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1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: m. w. Arnold Dinkins Pres. Mobile Reclaim, Inc. 3120 NW 37th St. Gainesville, FL 32605	4. Article Number P 407 852 934
Type of Service: <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	
Always obtain signature of addressee or agent and DATE DELIVERED.	
5. Signature - Addressee X <i>W. A. Dinkins</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery 12/24/90	

PS Form 3811, Apr. 1989 U.S.G.P.O. 1989-238-815 DOMESTIC RETURN RECEIPT

P 407 852 934

RECEIPT FOR CERTIFIED MAIL
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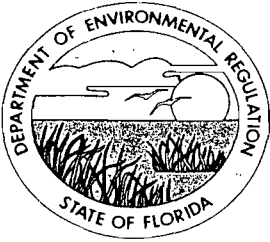
Sent to: *W. Arnold Dinkins*

Street and No.: *Mobile Reclaim*

P.O. State and ZIP Code: *3120 NW 37th St. Gainesville, FL*

Postage	
Certified Fee	
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Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	<i>12-21-90</i> <i>AC 01-179694</i>

PS Form 3800, June 1985



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

Mr. W. Arnold Dinkins, President
Mobile Reclaim, Inc.
3120 NW 37th Street
Gainesville, Florida 32605

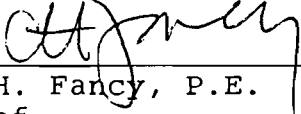
December 20, 1990

Enclosed is construction permit No. AC 01-179694. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this 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 permit 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

Copy furnished to:

Don Ehlenbeck, BWC
District Air Program Administrators
County Air Program Administrators
Stephen L. Neck, P.E.
John Austin

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of buisness on 12-21-90.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Kevin Baker
Clerk

12-21-90
Date

Final Determination

Mobile Reclaim, Inc.
Gainesville, Alachua County, Florida

25 TPH Mobile Soil Remediation Unit
Statewide Operation
Permit No. AC 01-179694

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

December 20, 1990

Final Determination

The Technical Evaluation and Preliminary Determination for the permit to construct a 25 TPH mobile soil remediation unit for Mobile Reclaim, Inc. was distributed on June 19, 1990. The Notice of Intent to Issue was published in the newspapers listed in the July 24, 1990, letter from Chandler, Gray, Lang & Haswell, P.A. (attached). Copies of the evaluation were available for public inspection at all approved County program offices, all Department District offices, and the Bureau of Air Regulation office.

In response to the public notices of the Department's Intent, a Petition for Administrative Proceedings was submitted by Mr. John N. Austin of Jacksonville, Florida on July 13, 1990. A summary of Mr. Austin's comments and the review engineer's responses is attached. The final order dismissing Mr. Austin's petition required the terms of an agreement (the Ancillary Agreement) between Mr. Austin and Mobile Reclaim, Inc. to be included in any permit issued by the Department. Specific Conditions Nos. 7, 14, 18, and 30 of the permit were revised to include the first four items of the Ancillary Agreement.

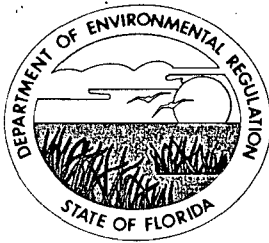
Mary Jelks, M.D., objected to the Department allowing the use of an incinerator to decontaminate the soil. She recommended the use of bacteria to decontaminate the soil. Although there are other methods to treat contaminated soil, the Department has concluded that incineration in a properly designed and operated unit will comply with the air pollution control regulations.

The applicant's engineer asked that EPA Method 25A instead of EPA Method 25 be allowed to determine compliance with the emission limits because VOC concentration in the stack would be less than 1 ppm. The Department notes that the allowable VOC emissions are above the minimum detectable level of 50 ppm for EPA Method 25. The Department will accept results by the EPA Method 25A test if the VOC concentrations are less than 50 ppm. Results above 50 PPM VOC by EPA Method 25A must be correlated with an EPA Method 25 test to be acceptable to the Department. Specific Condition No. 22 was revised to allow the use of Method 25A for low concentrations of VOC.

The Dade County Department of Environmental Resources Management commented that this source would have to obtain a county permit prior to operating in Dade County. Specific Condition No. 23 was revised to address this issue.

In late September, 1990, the Department adopted Chapter 17-775, F.A.C., Soil Thermal Treatment Facility. Specific Conditions Nos. 15 and 24 of the proposed permit have been revised to be consistent with this new rule.

The final action of the Department will be to issue construction permit No. AC 48-176117 with the changes discussed above.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-24

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
 Mobile Reclaim, Inc.
 3120 NW 37th Street
 Gainesville, Florida 32605

Permit Numbers: AC 01-179694
 Expiration Date: July 31, 1991
 County: Statewide Operation
 Project: 25 TPH Portable Rotary
 Kiln/Afterburner Systems, Serial
 Number SRU-202

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Authorization to construct a portable rotary kiln/afterburner system. The unit consists of a contaminated soil hopper and feed system, a 25 TPH rotary dryer with a No. 2 fuel oil burner, a 99% efficient baghouse, a 95% efficient No. 2 fuel oil fire afterburner (0.5 second retention time at 1400°F) and stack (3. ft. dia. by 20 ft. ht.) handling approximately 35,040 acfm (7,500 dscfm at 50% EA), and associated equipment, all of which is mounted on a truck.

The unit may be used throughout the state (all counties) after receiving Department authorization to operate at a new location.

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

Attachments are listed below:

1. Application received on April 26, 1990.
2. DER letter dated May 10, 1990
3. Air Consulting and Engineering, Inc. letter dated May 30, 1990
4. Chandler, Gray, Lang & Haswell letter dated July 24, 1990.
5. Summary of Hearing Request by Mr. John Austin
6. Air Consulting and Engineering letter dated July 5, 1990.
7. DERM letter dated June 28, 1990.
8. Final Order in OGC Case No. 90-1130.

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

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:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

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:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

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.

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

GENERAL CONDITIONS:

- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

Construction Requirements

1. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.
2. The stack sampling facilities must comply with F.A.C. Rule 17-2.700(4).
3. The afterburner shall be capable of operating above 1400°F with a 0.5 second retention time and have a minimum VOC destruction efficiency of 95%.

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

Emission Restrictions

4. Particulate matter emissions from this process shall neither exceed 0.08 grains/dscf corrected to 50% excess air nor 5.1 lbs/hr. Visible emissions from any part of the process shall not exceed 5% opacity.

5. Benzene emissions shall not exceed 6.0 lbs/hr. Total VOC emissions shall not exceed 20 lbs/hr. Compliance shall be determined from soil analysis, production rate, and the afterburner destruction efficiency.

6. The operation of this source shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor pursuant to F.A.C. Rule 17-2.600(c)2.

Operation Requirements

7. The system shall be properly operated and maintained (F.A.C. Rule 17-2.210(2)). No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly (F.A.C. Rule 17-2.240). Mobile shall perform its own maintenance upon the soil remediation unit and have quarterly inspections performed by a qualified representative of the manufacturer, complying with recommendations made by the manufacturer regarding any additional maintenance, if and when necessary.

8. Reasonable precautions shall be used to minimize unconfined emissions of particulate matter generated by this operation (F.A.C. Rule 17-2.610(3)). This includes hauling the soil in covered trucks and keeping the work areas wet where the soil is being removed and treated.

9. The unit shall not be operated at a location or in a manner that may create a nuisance.

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

11. This unit shall be allowed to operate continuously, 24 hours per day, 7 days per week, and 52 weeks per year. The permittee shall maintain a log that shows the location, time and dates the unit was operated.

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

12. Maximum soil charging rate to the unit shall not exceed 25 TPH. The permittee shall have means to determine the feed or production rate on site.

13. Only No. 2 fuel oil containing a maximum of 0.5% sulfur shall be used as fuel for this unit. Maximum permitted fuel consumption is 27.8 MMBtu/hr (201 GPH No. 2 fuel oil).

14. Only soils contaminated with virgin (non-recycled) petroleum products and "on-spec" used oil (see Specific Condition No. 15) shall be treated in this unit unless otherwise approved by the Bureau of Air Regulation (BAR). The portable rotary kiln/afterburner system shall neither be used to thermally process materials that are listed in 40 CFR 261.31, 261.32, 261.33 (revised as of July 1, 1988) nor materials that have the hazardous characteristics of corrosivity, reactivity, EP toxicity, and ignitability. Prior to the acceptance of contaminated materials for processing, the permittee shall provide the Department with reasonable assurance that the soil is contaminated with only virgin and/or "on specification" petroleum products. Reasonable assurance may be obtained by the sampling of the soil, by certification from owners regarding the history of the site, or by any other documentation or submission approved by the DER in such regard; provided, however, that Mobile's standard of performance shall not exceed any objective standard utilized by the DER in the State of Florida for providing "reasonable assurance."

15. Only soils contaminated with petroleum products (fuels and lubricants) shall be treated in this unit unless otherwise approved by the Bureau of Air Regulation.

Hazardous waste as defined in 40 CFR 261.3 shall not be processed by this unit.

Metals in the untreated soil shall not exceed the following:

Metals	Maximum Concentration	
	TCLP(mg/L)	Total(mg/Kg)
Arsenic	5.0	55
Barium	100.0	2750
Cadmium	1.0	55
Chromium	5.0	275
Lead	5.0	77
Mercury	0.2	17
Selenium	1.0	165
Silver	5.0	165

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

Total Volatile Organic Aromatics (VOA) constituent in the soil shall not exceed the concentrations that have the potential to exceed the acceptable ambient air concentration or the VOC emission limit for this unit (see Specific Conditions Nos. 5 and 17).

To show compliance with this condition, the permittee shall analyze a composite sample of the contaminated soil (see Specific Condition No. 16) by the EPA SW 846 Methods, Test Method for Evaluating Solid Waste Physical/Chemical, for VOA (EPA Method 5030/8020), TRPH (EPA draft Method 9073), and Metals (EPA Method 1311, 3050, 6010, 7040, 7041, 7060, 7061, 7080, 7130, 7131, 7190, 7191, 7420, 7421, 7471, and 7760).

The permittee may request, in writing, permission to treat "off-spec" material. The request shall include the history of the site to be treated, an analysis of the contaminants suspected to be in the soil, an estimate of the emissions from the unit while processing the soil, and calculations showing that the ambient air impact from the unit will not exceed the acceptable ambient air concentration for any toxic pollutant. The Department will approve or deny each request in writing on a case-by-case basis.

16. Sampling and analysis of the contaminated soil at each site, based on the procedures prescribed in SW-846, shall be conducted prior to remediation. Minimum number of composite samples for analysis at each site prior to remediation shall be as follows:

<u>Soil Quantity (yards³)</u>	<u>No. of Composite Samples</u>
Less than 100	1
100 to 500	3
500 to 1000	5
Each additional 250 yds	1 additional sample

17. Unless the Department has determined other concentrations are required to protect public health and safety, predicted ambient air impact of any toxic pollutant, as determined by the PTPLU 6 model or other DARM approved models, shall not exceed the concentration calculated by the following formula:

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

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

where,

AAC = acceptable ambient concentration

Safety Factor = 100 for category A substances and
50 for category B substances

X = 40 or the hours/week or actual hours of operation,
whichever is larger

OEL - Occupational exposure level such as the TWA-TLV
published by the ACGIH, OSHA, and NIOSH published
standards for toxic materials.

TWA-TLV is the threshold limit value (8 hrs/day,
40 hrs/wk) maximum exposure concentration considered
safe for workers by the ACGIH.

