1996 letter.

Mr. Bob Jamison
Page Three
June 19, 1996

CERTIFICATE OF SERVICE

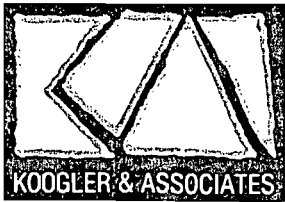
The undersigned duly designated deputy clerk hereby certifies that all copies of this INTENT TO ISSUE PERMIT AMENDMENT were mailed before the close of business on 6-21-96 to the listed persons.

Clerk Stamp

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

Kerl Jober 6-21-96
Clerk Date

cc: District Air Program Administrators
County Air Program Administrators
Mark Hagmann, Koogler & Associates



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

RECEIVED

JUN 4 1996

BUREAU OF
AIR REGULATION

KA532-96-01
May 31, 1996

Willard Hanks
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Sunbelt Resources, Inc. (AC37-216863B)
Mobile Soil Remediation Unit
Extension for Air Construction Permit

Dear Mr. Hanks:

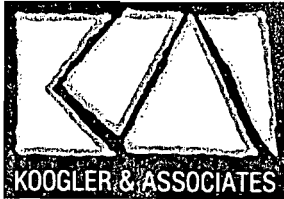
This is a request to extend construction permit No. AC37-216863B until July 1, 1998. The additional time will allow Sunbelt Resources to obtain a job in Florida, conduct the required tests, and submit a test report to the Bureau of Air Regulation.

It has been determined necessary to withdraw the air operation permit application at this time. We are requesting all appropriate fees be returned to Sunbelt Resources, Inc. Please retain \$50.00 as the appropriate fee for requesting an extension of construction permit No. AC37-316863B.

If you have any questions, please feel free to contact me. Thank you for your consideration and assistance in this matter.

Sincerely,

Mark A. Hagmann
KOOGLER & ASSOCIATES



KOOGLER & ASSOCIATES
 ENVIRONMENTAL SERVICES
 4014 NW THIRTEENTH STREET
 GAINESVILLE, FLORIDA 32609
 904/377-5822 • FAX 377-7158

RECEIVED

JUN 4 1996

BUREAU OF
 AIR REGULATION

KA532-96-01
 May 31, 1996

Willard Hanks
 Florida Department of Environmental Protection
 Twin Towers Office Building
 2600 Blair Stone Road
 Tallahassee, Florida 32399-2400

Subject: Sunbelt Resources, Inc. (AC37-216863B)
 Mobile Soil Remediation Unit
 Extension for Air Construction Permit

Dear Mr. Hanks:

This is a request to extend construction permit No. AC37-216863B until July 1, 1998. The additional time will allow Sunbelt Resources to obtain a job in Florida, conduct the required tests, and submit a test report to the Bureau of Air Regulation.

It has been determined necessary to withdraw the air operation permit application at this time. We are requesting all appropriate fees be returned to Sunbelt Resources, Inc. Please retain \$50.00 as the appropriate fee for requesting an extension of construction permit No. AC37-316863B.

If you have any questions, please feel free to contact me. Thank you for your consideration and assistance in this matter.

Sincerely,

Mark A. Hagmann
 Mark A. Hagmann
 KOOGLER & ASSOCIATES

*Willard -
 IS the fee
 situation OK?*

*anyone else
 need a copy?*

KJ

6-11-96

Willard's
Unit ARMS
11/27/95

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT AMENDMENT

In the matter of an
Application for Permit Amendment by:

DEP File No. AC 37-216863B
Mobile Unit

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

Enclosed is amended permit No. AC 37-216863B for your mobile soil thermal treatment. The amendment authorizes operation in Polk County. This permit amendment is issued pursuant to Section 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 14 days from the date this Notice is filed with the Clerk of the Department.



Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

C. H. Fancy

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **NOTICE OF PERMIT AMENDMENT** and all copies were mailed by certified mail before the close of business on 11-27-95 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT

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

Lynn J. Baker
Clerk

11-27-95
Date

Copies furnished to:

District Air Program Administrators
County Air Program Administrators
Dr. John Koogler, P.E.

Final Determination
Permit Amendment

Sunbelt Resources, Inc.
Tuscaloosa, Alabama

Mobile Soils Thermal Treatment Facility
Permit No. AC 37-216863B

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

November 22, 1995

Final Determination
Permit Amendment
Sunbelt Resources, Inc.
AC 37-216863A

The Intent to Issue an air construction permit amendment to allow Sunbelt Resources, Inc. of Tuscaloosa, Alabama to operate their mobile soil thermal treatment facility in Polk County was distributed on October 24, 1995. The Notice of Intent was published in the Polk County Democrat on October 30, 1995.

Copies of the proposed permit amendment were available for public inspection at the Polk County Public Works office in Bartow and the Department's offices in Tampa and Tallahassee.

No comments were submitted on the Department's intent to amend the permit. The final action of the Department will be to issue the amended permit as proposed.



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

Permit Number: AC37-216863B
Expiration Date: July 1, 1996
County: Mobile Operations
Project: 50 TPH Mobile Soil
Thermal Treatment Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-210, 212, 272, 275, 196, and 297; and 62-4, Florida Administrative Code (F.A.C.). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto and specifically described as follows:

Authorization to construct a 50 TPH mobile soil thermal treatment facility with air pollution controlled by an afterburner and baghouse. Major components of the facility are a contaminated soil feed bin, bin to dryer belt conveyor, a 30 MMBtu/hr dryer that is 7 feet in diameter by 34 feet long, a Tarmac Model P830HO 14 MMBtu/hr afterburner operating at 1500°F with approximately 1 second residence time, an air to air cooler, a Tarmac Model P1424BH baghouse, a pugmill, fuel (No. 2 fuel oil, propane, and natural gas) systems, and associated equipment. The facility is equipped with a stack (3.5 ft. diameter by 25 ft. high) that discharges approximately 24,487 acfm of flue gas at 375°F to the atmosphere.

This facility may operate in **Polk, Gulf, Okaloosa, Duval, Orange, Dade, Monroe, Wakulla** and **Escambia Counties**. The facility may operate in any other county within Florida after completing the public notice requirement and receiving Department authorization to operate in the county.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General Specific Conditions.

Attachments are listed below:

1. Application received July 22, 1992.
2. DER letter dated August 7, 1992.
3. Koogler's letter dated September 9, 1992.
4. DER letter dated September 30, 1992.
5. Koogler's letter dated October 5, 1992.
6. Koogler's letter dated November 19, 1992.
7. Koogler's letter dated March 17, 1995.
8. Koogler's letter dated April 6, 1995.
9. Sunbelt Resources, Inc.'s letter dated July 26, 1995.
10. Koogler's letter dated September 19, 1995.

Page 1 of 10

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

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

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 403.161, 403.727, or 403.859 through 403.861, F.S. 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), F.S., 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 F.S. and Department rules, unless specifically authorized by an order from the Department.

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.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

GENERAL CONDITIONS:

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.

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 F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120, 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.
- 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.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

GENERAL CONDITIONS:

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:

Miscellaneous

1. This permit replaces permit No. AC 37-216863A. A part of this permit is the attached (14) General Conditions. The following index of the specific conditions of this permit is provided for convenience.

Purpose of Specific Conditions	Specific Condition Numbers
Miscellaneous	1
Construction Requirements	2 - 5
Emission Restrictions	6 - 11
Operation Requirements	12 - 24
Compliance Requirements	25 - 28
Administrative Requirements	29 - 34

Construction Requirements

2. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.

3. The stack sampling facilities must comply with Rule 62-297.345, F.A.C.

4. The facility shall be equipped with a means to measure the pressure drop across the particulate matter air pollution control device and continuous emissions monitors and recorders for hot zone temperature and carbon monoxide concentration, (Rule 62-296.415(1)(c), F.A.C.).

5. The facility shall be equipped with instruments to measure the process feed rate of contaminated soil to the dryer.

Emission Restrictions

6. Particulate matter emissions shall not exceed any of the following limits (Based on data in the application and, Rule 62-296.415(2)(b), F.A.C.):

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

SPECIFIC CONDITIONS:

- (A) 0.04 grains per dry standard cubic foot.
 - (B) 3.9 pounds per hour
 - (C) 8.6 tons in any 12 consecutive month period based on 4,400 hours/year operation time.
7. Carbon monoxide emissions shall not exceed 100 parts per million by volume, dry, during any 60 consecutive minute period (Rule 62-296.415(1)(b), F.A.C.).
8. Visible emissions from the stack shall not exceed 5 percent opacity (Rule 62-296.415(2)(a), F.A.C.).
9. Reasonable precautions shall be taken to minimize uncontrolled particulate matter emissions (Rule 62-296.310, F.A.C.). These provisions are applicable to any source, including vehicular movement, transportation of materials, and industrial related activities such as loading, unloading, storing, and handling. Before and after thermal soil treatment is accomplished, unconfined emissions of particulate matter from the soil shall be controlled by the application of water and/or containment (Rule 62-296.415(3), F.A.C.).
10. Operation of this facility shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor (Rule 62-296.320, F.A.C.).
11. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local regulations.

Operation Requirements

12. In case of excess emissions resulting from a malfunction, the permittee shall notify the Department's District office and the Bureau of Air Regulation (BAR) within 1 working day of the cause and duration of the upset. If requested, the permittee shall submit a full written report on the malfunction. (Rule 62-210.700, F.A.C.).
13. The facility shall only treat petroleum contaminated soil as defined in Rule 62-775, F.A.C. (Rule 62-296.415, F.A.C.).
14. This facility shall not treat PCB contaminated soil.

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

15. The input rate of petroleum contaminated soil to the facility shall not exceed 50 tons per hour. Material entering the kiln shall not be larger than 2 inches in diameter. The permittee shall have the means of determining feed or production rates of the facility on site.
16. Untreated soil removed from the ground at the contaminated site shall be stored under a waterproof cover and on an impermeable surface.
17. The unit shall not be operated at a location or in a manner that creates a nuisance. The unit shall observe any local noise ordinances.
18. This unit shall be allowed to operate 24 hours per day, 7 days per week, 52 weeks per year, but not more than 4,400 hours per year in Florida.
19. The input of petroleum contaminants in the soil into the facility shall not exceed 500 pounds per hour, daily average (data per application).
20. The dryer shall use virgin No. 2 fuel oil, natural gas, propane or LPG fuels only. The sulfur content of this fuel shall not exceed 0.2 percent sulfur by weight. The fuel heat input to the dryer shall not exceed 30 million Btu per hour (approximately 214 GPH of No. 2 fuel).
21. The afterburner shall burn virgin No. 2 fuel oil, natural gas, or propane or LPG fuels only. The sulfur content of the virgin No. 2 fuel oil shall not exceed 0.2 per cent sulfur by weight (daily average). The fuel heat input to the afterburner shall not exceed 14.0 million Btu per hour (approximately 100 GPH No. 2 fuel oil, 140 GPH propane, or 14.0 mcfh of natural gas).
22. Contaminated soil shall not be treated by the facility unless the afterburner is operating at a minimum temperature of 1500°F and a retention time above 1.0 seconds (Rule 62-296.415(1)(a), F.A.C.).
23. All emission monitoring equipment shall be properly installed, calibrated, operated, and maintained in accordance with the manufacturer's requirements for that instrument.
24. Pressure drop across the particulate matter air pollution control device shall be recorded hourly and the temperature and carbon monoxide concentration of the hot zone shall be recorded continuously (Rule 62-296.415(1)(c), F.A.C.).

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

Compliance Requirements

25. The Bureau of Air Regulation, District and county environmental agency that the facility is operating in shall be notified in writing at least 15 days in advance of any formal compliance test to be conducted on this facility. The notification shall give the date, time, place, and contact person for the test (Rule 62-297.340(1)(i), F.A.C.).

26. This facility shall be tested (EPA test methods are specified in 40 CFR 60, Appendix A, revised July 1, 1992) within 30 days of placing it in service for and annually thereafter for:

- (A) Particulate matter (PM) emissions by EPA Methods 1, 2, 3, 4, and 5.
- (B) Visible emissions by EPA Method 9.
- (C) Carbon monoxide (CO) emissions by averaging each hour of the readings from the CO continuous emission monitor during the PM test periods.
- (D) Afterburner temperature by averaging each hour of the temperature readings from the continuous temperature monitor during the PM test period.
- (E) Afterburner residence time using the test data collected by EPA Methods 1 and 2.
- (F) Fuel oil sulfur limits based on analysis referenced in 40 CFR 60.17 or other methods after Department approval. A certified analysis by the fuel oil supplier may be acceptable.
- (G) Contaminated soil analysis for volatile organic aromatics (VOA), total recoverable petroleum hydrocarbons (TRPH), polynuclear aromatic hydrocarbons (PAH), volatile organic halocarbons (VOH), and metals as required by Rule 62-775.410, F.A.C.

27. Testing of emissions shall be conducted with the emission unit operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then emission units may be tested at less than 90 percent of the maximum operating rate allowed by the permit. In this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863B
Expiration Date: July 1, 1996

to regain the permitted capacity in the permit. Compliance tests results shall be submitted to the Bureau of Air Regulation within 45 days of the test.

28. When the Department, after investigation, has good reason to believe that any applicable emission standard or condition of this permit is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the plant and to provide a report on the results of said tests to the Department, (Rule 62-297.340(2), F.A.C.).

Administrative Requirements

29. The permittee for a mobile unit shall notify the Bureau of Air Regulation, local government (city and/or county), and the Department District office by registered mail at least 7 days prior to moving to a new operating site. The notification with DEP Form 62-210.900(3), F.A.C., shall provide 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. A county permit may be required prior to relocation of the unit to a new site. The Department or county may notify the permittee of new restrictions for the facility that will apply while it is operating at this work site (Rule 62-210.900, F.A.C.).

30. The permittee shall maintain a daily log that shows the date, location, operation time, pressure drop across the PM control device, processing rate, type and quantity of fuel consumption in the dryer and afterburner, and operation problems. These records shall be maintained for a minimum of 3 years.

31. The permittee shall maintain a file of all measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements, all continuous monitoring system performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on these systems or devices, all soil analysis required by Rule 62-775, F.A.C., and all other information required by rule or this permit, recorded in a permanent form suitable for inspection. The file shall be retained for at least 3 years following the date of such measurements, maintenance, reports, and records.

32. The permittee shall submit to Bureau of Air Regulation each calendar year, on or before March 1, an annual operation report for this facility for the preceding calendar year containing at least the following information pursuant to Subsection 403.061(13), F.S.:

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

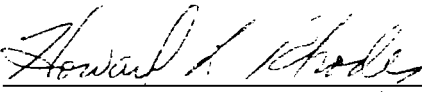
Permit Number: AC37-216863B
Expiration Date: July 1, 1996

- (A) Annual amount of material and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Annual hours of operation.
- (D) Any changes in the information contained in the permit.
- (E) All compliance test reports for the preceding year.
- (F) Temperature and CO exceedance reports for the year.

33. The permittee, for good cause, may request that this construction permit be extended. Such request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (Rule 62-4.090, F.A.C.).

34. An application for an operation permit must be submitted to the Bureau of Air Regulation 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 (Rule 62-4.220, F.A.C.).

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


Howard L. Rhodes, Director
Division of Air Resources
Management

*Request to
operate in
Polk Co.
received
\$250.00 fee*

Sept 19, 1995

PN Oct 24, 1995

PN Nov 3, 1995 (Nov 2, 11/13/95)

FD. Nov 27, 1995



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF PERMIT AMENDMENT

In the matter of an
Application for Permit Amendment by:

DEP File No. AC 37-216863A
Mobile Unit

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

Enclosed is amended permit No. AC 37-216863A for your mobile soil thermal treatment. The amendment authorizes operation in Dade, Orange, Monroe and Wakulla Counties. It requires a county permit when operating in Dade County and allows the use of natural gas and propane (LPG) fuels. This permit amendment is issued pursuant to Section 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 14 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT AMENDMENT and all copies were mailed by certified mail before the close of business on 9-11-95 to the listed persons.

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

Kara Joben 9-11-95
Clerk Date

Copies furnished to:

District Air Program Administrators
County Air Program Administrators
Dr. John Koogler, P.E.

Final Determination
Permit Amendment

Sunbelt Resources, Inc.
Tuscaloosa, Alabama

Mobile Soils Thermal Treatment Facility
Permit No. AC 37-216863A

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

September 1, 1995

Final Determination
Permit Amendment
Sunbelt Resources, Inc.
AC 37-216863A

The Intent to Issue an air construction permit amendment to allow Sunbelt Resources, Inc. of Tuscaloosa, Alabama to operate their mobile soil thermal treatment facility in Dade, Monroe, Orange, and Wakulla Counties was distributed on April 17, 1995. The Notice of Intent was published in the following newspapers on the date noted:

<u>Newspaper</u>	<u>Date</u>	<u>County</u>
Miami Herald	July 12, 1995	Dade
Orlando Sentinel	July 11, 1995	Orange
The Citizen	July 12, 1995	Monroe
The Wakulla	July 13, 1995	Wakulla
Florida Times-Union	July 10, 1995	Duval

Copies of the proposed permit amendment were available for public inspection in all District and approved county air program offices. Comments on the Department's Intent were submitted by Dade County Department of Environmental Resources Management (DERM) and Sunbelt Resources, Inc.

DERM indicated that the unit would need a county operation permit prior to being used in Dade County. Until the effective date for delegating of state air permitting authority to DERM, a separate county permit will be required in the county. Specific Condition No. 29 of the permit is amended to require the permittee to obtain a county permit where applicable.

Sunbelt Resources, Inc. requested permission to burn clean fuels, natural gas and propane, in this unit. This request is acceptable to the Department. Specific Condition No. 20 of the permit is revised to authorize the burning of these fuels.

The construction permit is also being extended to allow the permittee time to gather the information required to complete the application for permit to operate this unit (File No. AO 37-253489) and for the Department to process the application.



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

Permit Number: AC37-216863A
Expiration Date: July 1, 1996
County: Mobile Operations
Project: 50 TPH Mobile Soil
Thermal Treatment Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-210, 212, 272, 275, 196, and 297; and 62-4, Florida Administrative Code (F.A.C.). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto and specifically described as follows:

Authorization to construct a 50 TPH mobile soil thermal treatment facility with air pollution controlled by an afterburner and baghouse. Major components of the facility are a contaminated soil feed bin, bin to dryer belt conveyor, a 30 MMBtu/hr dryer that is 7 feet in diameter by 34 feet long, a Tarmac Model P830HO 14 MMBtu/hr afterburner operating at 1500°F with approximately 1 second residence time, an air to air cooler, a Tarmac Model P1424BH baghouse, a pugmill, fuel (No. 2 fuel oil, propane, and natural gas) systems, and associated equipment. The facility is equipped with a stack (3.5 ft. diameter by 25 ft. high) that discharges approximately 24,487 acfm of flue gas at 375°F to the atmosphere.

This facility may operate in **Gulf, Okaloosa, Duval, Orange, Dade, Monroe, Wakulla and Escambia Counties**. The facility may operate in any other county within Florida after completing the public notice requirement and receiving Department authorization to operate in the county.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General Specific Conditions.

Attachments are listed below:

1. Application received July 22, 1992.
2. DER letter dated August 7, 1992.
3. Koogler's letter dated September 9, 1992.
4. DER letter dated September 30, 1992.
5. Koogler's letter dated October 5, 1992.
6. Koogler's letter dated November 19, 1992.
7. Koogler's letter dated March 17, 1995.
8. Koogler's letter dated April 6, 1995.
9. Sunbelt Resources, Inc.'s letter dated July 26, 1995

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863A
Expiration Date: July 1, 1996

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 403.161, 403.727, or 403.859 through 403.861, F.S. 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), F.S., 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 F.S. and Department rules, unless specifically authorized by an order from the Department.

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.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863A
Expiration Date: July 1, 1996

GENERAL CONDITIONS:

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.

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 F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863A
Expiration Date: July 1, 1996

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120, 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.
- 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.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863A
Expiration Date: July 1, 1996

GENERAL CONDITIONS:

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:

Miscellaneous

1. This permit replaces permit No. AC 37-216863. A part of this permit is the attached (14) General Conditions. The following index of the specific conditions of this permit is provided for convenience.

Purpose of Specific Conditions	Specific Condition Numbers
Miscellaneous	1
Construction Requirements	2 - 5
Emission Restrictions	6 - 11
Operation Requirements	12 - 24
Compliance Requirements	25 - 28
Administrative Requirements	29 - 34

Construction Requirements

2. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.

3. The stack sampling facilities must comply with Rule 62-297.345, F.A.C.

4. The facility shall be equipped with a means to measure the pressure drop across the particulate matter air pollution control device and continuous emissions monitors and recorders for hot zone temperature and carbon monoxide concentration, (Rule 62-296.415(1)(c), F.A.C.).

5. The facility shall be equipped with instruments to measure the process feed rate of contaminated soil to the dryer.

Emission Restrictions

6. Particulate matter emissions shall not exceed any of the following limits (Based on data in the application and, Rule 62-296.415(2)(b), F.A.C.):

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863A
Expiration Date: July 1, 1996

SPECIFIC CONDITIONS:

- (A) 0.04 grains per dry standard cubic foot.
 - (B) 3.9 pounds per hour
 - (C) 8.6 tons in any 12 consecutive month period based on 4,400 hours/year operation time.
7. Carbon monoxide emissions shall not exceed 100 parts per million by volume, dry, during any 60 consecutive minute period (Rule 62-296.415(1)(b), F.A.C.).
8. Visible emissions from the stack shall not exceed 5 percent opacity (Rule 62-296.415(2)(a), F.A.C.).
9. Reasonable precautions shall be taken to minimize uncontrolled particulate matter emissions (Rule 62-296.310, F.A.C.). These provisions are applicable to any source, including vehicular movement, transportation of materials, and industrial related activities such as loading, unloading, storing, and handling. Before and after thermal soil treatment is accomplished, unconfined emissions of particulate matter from the soil shall be controlled by the application of water and/or containment (Rule 62-296.415(3), F.A.C.).
10. Operation of this facility shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor (Rule 62-296.320, F.A.C.).
11. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local regulations.

Operation Requirements

12. In case of excess emissions resulting from a malfunction, the permittee shall notify the Department's District office and the Bureau of Air Regulation (BAR) within 1 working day of the cause and duration of the upset. If requested, the permittee shall submit a full written report on the malfunction. (Rule 62-210.700, F.A.C.).
13. The facility shall only treat petroleum contaminated soil as defined in Rule 62-775, F.A.C. (Rule 62-296.415, F.A.C.).
14. This facility shall not treat PCB contaminated soil.

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863A
Expiration Date: July 1, 1996

15. The input rate of petroleum contaminated soil to the facility shall not exceed 50 tons per hour. Material entering the kiln shall not be larger than 2 inches in diameter. The permittee shall have the means of determining feed or production rates of the facility on site.
16. Untreated soil removed from the ground at the contaminated site shall be stored under a waterproof cover and on an impermeable surface.
17. The unit shall not be operated at a location or in a manner that creates a nuisance. The unit shall observe any local noise ordinances.
18. This unit shall be allowed to operate 24 hours per day, 7 days per week, 52 weeks per year, but not more than 4,400 hours per year in Florida.
19. The input of petroleum contaminants in the soil into the facility shall not exceed 500 pounds per hour, daily average (data per application).
20. The dryer shall use virgin No. 2 fuel oil, natural gas, propane or LPG fuels only. The sulfur content of this fuel shall not exceed 0.2 percent sulfur by weight. The fuel heat input to the dryer shall not exceed 30 million Btu per hour (approximately 214 GPH of No. 2 fuel).
21. The afterburner shall burn virgin No. 2 fuel oil, natural gas, or propane or LPG fuels only. The sulfur content of the virgin No. 2 fuel oil shall not exceed 0.2 per cent sulfur by weight (daily average). The fuel heat input to the afterburner shall not exceed 14.0 million Btu per hour (approximately 100 GPH No. 2 fuel oil, 140 GPH propane, or 14.0 mcfh of natural gas).
22. Contaminated soil shall not be treated by the facility unless the afterburner is operating at a minimum temperature of 1500°F and a retention time above 1.0 seconds (Rule 62-296.415(1)(a), F.A.C.).
23. All emission monitoring equipment shall be properly installed, calibrated, operated, and maintained in accordance with the manufacturer's requirements for that instrument.
24. Pressure drop across the particulate matter air pollution control device shall be recorded hourly and the temperature and carbon monoxide concentration of the hot zone shall be recorded continuously (Rule 62-296.415(1)(c), F.A.C.).

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863A
Expiration Date: July 1, 1996

Compliance Requirements

25. The Bureau of Air Regulation, District and county environmental agency that the facility is operating in shall be notified in writing at least 15 days in advance of any formal compliance test to be conducted on this facility. The notification shall give the date, time, place, and contact person for the test (Rule 62-297.340(1)(i), F.A.C.).

26. This facility shall be tested (EPA test methods are specified in 40 CFR 60, Appendix A, revised July 1, 1992) within 30 days of placing it in service for and annually thereafter for:

- (A) Particulate matter (PM) emissions by EPA Methods 1, 2, 3, 4, and 5.
- (B) Visible emissions by EPA Method 9.
- (C) Carbon monoxide (CO) emissions by averaging each hour of the readings from the CO continuous emission monitor during the PM test periods.
- (D) Afterburner temperature by averaging each hour of the temperature readings from the continuous temperature monitor during the PM test period.
- (E) Afterburner residence time using the test data collected by EPA Methods 1 and 2.
- (F) Fuel oil sulfur limits based on analysis referenced in 40 CFR 60.17 or other methods after Department approval. A certified analysis by the fuel oil supplier may be acceptable.
- (G) Contaminated soil analysis for volatile organic aromatics (VOA), total recoverable petroleum hydrocarbons (TRPH), polynuclear aromatic hydrocarbons (PAH), volatile organic halocarbons (VOH), and metals as required by Rule 62-775.410, F.A.C.

27. Testing of emissions shall be conducted with the emission unit operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then emission units may be tested at less than 90 percent of the maximum operating rate allowed by the permit. In this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863A
Expiration Date: July 1, 1996

to regain the permitted capacity in the permit. Compliance tests results shall be submitted to the Bureau of Air Regulation within 45 days of the test.

28. When the Department, after investigation, has good reason to believe that any applicable emission standard or condition of this permit is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the plant and to provide a report on the results of said tests to the Department, (Rule 62-297.340(2), F.A.C.).

Administrative Requirements

29. The permittee for a mobile unit shall notify the Bureau of Air Regulation, local government (city and/or county), and the Department District office by registered mail at least 7 days prior to moving to a new operating site. The notification with DEP Form 62-210.900(3), F.A.C., shall provide 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. A county permit may be required prior to relocation of the unit to a new site. The Department or county may notify the permittee of new restrictions for the facility that will apply while it is operating at this work site (Rule 62-210.900, F.A.C.).

30. The permittee shall maintain a daily log that shows the date, location, operation time, pressure drop across the PM control device, processing rate, type and quantity of fuel consumption in the dryer and afterburner, and operation problems. These records shall be maintained for a minimum of 3 years.

31. The permittee shall maintain a file of all measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements, all continuous monitoring system performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on these systems or devices, all soil analysis required by Rule 62-775, F.A.C., and all other information required by rule or this permit, recorded in a permanent form suitable for inspection. The file shall be retained for at least 3 years following the date of such measurements, maintenance, reports, and records.

32. The permittee shall submit to Bureau of Air Regulation each calendar year, on or before March 1, an annual operation report for this facility for the preceding calendar year containing at least the following information pursuant to Subsection 403.061(13), F.S.:

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863A
Expiration Date: July 1, 1996

- (A) Annual amount of material and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Annual hours of operation.
- (D) Any changes in the information contained in the permit.
- (E) All compliance test reports for the preceding year.
- (F) Temperature and CO exceedance reports for the year.

33. The permittee, for good cause, may request that this construction permit be extended. Such request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (Rule 62-4.090, F.A.C.).

34. An application for an operation permit must be submitted to the Bureau of Air Regulation 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 (Rule 62-4.220, F.A.C.).

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Howard L. Rhodes, Director
Division of Air Resources
Management



SUNBELT
• Resources, Inc. •

RECEIVED
JUL 27 1995

5453 Jug Factory Road Tuscaloosa, Alabama 35405 (205) 758-3555 Air Permit No. (205) 349-4288

RECEIVED

JUL 31 1995

Bureau of
Air Regulation

July 26, 1995

Mr. Willard Hanks
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Hanks,

Sunbelt Resources, Inc. respectfully requests that Item #20 of Specific Conditions in our Permit No. AC37-216863A be amended to read as follows: "The dryer shall use virgin No. 2 fuel oil, natural gas, or propane only."

If you have any questions regarding this request, please do not hesitate to call.

Very Truly Yours,

Bob Jamison
Vice President

cc: Dr. John B. Koogler

BJ/dw

Check Sheet

Company Name: Sunbelt Resources, Inc.
Permit Number: AC 37-216863
PSD Number: _____
Permit Engineer: _____

Application:

- | | |
|--|--------------------------|
| <input checked="" type="checkbox"/> Initial Application | Cross References: |
| <input 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 checked="" type="checkbox"/> Other <i>Notice of Application</i> | |

Intent:

- Intent to Issue
 - Notice of Intent to Issue
 - Technical Evaluation
 - BACT or LAER 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 or LAER Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 14, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

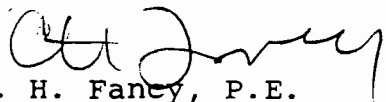
Mr. Bob Jamison, Vice President
Sunbelt Resources, Inc.
5453 Jug Factory Road
Tuscaloosa, Alabama 35405

Dear Mr. Jamison:

Enclosed for your action and publication, is a copy of the Intent to Issue an amended permit to Sunbelt Resources, Inc. When issued, the amendment will allow this mobile soil thermal treatment facility to operate in a total of six counties in Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. A. A. Linero of the Bureau of Air Regulation. If you have any questions regarding this matter, please write to me or call Willard Hanks at (904) 488-1344.

Sincerely,


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

CHF/wh/h

Enclosures

cc: District Air Program Administrators
County Air Program Administrators
Dr. John Koogler, P.E.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

DEP File No. AC 37-216863A

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

INTENT TO ISSUE

The Department of Environmental Protection hereby gives notice of its intent to amend a construction permit (copy attached) for the proposed project, as detailed in the file specified above, for the reasons stated below.

The applicant, Sunbelt Resources, Inc., applied on July 22, 1992, to the Department of Environmental Regulation for a permit to construct a 50 TPH mobile soil thermal treatment facility for operation within Florida.

The permit that was issued on December 23, 1992, restricted the facility to operating in Gulf, Okaloosa, and Escambia Counties. The permit allowed operation in other counties in Florida after completion of the public notice requirements. The permittee is now requesting and the Department is proposing to amend this construction permit to authorize operation in Gulf, Okaloosa, Duval, Orange, Monroe and Wakulla counties.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a construction permit amendment is required for the proposed action.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in each area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air

Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

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, F.S.. 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 publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. 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, F.S.

The Petition shall contain the following information;

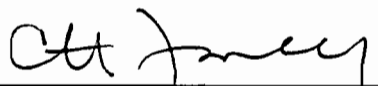
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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

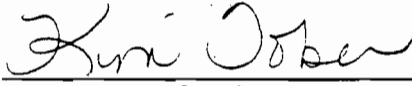

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
904-488-1344

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 4-17-95 to the listed persons.

Clerk Stamp

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


Clerk 4-17-95
Date

Copies furnished to:

cc: District Air Program Administrators
County Air Program Administrators
John Koogler, P.E.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO AMEND PERMIT

AC 37-216863A

The Department of Environmental Protection gives notice of its intent to issue an amended construction permit to Sunbelt Resources, Inc., 5453 Jug Factory Road, Tuscaloosa, Alabama 35405, for a 50 TPH mobile soil thermal treatment facility with air pollution controlled by a baghouse and afterburner. The amended permit will authorize operation in Gulf, Duval, Orange, Monroe, Escambia and Wakulla counties. The regulations did not require a Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination. The unit has the potential to emit 3.9 lbs/hr (8.6 TPY) particulate matter, 12.8 lbs/hr (28.2 TPY) sulfur dioxide, 6.3 lbs/hr (13.8 TPY) nitrogen oxides, 5.0 lbs/hr (11.0 TPY) volatile organic compounds, and 5.0 lbs/hr (11.0 TPY) carbon monoxide. These emissions will not cause a violation of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment. The Department is issuing this Intent to Issue for the reasons stated in the Intent to Issue.

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 (F.S.). 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, within 14 days of publication of this notice. 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, F.S.

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; (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 Notice. 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 publication of this notice 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, Florida Administrative Code.

The proposed amendment is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

2600 Blair Stone Road, Tallahassee, Florida 32399-2400
3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767
160 Governmental Center, Pensacola, Florida 32501-8218

and County offices located at:

421 West Church St., Suite 412, Jacksonville, Florida 32202-4111
2002 E. Michigan Ave., Orlando, Florida 32806

Any person may send written comments on the proposed action to Mr. A. A. Linero at the Department of Environmental Protection, Bureau of Air Regulation, Mail Station 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such request must be submitted within 14 days of this notice.



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

Permit Number: AC37-216863A
Expiration Date: Jan. 1, 1996
County: Mobile Operations
Project: 50 TPH Mobile Soil
Thermal Treatment Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-210, 212, 272, 275, 196, and 297; and 62-4, Florida Administrative Code (F.A.C.). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto and specifically described as follows:

Authorization to construct a 50 TPH mobile soil thermal treatment facility with air pollution controlled by an afterburner and baghouse. Major components of the facility are a contaminated soil feed bin, bin to dryer belt conveyor, a 30 MMBtu/hr dryer that is 7 feet in diameter by 34 feet long, a Tarmac Model P830HO 14 MMBtu/hr afterburner operating at 1600°F with approximately 1 second residence time, an air to air cooler, a Tarmac Model P1424BH baghouse, a pugmill, fuel (No. 2 fuel oil, propane, and natural gas) systems, and associated equipment. The facility is equipped with a stack (3.5 ft. diameter by 25 ft. high) that discharges approximately 24,487 acfm of flue gas at 375°F to the atmosphere.

This facility may operate in **Gulf, Okaloosa, Duval, Orange, Monroe, Wakulla** and **Escambia Counties**. The facility may operate in any other county within Florida after completing the public notice requirement and receiving Department authorization to operate in the county.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General Specific Conditions.

Attachments are listed below:

1. Application received July 22, 1992.
2. DER letter dated August 7, 1992.
3. Koogler's letter dated September 9, 1992.
4. DER letter dated September 30, 1992.
5. Koogler's letter dated October 5, 1992.
6. Koogler's letter dated November 19, 1992.
7. Koogler's letter dated March 17, 1995.
8. Koogler's letter dated April 6, 1995.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863A
Expiration Date: Jan. 1, 1996

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 403.161, 403.727, or 403.859 through 403.861, F.S. 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), F.S., 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 F.S. and Department rules, unless specifically authorized by an order from the Department.

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.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863A
Expiration Date: Jan. 1, 1996

GENERAL CONDITIONS:

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.

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 F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863A
Expiration Date: Jan. 1, 1996

GENERAL CONDITIONS:

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120, 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.
- 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.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863A
Expiration Date: Jan. 1, 1996

GENERAL CONDITIONS:

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:

Miscellaneous

1. This permit replaces permit No. AC 37-216863. A part of this permit is the attached (14) General Conditions. The following index of the specific conditions of this permit is provided for convenience.

Purpose of Specific Conditions	Specific Condition Numbers
Miscellaneous	1
Construction Requirements	2 - 5
Emission Restrictions	6 - 11
Operation Requirements	12 - 24
Compliance Requirements	25 - 28
Administrative Requirements	29 - 34

Construction Requirements

2. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.

3. The stack sampling facilities must comply with Rule 62-297.345, F.A.C.

4. The facility shall be equipped with a means to measure the pressure drop across the particulate matter air pollution control device and continuous emissions monitors and recorders for hot zone temperature and carbon monoxide concentration (Rule 62-296.415(1)(c), F.A.C.).

5. The facility shall be equipped with instruments to measure the process feed rate of contaminated soil to the dryer.

Emission Restrictions

6. Particulate matter emissions shall not exceed any of the following limits (Based on data in the application and Rule 62-296.415(2)(b), F.A.C.):

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863A
Expiration Date: Jan. 1, 1996

SPECIFIC CONDITIONS:

- (A) 0.04 grains per dry standard cubic foot.
 - (B) 3.9 pounds per hour
 - (C) 8.6 tons in any 12 consecutive month period based on 4,400 hours/year operation time.
7. Carbon monoxide emissions shall not exceed 100 parts per million by volume, dry, during any 60 consecutive minute period (Rule 62-296.415(1)(b), F.A.C.).
8. Visible emissions from the stack shall not exceed 5 percent opacity (Rule 62-296.415(2)(a), F.A.C.).
9. Reasonable precautions shall be taken to minimize uncontrolled particulate matter emissions (Rule 62-296.310, F.A.C.). These provisions are applicable to any source, including vehicular movement, transportation of materials, and industrial related activities such as loading, unloading, storing, and handling. Before and after thermal soil treatment is accomplished, unconfined emissions of particulate matter from the soil shall be controlled by the application of water and/or containment (Rule 62-296.415(3), F.A.C.).
10. Operation of this facility shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor (Rule 62-296.320, F.A.C.).
11. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 17-296 and 17-297, F.A.C., or any other requirements under federal, state, or local regulations.

Operation Requirements

12. In case of excess emissions resulting from a malfunction, the permittee shall notify the Department's District office and the Bureau of Air Regulation (BAR) within 1 working day of the cause and duration of the upset. If requested, the permittee shall submit a full written report on the malfunction. (Rule 62-210.700, F.A.C.).
13. The facility shall only treat petroleum contaminated soil as defined in Rule 62-775, F.A.C. (Rule 62-296.415).
14. This facility may not treat PCB contaminated soil.

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863A
Expiration Date: Jan. 1, 1996

15. The input rate of petroleum contaminated soil to the facility shall not exceed 50 tons per hour. Material entering the kiln shall not be larger than 2 inches in diameter. The permittee shall have the means of determining feed or production rates of the facility on site.
16. Untreated soil removed from the ground at the contaminated site shall be stored under a waterproof cover and on an impermeable surface.
17. The unit shall not be operated at a location or in a manner that creates a nuisance. The unit shall observe any local noise ordinances.
18. This unit shall be allowed to operate 24 hours per day, 7 days per week, 52 weeks per year, but not more than 4,400 hours per year.
19. The input of petroleum contaminants in the soil into the facility shall not exceed 500 pounds per hour, daily average (data per application).
20. The dryer shall use virgin No. 2 fuel only. The sulfur content of this fuel shall not exceed 0.2 percent sulfur by weight. The fuel heat input to the dryer shall not exceed 30 million Btu per hour (approximately 214 GPH of No. 2 fuel).
21. The afterburner shall burn virgin No. 2 fuel oil, natural gas, or propane only. The sulfur content of the virgin No. 2 fuel shall not exceed 0.2 per cent sulfur by weight (daily average). The fuel heat input to the afterburner shall not exceed 14.0 million Btu per hour (approximately 100 GPH No. 2 fuel oil, 140 GPH propane, or 14.0 mcfh of natural gas).
22. Contaminated soil shall not be treated by the facility unless the afterburner is operating at a minimum temperature of 1600°F and a retention time above 0.5 seconds (Rule 62-296.415(1)(a), F.A.C.).
23. All emission monitoring equipment shall be properly installed, calibrated, operated, and maintained in accordance with the manufacturer's requirements for that instrument.
24. Pressure drop across the particulate matter air pollution control device shall be recorded hourly and the temperature and carbon monoxide concentration of the hot zone shall be recorded continuously (Rule 62-296.415(1)(c), F.A.C.).

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863A
Expiration Date: Jan. 1, 1996

Compliance Requirements

25. The Bureau of Air Regulation, District and county environmental agency that the facility is operating in shall be notified in writing at least 15 days in advance of any formal compliance test to be conducted on this facility. The notification shall give the date, time, place, and contact person for the test (Rule 62-297.340(1)(i), F.A.C.).

26. This facility shall be tested (EPA test methods are specified in 40 CFR 60, Appendix A, revised July 1, 1992) within 30 days of placing it in service for and annually thereafter for:

- (A) Particulate matter (PM) emissions by EPA Methods 1, 2, 3, 4, and 5.
- (B) Visible emissions by EPA Method 9.
- (C) Carbon monoxide (CO) emissions by averaging each hour of the readings from the CO continuous emission monitor during the PM test periods.
- (D) Afterburner temperature by averaging each hour of the temperature readings from the continuous temperature monitor during the PM test period.
- (E) Afterburner residence time using the test data collected by EPA Methods 1 and 2.
- (F) Fuel oil sulfur limits based on analysis referenced in 40 CFR 60.17 or other methods after Department approval. A certified analysis by the fuel oil supplier may be acceptable.
- (G) Contaminated soil analysis for volatile organic aromatics (VOA), total recoverable petroleum hydrocarbons (TRPH), polynuclear aromatic hydrocarbons (PAH), volatile organic halocarbons (VOH), and metals as required by Rule 62-775.410, F.A.C.

27. Testing of emissions shall be conducted with the emission unit operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then emission units may be tested at less than 90 percent of the maximum operating rate allowed by the permit. In this case, subsequent emission unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emission unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863A
Expiration Date: Jan. 1, 1996

to regain the permitted capacity in the permit. Compliance tests results shall be submitted to the Bureau of Air Regulation within 45 days of the test.

28. When the Department, after investigation, has good reason to believe that any applicable emission standard or condition of this permit is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the plant and to provide a report on the results of said tests to the Department (Rule 62-297.340(2), F.A.C.).

Administrative Requirements

29. The permittee for a mobile unit shall notify the Bureau of Air Regulation, local government (city and/or county), and the Department District office by registered mail at least 7 days prior to moving to a new operating site. The notification with DEP Form 62-210.900(3), F.A.C., shall provide 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. The Department may notify the permittee of new restrictions for the facility that will apply while it is operating at this work site (Rule 62-210.900, F.A.C.).

30. The permittee shall maintain a daily log that shows the date, location, operation time, pressure drop across the PM control device, processing rate, type and quantity of fuel consumption in the dryer and afterburner, and operation problems. These records shall be maintained for a minimum of 3 years.

31. The permittee shall maintain a file of all measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements, all continuous monitoring system performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on these systems or devices, all soil analysis required by Rule 62-775, F.A.C., and all other information required by rule or this permit, recorded in a permanent form suitable for inspection. The file shall be retained for at least 3 years following the date of such measurements, maintenance, reports, and records.

32. The permittee shall submit to Bureau of Air Regulation each calendar year, on or before March 1, an annual operation report for this facility for the preceding calendar year containing at least the following information pursuant to Subsection 403.061(13), F.S.:

PERMITTEE:
Sunbelt Resources, Inc.
SPECIFIC CONDITIONS:

Permit Number: AC37-216863A
Expiration Date: Jan. 1, 1996

- (A) Annual amount of material and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Annual hours of operation.
- (D) Any changes in the information contained in the permit.
- (E) All compliance test reports for the preceding year.
- (F) Temperature and CO exceedance reports for the year.

33. The permittee, for good cause, may request that this construction permit be extended. Such request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (Rule 62-4.090, F.A.C.).

34. An application for an operation permit must be submitted to the Bureau of Air Regulation 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 (Rule 62-4.220, F.A.C.).

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Howard L. Rhodes, Director
Division of Air Resources
Management

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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Bob Garrison, VP
Sunbelt Resources, Inc
5453 Jug Factory Rd
Tuscaloosa, AL
Debra Wain 35405

4a. Article Number

Z 311 902 950

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 |

7. Date of Delivery

3/10/95

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

5. Signature (Addressee)

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 311 902 950



Receipt for Certified Mail

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

PS Form 3800, March 1993

Sent to		Bob Garrison
Street and No.		Sunbelt Resources
P.O., State and ZIP Code		Tuscaloosa, AL
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		3-8-95
Airmail		
		AC37-216863



Department of Environmental Protection

koogler's let. attached

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 6, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Jamison:

Re: Amendment of Permit No. AC37-216863

The Department has reviewed Mr. John Koogler's February 10, 1995, letter requesting that the referenced permit to construct a mobile soil thermal treatment facility be extended. The additional time is needed to repeat the compliance tests required by this permit. An acceptable compliance test report is needed to complete the application for permit to operate this facility (DEP file No. A037-253484).

This request is acceptable and the expiration date of permit No. AC37-216863 is extended to September 1, 1995.

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 (F.S.). 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 applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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, F.S.

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;

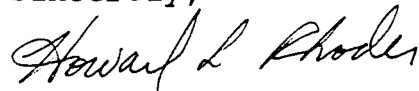
Mr. Bob Jamison
March 6, 1995
Amendment of Permit No. AC37-216863
Sunbelt Resources, Inc.
Page Two

- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (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 the 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 amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment request/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 amendment 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, Florida Administrative Code.

A copy of this letter amendment must be attached to the referenced permit, No. AC37-216863, and shall become a part of that permit.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

HLR/wh/t

Enclosures

cc: District Air Program Administrators
County Air Program Administrators
John Koogler, P.E.

Mr. Bob Jamison
March 6, 1995
Amendment of Permit No. AC37-216863
Sunbelt Resources, Inc.
Page Three

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 3-8-95 to the listed persons.

Clerk Stamp

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

Keri Jober

Clerk

3-8-95

Date



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 532-94-01

February 10, 1995

Mr. Willard Hanks
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

FEB 13 1995

Bureau of
Air Regulation

Subject: Sunbelt Resources, Inc.
Mobile Soil Thermal Treatment Facility
Permit No. AC37-216863/File No. AO37-253484

Dear Mr. Hanks:

The Department issued the above-referenced air construction permit to Sunbelt Resources, Inc. on February 24, 1993 for the construction of a mobile soil thermal treatment facility. The Certificate of Completion of Construction was submitted to Mr. Ed Middleswart on June 20, 1994. However, an operating permit has not been issued due to problems associated with the compliance test conducted on March 10, 1994.

At this time, Sunbelt requests permission to repeat the compliance test as soon as the plant is relocated to a Florida site, and requests that the expiration date of Permit No. AC37-216863 be extended accordingly. Enclosed is a check in the amount of \$50.00 in payment of the time extension fee.

If you have any questions, please do not hesitate to call.

Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

xc: Mr. Robert D. Jamison, Sunbelt Resources, Inc.

R. Hanks
E. Middleswart

Memorandum

Florida Department of
Environmental Protection

TO: Howard L. Rhodes
FROM: Al Linero *Al Linero 3/2/95*
DATE: March 3, 1995
SUBJECT: Extension of Permit No. AC 37-216863

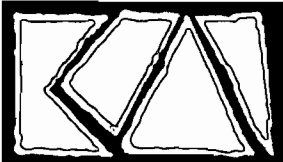
Attached is a letter to extend an expired construction permit for a mobile soil thermal treatment unit. Although our guidance dictates against it, I recommend we do it in this case for the following reasons:

- Our engineer specifically told them they could operate while we were considering their operating permit application. He told them this before the guidance was written which clarified that expired construction permits must be resubmitted.
- They conducted their compliance tests and submitted their operating permit application in a timely fashion, well before their construction permit expired.
- We did not issue their operating permit before their construction permit expired. The main reason was that we had questions about their compliance tests.
- I consider the main concern about their tests to be relatively unimportant. They relate to use of a visible emissions observer certified for EPA Method 9 in Alabama instead of Florida. Also, they described their particulate emissions test as EPA Method 5 as adopted and modified by Alabama. Actually, the Alabama methods measure exactly what our DEP (EPA) rules measure.
- We consider the source to have complied with the emissions limits in the construction permit.
- Since their compliance test, they have not operated in Florida. We only want to extend their construction permit to have them repeat their tests.
- Our alternatives are to issue their operating permit now or to deny their operating permit and make them get a new construction permit.

Everyone is aware of the guidance and will be proactive in making it clear to applicants the consequences of expired construction permits.

AL/kt

attachments



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 ■ FAX 377-7158

KA 532-94-01

February 10, 1995

Mr. Willard Hanks
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

FEB 13 1995

**Bureau of
Air Regulation**

Subject: Sunbelt Resources, Inc.
Mobile Soil Thermal Treatment Facility
Permit No. AC37-216863/File No. AO37-253484

Dear Mr. Hanks:

The Department issued the above-referenced air construction permit to Sunbelt Resources, Inc. on February 24, 1993 for the construction of a mobile soil thermal treatment facility. The Certificate of Completion of Construction was submitted to Mr. Ed Middleswart on June 20, 1994. However, an operating permit has not been issued due to problems associated with the compliance test conducted on March 10, 1994.

At this time, Sunbelt requests permission to repeat the compliance test as soon as the plant is relocated to a Florida site, and requests that the expiration date of Permit No. AC37-216863 be extended accordingly. Enclosed is a check in the amount of \$50.00 in payment of the time extension fee.

If you have any questions, please do not hesitate to call.

Very truly yours,

KOOGLER & ASSOCIATES


John B. Koogler, Ph.D., P.E.

xc: Mr. Robert D. Jamison, Sunbelt Resources, Inc.

W. Hanks
E. Middleswart, NW Dist.

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):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Terry L. Bunn, President
 Sunbelt Resources, Inc.
 5453 Jug Factory Road
 Tuscaloosa, Alabama 35405-4213

4a. Article Number
 P 872 562 675

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

7. Date of Delivery
 3-2-94

5. Signature (Addressee)
Debra P. Watson

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

6. Signature (Agent)
AWA

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

P 872 562 675



Receipt for Certified Mail

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

Sent to	Mr. Terry L. Bunn
Street and No.	5453 Jug Factory Road
P.O., State and Zip Code	Tuscaloosa, Alabama 35405-4213
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: 3/2/94

PS Form 3800, JUNE 1991



Florida Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

February 17, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Terry Bunn, President
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

Dear Mr. Bunn:

Re: Amendment of Permit No. AC37-216863
Mobile Soil Thermal Treatment Facility

The Department has reviewed Mr. John Koogler's February 1, 1994, letter requesting the referenced permit be amended. The amendment will allow a different operating temperature and residence time for the afterburner. This request is acceptable and Specific Condition No. 22 of permit No. AC 37-216863 is changed from:

FROM:

Contaminated soil shall not be treated by the facility unless the afterburner is operating at a minimum temperature of 1600°F, and a retention time above 0.5 seconds (Rule 17-296.415(1)(a), F.A.C.) (data per application).

TO:

Contaminated soil shall not be treated by the facility unless the afterburner is operating at a minimum temperature of 1500°F, and a minimum retention time of 1.0 seconds (Rule 17-296.415(1)(a), F.A.C.) (February 1, 1994 amendment request).

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 applicant of the amendment request/application and the parties

Mr. Terry Bunn
AC 37-216863
Permit Amendment
February 17, 1994
Page 2 of 3

listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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:

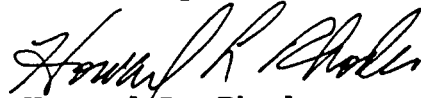
- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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;
- (g) A statement of the relief sought by petitioner, stating precisely the action the 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 amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/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 amendment 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.

Mr. Terry Bunn
AC 37-216863
Permit Amendment
February 17, 1994
Page 3 of 3

A copy of this letter must be filed with the referenced permit and shall be a condition of that permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/WH/bjb

Attachment: Koogler's February 1, 1994, letter

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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 2/17/94 to the listed persons.

Clerk Stamp

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

Barbara J. Boutwell 2/17/94
Clerk Date

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes
FROM: Clair H. Fancy
DATE: February 17, 1994
SUBJ: Amendment of Permit
Sunbelt Resources, Inc.

Attached for your approval and signature is a letter that will amend the construction permit for a mobile soil thermal treatment facility.

I recommend your approval and signature.

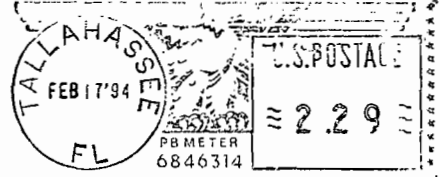
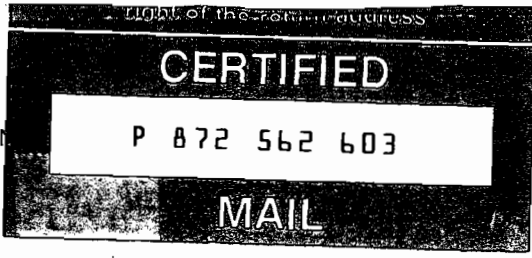
CHF/WH/bjb

Attachment

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ROUTING AND TRANSMITTAL SLIP	
TO: (NAME, OFFICE, LOCATION)	
1.	Director James J. Powers <i>Apr 21/1994</i>
2.	John Brown - Return MS 2/15 -
3.	Clair H. Fancy - Sign
4.	Howard L. Rhodes - Sign
Small Booklet <i>Base</i>	
AMEND SOIL TREATMENT Facility Permit	
FROM:	Clair H. Fancy <i>Willard Hanko</i>
DATE	<i>2/17/94</i>
PHONE	

550202
 STATE OF FLORIDA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 TWIN TOWERS OFFICE BUILDING
 2600 BLAIR STONE ROAD
 TALLAHASSEE, FLORIDA 32399-2400

ADDRESS CORRECTION REQUESTED



PS Form 3800, JUNE 1991

Postmark or Date	Mailed: 2-17-94 Permit: AC 37-216863
TOTAL Postage & Fees	\$
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
Restricted Delivery Fee	
Special Delivery Fee	
Certified Fee	
Postage	\$
Sent to Mr. Terry L. Bunn, Sunbelt Street and No. 715 Skyland Blvd., Regources P.O. State and zip Code Tuscaloosa, AL 35405	

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

P 872 562 603

Mr. Terry L. Bunn, President
 Sunbelt Resources, Inc.
 715 Skyland Blvd., East
 Tuscalo

5453

5453
 BUNN715 354050212 1493 02/23/94
 RETURN TO SENDER
 SUNBELT CONSTRUCTION CO INC
 715 JUG FACTORY RD
 TUSCALOOSA AL 35405-4212
 RETURN TO SENDER

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 DOMESTIC RETURN RECEIPT

3. Article Addressed to: Mr. Terry Bunn, President Sunbelt Resources, Inc. 715 Skyland Blvd., East Tuscaloosa, AL 35405	
4a. Article Number P 872 562 603	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
7. Date of Delivery	
5. Addressee's Address (Only if requested)	
6. Signature (Agent)	
8. Addressee's Address (Only if requested) and fee is paid	

Thank you for using Return Receipt Service.

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.



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 532-92-01

February 1, 1994

RECEIVED

FEB 03 1994

Bureau of
Air Regulation

Mr. Willard Hanks
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Sunbelt Resources, Inc.
Mobile Soil Thermal Treatment Facility
Permit AC37-216863
Requested Amendment of Afterburner
Operating Conditions

Dear Mr. Hanks:

Confirming our recent telephone conversation and our letter to Mr. Clair Fancy dated January 25, 1994, Sunbelt Resources, Inc. (Sunbelt) will be locating a mobile soil remediation unit permitted by AC37-216863 in Port St. Joe, Gulf County, Florida.

The purpose of this letter is to request that Specific Condition 22 of the referenced air construction permit be amended to allow the afterburner to operate at a different temperature/residence time combination. Rule 17-296.415, FAC, allows afterburners to operate at a temperature of 1500°F with a residence time of one second or at 1600°F with a residence time of 0.5 seconds or at a temperature of 1800°F with a residence time of 0.3 seconds. Currently, the Sunbelt unit is permitted for an afterburner temperature of 1600°F with a residence time of 0.5 seconds. We request that Specific Condition 22 be amended to allow the afterburner to operate at a temperature of 1500°F with a residence time of 1.0 seconds.

The design gas flow rate through the afterburner (see permit application) is 11,528 scfm, dry. At a temperature of 1500°F and a moisture content of 26 percent, the flow rate through the afterburner would be 57828 acfm (or 964 acfs). With an afterburner volume of 1500.9 cubic feet, the residence time would be 1.56 seconds; well in excess of the 1.0 second residence time required at 1500°F.

Enclosed is a check payable to the Florida Department of Environmental Protection in the amount of \$250 for a Type M1 amendment to the air construction permit. This requested amendment will require no physical modification to the facility nor will it affect any emissions from the facility.

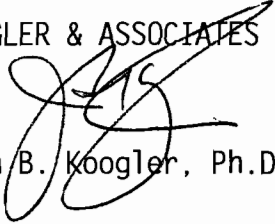
Mr. Willard Hanks
Florida Department of
Environmental Protection

February 1, 1994
Page 2

If you have any questions regarding this matter, please do not hesitate to contact me.

Very truly yours,

KOGLER & ASSOCIATES


John B. Koogler, Ph.D., P.E.

JBK:wa
Enc.

c: Mr. Ed Middleswart, FDEP, Pensacola
Mr. David Peterson, Sunbelt

W. Hanks



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. Terry Bunn, President
 Sunbelt Resources, Inc.
 5453 Jug Factory Rd.
 Tuscaloosa, AL 35405-4213

4a. Article Number
 P 872 562 573

4b. Service Type

Registered Insured

Certified COD

Express Mail Return Receipt for Merchandise

7. Date of Delivery
 11/29/93

5. Signature (Addressee)
 Brad Hubbard

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

6. Signature (Agent)

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

P 872 562 573



Receipt for Certified Mail

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

PS Form 3800, JUNE 1991

Sent to Mr. Terry Bunn Sunbelt	
Street and No. Resources 5453 Jug Factory Rd.	
P.O., State and ZIP Code Tuscaloosa, AL 35405-4213	
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: 11-24-93 Permit: AC 37-216863	



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

November 8, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Terry Bunn, President
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

Dear Mr. Bunn:

Re: Amendment of Permit No. AC37-216863

The Department has reviewed Mr. John Koogler's September 22, 1993, letter requesting that the referenced permit to construct your mobile soil thermal treatment facility be extended. The additional time is needed for Sunbelt to be awarded a contract in Florida, conduct the required compliance tests, and submit an application for a permit to operate.

This request is acceptable and permit No. AC37-216863 is extended from January 1, 1994, to September 1, 1994.

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 applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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.

Mr. Terry Bunn
AC 37-216863
Permit Amendment
November 8, 1993
Page 2 of 3

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;
- (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;
- (g) A statement of the relief sought by petitioner, stating precisely the action the 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 amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/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 amendment 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.

Mr. Terry Bunn
AC 37-216863
Permit Amendment
November 8, 1993
Page 3 of 3

A copy of this letter must be filed with the referenced permit and shall become a part of that permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/WH/bjb

Attachment: Koogler's September 22, 1993, letter

cc: District Air Program Administrators
County Air Program Administrators
John Koogler, P.E.

Memorandum

Florida Department of
Environmental Protection

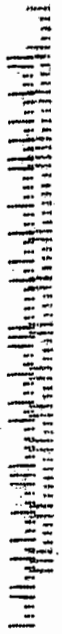
TO: Howard L. Rhodes
FROM: Clair Fancy *CF*
DATE: November 8, 1993
SUBJ: Amendment of Permit
Sunbelt Resources, Inc.

Attached for your approval and signature is a letter that will extend the expiration date of a construction permit issued for a mobile soil thermal treatment facility. The facility has not been operated in Florida.

I recommend your approval and signature.

CHF/WH/bjb

Attachment



35405-5075 43 5305-5075

RETURN TO SENDER
TUSCALOOSA AL 35405-5211
SUNBELT RESOURCES
3450 JUNGLE FACTORY RD
TUSCALOOSA AL 35405-5211

Mr. Terry Bunn, President
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

P 872 562 495



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

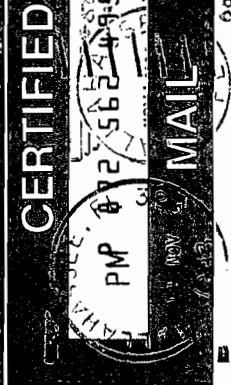
Sent to Mr. Terry Bunn, President	
Street and No. 715 Skyland Blvd., East	
P.O., State and ZIP Code Tuscaloosa, AL 35405	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	Mailed: 11/10/93 AC37-216863

PS Form 3800, JUNE 1991

ADDRESS CORRECTION REQUESTED
550202

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

Fold at line over of envelope to the right of the return address



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. Terry Bunn, President
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

I also wish to receive the following services (for an extra fee):
1. Addressee's Address
2. Restricted Delivery
Consult postmaster for fee.

4a. Article Number
P 872 562 495

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

7. Date of Delivery

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

5. Signature (Addressee)

6. Signature (Agent)

Thank you for using Return Receipt Service.

*Patty Willard
Barbara
new address*

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:
John B Koogler, PE
Koogler & Assoc
4014 NW 13th St.
Gainesville, FL 32609

4a. Article Number
P 230 524 407

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

7. Date of Delivery
9/27/93 D. P. ALLEN

5. Signature (Addressee)

6. Signature (Agent)
N. Man... [Signature]

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

PS Form 3811, December 1991 ★U.S. GPO: 1992-323-402

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

P 230 524 407



Receipt for Certified Mail

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

Sent to <i>John Koogler</i>	
Street and No. <i>K + Assoc</i>	
P.O. State and ZIP Code <i>Gainesville FL</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	<i>9-24-93</i> <i>Sunbelt Res.</i>

PS Form 3800, June 1991



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 24, 1993

CERTIFIED MAIL-RETURN RECEIPT

John B. Koogler, Ph.D., P.E.
Koogler and Associates
4014 N.W. Thirteenth Street
Gainesville, Florida 32609

Dear Dr. Koogler:

RE: Sunbelt Resources, Inc.
Request for Permit Extension

The Bureau of Air Regulation received your September 22, 1993, request for the above referenced project. On October 30, 1991, Rule 17-4.050(4)(o), F.A.C., was changed to require a \$50 processing fee for a permit extension; therefore, we will not be able to take action on your request until the fee is received. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,

Patricia G. Adams

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

CHF/pa

cc: Willard Hanks

SUNBELT RESOURCES, INC.

194

5153 Jug Factory Rd
Tuscaloosa, Al 35405

0000680 9-27 1993

PAY TO THE ORDER OF

Ala. Dept. of Environmental Protection

\$ 50.00

Fifty and no/100

DOLLARS

AM SOUTH

AmSouth Bank N.A.
Tuscaloosa, Alabama 35401

Sunbelt Resources, Inc.