Data in the application shows that, for continuous
operation, an emission of 1 gram/sec will have a maximum
ambient impact of 9.4×10^{-3} mg/m³ (8 hr. avg). If the
stack parameters are different than the values listed in
the application, the applicant must use the actual impact
factor as determined by the EPA Approved Screen - 1.1
Model.

$$\text{Maximum Allowable Emissions (g/sec)} = \frac{\text{AAC mg/m}^3}{9.4 \times 10^{-3}}$$

18. Pressure drop across the baghouse and temperature of the afterburner shall be recorded continuously during operations. The instruments used to obtain these measurements shall be properly calibrated, maintained, and in operation any time the unit is in service. The baghouse and the afterburner must be fully operational, as demonstrated by continuous monitoring instrumentation upon the unit, whenever the soil remediation unit is in service.

Compliance Requirements

19. This unit shall be tested at the maximum process weight rate at which the permittee intends to operate. All compliance tests shall meet the requirements listed in F.A.C. Rule 17-2.700. The unit shall not operate above the maximum permitted rate of 25 TPH.

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

20. When the Department, after investigation, has good reason (such as complaints, increased visible emissions, or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Chapter 17-2, F.A.C., or in this permit is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the Department.

21. The exhaust stack for this unit shall be tested concurrently for particulate matter and visible emissions by EPA Methods 5 and 9 pursuant to 40 CFR 60, Appendix A, revised as of July 1, 1988, within 5 days after placing the unit in commercial operation under this permit and annually thereafter. Operation at each subsequent site requires an EPA Method 9 test to be performed within 3 days of placing the unit in service.

22. The unit destruction efficiency, benzene, and VOC emissions shall be established by a material balance using process weight, soil analysis and Method 18, 25A (below 50 ppm) or 25 (at or above 50 ppm) test (40 CFR 60, Appendix A, revised as of July 1, 1988) or other methods as approved by the Department.

Administrative Requirements

23. The permittee shall furnish the available information listed in Specific Condition No. 24 prior to operating the portable rotary kiln/afterburner system at its initial site. This permit requires compliance with any applicable local (county) regulations. That can require obtaining a permit from the county prior to operating in the county.

24. This unit shall not be operated at any new site until the applicant has requested authorization for that site. Whenever it is feasible for the permittee, the request shall be at least 15 days prior to operation at the new site. The permittee shall notify the local government (city and county), district office, and the BAR by registered mail at least 3 days prior to the unit being relocated. The confirmation shall provide the permit number of the unit, a copy of the last stack test report, the date of the proposed move, the new site for the unit, and the locations and contamination levels of the soils to be treated. The Department shall notify the permittee of any new conditions the unit must meet within 3 days of the receipt of the relocation notice. This may include requirements for county operation permits and additional restrictions on the operation of this unit.

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

25. The permittee shall maintain a log that shows the unit's operation time during the preceeding 12 months. All required records must be available for inspection at the job site for the unit within 3 working days of a request by the Department.

26. The BAR shall be notified by phone (confirm in writing) at least 15 days in advance of any compliance test to be conducted on this source.

27. Any analysis required by Specific Condition No. 16 which indicates a potential violation of any condition in this permit shall be reported as soon as feasible to the BAR. An average concentration of benzene above 2,400 ppm in the soil or total hydrocarbons above 8,000 ppm indicate a potential violation of this permit. The soil may be decontaminated by operating at less than the 25 TPH production rate, or other means with prior approval of the Department. The permittee shall propose the method of compliance with this permit.

28. Records shall be kept on the location, date, time, and number of samples taken for each composite sample. Soil analysis results shall be kept at the clean up site and available for Department inspection as long as the unit is at the site. All soil samples taken at the remediation site and from the soil exiting the dryer shall be stored in a sealed clean glass container immediately upon sampling.

29. Stack test results from PM and VOC shall be submitted to the Department (BAR) within 45 days of the test.

30. Within five days of placing the unit in commercial operation in Florida, Mobile shall test samples of the dust captured by the baghouse in order to ascertain contaminant levels. Mobile shall collect samples of the dust captured by the baghouse at one-half hour intervals during the compliance testing. The incremental samples shall be composited and tested by TCLP method for toxic metal contaminants. The samples of the mixed soil and dust captured by the baghouse shall also be composited and tested in the manner above-described. The above test results shall be provided to DER and Mr. John N. Austin, 6365 Sundown Drive, Jacksonville, Florida 32244, within 5 days of receipt. If levels of TCLP contaminants exceed the levels listed in 40 CFR 261, the test materials shall be handled as required by law under RCRA, CERCLA, or other applicable programs. If either sample regime

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

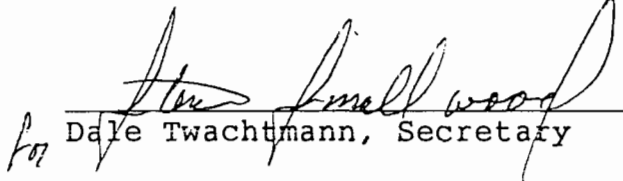
shall indicate levels of TCLP contaminants in excess of those listed in 40 CFR 261, then a panel of DER and Mobile representatives shall discuss and determine appropriate operating procedures for the unit. Austin shall be notified at least five days prior to the meeting of such panel. Recommendations and directives of the panel shall be added to Mobile's permit as a special condition, as required by DER.

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

32. An application for an operation permit must be submitted to the BAR at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this 20th day
of December, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


for Dale Twachtman, Secretary




State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Dale Twachtmann

FROM: Steve Smallwood 

DATE: December 20, 1990

SUBJ: Approval of Construction Permit No. AC 01-179694
Mobile Reclaim, 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 25 TPH portable soil remediation unit for operation throughout Florida.

The Final Determination addresses objections to the Department's Intent to Issue.

I recommend your approval and signature.

SS/WH/plm

Attachments

*CHF - Thank you -
I signed for DHT in his absence
Does Mr. Austin have a
copy of the permit?
JTS
12-20-90*

Check Sheet

Company Name: Mobil Reclaim, Inc
Permit Number: AC 01-179694
PSD Number: _____
Permit Engineer: _____

Application:

- Initial Application
 - Incompleteness Letters
 - Responses
 - Waiver of Department Action
 - Department Response
 - Other

Cross References:

- OGC 90-1130
- DACT 90-5114
- AC 01-202044

Intent:

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

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other



Department of Environmental Protection

C8d3

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 8, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Arnold Dinkins
Business Consulting & Investments
3120 N.W. 37th Street
Gainesville, Florida 32605

Dear Mr. Dinkins:

Re: Surrender of Air Permits for Mobile Reclaim, Inc.
DEP Permit Nos. AC 01-179694 and AO 01-202044

The Department acknowledges receipt of your August 16 letter suggesting that the referenced permits be canceled because Mobile Reclaim, Inc. ceased operation of a soil thermal treatment facility in Florida in April 1994. The authorization to construct and operate this unit under permits Nos. AC 01-179694 and AO 01-202044 is surrendered at your request. No air pollution unit can be constructed or operated under the authority of a surrendered permit pursuant to Rule 62-4.100(1), F.A.C.

Thank you for your cooperation in this matter.

Sincerely,

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

CF/wh/h

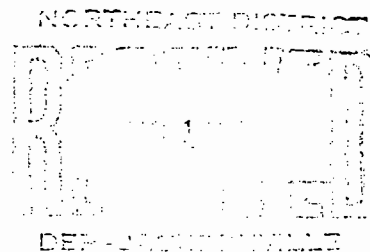
Copies furnished to:

District Air Program Administrators
County Air Program Administrators



W. Arnold Dinkins

Business Consulting & Investments
3120 N.W. 37th Street
Gainesville, FL 32605



August 16, 1995

Ms.. Phebe Scott
DEP N.W. District
7825 Bay Meadows
Suite B200
Jacksonville, Florida 32256-7577

RE: Mobile Reclaim, Inc.

Dear Ms. Scott:

RECEIVED
AUG 22 1995
Bureau of
Air Regulation

As I told you recently over the telephone, Mobile Reclaim, Inc. creased operations in April of 1994. I believe that the operating permit held by Mobile is still in effect, however I am unable to verify that because all the files of Mobile are in storage and are not available. Since Mobile no longer is operational and no longer has any equipment to operate, I would suggest that the DEP cancel the operating permit issued to Mobile Reclaim, Inc.

Very Truly Yours,

W. Arnold Dinkins

Florida Department of
Environmental Protection

Memorandum

To: Clair Fancy
 From: Al Linero *wmb for DL*
 Date: September 8, 1995
 Subject: Surrender of Permit
 Mobile Reclaim, Inc.

Attached for your approval and signature is a letter accepting the surrender of the air permits for Mobile Reclaim, Inc. They no longer operate their own soil thermal treatment facility in Florida. They are surrendering the permit to get out of the Title V permitting program.

I recommend your approval and signature of the letter.

Attachment

CF/al/h

Z 127 632 513



Receipt for Certified Mail

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

Send to	<i>Arnold Perkins</i>
Street and No.	<i>Business Consultants</i>
City, State and Zip Code	<i>Mobile Reclaim</i>
Postage	<i>Gainesville, FL</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 or Date	<i>9-11-95</i>
<i>AC01-179694</i>	
<i>AO 01-202044</i>	

PS Form 3800, March 1993

at OK. 9/6
I would rather
see this in a letter
format w/o all
formal stubs. (Ch)

Best Available Copy

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

5505

ADDRESS CORRECTION REQUESTED

N.C.
9/13
C-35

Z 127 632 513

MAIL

TALLAHASSEE
SEP 11 '95
U.S. POSTAGE
2.52
PS METER
K846214

Mr. W. Arnold Dinkins
Business Consulting & Investments
3120 NW 37th Street
Gainesville, FL 32605

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REASON RETURNED
Unclaimed
Not known
Address
Post number
Office in state
Do not re-mail in this envelope

Keep this with
letter resending - 10/25

9-26
10-2

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

DOMESTIC RETURN RECEIPT

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.

1. Addressee's Address following services (for an extra fee):

2. Restricted Delivery

3. Article Addressed to: *W. Arnold Dinkins
Business Consulting & Investments
3120 NW 37th St
Gainesville, FL 32605*

4a. Article Number: *Z 127 632 513*

4b. Service Type: Registered Insured

4c. Certified

4d. Express Mail Return Receipt for Merchandise

7. Date of Delivery

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

6. Signature (Agent)

5. Signature (Addressee)

Thank you for using Return Receipt Service.

fold at line over top of envelope
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.

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:
 W. Arnold Dinkins
 Business Consulting + Co.
 3120 NW 37th St.
 Gainesville, FL 32605

4a. Article Number
 2 127 632 555

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
 10-28-55

5. Signature (Addressee)

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

6. Signature (Agent)



Thank you for using Return Receipt Service.



BEST AVAILABLE COPY

Department of

Mobile Reclaim

Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

September 8, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Arnold Dinkins
Business Consulting & Investmer'
3120 N.W. 37th Street
Gainesville, Florida 32605

Dear Mr. Dinkins:

Re: Surrender of Air Permits for
DEP Permit Nos. AC 01-179694

The Department acknowledges rec suggesting that the referenced perm Reclaim, Inc. ceased operation of a in Florida in April 1994. The authoi operate this unit under permits Nos. is surrendered at your request. No a constructed or operated under the auth pursuant to Rule 62-4.100(1), F.A.C.

*10/25
This letter was mailed
@ September 8th.
It was Returned to
Sender. 10/24:
unclaimed.
We're trying again.
Kuni Tokun*

Thank you for your cooperation in this matter.