FOR Permit # AC 37-216863

Photo Jan

CERTIFIED MAIL-RETURN RECEIPT

0000680

RECEIVED
MAIL ROOM
9 OCT -4 AM 10:26

John B. Koogler, Ph.D., P.E.
Koogler and Associates
4014 N.W. Thirteenth Street
Gainesville, Florida 32609

Dear Dr. Koogler:

RE: Sunbelt Resources, Inc.
Request for Permit Extension

The Bureau of Air Regulation received your September 22, 1993, request for the above referenced project. On October 30, 1991, Rule 17-4.050(4)(o), F.A.C., was changed to require a \$50 processing fee for a permit extension; therefore, we will not be able to take action on your request until the fee is received. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,

Patricia G. Adams
for C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/pa

cc: Willard Hanks

*Mailed on 9/22/93
ck: # 465*



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 532-92-01

September 22, 1993

RECEIVED

SEP 23 1993

Division of Air
Resources Management

Mr. C. H. Fancy, P.E.
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Sunbelt Resources, Inc.
Mobile Soil Thermal
Treatment Facility
FDEP File AC37-216863

Dear Mr. Fancy:

On February 24, 1993, the Department issued air construction permit AC37-216863 to Sunbelt Resources, Inc. for the construction of a 50 TPH Mobile Soil Thermal Treatment Facility. Permit AC37-216863 will expire on January 1, 1994.

Specific Condition No. 25 requires that the facility be tested within 30 days of being placed in operation. At this time, Sunbelt Resources has not yet been awarded a contract in the state of Florida, therefore compliance testing has not been conducted. Specific Condition 34 requires that compliance test reports be submitted along with the Certificate of Completion of Construction, in order to apply for an operating permit.

At this time Sunbelt Resources requests an extension of the expiration date of permit AC37-216863 from January 1, 1994 to **July 1, 1994**. This extension should allow sufficient time to conduct all required testing and apply for an operating permit.

Please disregard our letter dated September 16, 1993, in which we inadvertently requested an extension from January 1, 1994 to July 1, 1993.

I appreciate your assistance in this matter. If you have any questions please do not hesitate to call.

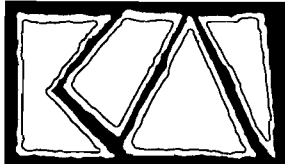
Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK:mem

c: Mr. Ed Middleswart, FDEP
Mr. David Peterson, Sunbelt Resources, Inc.
Mr. Gavis Whitfield, Sunbelt Resources, Inc.



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 ■ FAX 377-7158

KA 532-92-01

September 16, 1993

RECEIVED
SEP 21 1993
Division of Air
Resources Management

Mr. C. H. Fancy, P.E.
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Sunbelt Resources, Inc.
Mobile Soil Thermal
Treatment Facility
FDEP File AC37-216863

Dear Mr. Fancy:

On February 24, 1993, the Department issued air construction permit AC37-216863 to Sunbelt Resources, Inc. for the construction of a 50 TPH Mobile Soil Thermal Treatment Facility. Permit AC37-216863 will expire on January 1, 1994.

Specific Condition No. 25 requires that the facility be tested within 30 days of being placed in operation. At this time, Sunbelt Resources has not yet been awarded a contract in the state of Florida, therefore compliance testing has not been conducted. Specific Condition 34 requires that compliance test reports be submitted along with the Certificate of Completion of Construction, in order to apply for an operating permit.

At this time Sunbelt Resources requests an extension of the expiration date of permit AC37-216863 from January 1, 1994 to July 1, 1993. This extension should allow sufficient time to conduct all required testing and apply for an operating permit.

I appreciate your assistance in this matter. If you have any questions please do not hesitate to call.

Very truly yours,

KOGLER & ASSOCIATES


John B. Koogler, Ph.D., P.E.

JBK:mem

c: Mr. Ed Middleswart, FDEP
Mr. David Peterson, Sunbelt Resources, Inc.
Mr. Gaus Whitfield, Sunbelt Resources, Inc.

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:
*Terry Bunn, Pres.
 Sunbelt Resources, Inc
 715 Skyland Blvd., E.
 Tuscaloosa, AL 35405*

4a. Article Number
P 360 185 709

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

7. Date of Delivery
3/1/93

5. Signature (Addressee)

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

6. Signature (Agent)
Ann Cranmore

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

PS Form 3800, June 1991

Search No.	<i>Terry Bunn</i>
Serial and No.	<i>Sunbelt Resources</i>
Postage	<i>Tuscaloosa, AL</i>
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 of Date	<i>2-26-93</i>
	<i>AC 37-216863</i>

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

P 360 185 709

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

In the matter of an
Application for Permit by:

DER File No. AC37-216863
Mobile Operation

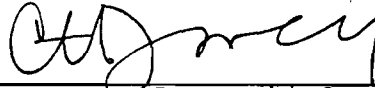
Mr. Terry Bunn, President
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

Enclosed is Permit Number AC37-216863 to construct a 50 TPH mobile soil thermal treatment facility that may operate in Gulf, Okaloosa, and Escambia Counties, issued pursuant to Section(s) 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



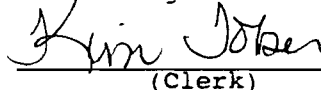
C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 2-26-93 to the listed persons.

Clerk Stamp

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


(Clerk)

2-26-93
(Date)

Copies furnished to:
District Air Program Administrators
County Air Program Administrators
John Koogler, P.E.
Tom Conrardy, BWC



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: <i>John</i>	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: <i>signed</i>	Date: _____

Interoffice Memorandum

TO: Howard L. Rhodes
FROM: C. H. Fancy *CHF*
DATE: February 18, 1993
SUBJ: Approval of Construction Permit **AC37-216863**
Sunbelt Resources, Inc.

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to construct a mobile soil thermal treatment facility. This unit is designed to use a dryer to evaporate petroleum products from contaminated soil, use a baghouse to filter the particulate matter from the gases leaving the dryer, and burn the petroleum vapors in an afterburner before discharging the gases to the ambient air.

The public notice requirements were completed and the permit will be valid for operation in Gulf, Okaloosa, and Escambia Counties.

Because of the public controversy associated with the operation of soil thermal treatment facilities, the Secretary has approved these permits in the past.

I recommend your approval and signature.

CHF/WH/plm

Attachments

Final Determination

Sunbelt Resources, Inc.
Tuscaloosa, Alabama

50 TPH Mobile Soil Thermal Treatment Facility
Statewide Operation

Permit No.: AC37-216863

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

February 18, 1993

Final Determination

The Technical Evaluation and Preliminary Determination for the permit to construct a 50 TPH mobile soil thermal treatment facility (rotary kiln with a baghouse and afterburner) was distributed on December 23, 1992. The Notice of Intent to Issue was published in the Pensacola Journal on January 27, 1993, and in the Ft. Walton Beach Daily News and the Panama City News Herald on January 28, 1993. Circulation of these papers include Gulf, Okaloosa, and Escambia Counties.

Copies of the evaluation were available for public inspection at all Department District and County air program offices.

No comments were submitted on the Department's Intent to Issue the permit. The final action of the Department will be to issue construction permit AC37-216863 as proposed in the Technical Evaluation and Preliminary Determination.



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

PERMITTEE:
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

Permit Number: AC37-216863
Expiration Date: January 1, 1994
County: Mobile Operation
Project: 50 TPH Mobile Soil
Thermal Treatment Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-210, 212, 275, 296, 297 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, 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 50 TPH mobile soil thermal treatment facility with air pollution controlled by an afterburner and baghouse. Major components of the facility are a contaminated soil feed bin, bin to dryer belt conveyor, a 30 MMBtu/hr dryer that is 7 ft. in diameter by 34 ft. long, a Tarmac Model P830HO 14 MMBtu/hr afterburner operating at 1600°F with approximately 1 second residence time, an air to air cooler, a Tarmac Model P1424BH baghouse, a pug mill, fuel (No. 2 fuel oil, propane, and natural gas) systems, and associated equipment. The facility is equipped with a stack (3.5 ft. diameter by 25 ft. high) that discharges approximately 24,487 acfm of flue gas at 375°F to the atmosphere.

This facility may operate in Gulf, Okaloosa, and Escambia Counties. The facility may operate in any other county within Florida after completing the public notice requirement and receiving Department authorization to operate in the county.

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 July 22, 1992.
2. DER letter dated August 7, 1992.
3. Koogler's letter dated September 9, 1992.
4. DER letter dated September 30, 1992.
5. Koogler's letter dated October 5, 1992.
6. Koogler's letter dated November 19, 1992.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

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 403.161, 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.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

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.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

GENERAL CONDITIONS:

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.

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

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

GENERAL CONDITIONS:

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:

Miscellaneous

1. A part of this permit is the previous (14) General Conditions. The following index of the specific conditions of this permit is provided for convenience.

<u>Purpose of Specific Conditions</u>	<u>Specific Condition Numbers</u>
Miscellaneous	1
Construction Requirements	2 - 5
Emission Restrictions	6 - 11
Operation Requirements	12 - 24
Compliance Requirements	25 - 28
Administrative Requirements	29 - 34

Construction Requirements

2. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

SPECIFIC CONDITIONS:

3. The stack sampling facilities must comply with Rule 17-297.345, F.A.C.

4. The facility shall be equipped with a means to measure the pressure drop across the particulate matter air pollution control device and continuous emissions monitors and recorders for hot zone temperature and carbon monoxide concentration (Rule 17-296.415(1)(c), F.A.C.).

5. The facility shall be equipped with instruments to measure the process feed rate of contaminated soil to the dryer.

Emission Restrictions

6. Particulate matter emissions shall not exceed any of the following limits (based on data in the application and Rule 17-296.415(2)(b), F.A.C.):

- (A) 0.04 grains per dry standard cubic foot
- (B) 3.9 pounds per hour
- (C) 8.6 tons in any 12 consecutive month period at 4400 hrs/yr operation time.

7. Carbon monoxide emissions shall not exceed 100 parts per million by volume, dry, during any 60 consecutive minute period (Rule 17-296.415(1)(b), F.A.C.).

8. Visible emissions from the stack shall not exceed 5 percent opacity (Rule 17-296.415(2)(a), F.A.C.).

9. Reasonable precautions shall be taken to minimize uncontrolled particulate matter emissions (Rule 17-296.310, F.A.C.). These provisions are applicable to any source, including vehicular movement, transportation of materials, and industrial related activities such as loading, unloading, storing, and handling. Before and after thermal soil treatment is accomplished, unconfined emissions of particulate matter from the soil shall be controlled by the application of water and/or containment (Rule 296.415(3), F.A.C.).

10. Operation of this facility shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor (Rule 17-296.320, F.A.C.).

11. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

SPECIFIC CONDITIONS:

requirements of Chapter 17-296 and 17-297, F.A.C., or any other requirements under federal, state, or local regulations.

Operation Requirements

12. In case of excess emissions resulting from a malfunction, the permittee shall notify the Department's District office that the facility is operating in and Bureau of Air Regulation (BAR) office within one (1) working day of the cause and duration of the upset. If requested, the permittee shall submit a full written report on the malfunction. (Rule 17-210.700, F.A.C.).

13. The facility shall only treat petroleum contaminated soil as defined in Rule 17-775, F.A.C. (Rule 17-296.415).

14. This facility may not treat PCB contaminated soil.

15. The input rate of petroleum contaminated soil to the facility shall not exceed 50 tons per hour. Material entering the kiln cannot be larger than 2 inches in diameter. The permittee shall have the means of determining feed or production rates of the facility on site.

16. Untreated soil removed from the ground at the contaminated site shall be stored under a waterproof cover and on an impermeable surface.

17. The unit shall not be operated at a location or in a manner that creates a nuisance, and shall observe local noise ordinances.

18. This unit shall be allowed to operate 24 hours per day, 7 days per week, 52 weeks per year, but not more than 4400 hours per year.

19. The input of petroleum contaminants into the facility shall not exceed 500 lbs/hr (daily average) (data per application).

20. The dryer shall use virgin No. 2 fuel oil only. The sulfur content of this fuel shall not exceed 0.2 percent sulfur by weight (daily average). The fuel heat input to the dryer shall not exceed 30 million Btu per hour, approximately 214 GPH of No. 2 fuel (data per application).

21. The afterburner shall burn virgin No. 2 fuel oil, natural gas, or propane only. The sulfur content of the virgin No. 2 fuel shall not exceed 0.3 percent sulfur by weight (daily average). The fuel heat input to the afterburner shall not exceed 14.0 million Btu per

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

SPECIFIC CONDITIONS:

hour, approximately 100 GPH No. 2 fuel oil, 140 GPH propane, or 14.0 mcfh of natural gas fuel (data per application).

22. Contaminated soil shall not be treated by the facility unless the afterburner is operating at a minimum temperature of 1600°F, and a retention time above 0.5 seconds (Rule 17-296.415(1)(a), F.A.C.) (data per application).

23. All emission monitoring equipment shall be properly installed, calibrated, operated, and maintained in accordance with the manufacturer's requirements for that instrument.

24. Pressure drop across the particulate matter air pollution control device shall be recorded hourly and the temperature and carbon monoxide concentration of the hot zone shall be recorded continuously (Rule 17-296.415(1)(c), F.A.C.).

Compliance Requirements

25. The Bureau of Air Regulation (BAR), District and County environmental agency that the facility is operating in shall be notified in writing at least 15 days in advance of any formal compliance test to be conducted on this facility. The notification shall give the date, time, place, and contact person for the test (Rule 17-297.340(1)(i), F.A.C.).

26. This facility shall be tested (EPA test methods are specified in 40 CFR 60, Appendix A, revised July 1, 1992) at 90-100% of its permitted process rate within 30 days of placing it in service for:

- (A) Particulate matter (PM) emissions by EPA Methods 1, 2, 3, 4, and 5.
- (B) Visible emissions by EPA Method 9.
- (C) Carbon monoxide (CO) emissions by averaging all readings taken each hour from the CO continuous emission monitor during the PM test periods.
- (D) Afterburner temperature by averaging all readings taken each hour from the continuous temperature monitor during the PM test period.
- (E) Afterburner residence time using the test data collected by EPA Methods 1 and 2.
- (F) Fuel oil sulfur limits based on analysis referenced in 40 CFR 60.17 or other methods after Department approval. An analysis by the permittee or certified analysis by the fuel oil supplier is acceptable for proof of compliance with this requirement.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

SPECIFIC CONDITIONS:

(G) Contaminated soil analysis for volatile organic aromatics (VOA), total recoverable petroleum hydrocarbons (TRPH), polynuclear aromatic hydrocarbons (PAH), volatile organic halocarbons (VOH), and metals as required by Rule 17-775.410, F.A.C.

27. Results of compliance tests shall be submitted to the BAR within 45 days of the test.

28. When the Department, after investigation, has good reason to believe that any applicable emission standard or condition of this permit is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the plant and to provide a report on the results of said tests to the Department (Rule 17-297.340(2), F.A.C.).

Administrative Requirements

29. The permittee for a mobile unit shall notify the Bureau of Air Regulation, local government (city and/or county), and the Department District office by registered mail at least 3 days prior to moving to a new operating site. The notification shall provide 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. The Department may notify the permittee of new restrictions for the facility that will apply while it is operating at this work site (Rule 17-775.700(1), F.A.C.).

30. The permittee shall maintain a log that shows the date, location, operation time, pressure drop across the PM control device, processing rate, type and quantity of fuel consumption in the dryer and afterburner, and operation problems. These records shall be maintained for a minimum of 3 years.

31. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements, all continuous monitoring system performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on these systems or devices, all soil analysis required by Rule 17-775, F.A.C., and all other information required by rule or this permit, recorded in a permanent form suitable for inspection. The file shall be retained for at least 3 years

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

SPECIFIC CONDITIONS:

following the date of such measurements, maintenance, reports, and records.

32. The permittee shall submit to BAR each calendar year, on or before March 1, an annual operation report for this facility for the preceding calendar year containing at least the following information pursuant to Subsection 403.061(13), F.S.:

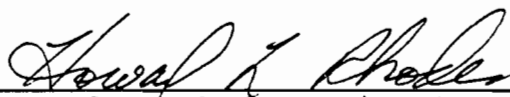
- (A) Annual amount of material and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Annual hours of operation.
- (D) Any changes in the information contained in the permit.
- (E) All compliance test reports for the preceding year.
- (F) Temperature and CO exceedance reports for the year.

33. The permittee, for good cause, may request that this construction permit be extended. Such request shall be submitted to the BAR prior to 60 days before the expiration of the permit (Rule 17-4.090, F.A.C.).

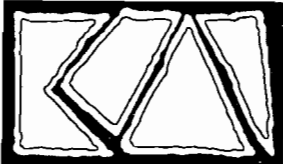
34. An application for an operation permit must be submitted to the BAR at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the 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 (Rule 17-4.220, F.A.C.).

Issued this 24 day
of February, 1993

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Howard L. Rhodes, Director
Division of Air Resources
Management



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 ■ FAX 377-7158

KA 532-92-02

February 1, 1993

RECEIVED

FEB 03 1993

Division of Air
Resources Management

Mr. Willard Hanks
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Published Notice of Intent to Issue
Sunbelt Resources, Inc.
File No. AC37-216863

Dear Mr. Hanks:

On January 27, 1993, Sunbelt Resources published the required Notice of Intent to Issue Permit required by the Florida Department of Environmental Regulation. Enclosed you will find the legal proof of the notice of publication.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES

Megan E. Miner

cc: C. Middleswart, NW Dist

Best Available Copy



QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

6170369096

2318M

6170369096

RECIPIENT'S COPY

From (Your Name) Please Print WENDY AUERBACH		Your Phone Number (Very Important) 004-377-5822		To (Recipient's Name) Please Print William Marks		Recipient's Phone Number (Very Important) 904-588-1111			
Company GOGLER & ASSOC		Department/Floor No. 		Company Florida Dept of Envir. Reg		Department/Floor No. 			
Street Address 014 NW 13TH ST				Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) 1101 TOWN ST					
City AINSVILLE		State FL		City Tallahassee		State FL			
ZIP Required 32009		ZIP Required 32304							
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice.) 532-90-01				IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address City State ZIP Required					
PAYMENT <input type="checkbox"/> Bill Sender <input type="checkbox"/> Bill Recipient's FedEx Acct. No. <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. <input type="checkbox"/> Bill Credit Card <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Check									
SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING (Check services required)		PACKAGES WEIGHT In Pounds Only YOUR DECLARED VALUE (See right)		Emp. No. Date Federal Express Use			
Priority Overnight (Delivery by next business morning) 11 <input type="checkbox"/> OTHER PACKAGING 16 <input checked="" type="checkbox"/> FEDEX LETTER 12 <input type="checkbox"/> FEDEX PAK * 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE		Standard Overnight (Delivery by next business afternoon. No Saturday delivery) 51 <input type="checkbox"/> OTHER PACKAGING 56 <input type="checkbox"/> FEDEX LETTER * 52 <input type="checkbox"/> FEDEX PAK * 53 <input type="checkbox"/> FEDEX BOX 54 <input type="checkbox"/> FEDEX TUBE		HOLD FOR PICK-UP (Fill in Box #) 1 <input type="checkbox"/> WEEKDAY or 31 <input type="checkbox"/> SATURDAY DELIVER { 2 <input checked="" type="checkbox"/> WEEKDAY or 3 <input type="checkbox"/> SATURDAY (Extra charge) (Not available to all locations)		Total Total Total DIM SHIPMENT (Chargeable Weight) lbs.		Base Charges Declared Value Charge Other 1 Other 2 Total Charges	
Economy Two-Day (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY		Government Overnight (Restricted for authorized users only) 46 <input type="checkbox"/> GOVT LETTER 41 <input type="checkbox"/> GOVT PACKAGE		4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE Dangerous Goods Shipper's Declaration not required Dry Ice, UN 1845, X kg, III 7 <input type="checkbox"/> OTHER SPECIAL SERVICE		Received By: X Date/Time Received FedEx Employee Number		REVISION DATE 6/92 PART #137204 FXEM 10/92 FORMAT #136 136 © 1991-92 FEDEX PRINTED IN U.S.A.	
Freight Service (for packages over 150 lbs.) 70 <input type="checkbox"/> OVERNIGHT FREIGHT ** 80 <input type="checkbox"/> TWO-DAY FREIGHT **		9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 12 <input type="checkbox"/> HOLIDAY DELIVERY (If offered) (Extra charge)		Received At: 1 <input type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input type="checkbox"/> On-Call Stop 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station		Release Signature:			



PUBLISHED DA

Pensacola, Escambia C

STATE OF FLORIDA
County of Escambia

Before the undersigned authority personally appeared

Sharon Hartman

who is personally known to me and who on oath says that he/she is a representative of The Pensacola News Journal, a daily newspaper published at Pensacola in Escambia County, Florida; that the attached copy of advertisement, being a Legal in the matter of

Notice

in the Court, was

published in said newspaper in the issues of

Jan 27, 1993

Affiant further says that the said Pensacola News Journal is a newspaper published at Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this 27

day of Jan A.D., 19 93

Betty J. Weekley
Notary Public

BETTY J. WEEKLEY
Notary Public-State of Florida
My Commission Expires Nov. 21, 1995
CC463199

and County offices located at:

621 S. Andrew Ave., Ft. Lauderdale, FL 33301
801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130
421 West Church St., Suite 412, Jacksonville, FL 32202-4111

1410 North 21st Street, Tampa, FL 33605
901 E. Evernia Street, West Palm Beach, FL 33402
300 S. Garden Ave., Clearwater, FL 34616
1301 Cattleman Road, Bldg. B, Sarasota, FL 43232-6299
2002 E. Michigan Avenue, Orlando, FL 32806

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

Legal No. 42409 1T January 27, 1993

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF INTENT TO ISSUE PERMIT

The Department of Environmental Regulation gives notice of its intent to issue a permit (AC37-216863) to Sunbelt Resource, Inc., 715 Skyland Blvd., East, Tuscaloosa, AL 35405, to construct a 50 TPH mobile soil thermal treatment facility with air pollution controlled by a baghouse and afterburner. The unit may be operated in any county in Florida after completion of the public notice requirements for that county. The regulations do not require a Best Available control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination. The unit has the potential to emit 3.9 lbs/hr (8.6 TPY) particulate matter, 12.8 lbs/hr (28.2 TPY) sulfur dioxide, 6.3 lbs/hr (13.8 TPY) nitrogen oxides, 5.0 lbs/hr (11.0 TPY) volatile organic compounds, and 5.0 lbs/hr (11.0 TPY) carbon monoxide. These emissions will not cause a violation of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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, within 14 days of publication of this notice. 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; (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 Notice. 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 publication of this notice 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.

The applications are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m. Monday through Friday, except legal holidays, at the Department of Environmental Regulation Offices located at:

- 2600 Blair Stone Road, Tallahassee, FL 32399-2400
3319 Maguire Blvd., Suite 232, Orlando, FL 32803-3767
160 Governmental Center, Pensacola, FL 32501-5794
3804 Coconut Palm Drive, Tampa, FL 33619-8218
2295 Victoria Ave., Fort Myers, FL 33901
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406

Daily News

Published Daily
Fort Walton Beach, Florida

State of Florida }
County of Okaloosa }

Before the undersigned authorized personally appeared _____

ERNESTINE TAYLOR _____, who on oath says that (s)he

is ACCT. ASST. _____ of the Northwest Florida Daily News, a daily

newspaper published at Fort Walton Beach, in Okaloosa County, Florida;

that the attached copy of advertisement, being a LEGAL 231

in the matter of NOTICE OF INTENT

ISSUE PERMIT-SUNBELT RESOURCES

in the OKALOOSA COUNTY

Court, was published in said newspaper in the issues of _____

JANUARY 28, 1993

Affiant further says that the said Northwest Florida Daily News is a newspaper published at Fort Walton Beach, in said Okaloosa County, Florida, and that the said newspaper has heretofore been continuously published in said Okaloosa County, Florida, each day, and has been entered as second class mail matter at the post office in Fort Walton Beach, in said Okaloosa County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that (s)he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

STATE OF FLORIDA
COUNTY OF OKALOOSA

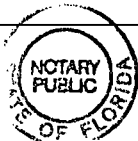
Subscribed and sworn to (or affirmed) before me this 1-28-93 (Date)

by Ernestine Taylor, who is/are personally known to me or

has/have produced _____ as identification.
(Type of identification)

Wanda Edwards Notary Public, Commission No. 154284
(Signature)

(Name of Notary typed, printed or stamped)



WANDA EDWARDS
My Comm. Exp. 11-5-95
Banded By Service Ins. Co.

Leg. 231
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF INTENT TO ISSUE PERMIT
The Department of Environmental Regulation gives notice of its intent to issue a permit (AC37-216863) to Sunbelt Resources, Inc., 715 Skyland Blvd., East, Tuscaloosa, AL 35405, to construct a 50 TPH mobile soil thermal treatment facility with air pollution controlled by a baghouse and afterburner. The unit may be operated in any county in Florida after completion of the public notice requirements for that county. The regulations do not require a Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination. The unit has the potential to emit 3.9 lbs/hr (8.6 TPY) particulate matter, 12.8 lbs/hr (28.2 TPY) sulfur dioxide, 6.3 lbs/hr (13.8 TPY) nitrogen oxides, 5.0 lbs/hr (11.0 TPY) volatile organic compounds, and 5.0 lbs/hr (11.0 TPY) carbon monoxide. These emissions will not cause a violation of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination. 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 the General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. 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; (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 Notice. 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 publication of this notice 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. The applications are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Regulation Offices located at:
2600 Blair Stone Road, Tallahassee, FL 32399-2400
3319 Maguire Blvd., Suite 232, Orlando, FL 32803-3767
160 Governmental Center, Pensacola, FL 32501-5794
3804 Coconut Palm Drive, Tampa, FL 33619-8218
2295 Victoria Ave., Fort Myers, FL 33901
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406
and County offices located at:
621 S. Andrew Ave., Ft. Lauderdale, FL 33301
801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130
421 West Church St., Suite 412, Jacksonville, FL 32202-4111
1410 North 21st Street, Tampa, FL 33605
901 E. Evernia Street, West Palm Beach, FL 33402
300 S. Garden Ave., Clearwater, FL 34616
1301 Cattleman Road, Bldg. B, Sarasota, FL 43232-6299
2002 E. Michigan Avenue, Orlando, FL 32806
Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.
Leg. 231 Jan. 28, 1993.

Florida Freedom Newspapers, Inc.

PUBLISHERS OF THE NEWS HERALD
Panama City, Bay County, Florida
Published Daily

State of Florida County of Bay

Before the undersigned authority appeared _____

Dennis Kozak, who on oath says that (s)he
is Advertising Director of the News Herald, a daily

newspaper published at Panama City, in Bay County, Florida; that the attached copy
of advertisement, being a Legal Advertisement

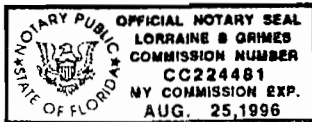
in the matter of Notice of Intent
Issue Permit

in the _____

Court, was published in said newspaper in the issues of Jan. 28, 1993

Affiant further says that the News Herald is a direct successor of the Panama City News and that this publication, together with its direct predecessor, has been continuously published in said Bay County, Florida, each day (except that the predecessor, Panama City News, was not published on Sundays), and that this publication together with its said predecessor, has been entered as a second class mail matter at the post office in Panama City in said Bay County, Florida, for a period of one year next preceding the first publication of the attached copy of the advertisement, all in accordance with the provisions of section 49.03, Florida Statutes; and affiant further says that (s)he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

State of Florida
County of Bay
Sworn to and subscribed before me this 28th day of January,
A. D., 1993 by Dennis Kozak, Advertising Director of The
News Herald. He is personally known to me or has produced _____
as identification and did take an oath.


Notary Public, State of Florida at Large

4996
STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF INTENT TO TISSUE PERMIT

The Department of Environmental Regulation gives notice of its Intent to issue a permit (AC37-216863) to Sunbelt Resources, Inc., 715 Skyland Blvd., East, Tuscaloosa, AL 35405, to construct a 50 TPH mobile soil thermal treatment facility with air pollution controlled by a baghouse and after burner. The unit may be operated in any county in Florida after completion of the public notice requirements for that county. The regulations do not require a Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination. The unit has the potential to emit 3.9 lbs/hr (8.6 TPY) particulate matter, 12.8 lbs/hr (28.2 TPY) sulfur dioxide, 6.3 lbs/hr (13.8 TPY) nitrogen oxides, 5.0 lbs/hr (11.0 TPY) volatile organic compounds, and 5.0 lbs/hr (11.0 TPY) carbon monoxide. These emissions will not cause a violation of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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, within 14 days of publication of this notice. 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; (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 the material facts disputed by 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 Notice. 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 publication of this notice 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.

The applications are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Regulation Offices located at:

2600 Blair Stone Road, Tallahassee, FL 32399-24; 3319 Maguire Blvd., Suite 232, Orlando, FL 32803-3767; 160 Governmental Center, Pensacola, FL 32501-5794; 3804 Coconut Palm Drive, Tampa, L 33619-8218; 2295 Victoria Ave., Fort Myers, FL 33901; 7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577; 1900 S. Congress Ave., Suite A, West Palm beach, FL 33406

and County offices located at:

621 S. Andrew Ave., Ft. Lauderdale, FL 33301; 801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130; 421 West Church St., Suite 412, Jacksonville, FL 32202-4111; 1410 North 21st Street, Tampa, FL 33605; 901 E. Evernia Street, West Palm Beach, FL 33402; 300 S. Garden Ave., Clearwater, FL 34616; 1301 Cattleman Road, Bldg. B, Sarasota, FL 43232-6299; 2002 E. Michigan Avenue, Orlando, FL 32806

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination. January 28, 1993

P 062 921 941



Receipt for Certified Mail

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

Sent to <i>Serry Bunn</i>	
Street and No. <i>Sunbelt Resources</i>	
P.O., State and ZIP Code <i>Tuscaloosa, AL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing To Whom & Date Delivered	
Date, Receipt Showing to Whom, Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>12-23-92</i>	
<i>AC 37-216863</i>	

PS Form 3800, June 1991

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article addressed to:
*Mr. Serry Bunn, Pres.
Sunbelt Resources, Inc
7153 Kylan Blvd. East
Tuscaloosa, AL 35405*

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail	<i>P 062 921 941</i>

Always obtain signature of addressee or agent and **DATE DELIVERED.**

- Signature - Addressee
X [Signature]
- Signature - Agent
X
- Date of Delivery
12/28/92
- Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

December 21, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Terry Bunn, President
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

Dear Mr. Bunn:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to construct a 50 TPH mobile soil thermal treatment facility.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis of the Bureau of Air Regulation.

Sincerely,

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

CHF/WH/plm

Attachments

cc: District Air Program Administrators
County Air Program Administrators
John Koogler, P.E.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Mr. Terry Bunn, President
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

DER File No. AC37-216863

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue an air construction permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Sunbelt Resources, Inc., applied on July 22, 1992, to the Department of Environmental Regulation for a permit to construct a 50 TPH mobile soil thermal treatment facility for operation within Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, Florida Statutes and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

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 publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. 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;

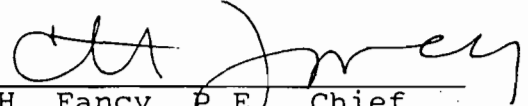
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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 REGULATION



C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

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 12/23/92 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT

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


clerk

12/23/92
Date

Copies furnished to:

District Air Program Administrators
County Air Program Administrators
John Koogler, P.E.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF INTENT TO ISSUE PERMIT

The Department of Environmental Regulation gives notice of its intent to issue a permit (AC37-216863) to Sunbelt Resources, Inc., 715 Skyland Blvd., East, Tuscaloosa, AL 35405, to construct a 50 TPH mobile soil thermal treatment facility with air pollution controlled by a baghouse and afterburner. The unit may be operated in any county in Florida after completion of the public notice requirements for that county. The regulations do not require a Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination. The unit has the potential to emit 3.9 lbs/hr (8.6 TPY) particulate matter, 12.8 lbs/hr (28.2 TPY) sulfur dioxide, 6.3 lbs/hr (13.8 TPY) nitrogen oxides, 5.0 lbs/hr (11.0 TPY) volatile organic compounds, and 5.0 lbs/hr (11.0 TPY) carbon monoxide. These emissions will not cause a violation of any ambient air quality standard or Prevention of Significant Deterioration (PSD) increment. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

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, within 14 days of publication of this notice. 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; (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 Notice. 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 publication of this notice 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.

The applications are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Regulation Offices located at:

2600 Blair Stone Road, Tallahassee, FL 32399-2400
3319 Maguire Blvd., Suite 232, Orlando, FL 32803-3767
160 Governmental Center, Pensacola, FL 32501-5794
3804 Coconut Palm Drive, Tampa, FL 33619-8218
2295 Victoria Ave., Fort Myers, FL 33901
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406

and County offices located at:

621 S. Andrew Ave., Ft. Lauderdale, FL 33301
801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130
421 West Church St., Suite 412, Jacksonville, FL 32202-4111
1410 North 21st Street, Tampa, FL 33605
901 E. Evernia Street, West Palm Beach, FL 33402
300 S. Garden Ave., Clearwater, FL 34616
1301 Cattleman Road, Bldg. B, Sarasota, FL 43232-6299
2002 E. Michigan Avenue, Orlando, FL 32806

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

1732

Technical Evaluation
and
Preliminary Determination

Sunbelt Resources, Inc.
Tuscaloosa, Alabama

50 TPH Mobile Soil Thermal Treatment Facility
Statewide Operation

File No.: AC37-216863

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

December 21, 1992

I. General Information

A. Applicant

Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

B. Request

On July 22, 1992, Sunbelt Resources, Inc. submitted an application for a permit to construct a 50 TPH mobile soil thermal treatment facility (rotary kiln with a baghouse and afterburner) which would be operated within the state. The application was considered complete on receipt (November 20, 1992) of their engineer's November 19, 1992, letter.

C. Project

The applicant is requesting permission to construct a 50 TPH mobile soil thermal treatment facility (SIC 1629) for operation within the state. The facility will contain a soil hopper, 30 MMBtu/hr rotary kiln, cyclone, baghouse, 14 MMBtu/hr afterburner, propane, natural gas, and No. 2 fuel oil systems, and associated equipment. The facility is to be used to decontaminate soils containing petroleum products (gasoline, No. 2-6 oil type fuels, motor oils, hydraulic fluids, and mineral oils).

D. Emissions

The unit will emit particulate matter (PM), including lead compounds, volatile organic compounds (VOC), and the products of combustion (SO₂, NO_x, and CO).

A 99.8% efficient Tarmac Model P1424BH baghouse will be used to control PM emissions. The baghouse will meet the particulate matter emissions standard of 0.04 grains per dry standard cubic foot (gr/dscf) (F.A.C. Rule 17-296.415(2)). Approximately 11,458 dscfm of air flow through the baghouse and afterburner resulting in an estimated PM emission of up to 3.9 lbs/hr. As the unit may operate 4,400 hours per year, the potential PM emissions will be 8.6 TPY.

The VOC evaporates from the contaminated soil in the kiln and passes to the afterburner which operates at 1600°F with approximately 1 second retention time. The applicant estimates that up to 500 lbs/hr of VOC will enter the afterburner and, after

99% destruction, 5 lbs/hr of VOC will be discharged to the atmosphere. Based on 4,400 hours per year operation, this is equivalent to 11 TPY VOC emissions.

No. 2 fuel oil, natural gas, and propane are the primary fuels for this facility. The maximum heat input to the rotary kiln is 30 MMBtu/hr (approximately 214 gal/hr No. 2 fuel oil). The maximum heat input to the afterburner is 14 MMBtu/hr (approximately 100 gal/hr No. 2 fuel oil, 140 gal/hr propane, or 14 MMCFH natural gas). Maximum emissions from this fuel and the hydrocarbons destroyed in the afterburner are estimated to be 12.8 lbs/hr (28.2 TPY) SO₂, 6.3 lbs/hr (13.8 TPY) NO_x, and 5.0 lbs/hr (11.0 TPY) CO.

Reasonable precautions will be required to control the unconfined emissions from decontaminated soil. This will involve wetting the dried material, covering storage piles, and hauling of the material in covered trucks.

At the low emission rates proposed, there should be no visible emissions from the stack on this facility.

II. Rule Applicability

The proposed project, construction and operation of a 50 TPH mobile soil thermal treatment facility, is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapters 17-210, 17-212, 17-275, 17-296 and 297, Florida Administrative Code (F.A.C.).

The facility may be operated in areas designated nonattainment for particulate matter, ozone, and sulfur dioxide (F.A.C. Rule 17-275.410), unclassifiable for particulate matter and sulfur dioxide (F.A.C. Rule 17-275.420), attainment for all criteria pollutants (F.A.C. Rule 17-275.420), and maintenance for ozone (F.A.C. Rule 17-275.600).

The facility is a minor source (F.A.C. Rule 17-212.300) because emissions of any single pollutant are less than 100 TPY. The proposed source is not subject to the preconstruction review requirements of F.A.C. Rule 17-212.400 because permit restrictions will prohibit the unit from emitting 100 TPY of any pollutant. Should the unit violate this restriction, it could become retroactively subject to other regulations.

The facility is subject to F.A.C. Rule 17-212.300, which pertains to sources not subject to PSD or nonattainment review. The unit is classified as a soil thermal treatment facility.

Allowable particulate matter emissions are limited to 0.04 gr/dscf (F.A.C. Rule 17-296.415(2)) and the emissions cannot cause objectionable odors (F.A.C. Rule 17-296.401(3)(b)). The Department's air pollution control regulations do not have an applicable RACT standard for particulate matter, sulfur dioxide or volatile organic compounds (VOC) that would apply to this source. Organic (VOC) emissions will be regulated under F.A.C. Rule 17-296.415(1). The discharge of pollutants also shall not cause an objectionable odor or an exceedance of an acceptable ambient air concentration (AAC) or risk for toxic pollutants.

Prior to issuance of the proposed construction permit, the applicant must provide the Department's Bureau of Air Regulation with a list of all counties that the soil dryer will be operated in, and certified proof of publication of the Notice of Intent and the Notice of Application from a newspaper of general circulation in each county on the list (F.A.C. Rule 17-210.350).

III. Technical Evaluation

This unit is restricted to processing petroleum contaminated soil as defined in F.A.C. Rule 17-775. The contaminants may be gasoline, diesel fuel, jet fuel, kerosene, Nos. 2-6 fuel oils, crude oil, bunker C oil, residual oils, and petroleum based lubricating, hydraulic and mineral oils. It cannot be authorized to treat hazardous material as defined in 40 CFR 261.3 (revised as of July 1, 1992) nor materials that are corrosive, reactive, EP toxic, explosive, or ignitable.

Chapter 17-775, F.A.C., Soil Thermal Treatment Facilities, regulates some aspects pertaining to the operation of this source. Some of these requirements are incorporated in the air permit.

Up to 50 TPH contaminated soil must be reduced to clumps that are a maximum of 2 inches in diameter prior to being fed into the kiln. The soil is heated to 400-900°F in the kiln to evaporate the petroleum products. These vapors flow through an afterburner operating at 1600°F with a retention time of approximately 1 second and a 99+% efficient baghouse.

At the allowable particulate matter standard of 0.04 gr/dscf, the unit may emit 3.9 lbs/hr. The proposed permits will limit particulate matter emissions to this value.

With 50 TPH of soil containing an average of 0.5% hydrocarbons being processed, the VOC emissions from the 99% efficient afterburner are estimated to be 5.0 lbs/hr. Both the hot

zone temperature and carbon monoxide concentration will have to be continuously monitored and recorded to confirm that proper combustion is occurring in the afterburner.

The guidance used by the Department to determine acceptable ambient concentrations (AAC) of hazardous pollutants is based on the following formula:

$$\text{Acceptable Ambient Concentration (AAC)} = \frac{40}{(\text{hrs per week operation})} \times \frac{1 \times (\text{OEL})}{\text{Safety factor}}$$

The safety factors are 100 for category A substances and 50 for category B substances.

OEL - Occupational Exposure Level such as ACGIH, OSHA, and NIOSH published standards for toxic materials.

TWA-TLV values are published by the American Conference of Governmental Industrial Hygienists (ACGIH). The values for the pollutants expected to be encountered in the proposed operation are as follows:

Pollutant	OEL mg/m ³	AAC (24 hr/day operation) mg/m ³
Benzene	3	0.0071
Toluene	375	1.786
Ethyl Benzene	435	1.036
Xylene	435	1.036

Calculations, using the EPA approved Screen - 1.1 Model (updated PTPLU 6 Model) and the stack parameters listed in the application, show that an emission rate of 1 gram/sec will have maximum ambient air impacts of 25.7×10^{-3} mg/m³ (8 hr. avg.).

If the stack parameters change from 25 feet stack height, 3.5 feet stack diameter, 42.4 feet/second stack gas velocity, and 375°F stack gas temperature, the impact of the emission will change. The model would need to be rerun with the correct parameters and the following calculations repeated.

The maximum emissions that can occur without exceeding the AAC can be determined by the following relationship:

$$\text{AAC} = \text{Impact of Unit} \times \text{Emissions.}$$

With this relationship and data, the Department can estimate the maximum emissions of a pollutant from the proposed unit that can occur without exceeding the AAC. Also, by knowing the process weight for the unit (50 TPH), assuming all VOC in the contaminated soil is evaporated in the kiln, and that 99% of this VOC is destroyed by the afterburner, the maximum content of the pollutants in the soil that can exist without the potential to exceed the AAC can be determined. The Department has made these calculations for benzene. The results are summarized in the following table:

Pollutant	Maximum Emissions		Maximum Soil Concentration PPM
	grams/second	lbs/hr	
Benzene	0.276	2.19	2,190

Using a similar procedure, it can be shown that the maximum VOC content of the untreated soil cannot exceed 5,000 PPM when the emissions from the afterburner are 5.0 lbs/hr VOC. Petroleum contaminated soil typically contains 0.5% VOC. Soil thermal treatment facilities generally cannot treat soil containing over 2.5% petroleum products. If soil containing 2.5% petroleum products were treated in this facility, VOC emissions would be 25 lbs/hr or 55 TPY. The facility would remain subject to the same regulations.

Because of the lower toxicity, the emissions of toluene, ethyl benzene, and xylene (commonly found in petroleum fuels) can be much higher than the benzene emissions without the unit's ambient air impact exceeding the AAC. Based on this review, the Department has chosen to limit the benzene content of the soil to provide reasonable assurance that the public's health is not endangered by the operation of this facility.

IV. Air Quality Analysis

By restricting the benzene content of the soil, the Department has reasonable assurance that the operation of the portable rotary kiln/afterburner system will not create a health hazard or cause/contribute to an ambient air quality violation.

V. Conclusion

Based on the information provided by Sunbelt Resources, Inc., the Department has reasonable assurance that the proposed construction/operation of the 50 TPH mobile rotary kiln/afterburner system, as described in this evaluation, and subject to the

TEPD - Sunbelt Resources, Inc.
AC37-216863
Page 7

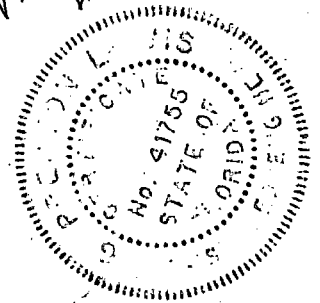
conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-296 and 297 of the Florida Administrative Code.

*Director Lewis
41755*

TEPD - Sunbelt Resources, Inc.
AC37-216863
Page 7

conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-296 and 297 of the Florida Administrative Code.

P. Preston Lewis
#41755





Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

Permit Number: AC37-216863
Expiration Date: January 1, 1994
County: Mobile Operation
Project: 50 TPH Mobile Soil
Thermal Treatment Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-210, 212, 275, 296, 297 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, 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 50 TPH mobile soil thermal treatment facility with air pollution controlled by an afterburner and baghouse. Major components of the facility are a contaminated soil feed bin, bin to dryer belt conveyor, a 30 MMBtu/hr dryer that is 7 ft. in diameter by 34 ft. long, a Tarmac Model P830HO 14 MMBtu/hr afterburner operating at 1600°F with approximately 1 second residence time, an air to air cooler, a Tarmac Model P1424BH baghouse, a pug mill, fuel (No. 2 fuel oil, propane, and natural gas) systems, and associated equipment. The facility is equipped with a stack (3.5 ft. diameter by 25 ft. high) that discharges approximately 24,487 acfm of flue gas at 375°F to the atmosphere.

This facility may operate in Gulf, Okaloosa, and Escambia Counties. The facility may operate in any other county within Florida after completing the public notice requirement and receiving Department authorization to operate in the county.

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 July 22, 1992.
2. DER letter dated August 7, 1992.
3. Koogler's letter dated September 9, 1992.
4. DER letter dated September 30, 1992.
5. Koogler's letter dated October 5, 1992.
6. Koogler's letter dated November 19, 1992.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

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 403.161, 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.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

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.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

GENERAL CONDITIONS:

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.
- 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

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

GENERAL CONDITIONS:

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:

Miscellaneous

1. A part of this permit is the previous (14) General Conditions. The following index of the specific conditions of this permit is provided for convenience.

<u>Purpose of Specific Conditions</u>	<u>Specific Condition Numbers</u>
Miscellaneous	1
Construction Requirements	2 - 5
Emission Restrictions	6 - 11
Operation Requirements	12 - 24
Compliance Requirements	25 - 28
Administrative Requirements	29 - 34

Construction Requirements

2. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

SPECIFIC CONDITIONS:

3. The stack sampling facilities must comply with Rule 17-297.345, F.A.C.

4. The facility shall be equipped with a means to measure the pressure drop across the particulate matter air pollution control device and continuous emissions monitors and recorders for hot zone temperature and carbon monoxide concentration (Rule 17-296.415(1)(c), F.A.C.).

5. The facility shall be equipped with instruments to measure the process feed rate of contaminated soil to the dryer.

Emission Restrictions

6. Particulate matter emissions shall not exceed any of the following limits (based on data in the application and Rule 17-296.415(2)(b), F.A.C.):

- (A) 0.04 grains per dry standard cubic foot
- (B) 3.9 pounds per hour
- (C) 8.6 tons in any 12 consecutive month period at 4400 hrs/yr operation time.

7. Carbon monoxide emissions shall not exceed 100 parts per million by volume, dry, during any 60 consecutive minute period (Rule 17-296.415(1)(b), F.A.C.).

8. Visible emissions from the stack shall not exceed 5 percent opacity (Rule 17-296.415(2)(a), F.A.C.).

9. Reasonable precautions shall be taken to minimize uncontrolled particulate matter emissions (Rule 17-296.310, F.A.C.). These provisions are applicable to any source, including vehicular movement, transportation of materials, and industrial related activities such as loading, unloading, storing, and handling. Before and after thermal soil treatment is accomplished, unconfined emissions of particulate matter from the soil shall be controlled by the application of water and/or containment (Rule 296.415(3), F.A.C.).

10. Operation of this facility shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor (Rule 17-296.320, F.A.C.).

11. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

SPECIFIC CONDITIONS:

requirements of Chapter 17-296 and 17-297, F.A.C., or any other requirements under federal, state, or local regulations.

Operation Requirements

12. In case of excess emissions resulting from a malfunction, the permittee shall notify the Department's District office that the facility is operating in and Bureau of Air Regulation (BAR) office within one (1) working day of the cause and duration of the upset. If requested, the permittee shall submit a full written report on the malfunction. (Rule 17-210.700, F.A.C.).

13. The facility shall only treat petroleum contaminated soil as defined in Rule 17-775, F.A.C. (Rule 17-296.415).

14. This facility may not treat PCB contaminated soil.

15. The input rate of petroleum contaminated soil to the facility shall not exceed 50 tons per hour. Material entering the kiln cannot be larger than 2 inches in diameter. The permittee shall have the means of determining feed or production rates of the facility on site.

16. Untreated soil removed from the ground at the contaminated site shall be stored under a waterproof cover and on an impermeable surface.

17. The unit shall not be operated at a location or in a manner that creates a nuisance, and shall observe local noise ordinances.

18. This unit shall be allowed to operate 24 hours per day, 7 days per week, 52 weeks per year, but not more than 4400 hours per year.

19. The input of petroleum contaminants into the facility shall not exceed 500 lbs/hr (daily average) (data per application).

20. The dryer shall use virgin No. 2 fuel oil only. The sulfur content of this fuel shall not exceed 0.2 percent sulfur by weight (daily average). The fuel heat input to the dryer shall not exceed 30 million Btu per hour, approximately 214 GPH of No. 2 fuel (data per application).

21. The afterburner shall burn virgin No. 2 fuel oil, natural gas, or propane only. The sulfur content of the virgin No. 2 fuel shall not exceed 0.3 percent sulfur by weight (daily average). The fuel heat input to the afterburner shall not exceed 14.0 million Btu per

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

SPECIFIC CONDITIONS:

hour, approximately 100 GPH No. 2 fuel oil, 140 GPH propane, or 14.0 mcfh of natural gas fuel (data per application).

22. Contaminated soil shall not be treated by the facility unless the afterburner is operating at a minimum temperature of 1600°F, and a retention time above 0.5 seconds (Rule 17-296.415(1)(a), F.A.C.) (data per application).

23. All emission monitoring equipment shall be properly installed, calibrated, operated, and maintained in accordance with the manufacturer's requirements for that instrument.

24. Pressure drop across the particulate matter air pollution control device shall be recorded hourly and the temperature and carbon monoxide concentration of the hot zone shall be recorded continuously (Rule 17-296.415(1)(c), F.A.C.).

Compliance Requirements

25. The Bureau of Air Regulation (BAR), District and County environmental agency that the facility is operating in shall be notified in writing at least 15 days in advance of any formal compliance test to be conducted on this facility. The notification shall give the date, time, place, and contact person for the test (Rule 17-297.340(1)(i), F.A.C.).

26. This facility shall be tested (EPA test methods are specified in 40 CFR 60, Appendix A, revised July 1, 1992) at 90-100% of its permitted process rate within 30 days of placing it in service for:

- (A) Particulate matter (PM) emissions by EPA Methods 1, 2, 3, 4, and 5.
- (B) Visible emissions by EPA Method 9.
- (C) Carbon monoxide (CO) emissions by averaging all readings taken each hour from the CO continuous emission monitor during the PM test periods.
- (D) Afterburner temperature by averaging all readings taken each hour from the continuous temperature monitor during the PM test period.
- (E) Afterburner residence time using the test data collected by EPA Methods 1 and 2.
- (F) Fuel oil sulfur limits based on analysis referenced in 40 CFR 60.17 or other methods after Department approval. An analysis by the permittee or certified analysis by the fuel oil supplier is acceptable for proof of compliance with this requirement.

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

SPECIFIC CONDITIONS:

(G) Contaminated soil analysis for volatile organic aromatics (VOA), total recoverable petroleum hydrocarbons (TRPH), polynuclear aromatic hydrocarbons (PAH), volatile organic halocarbons (VOH), and metals as required by Rule 17-775.410, F.A.C.

27. Results of compliance tests shall be submitted to the BAR within 45 days of the test.

28. When the Department, after investigation, has good reason to believe that any applicable emission standard or condition of this permit is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the plant and to provide a report on the results of said tests to the Department (Rule 17-297.340(2), F.A.C.).

Administrative Requirements

29. The permittee for a mobile unit shall notify the Bureau of Air Regulation, local government (city and/or county), and the Department District office by registered mail at least 3 days prior to moving to a new operating site. The notification shall provide 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. The Department may notify the permittee of new restrictions for the facility that will apply while it is operating at this work site (Rule 17-775.700(1), F.A.C.).

30. The permittee shall maintain a log that shows the date, location, operation time, pressure drop across the PM control device, processing rate, type and quantity of fuel consumption in the dryer and afterburner, and operation problems. These records shall be maintained for a minimum of 3 years.

31. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements, all continuous monitoring system performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on these systems or devices, all soil analysis required by Rule 17-775, F.A.C., and all other information required by rule or this permit, recorded in a permanent form suitable for inspection. The file shall be retained for at least 3 years

PERMITTEE:
Sunbelt Resources, Inc.

Permit Number: AC37-216863
Expiration Date: January 1, 1994

SPECIFIC CONDITIONS:

following the date of such measurements, maintenance, reports, and records.

32. The permittee shall submit to BAR each calendar year, on or before March 1, an annual operation report for this facility for the preceding calendar year containing at least the following information pursuant to Subsection 403.061(13), F.S.:

- (A) Annual amount of material and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Annual hours of operation.
- (D) Any changes in the information contained in the permit.
- (E) All compliance test reports for the preceding year.
- (F) Temperature and CO exceedance reports for the year.

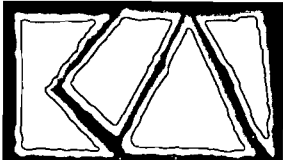
33. The permittee, for good cause, may request that this construction permit be extended. Such request shall be submitted to the BAR prior to 60 days before the expiration of the permit (Rule 17-4.090, F.A.C.).

34. 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 (Rule 17-4.220, F.A.C.).

Issued this _____ day
of _____, 1992

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Howard L. Rhodes, Director
Division of Air Resources
Management



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 ■ FAX 377-7158

RECEIVED

DEC 07 1992

Division of Air
Resources Management

KA 532-92-01

December 4, 1992

Mr. Willard Hanks
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Published Notice of Application
Sunbelt Resources, Inc.
File No. AC37-216863

Dear Mr. Hanks:

On November 13, 1992, Sunbelt Resources, Inc. received a proposed Notice of Application for the construction of a soil remediation unit. The Notice of Application was to be published in a newspaper having circulation in each county in which Sunbelt Resources intended to operate.

At the present time, Sunbelt Resources intends to operate the soil remediation unit in Gulf, Okaloosa, and Escambia counties. Enclosed you will find proof of publication of the Notice of Application for Sunbelt Resources, Inc., for the aforementioned counties.

If you have any questions or need additional information, please do not hesitate to give me a call.

Very truly yours,

KOOGLER & ASSOCIATES

Megan E. Miner

c: Mr. Terry Bunn, Sunbelt Resources, Inc.

*Mr. Hanks
E. Middlewart, NW Dist*

PENSACOLA
**News
Journal**

PUBLISHED DAILY

Pensacola, Escambia County, Florida

STATE OF FLORIDA
County of Escambia

Before the undersigned authority personally appeared

Sharon Hartman

who is personally known to me and who on oath says that he/she is a representative of The Pensacola News Journal, a daily newspaper published at Pensacola in Escambia County, Florida; that the attached copy of advertisement, being a Legal in the matter of _____

Application

_____ in the _____ Court, was

published in said newspaper in the issues of _____

Nov 25, 1992

Affiant further says that the said Pensacola News Journal is a newspaper published at Pensacola, in said Escambia County, Florida, and that the said newspaper has heretofore been continuously published in said Escambia County, Florida each day and has been entered as second class mail matter at the post office in Pensacola, in said Escambia County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this 30

day of Nov A.D., 19 92

Betty J. Weekley
Notary Public

BETTY J. WEEKLEY
"Notary Public—State of Florida"
My Commission Expires Nov. 21, 1995
CC463199

NOTICE
OF APPLICATION

The Department of Environmental Regulation announces receipt of an application for a permit from Sunbelt Resources, Inc. to construct a soil remediation unit that will evaporate and incinerate petroleum fuels and lubricants from soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: GULF, OKALOOSA, ESCAMBIA

The application is being reviewed at the Department of Environmental Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00 am - 5:00 pm, Monday through Friday, except for legal holidays, at the Department of Environmental Regulation offices located at:

- 2600 Blair Stone Road, Tallahassee, FL 32399-2400
- 160 Governmental Center, Pensacola, FL 32501-5794
- 3804 Coconut Palm Dr., Tampa, FL 33619-8218
- 2269 Bay Street, Fort Myers, FL 33901-2896
- 7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
- 1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406
- 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803
- and county offices located at:
- 621 S. Andrew Ave., Ft. Lauderdale, FL 33301
- 801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130
- 421 West Church St., Ste. 412, Jacksonville, FL 32202-4111
- 1410 North 21st Street, Tampa, FL 33605
- 901 E. Evernia Street, West Palm Beach, FL 33402
- 300 S. Garden Ave., Clearwater, FL 34616
- 1301 Cattleman Road, Bldg. B, Sarasota, FL 34232-6299
- 2002 E. Michigan Avenue, Orlando, FL 32806

Legal No. 42135 1T
Nov. 25, 1992

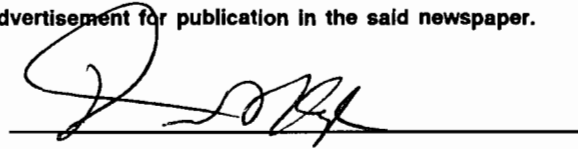
Florida Freedom Newspapers, Inc.

PUBLISHERS OF THE NEWS HERALD
Panama City, Bay County, Florida
Published Daily

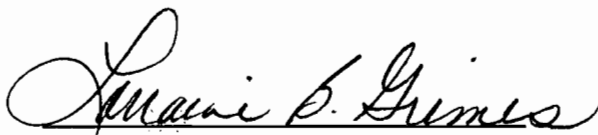
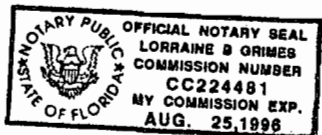
State of Florida County of Bay

Before the undersigned authority appeared _____
Dennis Kozak _____, who on oath says that (s)he
is Advertising Director _____ of the News Herald, a daily
newspaper published at Panama City, in Bay County, Florida; that the attached copy
of advertisement, being a Legal Advertisement _____
in the matter of Notice of Application _____
Soil Remediation Unit _____
in the _____
Court, was published in said newspaper in the issues of Nov. 27, 1992

Affiant further says that the News Herald is a direct successor of the Panama City News and that this publication, together with its direct predecessor, has been continuously published in said Bay County, Florida, each day (except that the predecessor, Panama City News, was not published on Sundays), and that this publication together with its said predecessor, has been entered as a second class mail matter at the post office in Panama City in said Bay County, Florida, for a period of one year next preceding the first publication of the attached copy of the advertisement, all in accordance with the provisions of section 49.03, Florida Statutes; and affiant further says that (s)he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



State of Florida
County of Bay
Sworn to and subscribed before me this 27th day of November
A. D., 1992 by Dennis Kozak _____, Advertising Director of The
News Herald. He is personally known to me or has produced _____
as identification and did take an oath.



Notary Public, State of Florida at Large

4676 NOTICE OF APPLICATION

The Department of Environmental Regulation announces receipt of an application for a permit from Sunbelt Resources, Inc. to construct a soil remediation unit that will evaporate and incinerate petroleum fuels and lubricants from soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: GULF, OKALOOSA, ESCAMBIA.

The application is being reviewed at the Department of Environmental Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00 am - 5:00 pm, Monday through Friday, except for legal holidays, at the Department of Environmental Regulation offices located at:

2600 Blair Stone Road, Tallahassee, FL 32399-2400; 160 Governmental Center, Pensacola, FL 32501-5794; 3804 Coconut Palm Dr., Tampa, FL 33619-8218; 2269 Bay Street, Fort Myers, FL 33901-2896; 7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577; 1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406; 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803; and county offices located at:

621 S. Andrew Ave., Ft. Lauderdale, FL 33301; 801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130; 421 West Church St., Ste. 412, Jacksonville, FL 32202-4111; 1410 North 21st Street, Tampa, FL 33605; 901 E. Evernia Street, West Palm Beach, FL 33402; 300 S. Garden Ave., Clearwater, FL 34616; 1301 Cattleman Road, Bldg. B, Sarasota, FL 34232-6299; 2002 E. Michigan Avenue, Orlando, FL 32806.
November 27, 1992

NORTHWEST FLORIDA
Daily News

Published Daily
Fort Walton Beach, Florida

State of Florida }
County of Okaloosa }

Before the undersigned authorized personally appeared _____

Denise Spencer _____, who on oath says that (s)he

is Acct. Asst. _____ of the Northwest Florida Daily News, a daily

newspaper published at Fort Walton Beach, in Okaloosa County, Florida;

that the attached copy of advertisement, being a legal _____

in the matter of Notice of Application _____

From Sunbelt Resources, Inc. _____

in the Okaloosa County _____

Court, was published in said newspaper in the issues of _____

November 27, 1992 _____

Affiant further says that the said Northwest Florida Daily News is a newspaper published at Fort Walton Beach, in said Okaloosa County, Florida, and that the said newspaper has heretofore been continuously published in said Okaloosa County, Florida, each day, and has been entered as second class mail matter at the post office in Fort Walton Beach, in said Okaloosa County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that (s)he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

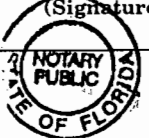
STATE OF FLORIDA
COUNTY OF OKALOOSA

Subscribed and sworn to (or affirmed) before me this Nov. 27, 1992
(Date)

by Denise Spencer _____, who is/are personally known to me or

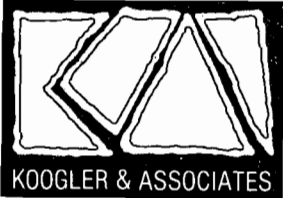
has/have produced FL DL #S152-171-64-825 _____ as identification.
(Type of identification)

Wanda Edwards Notary Public, Commission No. 158284



(Name of Notary typed, printed or stamped)
WANDA EDWARDS
My Comm. Exp. 11-5-95
Bonded By Service Ins. Co.

Leg. 1620
NOTICE OF APPLICATION
The Department of Environmental Regulation announces receipt of an application for a permit from Sunbelt Resources, Inc. to construct a soil remediation unit that will evaporate and incinerate petroleum fuels and lubricants from soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: GULF, OKALOOSA, ESCAMBIA
The application is being reviewed at the Department of Environmental Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00 am - 5:00 pm, Monday through Friday, except for legal holidays, at the Department of Environmental Regulation offices located at:
2600 Blair Stone Road, Tallahassee, FL 32399-2400
160 Governmental Center, Pensacola, FL 32501-5794
3804 Coconut Palm Dr., Tampa, FL 33619-8218
2269 Bay Street, Fort Myers, FL 33901-2896
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406
3319 Maguire Blvd., Suite 232, Orlando, Florida 32803
and county offices located at:
621 S. Andrew Ave., Ft. Lauderdale, FL 33301
801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130
421 West Church St., Ste. 412, Jacksonville, FL 32202-4111
1410 North 21st Street, Tampa, FL 33605
901 E. Evernia Street, West Palm Beach, FL 33402
300 S. Garden Ave., Clearwater, FL 34616
1301 Cattleman Road, Bldg. B, Sarasota, FL 34232-6299
2002 E. Michigan Avenue, Orlando, FL 32806
Leg. 1620 Nov. 27, 1992.