Sincerely,

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

CF/wh/h

Copies furnished to:

District Air Program Administrators
County Air Program Administrators

Z 127 632 555



Receipt for Certified Mail

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

Sent to W. Arnold Dinkus	
Post Office No. Bus. Cons. + Invest	
P.O., State and ZIP Code Gainesville, FL	
Postage (Mobile Reclaim)	
Certified Fee	
Special Delivery	(Resending)
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 10-25-95 AC 01-179694 AO 01-202044	

PS Form 3800, March 1993

the exemption, they said, because the state Department of Environmental Regulation had not certified equipment for dealers to use to inspect their own vehicles before selling them. They said it wouldn't be fair to make used car dealers conduct inspections until there was certified equipment, because it would mean dealers would have to take every vehicle through a central inspection station.

sions inspection. A vehicle can't be registered until it passes an inspection. If the vehicle fails, the buyer is responsible for making the repairs necessary to pass.

Inspection results are recorded in a computer linked to the state motor vehicle registration offices. Tags and registration renewals will not be issued for vehicles made after 1974 without a passed inspection.

Ex-employee sues soil-cleaning firm

Gainesville 8/24

By JUD MAGRIN

Sun staff writer

While a local company's forte is burning polluted soil, it also will have to contend with some dirty laundry, according to lawsuits filed by a former employee.

Compliance Management Corp. and its owner, William Butler, are owed nearly \$60,000 by Mobile Reclaim Inc. in addition to 12 percent of the company stock, according to two suits.

Company President Arnold Dinkins said Butler is just a disgruntled former employee.

"He's an ex-employee who was terminated. He had some problems," Dinkins said. "If I thought I owed him the money, I wouldn't go to court."

Mobile Reclaim and its \$750,000 soil-cleaning machine caught the attention of local residents and reporters in July when some 500 tons of soil were burned at 400 degrees at the Pop-a-Top on E. University Avenue.

Although they have a difference of opinion over an employment agreement, Butler, company officials and environmental experts praise the machine. It enables the soil to be decontaminated without hauling it off, bringing in new soil and risking transporting hazardous wastes that could spill and contaminate other areas.

While it was operating on E. University Avenue, several residents complained about the dust the machine produced, and the Alachua

County Department of Environmental Services shut it down. Dinkins said the company has satisfied the county's concerns and will be operating at other sites in the county. Mobile Reclaim has done work in Washington state and Kansas.

It was Butler who called the county complaining that the machine was emitting too much dust, according to Environmental Services Director John Schert. Schert investigated on three different occasions at the Pop-a-Top site and didn't find any violations. Then Butler brought Schert a videotape that showed the dust emissions.

Butler said he is an environmental consultant and was hired Jan. 1 by Mobile Reclaim. Dinkins said he fired Butler in April.

Although there is no written agreement, Butler states in his suit that he was to be paid \$80,000 a year by Mobile Reclaim and that the "parties understood that the salary alone was not sufficient compensation." He claims he was supposed to get 12 percent of Mobile Reclaim stock.

Butler claims that Mobile Reclaim has used his name in advertising and hurt his "national reputation."

Dinkins, a former owner and president of PCR Inc. in Gainesville, said several people in Gainesville invested in a private stock offering to capitalize Mobile Reclaim. Included in that group are Charles Denny, former owner of Florida Rock, and Donald Price, vice president of sponsored research at the University of Florida.



MOBILE RECLAIM INC.

RECEIVED

AUG 23 1991

Division of Air
Resources Management

AUGUST 22, 1991

FACSIMILE TRANSMITTAL

TO: MR. WILLARD HANKS, FDER/BAR
FAX NO. 904-922-6979

FROM: CRAIG R. HEDGECOCK, PE/PLS *CRH*

RE: NOTIFICATION OF RELOCATION

TRANSMITTED HERewith IS OUR LETTER REQUESTING AUTHORIZATION TO
COMMENCE TREATMENT IN HILLSBOROUGH COUNTY AND ALACHUA COUNTY.

HARD COPY TO FOLLOW IN MAIL TODAY.



MOBILE RECLAIM INC.

AUGUST 22, 1991

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
BUREAU OF AIR REGULATION
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

ATTENTION: MR. C. H. FANCY, P.E.

RE: PERMIT NUMBER AC 01-179694

DEAR MR. FANCY:

AS PER ADMINISTRATIVE REQUIREMENT NUMBER 24, WE HEREBY REQUEST AUTHORIZATION TO TREAT PETROLEUM CONTAMINATED SOIL IN HILLSBOROUGH COUNTY, FLORIDA COMMENCING ON OR ABOUT AUGUST 28, 1991 AND IN ALACHUA COUNTY, FLORIDA COMMENCING ON OR ABOUT SEPTEMBER 9, 1991 AT THE FOLLOWING SITES:

CENTRAL OIL
1001 MCCLUSKEY BOULEVARD
TAMPA, FLORIDA
CONTRACTOR: TOM BRISLIN
1000 CU.YD. OF DIESEL FUEL CONTAMINATED SOIL

UPON COMPLETION OF THE ABOVE SITE, WE ARE SCHEDULED TO TREAT THE PETROLEUM CONTAMINATED SOIL AT THE FOLLOWING SITES AND ALSO REQUEST AUTHORIZATIONS TO DO SAME:

BUTLER PLAZA WEST
SOUTHWEST ARCHER ROAD
GAINESVILLE, FLORIDA
CONSULTANT: ENVIRONMENTAL CONSULTING AND TECHNOLOGY
250 CU.YD. OF GASOLINE CONTAMINATED SOIL
(APPROXIMATE COMMENCEMENT DATE - SEPTEMBER 9, 1991)

BIELLING SITE - 200 BLOCK OF NORTH JOHNSON STREET, HAWTHORNE
150 TONS - CONTAMINANT LEVELS UNKNOWN AT THIS TIME
(APPROXIMATE COMMENCEMENT DATE - SEPTEMBER 16, 1991)

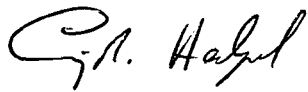
AT THIS TIME WE HAVE COMPLETED OUR COMPLIANCE STACK TEST AND ARE EXPECTING THE FINAL REPORT WITHIN THE NEXT FEW DAYS. THE TEST WAS PERFORMED JULY 22-23, 1991. MR. SHANNON BARUCH OF THE GAINESVILLE BRANCH OFFICE OF THE F.D.E.R. WAS PRESENT. WE WILL FORWARD THE STACK TEST RESULTS AND THE PRE-BURN ANALYTICALS TO YOUR DEPARTMENT AND THE COUNTIES AND CITIES INVOLVED AS SOON AS THEY ARE AVAILABLE AT LEAST THREE (3) DAYS BEFORE COMMENCEMENT OF WORK.

PAGE 2
STATE OF FLORIDA D.E.R. BAR
AUGUST 22, 1991

THANK YOU FOR YOUR CONSIDERATION OF THIS REQUEST. SHOULD YOU HAVE ANY QUESTIONS OR DESIRE ANY ADDITIONAL INFORMATION, PLEASE DO NOT HESITATE TO CONTACT US.

RESPECTFULLY SUBMITTED,

MOBILE RECLAIM, INC.

A handwritten signature in cursive script, appearing to read "C.R. Hedgecock".

BY: CRAIG R. HEDGECKOCK, PE/PLS
VICE-PRESIDENT OF OPERATIONS

**SOURCE TEST REPORT
for
PARTICULATE, VOLATILE ORGANIC COMPOUNDS
AND VISIBLE EMISSIONS**

**INCINERATOR OUTLET OF SRU 202
PERMIT NUMBER AC01-179694**

JULY 27, 1991

Prepared for:

**MOBILE RECLAIM, INC.
3120 NW 37TH STREET
GAINESVILLE, FLORIDA 32605**

Prepared by:

**AIR CONSULTING AND ENGINEERING, INC.
2106 N.W. 67TH PLACE, SUITE 4
GAINESVILLE, FLORIDA 32606
(904) 335-1889**

273-91-01

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5.4	DETERMINATION OF TOTAL GASEOUS ORGANIC CONCENTRATION USING A FLAME IONIZATION ANALYZER--EPA METHOD 25A.....	12

APPENDICES

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APPENDIX B--COMPLETE EMISSION DATA
AND SAMPLE CALCULATIONS

APPENDIX C--FIELD DATA SHEETS

APPENDIX D--LABORATORY DATA

APPENDIX E--VOC EMISSION DATA
AND STRIP CHART COPIES

APPENDIX F--VISIBLE EMISSION DATA
AND OBSERVER'S CERTIFICATION

APPENDIX G--QUALITY ASSURANCE

APPENDIX H--PRODUCTION DATA

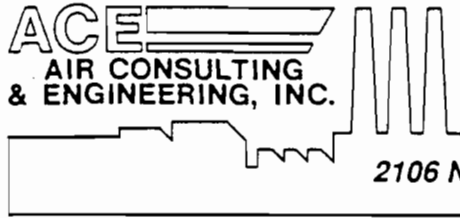
APPENDIX I--PROJECT PARTICIPANTS

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2	EPA METHOD 5 SAMPLING TRAIN.....	9
3	EPA 25A SAMPLING TRAIN.....	13



2106 N.W. 67th Place • Suite 4 • Gainesville, Florida • 32606
(904) 335-1889 FAX (904) 335-1891

REPORT CERTIFICATION

To the best of my knowledge, all applicable field and analytical procedures comply with Florida Department of Environmental Regulation requirements and all test data and plant operating data are true and correct.

Dagmar Neck

Dagmar Neck

8/22/90

Date

1.0 INTRODUCTION

On July 22, 1991, Air Consulting and Engineering, Inc. (ACE), conducted particulate, volatile organic compounds and visible emissions on the outlet stack of the Soil Remediation Unit (SRU) 202 owned by Mobile Reclaim, Inc. of Gainesville, Florida.

Testing was performed to demonstrate compliance with the conditions of the Florida Department of Environmental Regulation (FDER) Permit Number AC01-179694.

United States Environmental Protection Agency (EPA) Method 5 for the determination of particulate matter, EPA Method 3 for oxygen and carbon dioxide content, EPA Method 25A for VOC and EPA Method 9 for visible emissions were used for the testing.

Mr. Craig Hedgecock of Mobile Reclaim, Inc. coordinated the testing.

Mr. Shannon Baruch of the FDER observed a portion of the testing.

Table 1 Emission Summary
 SRU 202
 Mobile Reclaim, Inc.
 Gainesville, Florida
 July 22-23, 1991

Run Number	Time	Flow Rate SCFMD	Stack Temp. °F	Moisture %	Oxygen %	Particulate Emissions			VOC Emissions		
						gr/SCF	gr/SCF at 50% excess air	lbs/Hr	ppm wet as propane	ppm dry as propane	lbs/Hr as carbon
1	1305-1412	9643.5	1244	15.6	13.3	0.0303	0.0535	2.52	11.5	13.6	0.74
2	1608-1826	8262.8	1249	15.4	13.1	0.0266	0.0458	1.89	5.3	6.3	0.29
3	0930-1038	7020.1	1248	17.4	13.3	0.0276	0.0488	1.65	2.1	2.5	0.10
AVERAGE	---	8308.8	1247	16.1	13.2	0.0282	0.0494	2.02	6.3	7.5	0.38

$$\text{gr/SCF @ 50\% excess air} = \text{gr/SCF} \left(\frac{100 + \text{excess air}}{150} \right)$$

$$\text{lbs/Hr VOC} = \text{ppm} (2.595 \times 10^{-9})^3 (\text{MW})(\text{SCFMD}) 60$$

$$\text{VOC ppm (dry)} = \text{ppm (wet)} / (1 - \text{moisture fraction})$$

$$\text{MW C} = (12.011)$$

Allowable Emissions

$$\text{PM} = 0.08 \text{ gr/SCF @ 50\% excess air and } 5.1 \text{ lbs/Hr}$$

$$\text{VOC} = 20 \text{ lbs/Hr}$$

$$\text{Benzene} = 6.0 \text{ lbs/Hr}$$

Destruction Efficiencies

$$\text{Run 1 } \frac{6.31 - .74}{6.31} \times 100 = 88.3\%$$

$$\text{Run 2 } \frac{6.31 - .29}{6.31} \times 100 = 95.4\%$$

$$\text{Run 3 } \frac{6.31 - .10}{6.31} \times 100 = 98.4\%$$

} AVG 96.9

AVG 94.0

3.0 PROCESS DESCRIPTION AND OPERATION

Mobile Reclaim, Inc. owns and operates a Soil Remediation Unit (SRU) 202 with a portable rotary kiln/afterburner system. The unit consists of a contaminated soil hopper and feed system, a 25 TPH rotary dryer with a Number 2 fuel oil burner, a 99 percent efficient baghouse, a 95 percent efficient Number 2 fuel oil fired afterburner with a 0.5 second retention time at 1400°F and associated equipment.