KOGLER & ASSOCIATES
 ENVIRONMENTAL SERVICES
 4014 NW THIRTEENTH STREET
 GAINESVILLE, FLORIDA 32609
 904/377-5822 ■ FAX 377-7158

*\$50 check
 sent back
 by Pradup
 Raval 11-20-92
 PA*

KA 532-92-01

November 19, 1992

RECEIVED

NOV 20 1992

Division of Air
 Resources Management

Mr. Mark Halverstadt
 Florida Department of
 Environmental Regulation
 Twin Towers Office Building
 2600 Blair Stone Road
 Tallahassee, FL 32399-2400

Subject: Sunbelt Resources, Inc.
 Mobile Soil Remediation Unit
 File No. AC37-216863

Dear Mr. Halverstadt:

In accordance with our recent telephone conversation, I am enclosing revised pages to the air construction permit application for the mobile soil remediation unit proposed by Sunbelt Resources, Inc. (Sunbelt). The revisions will allow the use of new No. 2 fuel oil as an alternative fuel for the afterburner of the soil remediation unit. The No. 2 fuel oil will have a sulfur content of 0.3 percent and will increase sulfur dioxide emissions from 8.7 pounds per hour and 19.2 tons per year to 12.8 pounds per hour and a maximum of 28.2 tons per year. The fuel oil will also cause a slight increase in nitrogen oxides emissions; from 6.0 to 6.3 pounds per hour and from 13.2 to 13.8 tons per year.

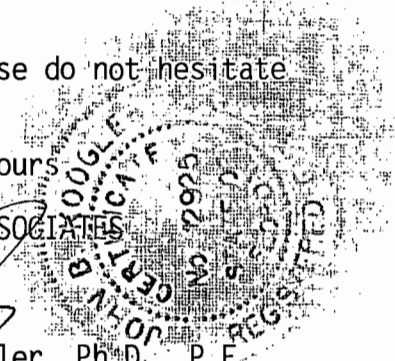
No other changes are requested for the unit. Enclosed please find a check for \$50 payable to the Florida Department of Environmental Regulation for a sub-type M2 minor permit modification.

If there are any questions regarding this matter, please do not hesitate to contact me.

Very truly yours

KOGLER & ASSOCIATES

John B. Koogler, Ph.D. P.E.



JBK:wa
 Enc.

c: Mr. David Peterson, Sunbelt

*DE Districts
 Social Programs*

The hydrocarbons and dust suspended in the gas stream leaving the rotary kiln are ducted to an afterburner for VOC control. The afterburner is designed for a residence time in excess of 1.0 seconds at a temperature of 1600°F. The afterburner is heated with a 30 million BTU per hour burner firing either propane or natural gas. Propane will be the primary fuel with natural gas being fired only when readily available.

or virgin No. 2 fuel oil
or virgin No. 2 fuel oil

From the afterburner, the gas stream will pass through an air-to-air heat exchanger where it will be cooled from approximately 1600°F to approximately 375°F. From the heat exchanger, the gas stream will pass through a baghouse with an air-to-cloth ratio of approximately 5.0/1.

The process flow utilized by Sunbelt assures that hydrocarbons will not condense on the baghouse dust. This eliminates the potential of recontamination of the baghouse dust and the reintroduction of hydrocarbon contaminants back into the site.

On start up, the plant is checked out and warm up procedures are completed. Once operating, the safety controls and automatic monitors make the operation of the remediation plant relatively uncomplicated. Automatic safety controls, temperature gauges and recording devices are designed to allow the plant to operate within strict parameter ranges.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Soil	P.M.	2-3	100,000	
	VOC	0.5		

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 100,000 lb/hr (50 tpy); wet weight
- Product Weight (lbs/hr): typically 92,000 lb/hr (46 tpy); dry weight

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
P.M.	3.9	8.6	(a)	3.9	2250	4950	
SO ₂	8.7 12.8 10.1	19.2 28.2 22.2	(b)	12.8 8.7 10.1	8.7 12.8 10.1	19.2 28.2 22.2	28.2
NOx	6.0 6.3 6.5	13.2 13.8 14.3	(c)	6.3 6.0 6.5	6.0 6.3 6.5	13.2 13.8 14.3	13.8
VOC	5.0	11.0	(d)	5.0	500.1	1100	
CO	5.0	11.0	(e)	5.0	5.0	11.0	

10/92
11/92

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

Note: All Emission limits requested by applicant.

- a) 0.04gr/dscf c) Based on AP-42 e) 100 ppm in stack gas
 b) 0.3% sulfur fuel oil d) 99% VOC control

Rev 10/2/92
 11/19/92

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Baghouse- Tarmac Model P1424BH	P.M.	99.8	>2um	Mfg.
Afterburner - Tarmac Model P830HO	VOC	99+%	NA	Mfg. & FDER

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Dryer- No. 2 Oil	185	214 gal/hr	30.0
On Spec Used Oil	200	240 gal/hr	30.0
Afterburner- Propane	120	140 gal/hr	14.0
- No. 2 Oil	90	100 gal/hr	14.0
- Natural Gas	12.0	14.0 mcfh	14.0

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis: No. 2/ ~~Used Oil~~/ Propane

Percent Sulfur: 0.3/ ~~0.3~~/ Nil Percent Ash: Nil/ ~~Nil~~/ Nil

Density: 6.8/ ~~7.0~~/ 5.0 lbs/gal Typical Percent Nitrogen: Nil/ ~~Nil~~/ Nil

Heat Capacity: 20,590/ ~~17,860~~/ 19,500 BTU/lb 140,000/ ~~125,000~~/ 97,500 BTU/gal

Other Fuel Contaminants (which may cause air pollution): Trace metals in on-specification used oil.

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average NA Maximum NA

G. Indicate liquid or solid wastes generated and method of disposal.

None

2/3. Controlled and Uncontrolled Emissions

A. Particulate Matter

Uncontrolled at 45 lb/ton (AP-42, Section 8.0)

$$\begin{aligned}
 &= 50 \text{ tph} \times 45 \text{ lb/ton} \\
 &= 2250 \text{ lb/hr} \\
 &\quad \times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\
 &= 4950 \text{ tpy}
 \end{aligned}$$

Controlled to 0.04 gr/dscf

$$\begin{aligned}
 &= 11458 \text{ ft}^3/\text{min} \times 0.04 \text{ gr/ft}^3 \times 60 \text{ min/hr} \times 1/7000 \\
 &= 3.93 \text{ lb/hr} \\
 &\quad \times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\
 &= 8.6 \text{ tpy}
 \end{aligned}$$

B. Sulfur Dioxide

Controlled and Uncontrolled

SRU - ²¹⁴~~240~~ gal/hr used oil at 0.3% sulfur; worst case | 10/92

Afterburner - ¹⁰⁰~~140~~ gal/hr propane with ^{No. 2 Oil} ~~0.014~~ pounds sulfur per ^{0.3% sulfur; worst case} ~~1000~~ gal | 11/92

$$\begin{aligned}
 \text{SO}_2 &= [\overset{214}{\cancel{240}} \text{ gal/hr} \times \overset{6.8}{\cancel{7.0}} \text{ lb/gal} \times (0.003 \times 2) \text{ lb SO}_2/\text{lb}] \\
 &\quad + [\overset{100}{\cancel{140}} \text{ gal/hr} \times (\overset{0.003}{\cancel{0.014/1000}}) \times 2) \text{ lb SO}_2/\text{gal}] \\
 &= \overset{8.7}{\cancel{10.1}} \text{ lb/hr} \quad \left\{ \begin{array}{l} \text{6.8 gal/ton} \\ \text{12.8} \end{array} \right. \quad | \quad 10-11/92 \\
 &\quad \times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\
 &= \overset{19.2}{\cancel{22.2}} \text{ tpy} \\
 &= 28.2 \quad | \quad 11/92
 \end{aligned}$$

C. Nitrogen Oxides

Controlled and Uncontrolled

SRU = ~~240~~ gal/hr used oil; worst cast @ 20 lb/1000 gal | 10/92

Afterburner = ¹⁰⁰~~140~~ gal/hr propane @ ^{No. 2 Oil} ~~12.4~~ lb/1000 gal ²⁰ | 11/92

$$\begin{aligned}
 \text{NOx} &= \left[\overset{214}{\cancel{240}} \text{ gal/hr} \times 20/1000 \text{ lb/gal} \right] \\
 &+ \left[\overset{100}{\cancel{140}} \text{ gal/hr} \times \overset{20}{\cancel{12.4}}/1000 \text{ lb/gal} \right] \\
 &= \overset{6.0}{\cancel{6.5}} \text{ lb/hr} \\
 &\quad \overset{6.3}{\cancel{6.3}} \\
 &\quad \times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\
 &= \overset{13.2}{\cancel{14.3}} \text{ tpy} \\
 &\quad \overset{13.8}{\cancel{13.8}}
 \end{aligned}$$

10/92
11/92
11/92
11/92

D. Carbon Monoxide

Controlled and Uncontrolled

Assume 100 ppm (dry volume basis) in stack gas

$$\begin{aligned}
 \text{CO} &= 11458 \text{ dscfm} \\
 &\quad \times 60 \text{ min/hr} \\
 &\quad \times (100 \times 10^{-6}) \\
 &\quad \times 28/385 \\
 &= 5.0 \text{ lb/hr} \\
 &\quad \times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\
 &= 11.0 \text{ tpy}
 \end{aligned}$$

E. VOC

Uncontrolled

$$\text{SRU} = \overset{214}{\cancel{240}} \text{ gal/hr used oil (worst case) at } 0.34 \text{ lb/1000 gal}$$

Afterburner

$$\text{Fuel} = \overset{100}{\cancel{140}} \text{ gal/hr propane at } \overset{0.34}{\cancel{0.25}} \text{ lb/1000 gal}$$

Contaminated Soil = 500 lb VOC/hr

$$\begin{aligned}
 \text{VOC} &= \left[\overset{214}{\cancel{240}} \text{ gal/hr} \times 0.34/1000 \text{ lb/gal} \right] \\
 &+ \left[\overset{100}{\cancel{140}} \text{ gal/hr} \times \overset{0.34}{\cancel{0.25}}/1000 \text{ lb/gal} \right] \\
 &+ [500 \text{ lb/hr}] \\
 &= 500.1 \text{ lb/hr} \\
 &\quad \times 4400 \text{ lb/yr} \times 1/2000 \text{ lb/ton} \\
 &= 1100 \text{ tpy}
 \end{aligned}$$

10/92
11/92
10/92
11/92

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 Fee will provide you the signature of the person delivered to and the date of delivery.

if 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. Terry Bunn, President
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

4a. Article Number
P 062 922 007

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

7. Date of Delivery

11/16/92

5. Signature (Addressee)

Terry Bunn

6. Signature (Agent)

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

PS Form 3811, November 1990 *U.S. GPO: 1991-287-066

DOMESTIC RETURN RECEIPT

P 062 922 007



Receipt for Certified Mail

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

Sent to Mr. Terry Bunn, Sunbelt	
Street and No. 715 Skyland Blvd., East Resources	
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: 11-13-92 Permit: AC 17-216863	

PS Form 3800, June 1991



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 13, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Terry Bunn, President
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

Re: File No. AC37-216863

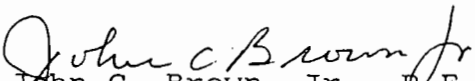
Dear Mr. Bunn:

The Department has made a preliminary review of your application to construct a 50 ton per hour soil remediation unit. Applicants for permits to construct soil remediation units are required to publish a Notice of Application in a newspaper having circulation in each county you intend to operate and provide the Department with proof of each publication. A proposed Notice of Application is enclosed.

You will also be required to publish a Notice of Intent to Issue in the same newspaper(s) should the Department approve your application. Any construction permit issued will limit you to operating in these counties. To operate in any other county, you must satisfy the public notice requirements for that county, and have your permit amended to authorize operation there. The public will have an opportunity to comment or petition for an administrative hearing in response to any public notice for your unit.

If you have any questions on this matter, please write me or call Mark Halverstadt at (904) 488-1344.

Sincerely,


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

JCB/MH/plm

Enclosure

cc: John Koogler, P.E.

NOTICE OF APPLICATION

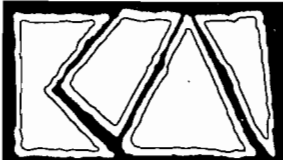
The Department of Environmental Regulation announces receipt of an application for a permit from Sunbelt Resources, Inc. to construct a soil remediation unit that will evaporate and incinerate petroleum fuels and lubricants from soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: (applicant fill in prior to publication).

The application is being reviewed at the Department of Environmental Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00am - 5:00pm, Monday through Friday, except for legal holidays, at the Department of Environmental Regulation offices located at:

2600 Blair Stone Road, Tallahassee, FL 32399-2400
160 Governmental Center, Pensacola, FL 32501-5794
3804 Coconut Palm Dr., Tampa, FL 33619-8218
2269 Bay Street, Fort Myers, FL 33901-2896
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406

and county offices located at:

621 S. Andrew Ave., Ft. Lauderdale, FL 33301
801 S.W. 3rd Avenue, 2nd Floor, Miami, FL 33130
421 West Church St., Ste. 412, Jacksonville, FL 32202-4111
1410 North 21st Street, Tampa, FL 33605
901 E. Evernia Street, West Palm Beach, FL 33402
300 S. Garden Ave., Clearwater, FL 34616
1301 Cattleman Road, Bldg. B, Sarasota, FL 34232-6299
2002 E. Michigan Avenue, Orlando, FL 32806



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 532-92-01

October 5, 1992

Mr. C. H. Fancy
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Sunbelt Resources, Inc.
Mobile Soil Remediation Unit
FDER File AC37-216863

Dear Mr. Fancy:

Following conversations with Mr. Willard Hanks of your staff and personnel with Sunbelt Resources, Inc. (Sunbelt), I am requesting, on behalf of Sunbelt, that on-specification used oil fuel be eliminated as a possible fuel for the mobile soil remediation unit being permitted by Sunbelt. Sunbelt will fire the rotary kiln portion of the soil remediation unit only with virgin No. 2 fuel oil. As specified in the permit application previously submitted, the afterburner associated with the soil remediation unit will be fired only with propane or natural gas.

I have attached hereto copies of FDER Form 17-1.202(1) deleting any reference to on-specification used oil as a fuel. The elimination of used oil as a fuel has a minor affect on some of the emission rates reported in the permit application and these have been corrected in the attached revisions to the permit application.

As a result of the elimination of used oil as a fuel, the information provided under Item 3 in my letter to you dated September 9, 1992, is no longer applicable. The elimination of used oil as a possible fuel eliminates nearly all potential for arsenic, cadmium, chromium and lead to be emitted from the soil remediation unit. These are the metals addressed in Item 3 of my September 9, 1992, letter to you.

RECEIVED

OCT 6 1992

Division of Air
Resources Management

BEST AVAILABLE COPY

FEDERAL EXPRESS

QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL PACKAGE TRACKING NUMBER

2380789353

2380789353

RECIPIENT'S COPY

From (Your Name) Please Print		Your Phone Number (Very Important)		To (Recipient's Name) Please Print		Recipient's Phone Number (Very Important)									
		205-752-8195		Mr. Willard Hulse											
Company		Department/Floor No.		Company		Department/Floor No.									
S T LANN CONSTRUCTION CO				Florida											
Street Address				Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes)											
715 SKYLAND BLVD															
City		State		City		State									
TUSCALOOSA		AL		Tallahassee		FL									
ZIP Required				ZIP Required											
3 5 4 0 5				32311-2400											
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice.)				IF HOLD FOR PICK-UP, Print FEDEX Address Here											
				Street Address											
PAYMENT 1 <input checked="" type="checkbox"/> Bill Sender, 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card				City				State							
5 <input type="checkbox"/> Cash <input type="checkbox"/> Check								ZIP Required							
4 SERVICES (Check only one box)		5 DELIVERY AND SPECIAL HANDLING (Check services required)		6 PACKAGES		WEIGHT in Pounds Only		YOUR DECLARED VALUE		Emp. No.		Date		Federal Express Use	
Priority Overnight (Delivery by next business morning) 11 <input type="checkbox"/> YOUR PACKAGING 16 <input checked="" type="checkbox"/> FEDEX LETTER 12 <input type="checkbox"/> FEDEX PAK * 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE Economy Two-Day (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY Freight Service (for Extra Large or any package over 150 lbs.) 70 <input type="checkbox"/> OVERNIGHT FREIGHT ** 80 <input type="checkbox"/> TWO-DAY FREIGHT **		Standard Overnight (Delivery by next business afternoon) 51 <input type="checkbox"/> YOUR PACKAGING 56 <input type="checkbox"/> FEDEX LETTER * 52 <input type="checkbox"/> FEDEX PAK * 53 <input type="checkbox"/> FEDEX BOX 54 <input type="checkbox"/> FEDEX TUBE Government Overnight (Restricted for authorized users only) 46 <input type="checkbox"/> GOVT LETTER 41 <input type="checkbox"/> GOVT PACKAGE		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box #) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE _____ Lbs 7 <input type="checkbox"/> OTHER SPECIAL SERVICE _____ 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> DESCRIPTION _____ 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)		Total Total Total DIM SHIPMENT (Chargeable Weight) L x W x H = _____ lbs. Received At 1 <input type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input checked="" type="checkbox"/> On-Call Stop 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station		Emp. No. <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold Street Address City State Zip Received By: X Date/Time Received FedEx Employee Number Release Signature: FedEx Emp. No. Date/Time		Base Charges Declared Value Charge Other 1 Other 2 Total Charges REVISION DATE 6/91 PART #137204 FXEM 3/92 FORMAT #099 099 © 1990-91 FEDEX PRINTED IN U.S.A.					

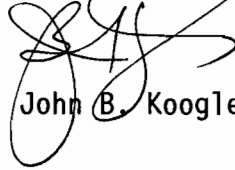
Mr. C. H. Fancy
Florida Department of
Environmental Regulation

October 5, 1992
Page 2

If there are any further questions regarding the Sunbelt soil remediation unit, please do not hesitate to contact me.

Very truly yours,

KOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

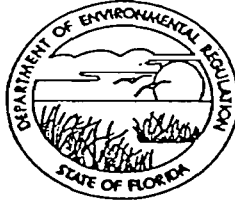
JBK:wa
Enc.

c: Mr. Willard Hanks, FDER, Tallahassee
Mr. David Peterson, Sunbelt



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED



OCT 13 1992

Division of Air
Resources Management

APPLICATION TO ~~OPERATE~~/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Mobile Soil Remediation Unit New¹ Existing¹

APPLICATION TYPE: Construction Operation Modification

COMPANY NAME: Sunbelt Resources, Inc. COUNTY: Statewide

Identify the specific emission point source(s) addressed in this application (i.e. Lime
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Tarmac Model P734CFD

SOURCE LOCATION: Street (Mobile Facility) City _____

UTM: East _____ North _____

Latitude _____° _____' _____"N Longitude _____° _____' _____"W

APPLICANT NAME AND TITLE: Terry Bunn, President

APPLICANT ADDRESS: 715 Skyland Blvd. East, Tuscaloosa, Ala 35405

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Sunbelt Resources, Inc.

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Terry Bunn

Terry Bunn, President
Name and Title (Please Type)

Date: 10/2/92 Telephone No. (205) 758-3657

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been ~~designed~~ examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed _____
(Handwritten Signature)

John B. Koogler, Ph.D., P.E.
Name (Please Type)

Koogler & Associates; Environmental Services
Company Name (Please Type)

4014 N.W. 13th Street, Gainesville, FL 32609
Mailing Address (Please Type)

Florida Registration No. 12925 Date: 10/2/92 Telephone No. (904) 377-5822

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction permit application for a 50 ton/hour mobile soil remediation facility.
The counties in which the plant will operate will be decided at the time public notice.
See page 2a of 12 for additional information.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction NA Completion of Construction NA

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Cost of afterburner, heat exchanger and baghouse is \$650,000.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

None

Rev 10/2/92

SECTION IIA: PROCESS DESCRIPTION

Sunbelt Resources, Inc. (Sunbelt) plans to operate a mobile thermal soil remediation plant in the state of Florida. It is anticipated that the plant will operate statewide. The counties in which a Public Notice will be published will be determined at the time the Department completes its Intent to Issue.

The mobile soil remediation unit is manufactured by Tarmac Equipment Company, Inc. of Kansas City, Missouri. Attachment 2 includes a general description of each component of the plant. Attachment 1 is the process flow diagram for the plant. The process entails heating the petroleum contaminated soil in a rotary kiln to temperatures between 600 and 900°F. The hydrocarbons are evaporated from the soil and are destroyed in an afterburner having a destruction efficiency estimated to be 99 percent. Following the afterburner, the gas is passed through an air-to-air heat exchanger and are cooled to 375°F. The gases then pass through a baghouse for particulate matter control and are exhausted to the atmosphere.

The mobile soil remediation unit will operate in compliance with all requirements of Chapters 17-2, 17-4 and 17-775, FAC. Typically, the soils processed through the plant will be used as backfill at the site of origin.

The soil remediation unit will process soils allowed under the requirements of Chapter 17-775, FAC at a rate of up to 50 tons per hour. The actual processing rate will depend upon the type of soil encountered and the level of contaminate in the soil. The contaminated soil from on-site stockpiles will be placed into cold-feed hoppers equipped with a variable speed feeder. The feeder meters the contaminated soil onto a belt conveyor which transports it to the rotary kiln. The rotary kiln is designed to dry and heat the contaminated soil to a temperature of 600-900°F to vaporize the hydrocarbon contaminants contained in the soil. The rotary kiln is heated with a 30 million BTU per hour burner capable of firing ~~either on specification used oil or~~ virgin No. 2 fuel oil; ~~each~~ | with a sulfur content of 0.3 percent or less.

The hydrocarbons and dust suspended in the gas stream leaving the rotary kiln are ducted to an afterburner for VOC control. The afterburner is designed for a residence time in excess of 1.0 seconds at a temperature of 1600°F. The afterburner is heated with a 30 million BTU per hour burner firing either propane or natural gas. Propane will be the primary fuel with natural gas being fired only when readily available.

From the afterburner, the gas stream will pass through an air-to-air heat exchanger where it will be cooled from approximately 1600°F to approximately 375°F. From the heat exchanger, the gas stream will pass through a baghouse with an air-to-cloth ratio of approximately 5.0/1.

The process flow utilized by Sunbelt assures that hydrocarbons will not condense on the baghouse dust. This eliminates the potential of recontamination of the baghouse dust and the reintroduction of hydrocarbon contaminants back into the site.

On start up, the plant is checked out and warm up procedures are completed. Once operating, the safety controls and automatic monitors make the operation of the remediation plant relatively uncomplicated. Automatic safety controls, temperature gauges and recording devices are designed to allow the plant to operate within strict parameter ranges.

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____
Annual hours of operation will be limited to 4400 hr/yr or less

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? (1)
a. If yes, has "offset" been applied? NA
b. If yes, has "Lowest Achievable Emission Rate" been applied? NA
c. If yes, list non-attainment pollutants. (1)

2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. NO

3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. NO

4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? NO

5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? NO

H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? (1)

a. If yes, for what pollutants? (1)

b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

1. Facility is a mobile soil remediation unit. It is probable that the plant
will operate in areas of the state that are designated non-attainment for
ozone (Duval, Broward, Dade, Palm Beach, Hillsborough and Pinellas counties)
and it is possible that the plant will operate in the areas of Duval and
Hillsborough counties designated non-attainment for particulate matter.
As the plant is mobile and will not be at any one location for an extended
period of time, compliance with the Departments emission limiting standards
for Thermal Soil Treatment limits should be considered RACT.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Soil	P.M.	2-3	100,000	
	VOC	0.5		

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 100,000 lb/hr (50 tph); wet weight
2. Product Weight (lbs/hr): typically 92,000 lb/hr (46 tpy); dry weight

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
P.M.	3.9	8.6	(a)	3.9	2250	4950	
SO ₂	8.7 10.1	19.2 22.2	(b)	8.7 10.1	8.7 10.1	19.2 22.2	
NOx	6.0 6.5	13.2 14.3	(c)	6.0 6.5	6.0 6.5	13.2 14.3	
VOC	5.0	11.0	(d)	5.0	500.1	1100	
CO	5.0	11.0	(e)	5.0	5.0	11.0	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

Note: All Emission limits requested by applicant.

- a) 0.04gr/dscf c) Based on AP-42 e) 100 ppm in stack gas
 b) 0.3% sulfur fuel oil d) 99% VOC control

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Baghouse- Tarmac Model P1424BH	P.M.	99.8	>2um	Mfg.
Afterburner - Tarmac Model P830HO	VOC	99+%	NA	Mfg. & FDER

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Dryer- No. 2 Oil	185	214 gal/hr	30.0
On Spec Used Oil	200	240 gal/hr	30.0
Afterburner- Propane	120	140 gal/hr	14.0
-Natural Gas	12.0	14.0 mcfh	14.0

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis: No. 2/ ~~Used Oil~~/ Propane

Percent Sulfur: 0.3/ ~~0.3~~/ Nil Percent Ash: Nil/ ~~Nil~~/ Nil

Density: 6.8/ ~~7.0~~/ 5.0 lbs/gal Typical Percent Nitrogen: Nil/ ~~Nil~~/ Nil

Heat Capacity: 20,590/ ~~17,860~~/ 19,500 BTU/lb 140,000/ ~~125,000~~/ 97,500 BTU/gal

Other Fuel Contaminants (which may cause air pollution): Trace metals in on-specification used oil.

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average NA Maximum NA

G. Indicate liquid or solid wastes generated and method of disposal.

None

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 25 ft. Stack Diameter: 3.5 ft.
 Gas Flow Rate: 24,487 ACFM 11,458 DSCFM Gas Exit Temperature: 375 °F.
 Water Vapor Content: 26 % Velocity: 42.4 FPS

SECTION IV: INCINERATOR INFORMATION

(NOT APPLICABLE)

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer: _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

(See Page 7a of 12)

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

SECTION V: SUPPLEMENTAL INFORMATION

1. Operating Parameters

A. Soil Remediation Unit

Feed Rate - 50 tph
 Moisture - 8%; typical
 Dry Feed - 46 tph
 VOC - 0.5%; typical high concentration

Heat Input - 30.0 MMBTU/hr (by Mfg)
 No. 2 Fuel - 214 gal/hr
~~Used Oil - 240 gal/hr~~

Soil Discharge
 Temperature - 600-900°F (600°F design @ 50 tph)

Gas Discharge from SRU to Afterburner
 Moisture - 9,950 lb/hr (Comb. products + soil moisture)
 - 3,548 scfm
 Dry Gas - 42,275 lb/hr
 - 9,352 scfm
 VOC - 500 lb/hr (at 0.5% contamination)
 - 46 scfm

 Total - 52,725 lb/hr
 - 12,946 scfm
 - 20,473 Acfm @ 375°F and 27% moisture

B. Afterburner

Heat in Gas Stream at 375°F

Dry Gas = 42,275 lb/hr x 71.3 BTU/lb
 = 3.01 MMBTU/hr
 Moisture = 9,950 lb/hr x 1180.0 BTU/lb
 = 11.74 MMBTU/hr
 Total = 14.75 MMBTU/hr

Heat in Gas Stream at 1600°F

Dry Gas = 42,275 lb/hr x 392.3 BTU/lb
 = 16.58 MMBTU/hr

Moisture = 9,950 lb/hr x 1095 BTU/lb
 = 10.90 MMBTU/hr
 Total = 27.48 MMBTU/hr

Heat Required in Afterburner @ 5% Loss
 = 1.05 (27.48 - 14.75)
 = 13.36 MMBTU/hr
 30 MMBTU/hr provided by MFG

Fuel Use; Propane @ 97,500 BTU/gal
 = 13.36 x 10⁶/97,500
 = 137 gal/hr
 Use 140 gal/hr (700 lb/hr)

Combustion Products

Dry Gas @ 16.6 lb/lb
 = 700 lb/hr x 16.60 lb/lb
 = 11,620 lb/hr

Moisture @ 1.64 lb/lb
 = 700 lb/hr x 1.64 lb/lb
 = 1148 lb/hr

Total Gas Flow from Afterburner

Dry Gas:	SRU	=	42,275
	Afterburner	=	<u>11,620</u>
	Total	=	53,895 lb/hr
			x (385/30) ft ³ /lb x 1/60 hr/min
		=	11,528 scfm (74% of flow)

Moisture: SRU = 9,950
 Afterburner = 1,148
 Total = 11,098 lb/hr
 x (385/18)ft³/lb x 1/60 hr/min
 = 3956 scfm (26% of flow)

Total: = 15,484 scfm @ 68°F and wet
 = 60,410 Acfm @ 1600°F and 26% Moisture

Afterburner Volume = 1100 ft³ (by Mfg)

Residence time @ 1600°F
 = 1.09 seconds

NOTE: At 1600°F and a residence time of 0.3 seconds, FDER assumes a VOC destruction efficiency of 99+%.