Operation data is presented in Appendix H.

4.0 SAMPLING POINT LOCATION

The outlet stack schematic and sampling point locations are shown in Figure 1.

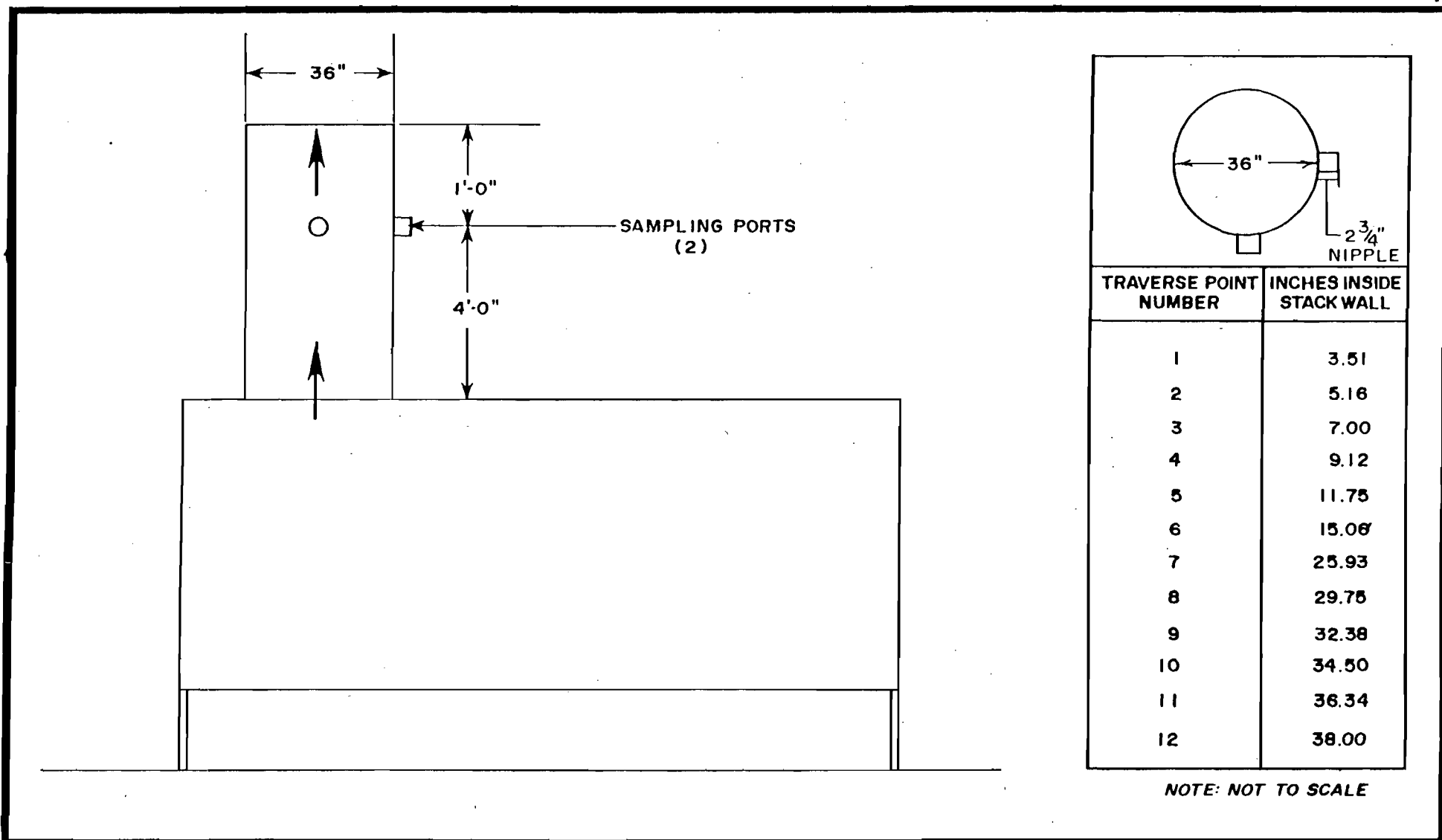


FIGURE 1.
 SAMPLING POINT LOCATION
 POP-A-TOP NO.2 INCINERATOR AFTERBURNER OUTLET
 MOBILE RECLAMATION SERVICES, INC.
 GAINESVILLE, FLORIDA

**AIR CONSULTING
 and
 ENGINEERING**

5.0 FIELD AND ANALYTICAL PROCEDURES

5.1 *CO₂ and O₂ Sampling and Analysis--EPA Method 3*

CO₂ and O₂ samples were collected by an integrated bag system. The orsat sampling system consisted of a stainless steel probe, sample line from probe to a condenser, a small vacuum pump with a rotometer, and a TEDLAR bag.

The orsat sampling procedure consists of the following leak-check and sampling techniques. Prior to sampling, the bag was leak-checked at 2 to 4 inches of water. The inlet to the condenser was plugged and a vacuum of 10 inches of Hg was pulled. The outlet of the pump was then plugged and the pump shut off. The vacuum held steady for at least 30 seconds. The sample line was then purged with stack gas and the bag was connected. Sampling was conducted at an appropriate constant rate at the same points and for the same length of time as the particulate sampling. At the conclusion of the run, the pump was shut off and the bag secured.

After leak checking the orsat gas analyzer, the average value for each gas was determined. The gas was measured until two values were obtained that fell within the specified variance of the gas tested.

Data were recorded on the field data sheet and the bag was evacuated for the next sample run.

5.2 Particulate Matter Sampling and Analysis--EPA Method 5 (Quartz Probe)

Particulate matter samples were collected by the particulate matter emission measurement method specified by the United States Environmental Protection Agency. A schematic diagram of the sampling train used is shown in Figure 2. All particulate matter captured from the nozzle to, and including, the filter was included in the calculation of the emission rate of particulate matter.

PREPARATION OF EQUIPMENT

1. **FILTERS** - Gelman type "A" filters were placed in a drying oven for two hours at 105 degrees C, removed and placed in a standard desiccator containing indicating silica gel, allowed to cool for two hours, and weighed to the nearest 0.1 mg. The filters were then re-desiccated for a minimum of six hours and weighed to a constant weight (less than 0.5 mg change from previous weighing). The average of the two constant weights was used as the tare weight.
2. **NOZZLE, FILTER HOLDER, AND SAMPLING PROBE** - The nozzle, filter holder, and sampling probe were washed vigorously with soapy water and brushes, rinsed with acetone and distilled water, and dried prior to the test program. All openings on the sampling equipment were sealed while in transit to the test site.
3. **IMPINGERS** - The Greenburg-Smith impingers were cleaned with a warm soapy water solution and brushes, rinsed with distilled water and acetone, and dried. The impingers were sealed tightly during transit.

TEST PROCEDURE

Prior to performing the actual particulate matter sample runs, certain stack and stack gas parameters were measured. These preliminary measurements included the average gas temperature, the stack gas velocity head, the stack gas moisture content, and the stack dimensions at the point where the tests were being performed. The stack gas temperature was determined by using a bi-metallic thermocouple and calibrated pyrometer. Velocity head measurements were made with calibrated type "S" pitot tube and an inclined manometer.

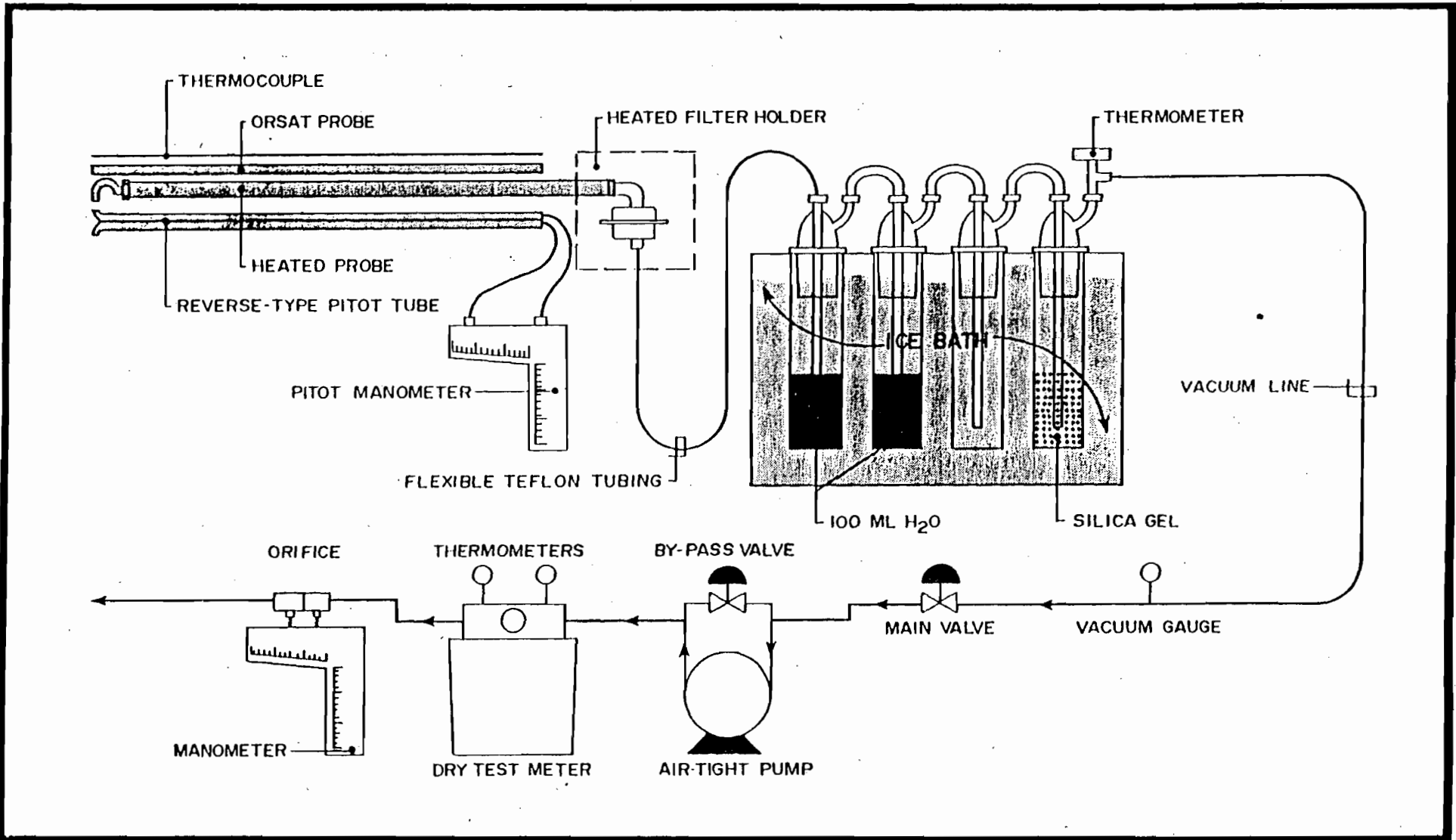


FIGURE 2
EPA METHOD 5 SAMPLING TRAIN

AIR CONSULTING
and
ENGINEERING

Velocity head measurements of 0.05 inches H₂O or less were measured utilizing a micromanometer.