C. Air/Air Heat Exchange

Temperature in = 1600°F
 Temperature out = 375°F
 Gas Volume out = 24,487 Acfm @ 375°F and 26% Moisture

D. Baghouse

Temperature in = 375°F
 Temperature out = 375°F
 Gas Volume = 24,487 Acfm @ 375°F
 = 11,458 scfm, dry
 Cloth Area = 4939 ft³
 Air/Cloth Ratio = 4.96/1

2/3. Controlled and Uncontrolled Emissions

A. Particulate Matter

Uncontrolled at 45 lb/ton (AP-42, Section 8.0)

$$\begin{aligned} &= 50 \text{ tph} \times 45 \text{ lb/ton} \\ &= 2250 \text{ lb/hr} \\ &\quad \times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\ &= 4950 \text{ tpy} \end{aligned}$$

Controlled to 0.04 gr/dscf

$$\begin{aligned} &= 11458 \text{ ft}^3/\text{min} \times 0.04 \text{ gr/ft}^3 \times 60 \text{ min/hr} \times 1/7000 \\ &= 3.93 \text{ lb/hr} \\ &\quad \times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\ &= 8.6 \text{ tpy} \end{aligned}$$

B. Sulfur Dioxide

Controlled and Uncontrolled

SRU - ~~240~~²¹⁴ gal/hr used oil at 0.3% sulfur; worst case
Afterburner - 140 gal/hr propane with 0.014 pounds sulfur per 1000 gal

$$\begin{aligned} \text{SO}_2 &= [\overset{214}{\cancel{240}} \text{ gal/hr} \times \overset{6.8}{\cancel{7.0}} \text{ lb/gal} \times (0.003 \times 2) \text{ lb SO}_2/\text{lb}] \\ &\quad + [140 \text{ gal/hr} \times ((0.014/1000) \times 2) \text{ lb SO}_2/\text{gal}] \\ &= \overset{8.7}{\cancel{10.1}} \text{ lb/hr} \\ &\quad \times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\ &= \overset{19.2}{\cancel{22.2}} \text{ tpy} \end{aligned}$$

C. Nitrogen Oxides

Controlled and Uncontrolled

SRU = ~~240~~ gal/hr used oil; worst cast @ 20 lb/1000 gal
Afterburner = 140 gal/hr propane @ 12.4 lb/1000 gal

$$\begin{aligned}
 \text{NOx} &= [\overset{214}{\cancel{240}} \text{ gal/hr} \times 20/1000 \text{ lb/gal}] \\
 &+ [140 \text{ gal/hr} \times 12.4/1000 \text{ lb/gal}] \\
 &= \overset{6.0}{\cancel{6.5}} \text{ lb/hr} \\
 &\times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\
 &= \overset{13.2}{\cancel{14.3}} \text{ tpy}
 \end{aligned}$$

D. Carbon Monoxide

Controlled and Uncontrolled

Assume 100 ppm (dry volume basis) in stack gas

$$\begin{aligned}
 \text{CO} &= 11458 \text{ dscfm} \\
 &\times 60 \text{ min/hr} \\
 &\times (100 \times 10^{-6}) \\
 &\times 28/385 \\
 &= 5.0 \text{ lb/hr} \\
 &\times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\
 &= 11.0 \text{ tpy}
 \end{aligned}$$

E. VOC

Uncontrolled

SRU = ~~240~~ gal/hr used oil (worst case) at 0.34 lb/1000 gal

Afterburner

Fuel = 140 gal/hr propane at 0.25 lb/1000 gal

Contaminated Soil = 500 lb VOC/hr

$$\begin{aligned}
 \text{VOC} &= [\overset{214}{\cancel{240}} \text{ gal/hr} \times 0.34/1000 \text{ lb/gal}] \\
 &+ [140 \text{ gal/hr} \times 0.25/1000 \text{ lb/gal}] \\
 &+ [500 \text{ lb/hr}] \\
 &= 500.1 \text{ lb/hr} \\
 &\times 4400 \text{ lb/yr} \times 1/2000 \text{ lb/ton} \\
 &= 1100 \text{ tpy}
 \end{aligned}$$

Controlled at 99% Control

$$\begin{aligned}(\text{VOC})_c &= 500.1 (1 - 0.99) \\ &= 5.0 \text{ lb/hr} \\ &\quad \times 4400 \text{ lb/yr} \times 1/2000 \text{ lb/ton} \\ &= 11.0 \text{ tpy}\end{aligned}$$

4. Design Details of Baghouse in Attachment 1. Afterburner details are documented in Section V.

5. Control Efficiencies

1.0 Particulate Matter

$$\begin{aligned}E &= (2250 - 3.93) \times 100/2250 \\ &= 99.8\%\end{aligned}$$

2.0 VOC

$$E = 99\%; \text{ estimated based on FDER criteria}$$

6. Flow Diagram

Attachment 1

7/8. Site and Location Maps

Not Applicable

9. Application Fee

Type IE application (<25 tpy of any single pollutant)

10. Certification of Completion

NA

9/30/92 *can*

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:
*Jerry Dunn, Pres.
 Sunbelt Resources, Inc.
 215 Skyland Blvd. East
 Tuscaloosa, AL 35405*

4. Type of Service: Article Number
 Registered Insured *P062 921 891*
 Certified COD
 Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X

6. Signature - Agent
X Lisa Cramore

7. Date of Delivery
10/5/92

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

DOMESTIC RETURN RECEIPT

P 062 921 891

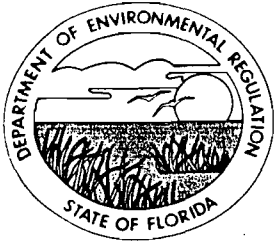


Receipt for Certified Mail

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

Sent to <i>Jerry Dunn</i>	
Street and No. <i>Sunbelt Resources</i>	
P.O. State and ZIP Code <i>Tuscaloosa, AL</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	<i>9-30-92</i>
<i>AC 37-216863</i>	

PS Form 3800, June 1991



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

September 30, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Terry Bunn, President
Sunbelt Resources, Inc.
715 Skyland Blvd., East
Tuscaloosa, AL 35405

Dear Mr. Bunn:

Re: File No. AC37-216863, Sunbelt

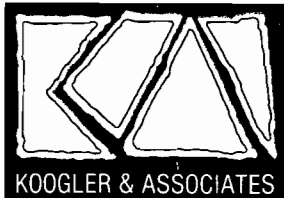
Koogler & Associates' September 9 response to the Department's request for additional information on your proposed mobile soil remediation unit confirmed our analysis that its emissions has the potential to exceed the no-threat-level for some metals. The Bureau cannot recommend approval of your application unless the potential metal emissions are reduced. Please investigate and propose controls that will reduce the potential metal emissions from your proposed unit. Processing of your application is being held in abeyance until this issue is resolved.

Sincerely,

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

CHF/WH/plm

cc: John Koogler, P.E.



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 532-92-01

September 9, 1992

RECEIVED

SEP 10 1992

Bureau of
Air Regulation

Mr. C. H. Fancy
Florida Department of
Environmental Regulation
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Sunbelt Resources, Inc.
Mobile Soil Remediation Unit
FDER File AC37-216863

Dear Mr. Fancy:

In response to your letter of August 7, 1992, to Mr. Terry Bunn of Sunbelt Resources, Inc. (Sunbelt), I am providing the following information to complete the application for construction permit for a mobile soil remediation unit.

Item No. 1. Please submit the detail calculations used to determine the residence time of the afterburner.

RESPONSE: Tarmac Equipment Company, Inc. has specified that the inside diameter of the afterburner will be 7'-0" and the inside length will be 39'-0". This results in an afterburner volume of 1500.9 cubic feet. From our original permit application, the gas flow rate through the afterburner is 60,410 actual cubic feet per minute at 1600°F and 26 percent moisture. At this flow rate, the afterburner will provide a residence time of 1.49 seconds. Attached hereto is a revised copy of page 7c of the Sunbelt permit application showing these dimensions and residence time calculations.

Item No. 2. Will the proposed facility be equipped with continuous monitors and recorders for the hot zone temperature and CO concentration?

RESPONSE: The afterburner will be equipped with a temperature monitoring device for the hot zone of the afterburner. The signal from this temperature monitor will be input to a recorder.

The unit will be equipped with a monitor that continuously monitors and records the carbon monoxide concentration of the stack gas if required by the rules of the Department as set forth in Chapter 17-2, FAC.

Item No. 3. What is the maximum potential ambient air quality impact of the metals emissions from the used oil and contaminated soil for 8-hour, 24-hour and annual time periods? Please document any capture efficiency assumed for the fine metal particles formed during the combustion of used oil in the kiln's burner. Include the downwash impacts in the calculations.

RESPONSE: For the calculations required to respond to this matter, it was assumed that the soil remediation unit would be fired with on-specification used oil at the rate of 240 gallons per hour and that the afterburner would be fired with natural gas or propane. The on-specification used oil was assumed to have a lead concentration of 100 ppm, an arsenic concentration of 5 ppm, a cadmium concentration of 2 ppm and a total chromium concentration of 10 ppm. Partitioning factors were used to express the fraction of each of these metals in the fuel that would appear in the gas stream approaching the baghouse and baghouse efficiencies were applied to calculate the final emission rates of these metals resulting for fuel combustion. The partitioning factors and control efficiencies are summarized on the attached pages. Both partitioning factors and control efficiencies are based on testing and a literature search performed by Koogler & Associates for facilities burning hazardous waste derived fuel in kilns with kiln feed material reaching temperatures of 2000°F and kiln gases reaching temperatures of 2500-2600°F.

Similar calculations were made for these same metals in the contaminated soil. For purposes of these calculations, it was assumed that the soil would have a lead concentration of 50 ppm, an arsenic concentration of 15 ppm, a cadmium concentration of 20 ppm and a total chromium concentration of 50 ppm. These concentrations are typical for concentrations of these metals found in soils with a certain safety factor to account for metals that may be contributed by the contaminating material. Again, partitioning factors were applied to estimate the fraction of each metal in the gas stream approaching the baghouse and control efficiencies were applied to estimate the emission rates of each metal.

The total metals emission rates (metals from fuel plus metals from soil) are summarized on the attached.

The ambient impacts of the metals were evaluated with the ISC2 air quality model using one year of meteorological data for Orlando; a central Florida location. An emission rate of 10.0 grams per second was input to the model (79.4 pounds per hour) and building dimensions were input to account for plume downwash. Impacts were calculated at receptors ranging from 50



Mr. C. H. Fancy
Florida Department of
Environmental Regulation

September 9, 1992
Page 3

meters to 1000 meters from the facility.

The results of the impact analysis are summarized in the attached. The modeling demonstrates that for the 8-hour and 24-hour periods, the maximum expected impacts are well below the FDER guideline No Threat Levels (NTLs). For the annual period, the modeling demonstrates that the NTLs for arsenic and cadmium could be exceeded while impacts of the proposed remediation facility are well below the NTLs for lead and chromium. It should be noted that the annual impact of a mobile soil remediation facility is of little meaning as the facility will not be at a single location for an extended period of time.

I trust the information provided herein will adequately respond to the concerns of the Department. If there are any further questions, please do not hesitate to contact me.

Very truly yours,

KOGLER & ASSOCIATES


John B. Koogler, Ph.D., P.E.

JBK:wa
Enc.

c: Mr. Willard Hanks, FDER
Mr. David Peterson, Sunbelt
DER Districts
Local Programs
BWC



Moisture: SRU = 9,950
 Afterburner = 1,148
 Total = 11,098 lb/hr
 x (385/18)ft³/lb x 1/60 hr/min
 = 3956 scfm (26% of flow)

Total: = 15,484 scfm @ 68°F and wet
 = 60,410 Acfm @ 1600°F and 26% Moisture

Afterburner Size = 7.0 ft dia x 39.0 ft long
 (inside dimensions)

Afterburner Volume = 1500.9 ft³

Residence time @ 1600°F
 = 1500.9/(60,410/60)
 = 1.49 seconds

NOTE: At 1600°F and a residence time of 0.5 seconds, FDER assumes a VOC destruction efficiency of 99+%.

C. Air/Air Heat Exchange

Temperature in = 1600°F
 Temperature out = 375°F
 Gas Volume out = 24,487 Acfm @ 375°F and 26% Moisture

D. Baghouse

Temperature in = 375°F
 Temperature out = 375°F
 Gas Volume = 24,487 Acfm @ 375°F
 = 11,458 scfm, dry
 Cloth Area = 4939 ft²
 Air/Cloth Ratio = 4.96/1

EMISSION ESTIMATED OF SELECTED METALS FROM FUEL AND FEED

SUNBELT RESOURCES
MOBILE SOIL REMEDIATION UNIT
FLORIDA

Constituent	Fuel @ 240 gph						Feed @ 50 tph						Total Emission (lb/hr)
	Conc (mg/kg)	Mass Input (lb/hr)	Part. Factor(1) (%)	Mass to Baghouse (lb/hr)	Control (%) (2)	Emission Rate (lb/hr)	Conc (mg/kg)	Mass Input (lb/hr)	Part. Factor(3) (%)	Mass to Baghouse (lb/hr)	Control (%) (2)	Emission Rate (lb/hr)	
Pb	100	0.180	60	0.108	95	0.005	50	5.00	35	1.75	95	0.087	0.092
As	5	0.009	75	0.007	95	<0.001	15	1.50	15	0.23	95	0.011	0.012
Cd	2	0.004	80	0.003	95	<0.001	20	2.00	10	0.20	95	0.010	0.011
Cr	10	0.018	5	0.001	95	<0.001	50	5.00	1	0.05	95	0.003	0.004

- (1) Partitioning Factor = fraction of metal in the fuel that is partitioned to the gas stream approaching the baghouse.
- (2) Control Efficiency based on test data and literature review for facilities burning HWD fuels at kiln temperature in excess of 20
- (3) Partitioning Factor = Fraction of metal in contaminated soil partitioned to the gas stream approaching the baghouse.

AIR QUALITY IMPACT ANALYSIS
 SUNBELT RESOURCES
 MOBILE SOIL REMEDIATION UNIT
 FLORIDA

Modeled Emission Rate = 10.0 g/s = 79.4 lb/hr

Modeled Impacts (Maximum)

8-hour = 638.1 $\mu\text{g}/\text{m}^3$
 24-hour = 252.4
 Annual = 5.66

Metal	Expected Emissions (lb/hr)	Expected Impact ($\mu\text{g}/\text{m}^3$) (1)					
		8-hr	NTL(2)	24-hr	NTL	Annual	NTL
Pb	0.092	0.743	1.5	0.294	0.36	0.0060	0.09
As	0.012	0.096	2	0.038	0.48	0.0009	0.00023
Cd	0.011	0.088	0.5	0.035	0.12	0.0008	0.00056
Cr	0.004	0.032	5	0.013	1.2	0.0003	0.002

(1) Expected impact = (Modeled Impact)/(Expected Emissions)/(Modeled Emissions)

(2) NTL - FDER guideline No Threat Level

9/9/92
/eter

*** ISCST2 - VERSION 92062 *** *** SUNBELT RESOURCES MET = ORL88

*** 08/26/92
*** 16:24:40
PAGE 1

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** MODEL SETUP OPTIONS SUMMARY ***

**Model Is Setup For Calculation of Average CONCentration Values.

**Model Uses RURAL Dispersion.

**Model Uses Regulatory DEFAULT Options:

1. Final Plume Rise.
2. Stack-tip Downwash.
3. Buoyancy-induced Dispersion.
4. Use Calms Processing Routine.
5. Not Use Missing Data Processing Routine.
6. Default Wind Profile Exponents.
7. Default Vertical Potential Temperature Gradients.
8. "Upper Bound" Values for Supersquat Buildings.
9. No Exponential Decay for RURAL Mode

Sunbelt

**Model Assumes Receptors on FLAT Terrain.

**Model Assumes No FLAGPOLE Receptor Heights.

**Model Calculates 2 Short Term Average(s) of: 8-HR 24-HR
and Calculates PERIOD Averages

**This Run Includes: 1 Source(s); 1 Source Group(s); and 252 Receptor(s)

**The Model Assumes A Pollutant Type of: OTHER

**Model Set To Continue RUNning After the Setup Testing.

**Output Options Selected:

- Model Outputs Tables of PERIOD Averages by Receptor
- Model Outputs Tables of Highest Short Term Values by Receptor (RECTABLE Keyword)
- Model Outputs Tables of Overall Maximum Short Term Values (MAXTABLE Keyword)

**NOTE: The Following Flags May Appear Following CONC Values: c for Calm Hours
 m for Missing Hours
 b for Both Calm and Missing Hours

**Misc. Inputs: Anem. Hgt. (m) = 10.00 ; Decay Coef. = 0.0000 ; Rot. Angle = 0.0
 Emission Units = (GRAMS/SEC) ; Emission Rate Unit Factor = 0.10000E+07
 Output Units = (MICROGRAMS/CUBIC-METER)

**Input Runstream File: SUNBELT.INP ; **Output Print File: SUNBELT.OUT

**Detailed Error/Message File: ERRORS.OUT

*** ISCST2 - VERSION 92062 ***

*** SUNBELT RESOURCES

MET = ORL88

*** 08/26/92

*** 16:24:40

PAGE 2

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** POINT SOURCE DATA ***

SOURCE ID	NUMBER PART. CATS.	EMISSION RATE		X (METERS)	Y (METERS)	BASE ELEV. (METERS)	STACK HEIGHT (METERS)	STACK TEMP. (DEG.K)	STACK EXIT VEL. (M/SEC)	STACK DIAMETER (METERS)	BUILDING EMISSION RATE	
		(USER UNITS)									EXISTS	SCALAR VARY BY
1	0	0.10000E+02		0.0	0.0	0.0	7.62	464.00	12.93	1.07	YES	

*** ISCST2 - VERSION 92062 ***

*** SUNBELT RESOURCES

NET = ORL88

08/26/92
16:24:40
PAGE 3

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** SOURCE IDs DEFINING SOURCE GROUPS ***

GROUP ID

SOURCE IDs

ALL 1 ,

*** ISCST2 - VERSION 92062 ***

*** SUNBELT RESOURCES

MET = DRL88

08/26/92

16:24:40

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

PAGE 5

*** GRIDDED RECEPTOR NETWORK SUMMARY ***

*** NETWORK ID: POL ; NETWORK TYPE: GRIDPOLR ***

*** ORIGIN FOR POLAR NETWORK ***

X-ORIG = 0.00 ; Y-ORIG = 0.00 (METERS)

*** DISTANCE RANGES OF NETWORK ***

(METERS)

50.0, 100.0, 200.0, 300.0, 500.0, 750.0, 1000.0,

*** DIRECTION RADIALS OF NETWORK ***

(DEGREES)

10.0, 20.0, 30.0, 40.0, 50.0, 60.0, 70.0, 80.0, 90.0, 100.0,
110.0, 120.0, 130.0, 140.0, 150.0, 160.0, 170.0, 180.0, 190.0, 200.0,
210.0, 220.0, 230.0, 240.0, 250.0, 260.0, 270.0, 280.0, 290.0, 300.0,
310.0, 320.0, 330.0, 340.0, 350.0, 360.0,

*** ISCST2 - VERSION 92062 ***

*** SUNBELT RESOURCES

MET = ORL88

*** 08/26/92

*** 16:24:40

PAGE 7

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE FIRST 24 HOURS OF METEOROLOGICAL DATA ***

FILE: C:\MET\ORL\ORLPRE88.ASC

FORMAT: (4I2,2F9.4,F6.1,I2,2F7.1)

SURFACE STATION NO.: 12815

UPPER AIR STATION NO.: 12842

NAME: ORLANDO,

NAME: TAMPA,

YEAR: 1988

YEAR: 1988

YEAR	MONTH	DAY	HOUR	FLOW	SPEED	TEMP	STAB	MIXING HEIGHT (M)	
				VECTOR	(M/S)	(K)	CLASS	RURAL	URBAN
88	1	1	1	241.0	2.57	286.5	6	1716.3	229.0
88	1	1	2	188.0	1.54	285.9	7	1721.8	229.0
88	1	1	3	194.0	1.54	285.4	6	1727.3	229.0
88	1	1	4	193.0	0.00	285.9	7	1732.9	229.0
88	1	1	5	223.0	1.54	285.4	7	1738.4	229.0
88	1	1	6	302.0	3.60	286.5	6	1743.9	229.0
88	1	1	7	275.0	1.54	285.9	7	1749.4	229.0
88	1	1	8	233.0	2.06	285.9	6	155.0	364.2
88	1	1	9	207.0	2.06	287.0	5	427.2	601.5
88	1	1	10	281.0	2.06	290.9	4	699.4	838.8
88	1	1	11	324.0	2.57	294.8	3	971.5	1076.1
88	1	1	12	296.0	4.12	297.0	3	1243.7	1313.4
88	1	1	13	303.0	4.12	297.6	3	1515.8	1550.7
88	1	1	14	349.0	4.63	298.7	3	1788.0	1788.0
88	1	1	15	352.0	3.60	297.6	3	1788.0	1788.0
88	1	1	16	274.0	4.63	297.6	4	1788.0	1788.0
88	1	1	17	271.0	4.12	297.0	4	1788.0	1788.0
88	1	1	18	247.0	3.60	294.8	4	1789.2	1789.2
88	1	1	19	264.0	3.09	293.7	5	1793.0	1431.5
88	1	1	20	267.0	2.57	292.6	5	1796.9	1160.0
88	1	1	21	260.0	2.06	291.5	5	1800.7	888.5
88	1	1	22	252.0	2.06	290.4	5	1804.6	617.0
88	1	1	23	250.0	2.06	289.8	5	1808.4	345.5
88	1	1	24	250.0	2.06	289.8	5	1812.2	74.0

*** NOTES: STABILITY CLASS 1=A, 2=B, 3=C, 4=D, 5=E AND 6=F.
FLOW VECTOR IS DIRECTION TOWARD WHICH WIND IS BLOWING.

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE PERIOD (8784 HRS) AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
 INCLUDING SOURCE(S): 1 ,

*** NETWORK ID: POL ; NETWORK TYPE: GRIDPOLR ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

DIRECTION : (DEGREES) :	50.00	100.00	200.00	DISTANCE (METERS)			750.00	1000.00
				300.00	500.00			
10.00 :	3.85095	4.80332	3.41236	3.62880	3.86164	3.04577	2.39492	
20.00 :	3.21572	4.29098	3.19189	3.49802	3.81734	3.07689	2.44746	
30.00 :	3.23342	4.14358	2.99247	3.17151	3.25928	2.52759	1.97787	
40.00 :	3.82863	4.85490	3.30150	3.29135	3.25406	2.55194	2.03756	
50.00 :	3.45283	4.35776	2.95449	2.96672	3.03185	2.48050	2.04027	
60.00 :	2.86284	3.59534	2.51357	2.58924	2.68206	2.14434	1.75122	
70.00 :	2.65352	3.30173	2.25168	2.27599	2.32939	1.83676	1.47924	
80.00 :	3.02526	3.69349	2.51922	2.53408	2.55340	1.98254	1.57099	
90.00 :	4.78574	5.45854	3.60660	3.49781	3.38167	2.53081	1.97746	
100.00 :	4.78724	5.53581	3.63033	3.50013	3.36795	2.47519	1.89900	
110.00 :	4.07748	5.02688	3.45895	3.46926	3.49939	2.67132	2.10153	
120.00 :	2.82791	4.13246	3.24051	3.55209	3.93726	3.19646	2.58970	
130.00 :	2.13538	3.42812	2.88388	3.28997	3.67868	2.87737	2.24337	
140.00 :	1.42916	2.52105	2.32027	2.82647	3.42899	2.77805	2.20175	
150.00 :	0.75910	1.63085	1.64911	2.09321	2.63189	2.25495	1.87402	
160.00 :	0.69310	1.51753	1.53675	1.97333	2.81971	2.80430	2.59453	
170.00 :	0.82045	1.63171	1.66523	2.17429	3.29781	3.28558	2.97001	
180.00 :	0.89129	1.71520	1.79194	2.40834	3.74726	3.87640	3.62593	
190.00 :	0.86844	1.72994	1.79216	2.41380	3.68659	3.69988	3.42593	
200.00 :	0.59304	1.39026	1.48612	2.00764	2.97450	2.99941	2.79383	
210.00 :	0.76522	1.71868	1.74890	2.26406	3.00406	2.85850	2.63044	
220.00 :	1.23818	2.37857	2.21441	2.70539	3.29679	2.92661	2.59211	
230.00 :	1.78478	3.12974	2.78843	3.35242	3.99840	3.51704	3.13859	
240.00 :	2.25458	3.87860	3.54208	4.44262	5.66181	5.14128	4.57471	
250.00 :	2.48129	4.18727	3.63844	4.37520	5.17228	4.34205	3.61865	
260.00 :	2.55300	4.46731	3.83073	4.49678	5.21212	4.31577	3.56352	
270.00 :	2.11697	3.90828	3.42825	4.06954	4.68448	3.78493	3.05109	
280.00 :	1.81816	3.32750	2.96545	3.60188	4.24721	3.54682	2.93919	
290.00 :	1.66863	3.17810	2.89442	3.54209	4.13028	3.42332	2.84184	
300.00 :	1.88548	3.64674	3.33791	4.08210	4.82204	4.04461	3.32722	
310.00 :	1.69843	3.22372	2.87167	3.39060	3.77863	3.06060	2.48973	
320.00 :	1.45269	2.68124	2.33826	2.69666	2.90911	2.32130	1.86711	
330.00 :	1.23112	2.12661	1.80053	2.06247	2.19801	1.75728	1.42735	
340.00 :	1.58450	2.49107	2.05583	2.40323	2.75588	2.31329	1.91997	
350.00 :	2.45895	3.46251	2.66287	2.97405	3.29805	2.70782	2.20515	
360.00 :	3.48487	4.51332	3.31634	3.63271	4.09026	3.41353	2.84707	

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE 1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): 1

*** NETWORK ID: POL ; NETWORK TYPE: GRIDPOLR ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

DIRECTION : (DEGREES) :	DISTANCE (METERS)				
	50.00	100.00	200.00	300.00	500.00
10.0 :	493.52649 (88022016)	412.29529 (88022016)	199.68123 (88022016)	141.58208 (88022016)	115.57767 (88122816)
20.0 :	454.26456 (88022016)	358.09180 (88022016)	170.08047 (88030416)	137.20288 (88030416)	155.11757 (88090624)
30.0 :	509.98175 (88022016)	412.48294 (88022016)	195.06526 (88022016)	148.97359 (88060816)	109.28282 (88060816)
40.0 :	616.20990 (88110516)	549.99799 (88060916)	302.82361 (88060916)	242.28712 (88060916)	187.68263 (88060916)
50.0 :	638.11932 (88041216)	544.80420 (88041216)	250.11063 (88041216)	156.52332 (88041216)	105.60854 (88060824)
60.0 :	568.47815 (88041216)	450.34784 (88041216)	200.56520 (88041216)	141.96904 (88042616)	98.91054 (88042616)
70.0 :	326.31250 (88041224)	255.89543 (88041224)	118.32526 (88041224)	76.66341 (88041116)	80.10438 (88040624)
80.0 :	230.89484 (88031024)	208.70334 (88050516)	114.69927 (88050516)	95.04776 (88042616)	97.23591 (88042324)
90.0 :	514.49872 (88031016)	435.79654 (88031016)	217.84842 (88031016)	156.89465 (88031016)	110.32850 (88031416)
100.0 :	472.42929 (88040716)	436.81537 (88040716)	206.91028 (88040716)	138.11087 (88040716)	133.22330 (88012524)
110.0 :	519.50977 (88021216)	424.34747 (88021216)	203.20459 (88021216)	141.83031 (88050616)	89.72169 (88012616)
120.0 :	235.17850 (88040716)	252.82658 (88040716)	136.96628 (88040716)	109.84460 (88040716)	90.28819 (88031916)
130.0 :	180.57143 (88041316)	248.51059 (88041316)	150.56010 (88041316)	120.13081 (88041316)	101.01006 (88112816)
140.0 :	264.80853 (88112316)	270.15512 (88112316)	165.56055 (88112316)	156.22754 (88112316)	154.21674 (88112316)
150.0 :	40.87613 (88042816)	80.21996 (88022816)	71.91834 (88022816)	85.05117 (88042716)	78.20198 (88042716)
160.0 :	59.61629 (88051516)	92.00943 (88051516)	79.95083 (88022616)	86.06883 (88022616)	85.56680 (88022616)
170.0 :	83.81935 (88020608)	109.21187 (88020608)	80.76210 (88020608)	80.30776 (88020608)	123.41409 (88121224)
180.0 :	104.73530 (88020608)	126.72366 (88020608)	89.22659 (88020608)	86.41183 (88020608)	100.77631 (88020608)
190.0 :	175.66614 (88052424)	151.31242 (88052424)	85.49171 (88050716)	88.78493 (88050716)	106.73246 (88010616)
200.0 :	34.20011 (88051516)	63.86106 (88050716)	60.26215 (88050716)	72.52044 (88052716)	74.56538 (88052716)
210.0 :	65.99275 (88100616)	101.15102 (88050716)	98.50424 (88050716)	104.65167 (88050716)	134.67838 (88100816)
220.0 :	99.06848 (88100616)	138.99084 (88081316)	120.26885 (88081316)	129.59619 (88081316)	108.95972 (88081316)
230.0 :	117.01786 (88070516)	221.61076 (88070516)	168.14290 (88070516)	166.18080 (88070516)	146.25233 (88070516)
240.0 :	151.61482 (88070516)	258.95871 (88070516)	170.01064 (88070516)	140.78300 (88070516)	111.74086 (88061316)
250.0 :	148.17923 (88080516)	169.68633 (88061216)	128.34242 (88091316)	151.06990 (88091316)	153.89891 (88091316)
260.0 :	168.72775 (88050816)	265.79678 (88050816)	162.34076 (88050816)	145.63028 (88091216)	143.29430 (88020716)
270.0 :	121.81893 (88050816)	177.68040 (88050816)	110.54478 (88050816)	101.88924 (88081216)	108.91757 (88053116)
280.0 :	159.64134 (88081216)	197.55104 (88081216)	135.79834 (88081216)	130.13797 (88081216)	109.26927 (88091416)
290.0 :	197.40913 (88080716)	163.22168 (88032916)	134.35181 (88032916)	129.78963 (88032916)	97.09137 (88032916)
300.0 :	146.30969 (88080716)	147.02797 (88050316)	110.59756 (88081516)	132.43071 (88111916)	152.75356 (88111916)
310.0 :	103.91936 (88072716)	208.82085 (88040116)	180.09396 (88040116)	192.01479 (88040116)	182.38062 (88040116)
320.0 :	162.63484 (88072716)	151.84344 (88032416)	117.36526 (88090216)	120.57045 (88090216)	95.66674 (88090216)
330.0 :	120.81499 (88072716)	97.90611 (88081916)	77.79631 (88032516)	84.99344 (88032516)	70.86690 (88032516)
340.0 :	149.93884 (88011916)	160.15993 (88011916)	105.91193 (88071116)	112.14600 (88071116)	98.17715 (88010724)
350.0 :	184.24971 (88080116)	242.11896 (88090416)	142.35320 (88090416)	121.17659 (88082816)	108.39372 (88030408)
360.0 :	242.54893 (88021916)	263.20087 (88090416)	150.56964 (88090416)	127.24982 (88052416)	132.10464 (88012016)

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE 1ST HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): 1 ,

*** NETWORK ID: POL ; NETWORK TYPE: GRIDPOLR ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

DIRECTION : DISTANCE (METERS)
(DEGREES) : 750.00 1000.00

10.0	103.97556 (88112808)	80.87765 (88112808)
20.0	130.26289 (88090624)	100.47636 (88090624)
30.0	66.13716 (88060816)	50.59573 (88082116)
40.0	125.47478 (88060916)	87.45454 (88060916)
50.0	73.93040 (88060824)	51.97950 (88042616)
60.0	74.16200 (88031908)	62.37104 (88031908)
70.0	66.12180 (88082424)	61.07104 (88082424)
80.0	81.46732 (88042324)	66.35423 (88042324)
90.0	76.19650 (88012624)	60.36802 (88012624)
100.0	107.68360 (88012524)	85.17386 (88012524)
110.0	66.29385 (88070116)	53.46011 (88040508)
120.0	79.55552 (88011316)	67.95651 (88011316)
130.0	81.28344 (88121716)	64.11570 (88121716)
140.0	109.45150 (88112316)	79.56680 (88031508)
150.0	55.15531 (88032008)	49.00806 (88032008)
160.0	84.30045 (88121308)	76.48712 (88121308)
170.0	112.61987 (88121224)	88.14985 (88121224)
180.0	79.40555 (88011516)	73.20580 (88121208)
190.0	108.59947 (88020524)	91.51506 (88020524)
200.0	68.10738 (88052624)	58.27042 (88012416)
210.0	111.63575 (88100816)	83.75840 (88100816)
220.0	83.15012 (88100616)	61.33352 (88100616)
230.0	97.46972 (88070516)	68.42399 (88060424)
240.0	98.84766 (88061316)	76.21097 (88061316)
250.0	109.11959 (88091316)	84.66866 (88070624)
260.0	105.58366 (88020716)	75.69331 (88020716)
270.0	85.73682 (88021816)	63.08669 (88021816)
280.0	81.27817 (88091416)	58.04321 (88091416)
290.0	89.95088 (88040224)	79.51183 (88040224)
300.0	111.61093 (88111916)	78.79762 (88111916)
310.0	124.06696 (88040116)	85.51417 (88040116)
320.0	57.64787 (88090216)	40.91041 (88030908)
330.0	43.27120 (88032516)	38.12631 (88031808)
340.0	81.36585 (88010724)	61.06382 (88010724)
350.0	93.17979 (88030408)	73.08055 (88030408)
360.0	95.62885 (88012016)	69.77325 (88021908)