The sampling traverse points were selected so that a representative sample could be extracted from the gas stream. The traverse points were located in the center of equal areas, the number of which were dependent upon the distance upstream and downstream from flow disturbances.

Each particulate matter test run consisted of sampling for a specific time at each traverse point. The type "S" pitot tube was connected to the sampling probe so that an instantaneous velocity head measurement could be made at each traverse point while making the test run. The stack gas temperature was also measured at each traverse point. Nomographs were used to calculate the isokinetic sampling rate at each traverse point during each test run.

The gases sampled passed through the following components: a stainless steel nozzle and quartz glass probe; a glass fiber filter, two impingers each with 100 ml of distilled water; one impinger dry; one impinger with 200 grams of silica gel; a flexible sample line; an air-tight pump; a dry test meter; and a calibrated orifice. The second impinger had a standard tip, while the first, third, and fourth impingers had modified tips with a 0.5 inch I.D. opening. Sample recovery was accomplished by the following procedures:

1. The pre-tared filter was removed from its holder and placed in Container 1 and sealed. (This is usually performed in the lab.)
2. All sample-exposed surfaces prior to the filter were washed with acetone and placed in Container 2, sealed and the liquid level marked.

3. The volume of water from the first three impingers was measured for the purpose of calculating the moisture in the stack gas and then discarded.
4. The used silica gel from the fourth impinger was transferred to the original tared container and sealed.

LABORATORY ANALYSIS

The three sample containers from each sample run were analyzed according to the following procedures:

1. The filter was dried at 105 degrees C for three hours, desiccated for a minimum of one hour, and weighed to the nearest 0.1 mg. A minimum of two such weighings six hours apart was made to determine constant weight.
2. The acetone from Container 2 was transferred to a tared beaker and evaporated to dryness at ambient temperature and pressure, desiccated for 24 hours, and weighed to the nearest 0.1 mg. A minimum of two such weighings six hours apart were made to determine constant weight.
3. The used silica gel in its tared container was weighed to the nearest 0.1 gram.

The total sample weight included the weight of material collected on the filter plus the weight of material collected in the nozzle, sampling probe, and front half of the filter holder.

DATA

The field data sheets, calculation sheets, and nomenclature definitions are included in the appendix of this report.

5.3 Visible Emissions Testing--EPA Method 9

The visible emission tests were performed in accordance with EPA Method 9. The observers maintain semi-annual FDER certification for the performance of visible emission tests.

All procedures listed in Method 9 were followed including observer's position relative to the sun, distance from the stack, and line of sight. These items are noted on the visible emission data sheet. Observations were made at 15-second intervals and recorded to the nearest five percent. The final opacity was determined by calculating the highest consecutive six minute average during the observation period.

5.4 Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer--EPA Method 25A

A Byron Model 215 Total Hydrocarbon Analyzer with a Flame Ionization Detector (FID) was utilized for EPA Method 25A testing. This instrument is a semicontinuous dual source analyzer that draws continuous samples from incinerator inlet and outlet test locations. Heat traced sample lines are used to deliver gases at 275°F to the heated FID detector via two interval sample loops. Sample loop contents are delivered to the FID on alternating one minute intervals. Combustion and carrier air are supplied by a Byron 25 ultra pure air system.

The instrument was calibrated on NBS traceable EPA Protocol 1 propane in air cylinder gases injected at the sampling interface via a three-way valve (Figure 3). A record of accuracy demonstration as well as drift checks is provided in Appendix G. The inlet source integrator was calibrated to match propane calibration gas peak height response. Analyzer results are reported as ppm carbon by multiplying the response as propane by a factor of 3.0.

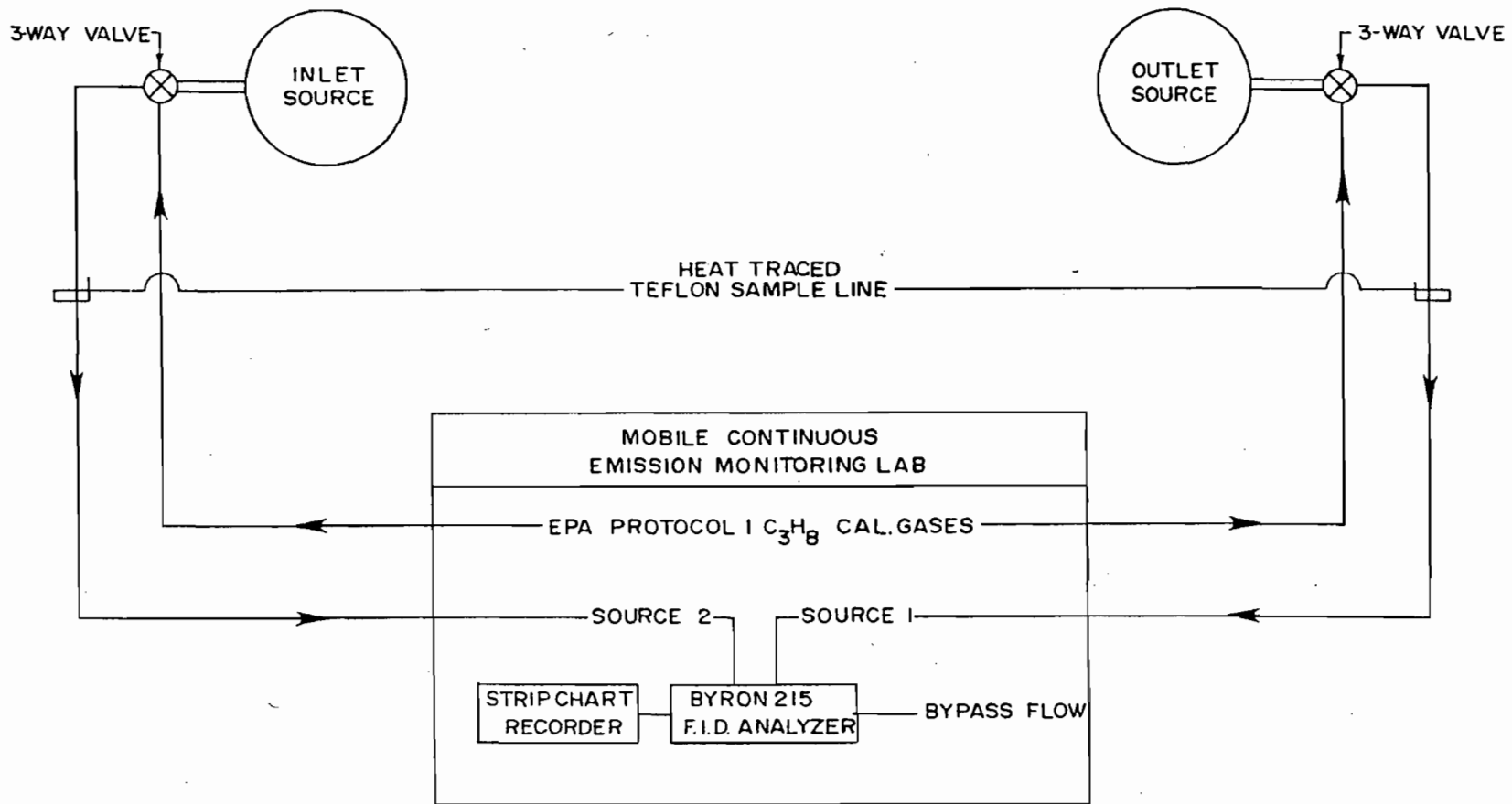
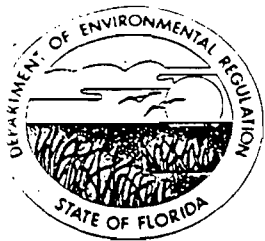


FIGURE 3
EPA 25A SAMPLING TRAIN

AIR CONSULTING
and
ENGINEERING

APPENDIX A
PERMIT NUMBER AC 01-179694



Best Available Copy

Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Craig ... 373 ... 14

PERMITTEE:

Mobile Reclaim, Inc.
3120 NW 37th Street
Gainesville, Florida 32605

P.O. 41891 32203-4189

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991
County: Statewide Operation
Project: 25 TPH Portable Rotary
Kiln/Afterburner Systems, Serial
Number SRU-202

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Authorization to construct a portable rotary kiln/afterburner system. The unit consists of a contaminated soil hopper and feed system, a 25 TPH rotary dryer with a No. 2 fuel oil burner, a 99% efficient baghouse, a 95% efficient No. 2 fuel oil fired afterburner (0.5 second retention time at 1400°F) and stack (3.0 ft. dia. by 20 ft. ht.) handling approximately 35,040 acfm (7,500 dscfm at 50% EA), and associated equipment, all of which is mounted on a truck.

The unit may be used throughout the state (all counties) after receiving Department authorization to operate at a new location.

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

Attachments are listed below:

1. Application received on April 26, 1990.
2. DER letter dated May 10, 1990
3. Air Consulting and Engineering, Inc. letter dated May 30, 1990.
4. Chandler, Gray, Lang & Haswell letter dated July 24, 1990.
5. Summary of Hearing Request by Mr. John Austin
6. Air Consulting and Engineering letter dated July 5, 1990.
7. DERM letter dated June 28, 1990.
8. Final Order in OGC Case No. 90-1130.



PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

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:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

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:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

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.

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

GENERAL CONDITIONS:

- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

Construction Requirements

1. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.
2. The stack sampling facilities must comply with F.A.C. Rule 17-2.700(4).
3. The ~~scrubbers~~ shall be capable of operating ~~above 100°F~~ with a ~~40.5 second retention time~~ and have a ~~minimum 95%~~ ~~destruction efficiency of 95%~~.

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

Emission Restrictions

4. ~~Particulate matter~~ emissions from this process shall neither exceed ~~0.08 grains/dscf corrected to 5% excess air nor 5 lbs/hr.~~ ~~Visible emissions~~ from any part of the process shall not exceed ~~5% opacity.~~

5. ~~Benzene emissions shall not exceed 6.0 lbs/hr.~~ ~~Total VOC emissions shall not exceed 20 lbs/hr.~~ Compliance shall be determined from soil analysis, production rate, and the afterburner destruction efficiency.

6. The operation of this source shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor pursuant to F.A.C. Rule 17-2.600(c)2.

Operation Requirements

7. The system shall be properly operated and maintained (F.A.C. Rule 17-2.210(2)). No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly (F.A.C. Rule 17-2.240). Mobile shall perform its own maintenance upon the soil remediation unit and have quarterly inspections performed by a qualified representative of the manufacturer, complying with recommendations made by the manufacturer regarding any additional maintenance, if and when necessary.

8. Reasonable precautions shall be used to minimize unconfined emissions of particulate matter generated by this operation (F.A.C. Rule 17-2.610(3)). This includes hauling the soil in covered trucks and keeping the work areas wet where the soil is being removed and treated.

9. The unit shall not be operated at a location or in a manner that may create a nuisance.

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

11. This unit shall be allowed to operate continuously, 24 hours per day, 7 days per week, and 52 weeks per year. The permittee shall maintain a log that shows the location, time and dates the unit was operated.

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

12. Maximum soil charging rate to the unit shall not exceed 25 TPH. The permittee shall have means to determine the feed or production rate on site.

13. ~~Only No. 2 Fuel oil~~ containing a maximum of ~~0.05% sulfur~~ shall be used as fuel for this unit. Maximum permitted fuel consumption is 27.8 MMBtu/hr (201 GPH No. 2 fuel oil).