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE 2ND HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): 1 ,

*** NETWORK ID: POL ; NETWORK TYPE: GRIDPOLR ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

DIRECTION : (DEGREES) :	DISTANCE (METERS)				
	50.00	100.00	200.00	300.00	500.00
10.0 :	339.77884 (88030416)	308.10150 (88030416)	161.27654 (88030416)	128.52994 (88012016)	114.90762 (88112808)
20.0 :	346.54199 (88030416)	320.41647 (88030416)	163.21207 (88022016)	127.61249 (88090624)	101.70270 (88030416)
30.0 :	273.95261 (88090616)	255.63058 (88060816)	168.05499 (88060816)	129.27322 (88022016)	87.29944 (88090616)
40.0 :	478.89948 (88060916)	534.50562 (88110516)	268.13330 (88110516)	200.00584 (88110516)	133.14407 (88110516)
50.0 :	291.91037 (88110516)	263.08929 (88060916)	131.28798 (88060916)	114.01208 (88042316)	103.74857 (88042616)
60.0 :	299.49420 (88042616)	331.14969 (88042616)	180.36655 (88042616)	124.02325 (88041216)	66.55919 (88031908)
70.0 :	310.54074 (88041216)	235.18251 (88041216)	109.72839 (88050516)	76.08473 (88041224)	67.28115 (88063016)
80.0 :	188.49055 (88041224)	187.84402 (88031024)	102.13838 (88042616)	89.64842 (88050516)	77.94346 (88042616)
90.0 :	291.91547 (88031424)	276.17902 (88031424)	152.81413 (88031424)	131.16638 (88031416)	107.38246 (88031016)
100.0 :	423.37500 (88021216)	353.61505 (88021216)	172.41411 (88021216)	123.20509 (88021216)	108.25700 (88031024)
110.0 :	282.38315 (88031916)	322.79257 (88050616)	190.92973 (88050616)	138.76712 (88021216)	88.91702 (88021224)
120.0 :	192.93221 (88021216)	197.50467 (88041316)	120.59987 (88041316)	99.79796 (88031916)	86.74369 (88040716)
130.0 :	165.65808 (88112816)	180.53584 (88112816)	112.99033 (88112816)	105.15628 (88112816)	93.51355 (88121316)
140.0 :	86.87715 (88112816)	101.39659 (88112816)	87.14202 (88022816)	87.06585 (88022816)	120.93479 (88031508)
150.0 :	39.63684 (88040916)	75.30241 (88042816)	71.53281 (88042716)	73.55238 (88022816)	69.98174 (88102216)
160.0 :	35.44526 (88082316)	82.36740 (88082316)	69.24323 (88082316)	76.98018 (88082316)	75.00598 (88112416)
170.0 :	70.42444 (88051516)	106.42785 (88051516)	77.64238 (88051516)	78.42742 (88051516)	97.54630 (88020608)
180.0 :	103.11267 (88112308)	96.71841 (88112308)	71.30512 (88102516)	85.43974 (88102516)	90.86070 (88120316)
190.0 :	50.12790 (88010516)	87.76268 (88050716)	76.27206 (88052424)	74.58487 (88010616)	96.14097 (88020524)
200.0 :	33.99976 (88050116)	61.76932 (88092816)	52.22659 (88052716)	61.00933 (88050716)	73.86221 (88052624)
210.0 :	48.75628 (88100816)	94.71622 (88081316)	91.00510 (88081316)	102.45832 (88081316)	95.56461 (88101616)
220.0 :	73.59831 (88081316)	116.35502 (88100616)	97.83405 (88050716)	104.23685 (88050716)	105.85341 (88100616)
230.0 :	95.81618 (88060216)	161.34492 (88050216)	121.28938 (88050216)	113.70310 (88050216)	87.22511 (88061416)
240.0 :	141.31395 (88080416)	173.32433 (88050216)	141.72887 (88050216)	139.57555 (88050216)	110.57014 (88070616)
250.0 :	113.01643 (88080416)	148.34340 (88091216)	121.92300 (88061216)	113.27070 (88061216)	101.64128 (88070624)
260.0 :	151.29933 (88080516)	199.09436 (88091216)	141.42273 (88091216)	126.49075 (88050816)	139.83264 (88091216)
270.0 :	100.24774 (88082916)	131.01437 (88053016)	103.55016 (88053016)	100.82982 (88053016)	107.05653 (88021816)
280.0 :	141.06024 (88061816)	178.70161 (88061816)	109.86221 (88061816)	105.15377 (88032916)	102.85964 (88081216)
290.0 :	93.91649 (88032316)	140.24966 (88050916)	114.34850 (88050916)	117.12724 (88050916)	91.59789 (88050916)
300.0 :	89.06376 (88050316)	145.94164 (88081516)	104.22731 (88111916)	106.51845 (88081516)	96.13820 (88032416)
310.0 :	97.40164 (88081516)	170.46349 (88081516)	124.99295 (88081516)	114.26295 (88081516)	118.68654 (88112616)
320.0 :	87.52928 (88032416)	146.67346 (88090216)	101.26576 (88032416)	86.61754 (88032416)	69.08051 (88020116)
330.0 :	73.94738 (88081916)	88.01395 (88050416)	65.21424 (88081916)	60.13965 (88081916)	51.29174 (88030216)
340.0 :	85.99402 (88080116)	150.61749 (88090416)	100.92193 (88090416)	92.55901 (88081916)	85.71233 (88071116)
350.0 :	173.02483 (88011916)	189.86467 (88011916)	116.73108 (88011916)	110.34077 (88090416)	101.81541 (88031216)
360.0 :	240.12157 (88041816)	246.45750 (88021916)	143.41887 (88021916)	126.69383 (88112716)	107.62100 (88112716)

*** MODELING OPTIONS USED: CONC RURAL FLAT DEFAULT

*** THE 2ND HIGHEST 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): 1 ,

*** NETWORK ID: POL ; NETWORK TYPE: GRIDPOLR ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

DIRECTION : DISTANCE (METERS)
(DEGREES) : 750.00 1000.00

10.0	81.11053 (88122816)	57.34301 (88122816)
20.0	66.23991 (88110508)	48.66317 (88090724)
30.0	66.10184 (88082116)	45.01630 (88120916)
40.0	79.32370 (88110516)	52.49802 (88110516)
50.0	73.65263 (88042616)	51.95864 (88060824)
60.0	60.19846 (88042616)	39.74686 (88042508)
70.0	59.11430 (88040624)	42.20946 (88040624)
80.0	57.27898 (88121616)	44.55117 (88121616)
90.0	71.89751 (88031416)	49.09938 (88031416)
100.0	79.88738 (88031924)	58.93062 (88031924)
110.0	65.94152 (88021224)	51.61968 (88070116)
120.0	60.21889 (88021608)	53.06340 (88022524)
130.0	80.97290 (88121316)	61.29788 (88121316)
140.0	104.28637 (88031508)	78.02012 (88112324)
150.0	53.86035 (88102216)	39.90611 (88011508)
160.0	76.30307 (88112416)	66.95190 (88011108)
170.0	82.71949 (88010424)	73.49158 (88010424)
180.0	74.66717 (88020608)	63.72542 (88011516)
190.0	90.28470 (88010616)	68.76290 (88010616)
200.0	66.38790 (88020524)	53.95494 (88020524)
210.0	79.80798 (88101616)	59.86295 (88101616)
220.0	66.83311 (88081316)	42.99393 (88081316)
230.0	80.86730 (88060424)	66.54124 (88070516)
240.0	80.35819 (88070616)	59.04581 (88070708)
250.0	103.08705 (88070624)	76.82927 (88091316)
260.0	98.05144 (88091216)	68.53957 (88091216)
270.0	78.63661 (88053116)	55.53168 (88053116)
280.0	68.88798 (88050316)	50.00108 (88050316)
290.0	72.07439 (88050324)	63.42097 (88050324)
300.0	76.38525 (88032416)	57.92612 (88081924)
310.0	89.08118 (88112616)	64.50120 (88031816)
320.0	49.02408 (88013116)	36.91303 (88090216)
330.0	40.17051 (88110416)	31.06169 (88110416)
340.0	56.93950 (88040316)	43.16914 (88030408)
350.0	74.55538 (88031216)	63.03944 (88040408)
360.0	79.66696 (88021908)	67.99651 (88012016)

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE 1ST HIGHEST 24-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
 INCLUDING SOURCE(S): 1 ,

*** NETWORK ID: POL ; NETWORK TYPE: GRIDPOLR ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

DIRECTION ; (DEGREES) ;	DISTANCE (METERS)				
	50.00	100.00	200.00	300.00	500.00
10.0 ;	164.61557 (88022024)	138.47227 (88022024)	68.98177 (88022024)	52.70625 (88022024)	45.03083 (88022024)
20.0 ;	151.44943 (88022024)	119.61191 (88022024)	66.51310 (88030924)	68.12201 (88090624)	77.45553 (88090624)
30.0 ;	170.03209 (88022024)	137.51292 (88022024)	65.02676 (88022024)	55.49842 (88060824)	48.48074 (88060824)
40.0 ;	217.11656 (88110524)	192.27501 (88060924)	107.07084 (88060924)	87.57742 (88060924)	73.06582 (88060924)
50.0 ;	213.98094 (88041224)	182.27428 (88041224)	83.56568 (88041224)	64.43966 (88060824)	54.88391 (88060824)
60.0 ;	252.37614 (88041224)	197.85460 (88041224)	88.39587 (88041224)	54.47960 (88041224)	45.98288c (88040624)
70.0 ;	212.28441 (88041224)	163.69266 (88041224)	74.09101 (88041224)	55.39646c (88040624)	55.93602c (88040624)
80.0 ;	127.16544c (88031024)	107.63212 (88042624)	63.82211 (88042624)	57.89961 (88042624)	46.45626 (88042624)
90.0 ;	232.39848c (88031024)	209.10423c (88031024)	111.79360c (88031024)	87.62316c (88031024)	71.62370 (88031424)
100.0 ;	219.62859 (88040724)	196.96223 (88040724)	93.84068 (88040724)	76.55494c (88031024)	67.82995 (88012524)
110.0 ;	213.93498 (88021224)	185.93018 (88021224)	96.57281 (88021224)	73.11311 (88021224)	66.92242 (88031924)
120.0 ;	83.81373 (88040724)	89.29032 (88040724)	48.26630 (88040724)	40.80849 (88041324)	43.06186 (88041324)
130.0 ;	60.32324 (88041324)	83.28754 (88041324)	50.83121 (88041324)	41.20915 (88041324)	49.66421 (88121724)
140.0 ;	94.28210 (88112324)	104.14063 (88112324)	71.09660 (88112324)	75.59365 (88112324)	91.53116 (88112324)
150.0 ;	14.41340c (88040924)	26.74004 (88022824)	24.42425 (88042724)	29.83155 (88042724)	28.45315 (88042724)
160.0 ;	19.87915 (88051524)	30.75267 (88051524)	27.00845 (88022624)	29.70843c (88022424)	33.94046 (88112424)
170.0 ;	30.06377 (88020624)	42.71371 (88020624)	35.13099 (88020624)	38.65244 (88020624)	60.13188 (88121224)
180.0 ;	36.04426 (88020624)	46.49405 (88020624)	35.97958 (88020624)	38.24710 (88020624)	55.61670 (88020624)
190.0 ;	58.55538 (88052424)	50.43747 (88052424)	28.50862 (88050724)	34.41929 (88101324)	49.00564c (88020524)
200.0 ;	13.05758 (88050124)	21.37472 (88050724)	20.53802 (88050724)	26.02386 (88101324)	38.57190c (88020524)
210.0 ;	21.99928 (88100624)	34.85240c (88081324)	34.90118 (88050724)	40.19849c (88081324)	66.36024 (88100824)
220.0 ;	33.07354 (88100624)	51.14999c (88081324)	45.64198c (88081324)	51.73688c (88081324)	48.38076c (88081324)
230.0 ;	67.92711 (88070524)	109.90434 (88070524)	80.51386 (88070524)	80.00788 (88070524)	72.06956 (88070524)
240.0 ;	55.42242 (88070524)	91.52863 (88070524)	61.15649 (88050224)	62.84639 (88050224)	65.14225 (88061324)
250.0 ;	53.88346c (88080524)	62.39711 (88091224)	45.77872 (88061224)	55.57212 (88091324)	62.07035 (88091324)
260.0 ;	67.49110c (88050824)	106.32442c (88050824)	64.95927c (88050824)	50.86618 (88053024)	50.87317 (88091124)
270.0 ;	48.73592c (88050824)	71.09089c (88050824)	44.40204c (88050824)	48.86557 (88053124)	56.67842 (88053124)
280.0 ;	53.73871c (88061824)	68.18073c (88061824)	47.20347 (88081224)	48.64761 (88081224)	47.58511 (88091424)
290.0 ;	68.66405c (88080724)	54.56129 (88032924)	45.63055 (88032924)	46.58188 (88032924)	54.36639c (88040224)
300.0 ;	50.89033c (88080724)	49.12322 (88050324)	36.88818 (88081524)	46.47917 (88111924)	57.58485 (88111924)
310.0 ;	41.56774c (88072724)	69.63054 (88040124)	60.06516 (88040124)	64.04354 (88040124)	60.83014 (88040124)
320.0 ;	65.05394c (88072724)	50.62715 (88032424)	39.12175 (88090224)	40.19015 (88090224)	31.88891 (88090224)
330.0 ;	48.32600c (88072724)	33.52933c (88050424)	26.24839 (88071124)	28.98115 (88071124)	23.62266 (88032524)
340.0 ;	61.27617 (88011924)	67.13012 (88011924)	41.75167 (88011924)	39.71080 (88011924)	35.56398 (88011924)
350.0 ;	89.91400 (88012124)	93.65116 (88012124)	57.17650 (88012124)	53.02399 (88012124)	56.99565c (88031224)
360.0 ;	101.36944 (88012124)	94.54856 (88012124)	54.55299 (88021924)	51.80734 (88012024)	67.62963 (88012024)

*** ISCST2 - VERSION 92062 ***

*** SUNBELT RESOURCES

NET = ORL88

*** 08/26/92

*** 16:24:40

PAGE 14

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE 1ST HIGHEST 24-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): 1 ,

*** NETWORK ID: POL ; NETWORK TYPE: GRIDPOLR ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

DIRECTION : DISTANCE (METERS)
(DEGREES) : 750.00 1000.00

DIRECTION (DEGREES)	750.00	1000.00
10.0	35.28445 (88022024)	27.70385 (88022024)
20.0	61.25417 (88090624)	45.87411 (88090624)
30.0	35.48579 (88060824)	26.59840 (88060824)
40.0	54.74469 (88060924)	42.82721 (88060924)
50.0	38.57198 (88060824)	28.66462 (88060824)
60.0	33.32151c (88040624)	24.82992c (88040624)
70.0	40.34672c (88040624)	28.47647c (88040624)
80.0	29.88301 (88042624)	23.45731 (88042324)
90.0	46.91801 (88031424)	32.06733 (88031424)
100.0	52.31082 (88012524)	40.15497 (88012524)
110.0	49.04109 (88031924)	35.70704 (88031924)
120.0	33.44237 (88041324)	28.92745 (88012224)
130.0	47.17065 (88121724)	39.02790 (88121724)
140.0	70.90713 (88112324)	51.87825 (88112324)
150.0	24.99056 (88031524)	21.55865 (88031524)
160.0	42.46103 (88112424)	39.37469 (88112424)
170.0	65.97045 (88121224)	56.78541 (88121224)
180.0	51.33640 (88121224)	50.88597 (88121224)
190.0	52.28494c (88020524)	42.99248c (88020524)
200.0	39.09664c (88020524)	31.62029 (88050124)
210.0	60.45857 (88100824)	47.31621 (88100824)
220.0	36.13298 (88100624)	28.55846 (88100624)
230.0	48.52382 (88070524)	35.65740 (88100624)
240.0	56.96024 (88061324)	46.01376 (88061324)
250.0	51.72832 (88070624)	40.25235 (88070624)
260.0	41.13028 (88091124)	31.54379 (88091124)
270.0	42.10753 (88053124)	30.20792 (88053124)
280.0	37.94128 (88091424)	29.22666 (88091424)
290.0	49.15030c (88040224)	40.10938c (88040224)
300.0	44.24872 (88111924)	33.56472 (88030824)
310.0	41.37409 (88040124)	32.01848 (88031824)
320.0	21.06933c (88011724)	18.03163c (88011724)
330.0	14.42396 (88032524)	13.05937 (88031824)
340.0	27.12195 (88010724)	20.35461 (88010724)
350.0	48.14976c (88031224)	37.54755c (88031224)
360.0	55.51277 (88012024)	43.99660 (88012124)

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE 2ND HIGHEST 24-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): 1 ,

*** NETWORK ID: POL ; NETWORK TYPE: GRIDPOLR ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

DIRECTION : (DEGREES) :	DISTANCE (METERS)				
	50.00	100.00	200.00	300.00	500.00
10.0 :	118.22897 (88030424)	109.84484 (88030424)	59.06888 (88030424)	47.80869 (88030424)	42.00153 (88090624)
20.0 :	120.25268 (88030424)	113.71082 (88030424)	64.72581 (88090624)	60.28980 (88030924)	52.60676 (88030924)
30.0 :	96.62170 (88090624)	89.59293 (88090624)	59.30699 (88060824)	43.09400 (88022024)	37.29202c (88061024)
40.0 :	166.51906 (88060924)	187.77782 (88110524)	93.81303 (88110524)	69.84692 (88110524)	50.47293 (88042324)
50.0 :	97.35528 (88110524)	116.44315 (88060924)	67.40789 (88060824)	52.27352 (88041224)	43.50119 (88042624)
60.0 :	113.02430 (88041124)	119.26321 (88042624)	65.94300 (88042624)	53.70058 (88042624)	40.87113 (88042624)
70.0 :	93.76795 (88041124)	96.21524 (88041124)	55.99137c (88040624)	46.71522 (88041224)	32.28042 (88052524)
80.0 :	111.92100 (88041224)	102.58810c (88031024)	49.68721 (88042424)	45.82488 (88042424)	39.22358 (88042424)
90.0 :	182.04341 (88031424)	178.42635 (88031424)	101.53201 (88031424)	85.00349 (88031424)	69.86997c (88031024)
100.0 :	186.40379c (88031024)	170.70622c (88031024)	93.56850c (88031024)	67.13358 (88012524)	67.32588c (88031024)
110.0 :	173.35689c (88031024)	155.57504 (88031924)	86.62469 (88031924)	71.47842 (88031924)	58.85556 (88021224)
120.0 :	77.29296 (88031924)	76.29224 (88031924)	44.37105 (88041324)	38.96264 (88040724)	35.22866c (88022124)
130.0 :	55.21936 (88112824)	60.17862 (88112824)	37.66344 (88112824)	35.05209 (88112824)	33.67002 (88112824)
140.0 :	28.95905 (88112824)	37.80120 (88031524)	34.48649 (88031524)	41.21428 (88031524)	62.54536 (88031524)
150.0 :	13.62538 (88042824)	25.12509 (88042724)	23.97286 (88022824)	24.51753 (88022824)	27.83947 (88031524)
160.0 :	12.88918c (88082324)	29.95201c (88082324)	25.64005c (88022424)	29.11525 (88022624)	32.75694 (88020624)
170.0 :	23.55979 (88051524)	36.57285 (88051524)	28.24761 (88051524)	29.90596 (88051524)	56.61034 (88020624)
180.0 :	34.37381 (88112324)	32.24186 (88112324)	27.38006 (88102524)	34.97094 (88102524)	43.91102 (88011524)
190.0 :	16.75245 (88010524)	29.26127 (88050724)	25.42402 (88052424)	29.59999 (88050724)	48.50809 (88101324)
200.0 :	11.40050 (88051524)	20.59725 (88092824)	17.75777 (88101324)	24.17767 (88052724)	37.62336 (88101324)
210.0 :	16.65310 (88100824)	34.73094 (88050724)	34.41342c (88081324)	38.34497 (88100824)	36.98655c (88081324)
220.0 :	26.78738c (88081324)	38.90608 (88100624)	36.51299 (88050724)	41.61026 (88050724)	40.84588 (88100624)
230.0 :	32.41341 (88060224)	55.10857 (88050224)	41.23973 (88050224)	40.39719 (88070424)	40.78224 (88100624)
240.0 :	49.15268c (88080424)	77.03379 (88050224)	59.63842 (88070524)	49.53547 (88070524)	61.90985 (88070624)
250.0 :	42.84146 (88070624)	61.10541 (88061224)	44.83272 (88091324)	47.38737 (88091224)	59.05802 (88070624)
260.0 :	55.01902c (88080524)	71.59496 (88053024)	52.91192 (88053024)	50.60291c (88050824)	47.80577 (88020724)
270.0 :	36.86779c (88061824)	52.44426 (88053024)	40.43220 (88053124)	39.20024c (88050824)	42.14905 (88091424)
280.0 :	53.28620 (88081224)	66.62870 (88081224)	42.44617c (88061824)	42.59016 (88032324)	47.39820 (88081224)
290.0 :	35.64444 (88032324)	51.83054 (88032324)	41.81714c (88050924)	46.24960c (88050924)	45.24421c (88050924)
300.0 :	29.72304 (88050324)	48.64722 (88081524)	35.45620 (88111924)	37.19483 (88073024)	50.68120 (88030824)
310.0 :	32.46721 (88081524)	56.82119 (88081524)	41.71233 (88081524)	38.50130 (88081524)	40.72689 (88112624)
320.0 :	29.19188 (88032424)	48.89116 (88090224)	33.76009 (88032424)	28.87562 (88032424)	23.32096c (88070924)
330.0 :	25.34653c (88050424)	32.63551 (88081924)	25.93221 (88032524)	28.33137 (88032524)	23.37889 (88071124)
340.0 :	29.91096c (88080124)	52.40796c (88090424)	37.16100 (88071124)	39.69164 (88071124)	32.72572 (88010724)
350.0 :	65.13735 (88011924)	84.22726c (88090424)	49.68533c (88090424)	42.48149c (88082824)	50.24466 (88012124)
360.0 :	83.88261 (88021924)	92.28345c (88090424)	53.69414 (88012124)	51.70757 (88021924)	60.66101 (88012124)

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE 2ND HIGHEST 24-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL ***
INCLUDING SOURCE(S): 1 ,

*** NETWORK ID: PDL ; NETWORK TYPE: GRIDPOLR ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

DIRECTION : DISTANCE (METERS)
(DEGREES) : 750.00 1000.00

10.0	34.65852 (88112824)	26.95922 (88112824)
20.0	41.83028 (88090724)	37.45163 (88090724)
30.0	31.63588 (88082124)	25.60909 (88082124)
40.0	36.74971 (88060824)	29.84774 (88060824)
50.0	36.77500 (88042624)	28.50895 (88042624)
60.0	28.61880 (88042624)	23.00134 (88042624)
70.0	25.64191c (88082424)	23.24968c (88082424)
80.0	29.35077 (88042324)	21.10884 (88042624)
90.0	45.13618c (88031024)	31.35365 (88063024)
100.0	45.26414c (88031024)	31.23931c (88031024)
110.0	38.99686 (88021224)	26.95744 (88021224)
120.0	30.67737 (88012224)	26.32881c (88011324)
130.0	31.31591 (88030124)	26.59454 (88030124)
140.0	52.14408 (88031524)	39.76414 (88031524)
150.0	20.28154 (88121324)	17.45932 (88032024)
160.0	32.89508 (88011124)	29.81997 (88011124)
170.0	47.39675 (88020624)	41.01015c (88010424)
180.0	49.41915 (88020624)	44.30455 (88011524)
190.0	42.80374 (88100724)	34.89794 (88100724)
200.0	37.34681 (88021024)	31.37483c (88020524)
210.0	29.42607 (88011424)	28.59415c (88121024)
220.0	33.93402c (88081324)	24.80618c (88081324)
230.0	42.42166 (88100624)	33.39883 (88070524)
240.0	50.98572 (88070624)	39.26492 (88070724)
250.0	46.51603 (88091324)	36.38038 (88070724)
260.0	35.23130 (88020724)	27.09303 (88061624)
270.0	32.87556 (88091424)	26.64730 (88091524)
280.0	33.91221 (88081224)	26.13686c (88110324)
290.0	39.01005 (88050324)	32.05516 (88050324)
300.0	43.60536 (88030824)	32.26263 (88111924)
310.0	34.58104 (88031824)	28.51422 (88040124)
320.0	19.62502c (88040224)	15.65994c (88040224)
330.0	14.17185 (88071124)	12.48582 (88071024)
340.0	24.45446c (88090424)	19.90515c (88040324)
350.0	34.95310 (88012124)	27.02851 (88090824)
360.0	53.90144 (88012124)	43.20224 (88090724)

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE MAXIMUM 50 8-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL
INCLUDING SOURCE(S): 1 ,

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

RANK	CONC	(YYMMDDHH) AT	RECEPTOR (XR,YR) OF TYPE	RANK	CONC	(YYMMDDHH) AT	RECEPTOR (XR,YR) OF TYPE
1.	638.11932	(88041216) AT (38.30, 32.14) GP	26.	331.14969	(88042616) AT (86.60, 50.00) GP
2.	616.20990	(88110516) AT (32.14, 38.30) GP	27.	326.31250	(88041224) AT (46.98, 17.10) GP
3.	568.47815	(88041216) AT (43.30, 25.00) GP	28.	322.79257	(88050616) AT (93.97, -34.20) GP
4.	549.99799	(88060916) AT (64.28, 76.60) GP	29.	320.41647	(88030416) AT (34.20, 93.97) GP
5.	544.80420	(88041216) AT (76.60, 64.28) GP	30.	310.54074	(88041216) AT (46.98, 17.10) GP
6.	534.50562	(88110516) AT (64.28, 76.60) GP	31.	308.10150	(88030416) AT (17.36, 98.48) GP
7.	519.50977	(88021216) AT (46.98, -17.10) GP	32.	302.82361	(88060916) AT (128.56, 153.21) GP
8.	514.49872	(88031016) AT (50.00, 0.00) GP	33.	299.49420	(88042616) AT (43.30, 25.00) GP
9.	509.98175	(88022016) AT (25.00, 43.30) GP	34.	298.03854	(88031424) AT (49.24, -8.68) GP
10.	493.52649	(88022016) AT (8.68, 49.24) GP	35.	296.92310	(88012524) AT (49.24, -8.68) GP
11.	478.89948	(88060916) AT (32.14, 38.30) GP	36.	291.91547	(88031424) AT (50.00, 0.00) GP
12.	472.42929	(88040716) AT (49.24, -8.68) GP	37.	291.91037	(88110516) AT (38.30, 32.14) GP
13.	454.26456	(88022016) AT (17.10, 46.98) GP	38.	286.44144	(88021516) AT (8.68, 49.24) GP
14.	450.34784	(88041216) AT (86.60, 50.00) GP	39.	283.06296	(88060816) AT (64.28, 76.60) GP
15.	436.81537	(88040716) AT (98.48, -17.36) GP	40.	282.38315	(88031916) AT (46.98, -17.10) GP
16.	435.79654	(88031016) AT (100.00, 0.00) GP	41.	282.22015	(88042416) AT (32.14, 38.30) GP
17.	424.34747	(88021216) AT (93.97, -34.20) GP	42.	278.36624	(88040724) AT (50.00, 0.00) GP
18.	423.37500	(88021216) AT (49.24, -8.68) GP	43.	277.42960	(88122816) AT (8.68, 49.24) GP
19.	412.48294	(88022016) AT (50.00, 86.60) GP	44.	276.17902	(88031424) AT (100.00, 0.00) GP
20.	412.29529	(88022016) AT (17.36, 98.48) GP	45.	274.16974	(88031424) AT (98.48, -17.36) GP
21.	362.45810	(88042416) AT (64.28, 76.60) GP	46.	274.00049	(88041916) AT (32.14, 38.30) GP
22.	358.09180	(88022016) AT (34.20, 93.97) GP	47.	273.95261	(88090616) AT (25.00, 43.30) GP
23.	353.61505	(88021216) AT (98.48, -17.36) GP	48.	271.05203	(88050616) AT (98.48, -17.36) GP
24.	346.54199	(88030416) AT (17.10, 46.98) GP	49.	270.15512	(88112316) AT (64.28, -76.60) GP
25.	339.77884	(88030416) AT (8.68, 49.24) GP	50.	268.13330	(88110516) AT (128.56, 153.21) GP

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR
BD = BOUNDARY

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE MAXIMUM 50 24-HR AVERAGE CONCENTRATION VALUES FOR SOURCE GROUP: ALL
INCLUDING SOURCE(S): 1 , ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

RANK	CONC	(YYMMDDHH) AT	RECEPTOR (XR,YR) OF TYPE	RANK	CONC	(YYMMDDHH) AT	RECEPTOR (XR,YR) OF TYPE
1.	252.37614	(88041224) AT (43.30, 25.00) GP	26.	163.69266	(88041224) AT (93.97, 34.20) GP
2.	232.39848c	(88031024) AT (50.00, 0.00) GP	27.	161.96458	(88021224) AT (49.24, -8.68) GP
3.	219.62859	(88040724) AT (49.24, -8.68) GP	28.	155.57504	(88031924) AT (93.97, -34.20) GP
4.	217.11656	(88110524) AT (32.14, 38.30) GP	29.	154.38087	(88012524) AT (98.48, -17.36) GP
5.	213.98094	(88041224) AT (38.30, 32.14) GP	30.	153.49907	(88040724) AT (100.00, 0.00) GP
6.	213.93498	(88021224) AT (46.98, -17.10) GP	31.	151.44943	(88022024) AT (17.10, 46.98) GP
7.	212.28441	(88041224) AT (46.98, 17.10) GP	32.	147.42867c	(88031024) AT (93.97, -34.20) GP
8.	209.10423c	(88031024) AT (100.00, 0.00) GP	33.	141.48158	(88021224) AT (98.48, -17.36) GP
9.	197.85460	(88041224) AT (86.60, 50.00) GP	34.	138.47227	(88022024) AT (17.36, 98.48) GP
10.	196.96223	(88040724) AT (98.48, -17.36) GP	35.	137.51292	(88022024) AT (50.00, 86.60) GP
11.	192.27501	(88060924) AT (64.28, 76.60) GP	36.	131.98814	(88012524) AT (50.00, 0.00) GP
12.	197.77782	(88110524) AT (64.28, 76.60) GP	37.	127.16544c	(88031024) AT (49.24, 8.68) GP
13.	186.40379c	(88031024) AT (49.24, -8.68) GP	38.	122.51366	(88031424) AT (49.24, -8.68) GP
14.	185.93018	(88021224) AT (93.97, -34.20) GP	39.	120.81940	(88042424) AT (64.28, 76.60) GP
15.	182.27428	(88041224) AT (76.60, 64.28) GP	40.	120.25268	(88030424) AT (17.10, 46.98) GP
16.	182.04341	(88031424) AT (50.00, 0.00) GP	41.	119.61191	(88022024) AT (34.20, 93.97) GP
17.	179.30725	(88012524) AT (49.24, -8.68) GP	42.	119.26321	(88042624) AT (86.60, 50.00) GP
18.	178.42635	(88031424) AT (100.00, 0.00) GP	43.	118.22897	(88030424) AT (8.68, 49.24) GP
19.	173.35689c	(88031024) AT (46.98, -17.10) GP	44.	117.15672	(88041124) AT (86.60, 50.00) GP
20.	172.47919	(88040724) AT (50.00, 0.00) GP	45.	116.44315	(88060924) AT (76.60, 64.28) GP
21.	170.70622c	(88031024) AT (98.48, -17.36) GP	46.	114.99760	(88031424) AT (98.48, -17.36) GP
22.	170.03209	(88022024) AT (25.00, 43.30) GP	47.	114.96832	(88050624) AT (93.97, -34.20) GP
23.	166.51906	(88060924) AT (32.14, 38.30) GP	48.	113.71082	(88030424) AT (34.20, 93.97) GP
24.	166.31708	(88031924) AT (46.98, -17.10) GP	49.	113.08709	(88040724) AT (93.97, -34.20) GP
25.	164.61557	(88022024) AT (8.68, 49.24) GP	50.	113.02430	(88041124) AT (43.30, 25.00) GP