14. Only soils contaminated with virgin (non-recycled) petroleum products and "on-spec" used oil (see Specific Condition No. 15) shall be treated in this unit unless otherwise approved by the Bureau of Air Regulation (BAR). The portable rotary kiln/afterburner system shall neither be used to thermally process materials that are listed in 40 CFR 261.31, 261.32, 261.33 (revised as of July 1, 1988) nor materials that have the hazardous characteristics of corrosivity, reactivity, EP toxicity, and ignitability. Prior to the acceptance of contaminated materials for processing, the permittee shall provide the Department with reasonable assurance that the soil is contaminated with only virgin and/or "on specification" petroleum products. Reasonable assurance may be obtained by the sampling of the soil, by certification from owners regarding the history of the site, or by any other documentation or submission approved by the DER in such regard; provided, however, that Mobile's standard of performance shall not exceed any objective standard utilized by the DER in the State of Florida for providing "reasonable assurance."

15. Only soils contaminated with petroleum products (fuels and lubricants) shall be treated in this unit unless otherwise approved by the Bureau of Air Regulation.

Hazardous waste as defined in 40 CFR 261.3 shall not be processed by this unit.

Metals in the untreated soil shall not exceed the following:

Metals	Maximum Concentration	
	TCLP(mg/L)	Total(mg/Kg)
Arsenic	5.0	55
Barium	100.0	2750
Cadmium	1.0	55
Chromium	5.0	275
Lead	5.0	77
Mercury	0.2	17
Selenium	1.0	165
Silver	5.0	165

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

Total Volatile Organic Aromatics (VOA) constituent in the soil shall not exceed the concentrations that have the potential to exceed the acceptable ambient air concentration or the VOC emission limit for this unit (see Specific Conditions Nos. 5 and 17).

To show compliance with this condition, the permittee shall analyze a composite sample of the contaminated soil (see Specific Condition No. 16) by the EPA SW 846 Methods, Test Method for Evaluating Solid Waste Physical/Chemical, for VOA (EPA Method 5030/8020), TRPH (EPA draft Method 9073), and Metals (EPA Method 1311, 3050, 6010, 7040, 7041, 7060, 7061, 7080, 7130, 7131, 7190, 7191, 7420, 7421, 7471, and 7760).

The permittee may request, in writing, permission to treat "off-spec" material. The request shall include the history of the site to be treated, an analysis of the contaminants suspected to be in the soil, an estimate of the emissions from the unit while processing the soil, and calculations showing that the ambient air impact from the unit will not exceed the acceptable ambient air concentration for any toxic pollutant. The Department will approve or deny each request in writing on a case-by-case basis.

16. Sampling and analysis of the contaminated soil at each site, based on the procedures prescribed in SW-846, shall be conducted prior to remediation. Minimum number of composite samples for analysis at each site prior to remediation shall be as follows:

<u>Soil Quantity (yards³)</u>	<u>No. of Composite Samples</u>
Less than 100	1
100 to 500	3
500 to 1000	5
Each additional 250 yds	1 additional sample

17. Unless the Department has determined other concentrations are required to protect public health and safety, predicted ambient air impact of any toxic pollutant, as determined by the PTPLU 6 model or other DARM approved models, shall not exceed the concentration calculated by the following formula:

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

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

where,

AAC = acceptable ambient concentration

Safety Factor = 100 for category A substances and
50 for category B substances

X = 40 or the hours/week or actual hours of operation,
whichever is larger

OEL - Occupational exposure level such as the TWA-TLV
published by the ACGIH, OSHA, and NIOSH published
standards for toxic materials.

TWA-TLV is the threshold limit value (8 hrs/day,
40 hrs/wk) maximum exposure concentration considered
safe for workers by the ACGIH.

Data in the application shows that, for continuous
operation, an emission of 1 gram/sec will have a maximum
ambient impact of $9.4 \times 10^{-3} \text{ mg/m}^3$ (8 hr. avg). If the
stack parameters are different than the values listed in
the application, the applicant must use the actual impact
factor as determined by the EPA Approved Screen - 1.1
Model.

$$\text{Maximum Allowable Emissions (g/sec)} = \frac{\text{AAC mg/m}^3}{9.4 \times 10^{-3}}$$

18. ~~Pressure drop across the baghouse and temperature of the~~
~~afterburner shall be recorded continuously during operation.~~ The
instruments used to obtain these measurements shall be properly
calibrated, maintained, and in operation any time the unit is in
service. The baghouse and the afterburner must be fully
operational, as demonstrated by continuous monitoring
instrumentation upon the unit, whenever the soil remediation unit
is in service.

Compliance Requirements

19. This unit shall be ~~tested at the maximum process weight rate~~
at which the permittee intends to operate. All compliance tests
shall meet the requirements listed in F.A.C. Rule 17-2.700. The
unit shall not operate above the maximum permitted rate of ~~25,000~~

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

20. When the Department, after investigation, has good reason (such as complaints, increased visible emissions, or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Chapter 17-2, F.A.C., or in this permit is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the Department.

21. The exhaust stack for this unit shall be ~~tested concurrently for particulate matter and visible emissions by EPA Methods 5 and 9~~ pursuant to 40 CFR 60, Appendix A, revised as of July 1, 1988, ~~within 5 days after placing the unit in commercial operation under this permit and annually thereafter.~~ Operation at each subsequent site requires an EPA Method 9 test to be performed ~~within 3 days~~ of placing the unit in service.

22. The unit destruction efficiency, benzene, and VOC emissions shall be established by a material balance using process weight, soil analysis and Method 18, 25A (below 50 ppm) or 25 (at or above 50 ppm) test (40 CFR 60, Appendix A, revised as of July 1, 1988) or other methods as approved by the Department.

Administrative Requirements

23. The permittee shall furnish the available information listed in Specific Condition No. 24 prior to operating the portable rotary kiln/afterburner system at its initial site. This permit requires compliance with any applicable local (county) regulations. That can require obtaining a permit from the county prior to operating in the county.

24. This unit shall not be operated at any new site until the applicant has requested authorization for that site. Whenever it is feasible for the permittee, the request shall be at least 15 days prior to operation at the new site. The permittee shall notify the local government (city and county), district office, and the BAR by registered mail at least 3 days prior to the unit being relocated. The confirmation shall provide the permit number of the unit, a copy of the last stack test report, the date of the proposed move, the new site for the unit, and the locations and contamination levels of the soils to be treated. The Department shall notify the permittee of any new conditions the unit must meet within 3 days of the receipt of the relocation notice. This may include requirements for county operation permits and additional restrictions on the operation of this unit.

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

25. The permittee shall maintain a log that shows the unit's operation time during the preceeding 12 months. All required records must be available for inspection at the job site for the unit within 3 working days of a request by the Department.

26. The BAR shall be notified by phone (confirm in writing) at least 15 days in advance of any compliance test to be conducted on this source.

27. Any analysis required by Specific Condition No. 16 which indicates a potential violation of any condition in this permit shall be reported as soon as feasible to the BAR. An average concentration of benzene above 2,400 ppm in the soil or total hydrocarbons above 8,000 ppm indicate a potential violation of this permit. The soil may be decontaminated by operating at less than the 25 TPH production rate, or other means with prior approval of the Department. The permittee shall propose the method of compliance with this permit.

28. Records shall be kept on the location, date, time, and number of samples taken for each composite sample. Soil analysis results shall be kept at the clean up site and available for Department inspection as long as the unit is at the site. All soil samples taken at the remediation site and from the soil exiting the dryer shall be stored in a sealed clean glass container immediately upon sampling.

29. Stack test results from PM and VOC shall be submitted to the Department (BAR) within 45 days of the test.

30. Within five days of placing the unit in commercial operation in Florida, Mobile shall test samples of the dust captured by the baghouse in order to ascertain contaminant levels. Mobile shall collect samples of the dust captured by the baghouse at one-half hour intervals during the compliance testing. The incremental samples shall be composited and tested by TCLP method for toxic metal contaminants. The samples of the mixed soil and dust captured by the baghouse shall also be composited and tested in the manner above-described. The above test results shall be provided to DER and Mr. John N. Austin, 6365 Sundown Drive, Jacksonville, Florida 32244, within 5 days of receipt. If levels of TCLP contaminants exceed the levels listed in 40 CFR 261, the test materials shall be handled as required by law under RCRA, CERCLA, or other applicable programs. If either sample regime

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: July 31, 1991

SPECIFIC CONDITIONS:

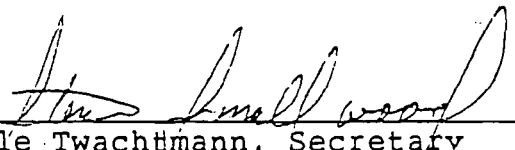
shall indicate levels of TCLP contaminants in excess of those listed in 40 CFR 261, then a panel of DER and Mobile representatives shall discuss and determine appropriate operating procedures for the unit. Austin shall be notified at least five days prior to the meeting of such panel. Recommendations and directives of the panel shall be added to Mobile's permit as a special condition, as required by DER.

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

32. An application for an operation permit must be submitted to the BAR at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this 20th day
of December, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtman, Secretary

APPENDIX B
COMPLETE EMISSION DATA
AND
SAMPLE CALCULATIONS

AIR CONSULTING AND ENGINEERING, INC.

Complete Emission Results

Plant: Mobile Reclaim, Inc.
 Location: Gainesville, Florida
 Date: 07/22/91
 Stack: Incinerator A/B Outlet, SRU 202 Run: 1 From 1305 to 1412

Y Factor	1.004	Nozzle Diameter	0.375	In
Total Time	60 Min	Nozzle Area	0.000767	Ft ²
Stack Area	7.070 Ft ²	Barometric Pressure	30.00	In Hg
Stack Temperature	1244.0 °F	Meter Temperature	103.2	°F
Stack Pressure	30.00 In Hg	Meter Orifice Diff	3.765	In H ₂ O
Stack Avg $\sqrt{\text{Vel Head}}$	0.843 In H ₂ O	Meter Volume	59.248	CF
		Condensate Volume	222.0	ml

- | | |
|---|----------------|
| 1. Volume Water Vapor Sampled | 10.450 SCF |
| 2. Volume Standard Dry Gas Sampled | 56.409 SCF |
| 3. Total Standard Sample Volume | 66.858 SCF |
| 4. Percent Moisture | 15.629 |
| 5. Percent Dry Air | 84.371 |
| 6. Molecular Weight of Dry Flue Gas | 29.460 |
| 7. Molecular Weight of Wet Flue Gas | 27.669 |
| 8. Specific Gravity Flue Gas | 0.96 |
| 9. Percent Oxygen [O ₂] | 13.30 |
| 10. Percent Carbon Dioxide [CO ₂] | 5.80 |
| 11. Percent Excess Air | 165.062 |
| 12. Velocity of Flue Gas | 86.725 FPS |
| 13. Actual Volumetric Flow Rate | 36788.8 ACFM |
| 14. Dry Volumetric Flow Rate | 31039.0 ACFMD |
| 15. Standard Volumetric Flow Rate | 9643.4 SCFMD |
| 16. Emission Concentration | 0.03031 gr/SCF |
| 17. Emission Concentration | 0.00794 gr/ACF |
| 18. Emission Rate | 2.505 lbs/Hr |
| 19. Percent Isokinetic | 89.9 |

Probe/Nozzle Wash	35.60 mg
Filter	75.20 mg
Total	110.80 mg

AIR CONSULTING AND ENGINEERING, INC.