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR
BD = BOUNDARY

*** ISCST2 - VERSION 92062 ***

*** SUNBELT RESOURCES

MET = ORL88

*** 08/26/92

*** 16:24:40

PAGE 19

*** MODELING OPTIONS USED: CONC RURAL FLAT DEFAULT

*** THE SUMMARY OF MAXIMUM PERIOD (8784 HRS) RESULTS ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

GROUP ID	AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZFLAG)	OF TYPE	NETWORK GRID-ID
ALL	1ST HIGHEST VALUE IS 5.66181 AT (-433.01, -250.00, 0.00, 0.00)	GP	POL
	2ND HIGHEST VALUE IS 5.53581 AT (98.48, -17.36, 0.00, 0.00)	GP	POL
	3RD HIGHEST VALUE IS 5.45854 AT (100.00, 0.00, 0.00, 0.00)	GP	POL
	4TH HIGHEST VALUE IS 5.21212 AT (-492.40, -86.82, 0.00, 0.00)	GP	POL
	5TH HIGHEST VALUE IS 5.17228 AT (-469.85, -171.01, 0.00, 0.00)	GP	POL
	6TH HIGHEST VALUE IS 5.14128 AT (-649.52, -375.00, 0.00, 0.00)	GP	POL

*** RECEPTOR TYPES: GC = GRIDCART
 GP = GRIDPOLR
 DC = DISCCART
 DP = DISCPOLR
 BD = BOUNDARY

*** ISCST2 - VERSION 92062 ***

*** SUNBELT RESOURCES

NET = ORL89

*** 08/26/92

*** 16:24:40

PAGE 20

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE SUMMARY OF HIGHEST 8-HR RESULTS ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

GROUP ID	AVERAGE CONC	DATE (YYMMDDHH)	RECEPTOR (XR, YR, ZELEV, ZFLAG)	OF TYPE	NETWORK GRID-ID
ALL	HIGH 1ST HIGH VALUE IS	638.11932 ON 88041216: AT (38.30, 32.14, 0.00,	0.00)	GP POL
	HIGH 2ND HIGH VALUE IS	534.50562 ON 88110516: AT (64.28, 76.60, 0.00,	0.00)	GP POL

*** RECEPTOR TYPES:

- GC = GRIDCART
- GP = GRIDPOLR
- DC = DISCCART
- DP = DISCPOLR
- BD = BOUNDARY

*** ISCST2 - VERSION 92062 ***

*** SUNBELT RESOURCES

MET = ORL88

08/26/92

16:24:40

PAGE 21

*** MODELING OPTIONS USED: CONC RURAL FLAT DFAULT

*** THE SUMMARY OF HIGHEST 24-HR RESULTS ***

** CONC OF OTHER IN (MICROGRAMS/CUBIC-METER) **

GROUP ID	AVERAGE CONC	DATE (YYMMDDHH)	RECEPTOR (XR, YR, ZELEV, ZFLAG)	OF TYPE	NETWORK GRID-ID				
ALL	HIGH 1ST HIGH VALUE IS	252.37614	ON 88041224: AT (43.30,	25.00,	0.00,	0.00)	GP	POL
	HIGH 2ND HIGH VALUE IS	187.77782	ON 88110524: AT (64.28,	76.60,	0.00,	0.00)	GP	POL

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR
BD = BOUNDARY

```
*** ISCST2 - VERSION 92062 ***   *** SUNBELT RESOURCES   MET = ORL88   ***   09/26/92
***                               ***                               ***   16:24:40
***                               ***                               ***   PAGE 22

*** MODELING OPTIONS USED:  CONC  RURAL  FLAT          DEFAULT
```

*** Message Summary For ISC2 Model Execution ***

----- Summary of Total Messages -----

```
A Total of      0 Fatal Error Message(s)
A Total of      0 Warning Message(s)
A Total of      263 Informational Message(s)

A Total of      263 Calm Hours Identified
```

```
***** FATAL ERROR MESSAGES *****
*** NONE ***
```

```
***** WARNING MESSAGES *****
*** NONE ***
```

```
*****
*** ISCST2 Finishes Successfully ***
*****
```



STATE OF FLORIDA
DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

ESE-WPB

August 18, 1992

C.H. Fancy
Chief, Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Re: AC38-216863, Sunbelt Resources, Inc.
Mobile Soil Remediation Unit

Dear Mr. Fancy:

The Palm Beach County Public Health Unit received the above referenced application on 8/13/92, and offers the following comments:

We request a specific condition that provides advance notice to our Air Pollution Control Section, prior to an SRU moving into Palm Beach County.

Thank you for the opportunity to comment on this application.

Sincerely,

For the Division Director
Environmental Science and Engineering

Jeffery F. Koerner
Engineer III
Air Pollution Control Section

FJG/JFK/lh

cc: AP-Source File

RECEIVED
AUG 21 1992
DIVISION OF AIR
RESOURCES

P 062 921 876



Receipt for Certified Mail

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

Sent to	
Terry Dunn	
Street and No.	
Sunbelt Resources	
P.O., State and ZIP Code	
Tuscaloosa, AL	
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	8-10-92
AC 37-216863	

PS Form 3800, June 1991

91992 Rate

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

- Show to whom, date and address of delivery.
- Restricted Delivery.

3. Article Addressed to:

Terry Dunn
Sunbelt Resources, Inc
715 Skyland Blvd East
Tuscaloosa, AL 35405

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured <input type="checkbox"/> COD P062921876

Always obtain signature of addressee or agent and **DATE DELIVERED.**

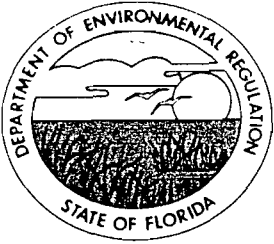
5. Signature - Addressee
X

6. Signature - Agent
X Lisa Chanmore

7. Date of Delivery
8/14/92

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

DOMESTIC RETURN RECEIPT



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

August 7, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Terry Bunn, President
Sunbelt Resources, Inc.
715 Skyland Blvd. East
Tuscaloosa, AL 35405

Dear Mr. Bunn:

Re: File No. AC 37-216863, Sunbelt Resources SRU Application

The Department has made a preliminary review of your application for permit to construct a 50 TPH mobile soil thermal treatment facility in Florida. The Department will need the following additional information before this application can be processed.

1. Please submit the detailed calculations used to determine the residence time of the afterburner.
2. Will the proposed facility be equipped with continuous monitors and recorders for the hot zone temperature and CO concentration?
3. What is the maximum potential ambient air quality impact of the metal emissions from the used oil and contaminated soil for 8-hour, 24-hour, and annual time periods? Please document any capture efficiency assumed for the fine metal particles formed during the combustion of used oil in the kiln's burner. Include the downwash impacts in the calculations.

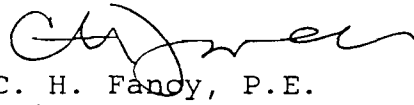
Applicants for permits to construct soil thermal treatment facilities are required to publish a Notice of Application on submittal of a complete application for a permit to construct. Your application will be considered substantially complete on responding satisfactorily to the questions in this letter. Your Notice of Application is enclosed. Note that the counties you intend to operate in must be listed in the notice. You must publish the notice in a newspaper having circulation in each of these counties and provide the Department with proof of each publication. You will also be required to publish a Notice of Intent to Issue in the same newspapers should the Department approve your application. Any construction permit issued for this facility will limit its operation to these counties. To operate in

Mr. Terry Bunn
Page 2 of 2
August 7, 1992
Request for Additional Information

any other county, you will have to satisfy the public notice requirements for that county and have your permit amended to authorize operation in that county. The public will have an opportunity to comment or petition for an administrative hearing in response to any public notice published for your facility.

The Department will resume processing your application after you furnish the requested information. The Department must receive the proof of publications before we can issue our evaluation and proposed permit for your project. If you have any questions on this matter, please write to me or call Willard Hanks, Review Engineer, at (904) 488-1344.

Sincerely,



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

CHF/WH/plm

Attachment

cc: John Koogler, P.E.
Tom Conrardy, BWC

NOTICE OF APPLICATION

The Department of Environmental Regulation announces receipt of an application for permit to construct a mobile soil thermal treatment facility from Sunbelt Resources, Inc., 715 Skyland Blvd. East, Tuscaloosa, AL 35405. This equipment will be used to evaporate and burn petroleum products (fuels and lubricants) from soils. The facility may operate in the following counties: _____.

The application is being processed at the Department of Environmental Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. Copies of the application are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m. - Monday through Friday, except legal holidays, at the Department of Environmental Regulation offices located at:

2600 Blair Stone Road, Tallahassee, FL 32399-2400
160 Governmental Center, Pensacola, FL 32501-5794
3319 Maguire Blvd., Suite 232, Orlando, FL 32803-3767
4520 Oak Fair Blvd., Tampa, FL 33610-7347
2295 Victoria Ave., Suite 362, Ft. Myers, FL 33901
7825 Baymeadows Way, Suite B200, Jacksonville, FL 32256-7577
1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406

and the county environmental program offices at:

621 S. Andrew Ave., Ft. Lauderdale, FL 33301
801 S.W. 3rd Ave., 2nd Floor, Miami, FL 33130
421 W. Church St., Suite 412, Jacksonville, FL 32202-4111
1410 N. 21st St., Tampa, FL 33605
901 E. Evernia St., West Palm Beach, FL 33402
300 S. Garden Ave., Clearwater, FL 34616
1301 Cattleman Rd., Bldg. B, Sarasota, FL 43232-6299
2002 E. Michigan Ave., Orlando, FL 32806

Comments on this project may be sent to Mr. Preston Lewis at the Department's Tallahassee address.

S. T. BUNN CONSTRUCTION CO., INC. 192
CONTRACTORS
715 SKYLAND BLVD E STE 6
TUSCALOOSA, AL 35405

Best Available Copy

7/21 1992

PAY TO THE ORDER OF

Florida Dept. of Environmental Regulation

\$ 1,000.00

ONE THOUSAND DOLLARS

DOLLARS

AMSOUTH
AmSouth Bank N.A.
Tuscaloosa, Alabama 35401

S. T. BUNN CONSTRUCTION CO., INC.
CONTRACTORS

FOR

Brad Hubbard

SOURCE TYPE: Mobile Soil Remediation Unit New¹ Existing¹

APPLICATION TYPE: Construction Operation Modification

COMPANY NAME: Sunbelt Resources, Inc. COUNTY: Statewide

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Tarmac Model P734CFD

SOURCE LOCATION: Street (Mobile Facility) City: _____

UTM: East _____ North _____

Latitude _____ ° _____ ' _____ "N Longitude _____ ° _____ ' _____ "W

APPLICANT NAME AND TITLE: Terry Bunn, President

APPLICANT ADDRESS: 715 Skyland Blvd. East, Tuscaloosa, Ala 35405

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Sunbelt Resources, Inc.

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: _____

Terry Bunn, President
Name and Title (Please Type)

Date: 7-21-92 Telephone No. (205) 758-3657

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been ~~designed~~/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

001031

Dunbelt Resources, Inc.

Screen model shows 1 g/s emission has max 1 hr impact of $36.75 \mu\text{g}/\text{m}^3$

1. What is max. impact of metal emissions?

#/hr used oil burned = $240 \text{ gal/hr} \times 7.0 \text{ lbs/gal} = 1680 \text{ lbs/hr}$

g	NTL ($\mu\text{g}/\text{m}^3$)		metal	Max ppm	Max lbs/hr in	Max g/sec fuel	IMPACTS (max) $\mu\text{g}/\text{m}^3$			
	24	A					1hr	8	24	ANN X
2	0.48	2.3-4	Arsenic	5	8.4E^{-3}	1.06E^{-3}	0.04	0.03	0.016	3.9E^{-3}
.5	.12	5.6-4	Cadmium	2	3.4E^{-3}	4.3E^{-4}	0.016	0.011	6.3E^{-3}	1.6E^{-3}
.5	.12	8.3-5	Chromium	10	1.7E^{-2}	2.1E^{-3}	0.077	0.054	0.031	7.7E^{-5}
.5	.12	9-2	Lead	100	1.7E^{-1}	2.1E^{-2}	0.77	0.54	0.31	7.7E^{-2}
			Halogens	4000	6.72	0.8	-	-	-	-

Calc
 g/gal
 let - impact
 more
 in and out

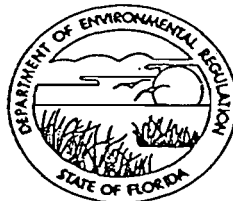
$$\text{Max lbs/hr in} = \frac{1680 \text{ lbs}}{\text{hr}} \cdot \frac{1 \text{ ppm}}{10^6} = 1680 \times 10^{-6} \text{ lbs/hr/ppm}$$

$$\text{Max g/s} = \frac{\text{lbs}}{\text{hr}} \cdot \frac{454 \text{g}}{1 \text{lb}} = 0.126 \text{ (lbs/hr)}$$

$$\text{hr} \cdot \frac{3600 \text{ sec}}{1 \text{ hr}} = 16$$

\$1,000pd.
7-22-92
Receipt #18078

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



AC 37-216863

APPLICATION TO ~~OPERATE~~/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Mobile Soil Remediation Unit New¹ Existing¹

APPLICATION TYPE: Construction Operation Modification

COMPANY NAME: Sunbelt Resources, Inc. COUNTY: Statewide

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Tarmac Model P734CFD

SOURCE LOCATION: Street (Mobile Facility) City _____

UTM: East _____ North _____

Latitude _____° _____' _____"N Longitude _____° _____' _____"W

APPLICANT NAME AND TITLE: Terry Bunn, President

APPLICANT ADDRESS: 715 Skyland Blvd. East, Tuscaloosa, Ala 35405

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Sunbelt Resources, Inc.

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: *Terry Bunn*

Terry Bunn, President
Name and Title (Please Type)

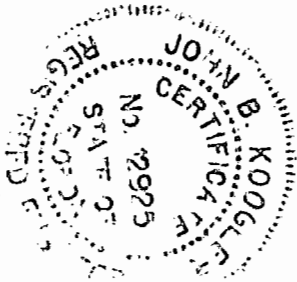
Date: 7-21-92 Telephone No. (205) 758-3657

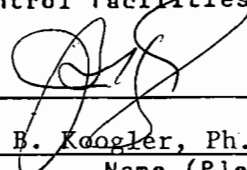
B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been ~~designed~~/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed 

John B. Koogler, Ph.D., P.E.
Name (Please Type)

Koogler & Associates; Environmental Services
Company Name (Please Type)

4014 N.W. 13th Street, Gainesville, FL 32609
Mailing Address (Please Type)

Florida Registration No. 12925 Date: 7/20/92 Telephone No. (904) 377-5822

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Construction permit application for a 50 ton/hour mobile soil remediation facility.

The counties in which the plant will operate will be decided at the time public notice.

See page 2a of 12 for additional information.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction NA Completion of Construction NA

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Cost of afterburner, heat exchanger and baghouse is \$650,000.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

None

SECTION IIA: PROCESS DESCRIPTION

Sunbelt Resources, Inc. (Sunbelt) plans to operate a mobile thermal soil remediation plant in the state of Florida. It is anticipated that the plant will operate statewide. The counties in which a Public Notice will be published will be determined at the time the Department completes its Intent to Issue.

The mobile soil remediation unit is manufactured by Tarmac Equipment Company, Inc. of Kansas City, Missouri. Attachment 2 includes a general description of each component of the plant. Attachment 1 is the process flow diagram for the plant. The process entails heating the petroleum contaminated soil in a rotary kiln to temperatures between 600 and 900°F. The hydrocarbons are evaporated from the soil and are destroyed in an afterburner having a destruction efficiency estimated to be 99 percent. Following the afterburner, the gas is passed through an air-to-air heat exchanger and are cooled to 375°F. The gases then pass through a baghouse for particulate matter control and are exhausted to the atmosphere.

The mobile soil remediation unit will operate in compliance with all requirements of Chapters 17-2, 17-4 and 17-775, FAC. Typically, the soils processed through the plant will be used as backfill at the site of origin.

The soil remediation unit will process soils allowed under the requirements of Chapter 17-775, FAC at a rate of up to 50 tons per hour. The actual processing rate will depend upon the type of soil encountered and the level of contaminate in the soil. The contaminated soil from on-site stockpiles will be placed into cold-feed hoppers equipped with a variable speed feeder. The feeder meters the contaminated soil onto a belt conveyor which transports it to the rotary kiln. The rotary kiln is designed to dry and heat the contaminated soil to a temperature of 600-900°F to vaporize the hydrocarbon contaminants contained in the soil. The rotary kiln is heated with a 30 million BTU per hour burner capable of firing either on-specification used oil or virgin No. 2 fuel oil; each with a sulfur content of 0.3 percent or less.

The hydrocarbons and dust suspended in the gas stream leaving the rotary kiln are ducted to an afterburner for VOC control. The afterburner is designed for a residence time in excess of 1.0 seconds at a temperature of 1600°F. The afterburner is heated with a 30 million BTU per hour burner firing either propane or natural gas. Propane will be the primary fuel with natural gas being fired only when readily available.

From the afterburner, the gas stream will pass through an air-to-air heat exchanger where it will be cooled from approximately 1600°F to approximately 375°F. From the heat exchanger, the gas stream will pass through a baghouse with an air-to-cloth ratio of approximately 5.0/1.

The process flow utilized by Sunbelt assures that hydrocarbons will not condense on the baghouse dust. This eliminates the potential of recontamination of the baghouse dust and the reintroduction of hydrocarbon contaminants back into the site.

On start up, the plant is checked out and warm up procedures are completed. Once operating, the safety controls and automatic monitors make the operation of the remediation plant relatively uncomplicated. Automatic safety controls, temperature gauges and recording devices are designed to allow the plant to operate within strict parameter ranges.

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52; if power plant, hrs/yr _____; if seasonal, describe: _____
Annual hours of operation will be limited to 4400 hr/yr or less

F. If this is a new source or major modification, answer the following questions. (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? (1)
a. If yes, has "offset" been applied? NA
b. If yes, has "Lowest Achievable Emission Rate" been applied? NA
c. If yes, list non-attainment pollutants. (1)

2. Does best available control technology (BACT) apply to this source? NO
If yes, see Section VI.

3. Does the State "Prevention of Significant Deterioration" (PSD) requirement apply to this source? If yes, see Sections VI and VII. NO

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? NO

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? NO

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? (1)

a. If yes, for what pollutants? (1)

b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

1. Facility is a mobile soil remediation unit. It is probable that the plant will operate in areas of the state that are designated non-attainment for ozone (Duval, Broward, Dade, Palm Beach, Hillsborough and Pinellas counties) and it is possible that the plant will operate in the areas of Duval and Hillsborough counties designated non-attainment for particulate matter. As the plant is mobile and will not be at any one location for an extended period of time, compliance with the Department's emission limiting standards for Thermal Soil Treatment limits should be considered RACT.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Soil	P.M.	2-3	100,000	
	VOC	0.5		

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 100,000 lb/hr (50 tpy); wet weight

2. Product Weight (lbs/hr): typically 92,000 lb/hr (46 tpy); dry weight

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
P.M.	3.9	8.6	(a)	3.9	2250	4950	
SO ₂	10.1	22.2	(b)	10.1	10.1	22.2	
NOx	6.5	14.3	(c)	6.5	6.5	14.3	
VOC	5.0	11.0	(d)	5.0	500.1	1100	
CO	5.0	11.0	(e)	5.0	5.0	11.0	

¹See Section V, Item 2.

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).

Note: All Emission limits requested by applicant.

a) 0.04gr/dscf

c) Based on AP-42

e) 100 ppm in stack gas

b) 0.3% sulfur fuel oil d) 99% VOC control

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Baghouse- Tarmac Model P1424BH	P.M.	99.8	>2um	Mfg.
Afterburner - Tarmac Model P830HO	VOC	99+%	NA	Mfg. & FDER

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Dryer- No. 2 Oil	185	214 gal/hr	30.0
- On-Spec Used Oil	200	240 gal/hr	30.0
Afterburner- Propane	120	140 gal/hr	14.0
-Natural Gas	12.0	14.0 mcfh	14.0

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis: No. 2/ Used Oil/ Propane

Percent Sulfur: 0.3/ 0.3/ Nil Percent Ash: Nil/ Nil/ Nil

Density: 6.8/ 7.0/ 5.0 lbs/gal Typical Percent Nitrogen: Nil/ Nil/ Nil

Heat Capacity: 20,590/17,860/19,500 BTU/lb 140,000/ 125,000/ 97,500 BTU/gal

Other Fuel Contaminants (which may cause air pollution): Trace metals in on-specification used oil.

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average NA Maximum NA

G. Indicate liquid or solid wastes generated and method of disposal.

None

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 25 ft. Stack Diameter: 3.5 ft.
 Gas Flow Rate: 24,487 ACFM 11,458 DSCFM Gas Exit Temperature: 375 °F.
 Water Vapor Content: 26 % Velocity: 42.4 FPS

SECTION IV: INCINERATOR INFORMATION

(NOT APPLICABLE)

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner

Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

(See Page 7a of 12)

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

SECTION V: SUPPLEMENTAL INFORMATION

1. Operating Parameters

A. Soil Remediation Unit

Feed Rate - 50 tph
Moisture - 8%; typical
Dry Feed - 46 tph
VOC - 0.5%; typical high concentration

Heat Input - 30.0 MMBTU/hr (by Mfg)
No. 2 Fuel - 214 gal/hr
Used Oil - 240 gal/hr

Soil Discharge
Temperature - 600-900°F (600°F design @ 50 tph)

Gas Discharge from SRU to Afterburner
Moisture - 9,950 lb/hr (Comb. products + soil moisture)
- 3,548 scfm
Dry Gas - 42,275 lb/hr
- 9,352 scfm
VOC - 500 lb/hr (at 0.5% contamination)
- 46 scfm

Total - 52,725 lb/hr
- 12,946 scfm
- 20,473 Acfm @ 375°F and 27% moisture

B. Afterburner

Heat in Gas Stream at 375°F

Dry Gas = 42,275 lb/hr x 71.3 BTU/lb
= 3.01 MMBTU/hr

Moisture = 9,950 lb/hr x 1180.0 BTU/lb
= 11.74 MMBTU/hr

Total = 14.75 MMBTU/hr

Heat in Gas Stream at 1600°F

Dry Gas = 42,275 lb/hr x 392.3 BTU/lb
= 16.58 MMBTU/hr

$$\begin{aligned}
\text{Moisture} &= 9,950 \text{ lb/hr} \times 1095 \text{ BTU/lb} \\
&= 10.90 \text{ MMBTU/hr} \\
\text{Total} &= 27.48 \text{ MMBTU/hr}
\end{aligned}$$

$$\begin{aligned}
&\text{Heat Required in Afterburner @ 5\% Loss} \\
&= 1.05 (27.48 - 14.75) \\
&= 13.36 \text{ MMBTU/hr} \\
&30 \text{ MMBTU/hr provided by MFG}
\end{aligned}$$

$$\begin{aligned}
&\text{Fuel Use; Propane @ 97,500 BTU/gal} \\
&= 13.36 \times 10^6 / 97,500 \\
&= 137 \text{ gal/hr} \\
&\text{Use 140 gal/hr (700 lb/hr)}
\end{aligned}$$

Combustion Products

$$\begin{aligned}
&\text{Dry Gas @ 16.6 lb/lb} \\
&= 700 \text{ lb/hr} \times 16.60 \text{ lb/lb} \\
&= 11,620 \text{ lb/hr}
\end{aligned}$$

$$\begin{aligned}
&\text{Moisture @ 1.64 lb/lb} \\
&= 700 \text{ lb/hr} \times 1.64 \text{ lb/lb} \\
&= 1148 \text{ lb/hr}
\end{aligned}$$

Total Gas Flow from Afterburner

$$\begin{aligned}
\text{Dry Gas:} \quad \text{SRU} &= 42,275 \\
&\text{Afterburner} = \underline{11,620} \\
\text{Total} &= 53,895 \text{ lb/hr} \\
&\quad \times (385/30) \text{ ft}^3/\text{lb} \times 1/60 \text{ hr/min} \\
&= 11,528 \text{ scfm (74\% of flow)}
\end{aligned}$$

Moisture: SRU = 9,950
 Afterburner = 1,148
 Total = 11,098 lb/hr
 x (385/18)ft³/lb x 1/60 hr/min
 = 3956 scfm (26% of flow)

Total: = 15,484 scfm @ 68°F and wet
 = 60,410 Acfm @ 1600°F and 26% Moisture

Afterburner Volume = 1100 ft³ (by Mfg)

Residence time @ 1600°F
 = 1.09 seconds

NOTE: At 1600°F and a residence time of 0.3 seconds, FDER assumes a VOC destruction efficiency of 99+%.

C. Air/Air Heat Exchange

Temperature in = 1600°F
 Temperature out = 375°F
 Gas Volume out = 24,487 Acfm @ 375°F and 26% Moisture

D. Baghouse

Temperature in = 375°F
 Temperature out = 375°F
 Gas Volume = 24,487 Acfm @ 375°F
 = 11,458 scfm, dry
 Cloth Area = 4939 ft³
 Air/Cloth Ratio = 4.96/1

2/3. Controlled and Uncontrolled Emissions

A. Particulate Matter

Uncontrolled at 45 lb/ton (AP-42, Section 8.0)

$$\begin{aligned} &= 50 \text{ tph} \times 45 \text{ lb/ton} \\ &= 2250 \text{ lb/hr} \\ &\quad \times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\ &= 4950 \text{ tpy} \end{aligned}$$

Controlled to 0.04 gr/dscf

$$\begin{aligned} &= 11458 \text{ ft}^3/\text{min} \times 0.04 \text{ gr/ft}^3 \times 60 \text{ min/hr} \times 1/7000 \\ &= 3.93 \text{ lb/hr} \\ &\quad \times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\ &= 8.6 \text{ tpy} \end{aligned}$$

B. Sulfur Dioxide

Controlled and Uncontrolled

SRU - 240 gal/hr used oil at 0.3% sulfur; worst case

Afterburner - 140 gal/hr propane with 0.014 pounds sulfur per 1000 gal

$$\begin{aligned} \text{SO}_2 &= [240 \text{ gal/hr} \times 7.0 \text{ lb/gal} \times (0.003 \times 2) \text{ lb SO}_2/\text{lb}] \\ &\quad + [140 \text{ gal/hr} \times ((0.014/1000) \times 2) \text{ lb SO}_2/\text{gal}] \\ &= 10.1 \text{ lb/hr} \\ &\quad \times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\ &= 22.2 \text{ tpy} \end{aligned}$$

C. Nitrogen Oxides

Controlled and Uncontrolled

SRU = 240 gal/hr used oil; worst cast @ 20 lb/1000 gal

Afterburner = 140 gal/hr propane @ 12.4 lb/1000 gal

$$\begin{aligned}
\text{NOx} &= [240 \text{ gal/hr} \times 20/1000 \text{ lb/gal}] \\
&+ [140 \text{ gal/hr} \times 12.4/1000 \text{ lb/gal}] \\
&= 6.5 \text{ lb/hr} \\
&\times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\
&= 14.3 \text{ tpy}
\end{aligned}$$

D. Carbon Monoxide

Controlled and Uncontrolled

Assume 100 ppm (dry volume basis) in stack gas

$$\begin{aligned}
\text{CO} &= 11458 \text{ dscfm} \\
&\times 60 \text{ min/hr} \\
&\times (100 \times 10^{-6}) \\
&\times 28/385 \\
&= 5.0 \text{ lb/hr} \\
&\times 4400 \text{ hr/yr} \times 1/2000 \text{ lb/ton} \\
&= 11.0 \text{ tpy}
\end{aligned}$$

E. VOC

Uncontrolled

SRU = 240 gal/hr used oil (worst case) at 0.34 lb/1000 gal

Afterburner

Fuel = 140 gal/hr propane at 0.25 lb/1000 gal

Contaminated Soil = 500 lb VOC/hr

$$\begin{aligned}
\text{VOC} &= [240 \text{ gal/hr} \times 0.34/1000 \text{ lb/gal}] \\
&+ [140 \text{ gal/hr} \times 0.25/1000 \text{ lb/gal}] \\
&+ [500 \text{ lb/hr}] \\
&= 500.1 \text{ lb/hr} \\
&\times 4400 \text{ lb/yr} \times 1/2000 \text{ lb/ton} \\
&= 1100 \text{ tpy}
\end{aligned}$$

Controlled at 99% Control

$$\begin{aligned}(\text{VOC})_c &= 500.1 (1 - 0.99) \\ &= 5.0 \text{ lb/hr} \\ &\quad \times 4400 \text{ lb/yr} \times 1/2000 \text{ lb/ton} \\ &= 11.0 \text{ tpy}\end{aligned}$$

4. Design Details of Baghouse in Attachment 1. Afterburner details are documented in Section V.

5. Control Efficiencies

1.0 Particulate Matter

$$\begin{aligned}E &= (2250 - 3.93) \times 100/2250 \\ &= 99.8\%\end{aligned}$$

2.0 VOC

$$E = 99\%; \text{ estimated based on FDER criteria}$$

6. Flow Diagram

Attachment 1

7/8. Site and Location Maps

Not Applicable

9. Application Fee

Type IE application (<25 tpy of any single pollutant)

10. Certification of Completion

NA

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft.
- b. Diameter: ft.
- c. Flow Rate: ACFM
- d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

5. Describe the control technology selected:

1. Control Device:

2. Efficiency:¹

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:²

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? Yes No
- b. Was instrumentation calibrated in accordance with Department procedures?
 Yes No Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
- 2. Surface data obtained from (location) _____
- 3. Upper air (mixing height) data obtained from (location) _____
- 4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

- 1. _____ Modified? If yes, attach description.
- 2. _____ Modified? If yes, attach description.
- 3. _____ Modified? If yes, attach description.
- 4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ₂	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT 1
PROCESS FLOW DIAGRAM

Soil Remediation Overview