Complete Emission Results

 Plant: Mobile Reclaim, Inc.
 Location: Gainesville, Florida
 Date: 07/22/91
 Stack: Incinerator A/B Outlet, SRU 202 Run: 2 From 1608 to 1826

Y Factor	1.004	Nozzle Diameter	0.300	In
Total Time	60 Min	Nozzle Area	0.000491	Ft ²
Stack Area	7.070 Ft ²	Barometric Pressure	30.00	In Hg
Stack Temperature	1248.7 °F	Meter Temperature	100.5	°F
Stack Pressure	30.00 In Hg	Meter Orifice Diff	1.473	In H ₂ O
Stack Avg √ Vel Head	0.721 In H ₂ O	Meter Volume	37.137	CF
		Condensate Volume	136.2	ml

- | | |
|---|----------------|
| 1. Volume Water Vapor Sampled | 6.411 SCF |
| 2. Volume Standard Dry Gas Sampled | 35.328 SCF |
| 3. Total Standard Sample Volume | 41.739 SCF |
| 4. Percent Moisture | 15.360 |
| 5. Percent Dry Air | 84.640 |
| 6. Molecular Weight of Dry Flue Gas | 29.468 |
| 7. Molecular Weight of Wet Flue Gas | 27.707 |
| 8. Specific Gravity Flue Gas | 0.96 |
| 9. Percent Oxygen [O ₂] | 13.10 |
| 10. Percent Carbon Dioxide [CO ₂] | 5.90 |
| 11. Percent Excess Air | 158.136 |
| 12. Velocity of Flue Gas | 74.275 FPS |
| 13. Actual Volumetric Flow Rate | 31507.4 ACFM |
| 14. Dry Volumetric Flow Rate | 26668.0 ACFMD |
| 15. Standard Volumetric Flow Rate | 8262.8 SCFMD |
| 16. Emission Concentration | 0.02664 gr/SCF |
| 17. Emission Concentration | 0.00699 gr/ACF |
| 18. Emission Rate | 1.887 lbs/Hr |
| 19. Percent Isokinetic | 102.7 |

 Probe/Nozzle Wash 32.20 mg
 Filter 28.80 mg
 Total 61.00 mg

AIR CONSULTING AND ENGINEERING, INC.

Complete Emission Results

Plant: Mobile Reclaim, Inc.
 Location: Gainesville, Florida
 Date: 07/23/91
 Stack: Incinerator A/B Outlet, SRU 202 Run: 3 From 0930 to 1038

Y Factor	1.004	Nozzle Diameter	0.300	In
Total Time	60 Min	Nozzle Area	0.000491	Ft ²
Stack Area	7.070 Ft ²	Barometric Pressure	29.94	In Hg
Stack Temperature	1248.2 °F	Meter Temperature	91.1	°F
Stack Pressure	29.94 In Hg	Meter Orifice Diff	1.081	In H ₂ O
Stack Avg √ Vel Head	0.623 In H ₂ O	Meter Volume	31.988	CF
		Condensate Volume	138.0	ml

- | | |
|---|----------------|
| 1. Volume Water Vapor Sampled | 6.496 SCF |
| 2. Volume Standard Dry Gas Sampled | 30.858 SCF |
| 3. Total Standard Sample Volume | 37.354 SCF |
| 4. Percent Moisture | 17.389 |
| 5. Percent Dry Air | 82.611 |
| 6. Molecular Weight of Dry Flue Gas | 29.460 |
| 7. Molecular Weight of Wet Flue Gas | 27.467 |
| 8. Specific Gravity Flue Gas | 0.95 |
| 9. Percent Oxygen [O ₂] | 13.30 |
| 10. Percent Carbon Dioxide [CO ₂] | 5.80 |
| 11. Percent Excess Air | 165.062 |
| 12. Velocity of Flue Gas | 64.520 FPS |
| 13. Actual Volumetric Flow Rate | 27369.2 ACFM |
| 14. Dry Volumetric Flow Rate | 22609.9 ACFMD |
| 15. Standard Volumetric Flow Rate | 6993.5 SCFMD |
| 16. Emission Concentration | 0.02755 gr/SCF |
| 17. Emission Concentration | 0.00704 gr/ACF |
| 18. Emission Rate | 1.652 lbs/Hr |
| 19. Percent Isokinetic | 106.0 |

Probe/Nozzle Wash	22.40 mg
Filter	32.70 mg
Total	55.10 mg

Plant: Mobile Reclaim, Inc.
Date: 07/22/91
Stack: Incinerator A/B Outlet, SRU 202
Run Number: 1

Average $\sqrt{\text{Velocity Head}} = 0.843$

Velocity Head Inputs:

1.8000	1.7000	1.2000	1.0500	0.7100	0.4100
0.2300	0.2700	0.2700	0.3300	0.3600	0.3600
1.3500	1.2500	1.2000	0.8700	0.5600	0.5300
0.3800	0.3800	0.4600	0.8000	1.1000	1.1000

Average Orifice Pressure = 3.765

Orifice Pressure Inputs:

5.5000	5.2000	5.1000	5.0000	4.8500	4.8500
1.3500	1.6000	1.6000	1.9000	2.1000	2.1000
5.1000	5.1000	4.7000	4.6000	4.5000	4.4000
2.2000	2.2000	2.7000	4.7000	4.5000	4.5000

Average Stack Temperature = 1244.0

Stack Temperature Inputs:

1284.0	1286.0	1261.0	1248.0	1217.0	1209.0
1198.0	1198.0	1193.0	1198.0	1210.0	1214.0
1220.0	1224.0	1233.0	1244.0	1247.0	1240.0
1226.0	1310.0	1265.0	1284.0	1337.0	1310.0

Average Meter Temperature = 103.2

Meter Temperature Inputs:

99.0	99.0	99.0	99.0	99.0	99.0
100.0	101.0	101.0	102.0	103.0	103.0
105.0	105.0	105.0	105.0	106.0	106.0
106.0	106.0	107.0	107.0	107.0	108.0

Plant: Mobile Reclaim, Inc.
Date: 07/22/91
Stack: Incinerator A/B Outlet, SRU 202
Run Number: 2

Average \sqrt{v} Velocity Head = 0.721

Velocity Head Inputs:

0.6500	0.8500	0.7900	0.6600	0.3400	0.2500
0.2500	0.4100	0.5000	0.8400	0.8100	0.7900
1.3000	1.1500	1.1500	0.6500	0.3200	0.3600
0.3600	0.2100	0.2000	0.2200	0.2200	0.3000

Average Orifice Pressure = 1.473

Orifice Pressure Inputs:

1.7000	2.2000	2.0500	1.7000	0.8800	0.6500
0.6500	1.0700	1.3000	2.2000	2.1000	2.0500
3.4000	3.0000	3.0000	1.7000	0.8300	0.9400
0.9400	0.5500	0.5200	0.5700	0.5700	0.7800

Average Stack Temperature = 1248.7

Stack Temperature Inputs:

1213.0	1289.0	1241.0	1209.0	1226.0	1203.0
1202.0	1298.0	1299.0	1319.0	1307.0	1332.0
1308.0	1264.0	1247.0	1213.0	1231.0	1226.0
1194.0	1229.0	1223.0	1233.0	1233.0	1229.0

Average Meter Temperature = 100.5

Meter Temperature Inputs:

105.0	105.0	105.0	105.0	100.0	100.0
99.0	99.0	99.0	99.0	99.0	99.0
99.0	100.0	100.0	100.0	100.0	100.0
100.0	100.0	100.0	100.0	100.0	100.0

Plant: Mobile Reclaim, Inc.
Date: 07/23/91
Stack: Incinerator A/B Outlet, SRU 202
Run Number: 3

Average $\sqrt{\text{Velocity Head}} = 0.623$

Velocity Head Inputs:

0.7800	0.7600	0.6400	0.5200	0.2300	0.2000
0.1800	0.1800	0.2400	0.2400	0.3000	0.3000
0.7200	0.5200	0.5200	0.2700	0.2700	0.2700
0.2300	0.2300	0.3600	0.5000	0.6800	0.8000

Average Orifice Pressure = 1.081

Orifice Pressure Inputs:

2.0000	2.0000	1.7000	1.3500	0.6000	0.5200
0.4700	0.4700	0.6200	0.6200	0.7800	0.7800
1.9000	1.3500	1.3500	0.7000	0.7000	0.7000
0.6000	0.6000	0.9400	1.3000	1.8000	2.1000

Average Stack Temperature = 1248.2

Stack Temperature Inputs:

1267.0	1284.0	1280.0	1279.0	1259.0	1251.0
1201.0	1211.0	1223.0	1232.0	1235.0	1235.0
1277.0	1269.0	1266.0	1261.0	1171.0	1181.0
1217.0	1261.0	1267.0	1274.0	1285.0	1270.0

Average Meter Temperature = 91.1

Meter Temperature Inputs:

88.0	88.0	88.0	88.0	88.0	88.0
89.0	90.0	90.0	90.0	90.0	91.0
92.0	92.0	92.0	92.0	93.0	93.0
93.0	94.0	94.0	94.0	95.0	95.0

Sample Calculations Run 1

Plant: Mobile Reclaim, Inc.
 Date: 07/22/91
 Stack: Incinerator A/B Outlet, SRU 202

Vwv Volume Water Vapor Sampled
 $Vwv = 0.04707 \times 222.000 = 10.450 \text{ SCF}$

VMstd Volume Standard Dry Gas Sampled
 $VMstd = 17.64 \times 59.248 \times 1.004 \times$
 $[30.00 + (3.765 / 13.6)] / (103.2 + 460) = 56.409 \text{ SCF}$

Vt Total Standard Sample Volume
 $Vt = 10.450 + 56.409 = 66.858 \text{ SCF}$

W Percent Water = $(10.450 / 66.858) \times 100 = 15.6 \%$

FDA Percent Dry Air = $(1 - 0.156) \times 100 = 84.4 \%$

Md Molecular Weight of Dry Stack Gas
 $Md = (0.44 \times 5.80 \%CO_2) + (0.32 \times 13.30 \%O_2) +$
 $[0.28 \times (80.90 \%N_2 + 0.00 \%CO)] = 29.46$

MS Molecular Weight of Wet Stack Gas
 $MS = (29.460 \times 0.844) + (18 \times 0.156) = 27.669$

SG Specific Gravity Stack Gas
 $SG = 27.669 / 28.84 = 0.96$

Ea Percent Excess Air
 $Ea = [(13.30 \%O_2) - (0.00 \%CO / 2)] \times 100$
 $(.264 \times (80.90 \%N_2)) - ((13.30 \%O_2) + (0.00 \%CO / 2))$
 $EA = 165.062$

Vs Velocity of Stack
 $Vs = (85.49 \times 0.84 \times 0.843) \times [(1244.0 + 460) / (30.00 \times 27.67)]$
 $Vs = 86.725$

Qa Actual Volumetric Flow
 $Qa = (7.070 \times 86.725 \times 60) = 36788.8 \text{ ACFM}$

Qd = Dry Volumetric Flow
 $Qd = (36788.8 \times 0.844) = 31039.0 \text{ ACFMD}$

Qsd Standard Volumetric Flow
 $Qsd = 36788.8 \times 0.844 \times [528 / (1244.0 + 460)] \times$
 $(30.00 / 29.92) = 9643.4 \text{ SCFMD}$

1 1

Particulate Matter Emissions

2

(56.409)

= 2.51

0) + (59.248 X 1.004 /
 .6)) /
 7)

----- Particulate Matter -----			
Flow Rate	Stack Gas Moisture (%)	Conc. (gr/SCF)	Emission Rate (Lbs/Hr)

1)	15.6	0.0303	2.51
7	15.4	0.0266	1.89
2	17.4	0.0276	1.66

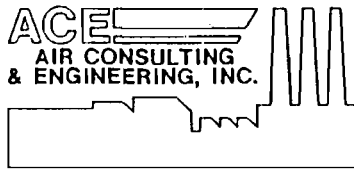
3)	16.1	0.0282	2.02

APPENDIX C
FIELD DATA SHEETS

STACK SAMPLING FIELD DATA SHEET

Best Available Copy

ACE
AIR CONSULTING
& ENGINEERING, INC.



2106 N. W. 67th PLACE - Suite 9 B 10
GAINESVILLE, FLORIDA - 32606

5183
36634
961750

TEST ID 1
PAGE OF

PLANT MOBILE RECLAIM
SOURCE INCINERATOR A/B OUTLET
PLANT LOCATION RAINSVILLE, FLORIDA
TYPE OF SAMPLING TRAIN EPA-5, 3A
TYPE OF SAMPLES PM
DATE 7-22-91 RUN NO. 1
TIME START 1305 TIME END 1412
SAMPLE TIME 24125 (min/pi) = 60 Total min
ASSUMED MOISTURE 20 % FDA .80
NOMOGRAPH C_p 1.85 PITOT CORR. .84
P_b 30.0 "Hg P_s 30.0 "Hg
WEATHER CCAL TEMP °F
METER BOX NO. 1 H 2.04 V 1.004
NOZZLE CAL. 474 37.5 477 477 = 477 37.5
STACK DIMENSIONS 37.5 36" φ
STACK AREA 7.07 ft² EFFECTIVE ft²
STACK HEIGHT ft.
STACK DIAMETER: UPSTRM. DNSTRM.
PORT SIZE in. NIPPLE LENGTH 2 3/4 in.
U CORD LENGTH
REMARKS:

MAT'L PROCESSING RATE
GAS METER READINGS: FINAL 665.476 ft³
INITIAL 606.228 ft³
NET ft³
FILTER NO. 1335 IMP. VOL. GAIN 210 ml.
SIL GEL NO. 3 WT. GAIN 12.0 ml.
TOTAL CONDENSATE 222.0 ml.

ORSAT

	1	2	3	4	AVG.
% CO ₂	5.8				5.8
% O ₂	13.3				13.3
% CO					
% N ₂					

F₀ = F₀ RANGE =

ORSAT ANALYZER

LEAK CHECKS

PRE 0.00 cfm 20 "Hg POST 0.00 cfm 20 "Hg

METER BOX/PUMP GAS SAMPLE SYST.

ORSAT BAG

PITOT TUBE NO. PRE-TEST OK

POST-TEST(+) 4.4 / 1 / 10 H₂O/Sec

POST-TEST(-) 4.1 / 1 / 0 H₂O/Sec

PYROMETER NO. A7KWS 2

BOX OPERATOR NEEK PROBE HOLDER ET AL

176 273 9101
2.41
4.25
6.37
9.0
12.81
~~14.1~~ 23.18
27.0
29.63
31.75
33.59
35.24

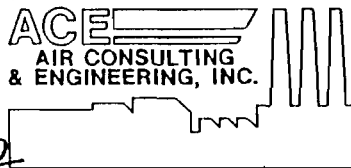
1.42
80.7
56.48 scf
FDA = .84

1.04

1241 1711 103

PORT AND TRAVERSE POINT NUMBER	DISTANCE FROM INSIDE STACK WALL / COMMENTS	CLOCK TIME	GAS METER READING (FT. ³)	STACK VELOCITY HEAD	METER ORIFICE PRESS. DIFF. ("H ₂ O)		STACK GAS TEMP (°F)	SAMPLE BOX TEMP (°F)	LAST IMPINGER TEMP (°F)	DRY GAS METER TEMP (°F)	VACUUM ON SAMPLE TRAIN ("Hg)
					CALC.	ACTUAL					
	3.51 1288		608.20	1.8	10.5	5.5	1284	230	71	99	17
	5.16 29.75	1310	612.03	1.7	9.95	5.2	1286	233	62	99	17
	7.0 32.58		614.94	1.2	7.0	5.1	1261	235	60	99	17
	9.12 34.5	1215	617.74	1.05	6.14	5.0	1248	235	59	99	17
	11.75 36.3		620.58	1.1	4.15	4.85	1217	235	59	99	17
	15.06 38	1320	623.46	1.41	2.4	4.85	1209	240	57	99	17

STACK SAMPLING FIELD DATA SHEET



2106 N. W. 67th PLACE · Suites 9&10
GAINESVILLE, FLORIDA · 32606

TEST ID 2
PAGE OF

PLANT MOBILE RECLAIM
SOURCE INCINERATOR SPU 202
PLANT LOCATION GAINESVILLE FL. - POP-2-Top 2
TYPE OF SAMPLING TRAIN EPA-5, 3A
TYPE OF SAMPLES PM-02
DATE 7-22-91 RUN NO. 2
TIME START 1608 TIME END 1826
SAMPLE TIME 24125 (min/pi) = 60 Total min
ASSUMED MOISTURE 16 % FDA .84
NOMOGRAPH C_p 2.6 PITOT CORR. .84
P_b 30.00 "Hg P_s 30.00 "Hg
WEATHER CLEAR TEMP. °F
METER BOX NO. H. 1.004
NOZZLE CAL. .300 .300 .300 = .300
STACK DIMENSIONS 36"Ø
STACK AREA 7.07 ft² EFFECTIVE ft²
STACK HEIGHT ft.
STACK DIAMETER: UPSTRM. DNSTRM.
PORT SIZE in. NIPPLE LENGTH in.
U CORD LENGTH
REMARKS:

MAT'L PROCESSING RATE
GAS METER READINGS: FINAL 702.882 ft³
INITIAL 665.745 ft³
NET 36.137 ft³
FILTER NO. 3335 IMP. VOL. GAIN 130 ml.
SIL GEL NO. 97 WT. GAIN 6.2 ml.
TOTAL CONDENSATE 636.2 ml.

ORSAT

	1	2	3	4	AVG.
% CO ₂					5.9
% O ₂					13.1
% CO					
% N ₂					

F₀ = F₀ RANGE =

ORSAT ANALYZER

LEAK CHECKS

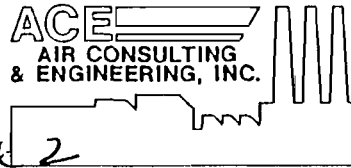
PRE OK cfm "Hg POST 0.00 cfm 10.5 "Hg
METER BOX/PUMP GAS SAMPLE SYST.
ORSAT BAG
PITOT TUBE NO. PRE-TEST
POST-TEST(+) 3.3 / 0 H₂O/Sec
POST-TEST(-) 4.3 / 0 H₂O/Sec
PYROMETER NO. ATKUS 2
BOX OPERATOR HECK PROBE HOLDER General Chack

35.24 SCF
.84 FDA
4436 FPM
31363 ACFM
82.9 SCFD
4720
4208
3907
0301
518 =
72 = √DP
1248 75
19635
871
228.8
0000031
0429
1.53 151M

PORT AND TRAVERSE POINT NUMBER	DISTANCE FROM INSIDE STACK WALL / COMMENTS	CLOCK TIME	GAS METER READING (FT. ³)	STACK VELOCITY HEAD	METER ORIFICE PRESS. DIFF. ("H ₂ O)		STACK GAS TEMP (°F)	SAMPLE BOX TEMP (°F)	LAST IMPINGER TEMP. F	DRY GAS METER TEMP. (°F)	VACUUM ON SAMPLE TRAIN ("Hg)
					CALC.	ACTUAL					
1-1	STOP PERIOD FOR 1734	1618	667.48	.65	1.7	1.7	1213	224	67	105	6
2		1618	669.45	.85	2.2	2.2	1289	225	52	105	7.5
3		1618	671.33	.79	2.05	2.0	1241	243	47	105	7
4		1618	673.04	.66	1.7	1.7	1209	248	47	105	6
5		1618	674.33	.34	.88	.88	1226	250	65	100	4
6		1618	675.43	.25	.65	.65	1203	254	57	100	4

PORT AND TRAVERSE POINT NUMBER	DISTANCE FROM INSIDE STACK WALL /COMMENTS	CLOCK TIME	GAS METER READING (ft ³)	STACK VELOCITY HEAD	METER ORIFICE PRESS. DIFF. ("H ₂ O)		STACK GAS TEMP (°F)	SAMPLE BOX TEMP (°F)	LAST IMPINGER TEMP (°F)	DRY GAS METER TEMP (°F)	VACUUM ON SAMPLE TRAIN ("Hg)
					CALC.	ACTUAL					
1-7			676.5	1.25	.65	.65	1202	252	52	99	3.5
8		1744	677.82	.41	1.07	1.07	1298	261	51	99	5.0
9			679.35	.50	1.3	1.3	1299	266	51	99	5.5
10		1749	681.26	.84	2.2	2.2	1319	264	51	99	8
11			683.20	.81	2.1	2.1	1307	272	51	99	8
12		1754	685.13	1.79	2.05	2.05	1332	272	51	99	7.5
2-1			687	1.3	3.4	3.4	1308	230	53	99	10.5
2		1801	689.73	1.15	3.0	3.0	1264	228	53	100	10.5
3			692.03	1.15	3.0	3.0	1247	227	53	100	10.5
4		1806	693.86	1.65	1.7	1.7	1213	220	53	100	6.5
5			695.15	1.32	.83	.83	1231	223	53	100	4.5
6		1811	696.46	1.36	.94	.94	1226	233	52	100	4.5
7			697.80	1.36	.94	.94	1194	236	52	100	4.5
8		1816	698.78	1.21	.55	.55	1209	256	52	100	3.5
9			699.75	1.20	.52	.52	1210	261	53	100	3.5
10		1821	700.12	1.22	.57	.57	1188	264	52	100	3.5
11			701.71	1.22	.57	.57	1217	257	52	100	3.5
12		1826	702.88	1.30	.78	.78	1229	25	52	100	4.5

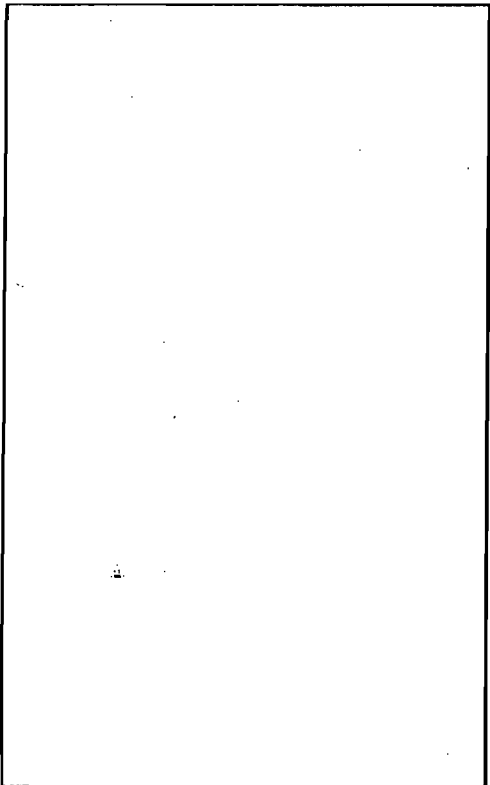
STACK SAMPLING FIELD DATA SHEET



2106 N. W. 67th PLACE - Suites 9 & 10
GAINESVILLE, FLORIDA 32606

TEST ID 3
PAGE OF

PLANT MOBILE RECLAIM -
SOURCE INCINERATOR AB SRU 202
PLANT LOCATION GAINESVILLE, FL - PIC-2-Pak 2
TYPE OF SAMPLING TRAIN EPA-5/3A
TYPE OF SAMPLES PM O₂
DATE 7-23 RUN NO. 3
TIME START 0930 TIME END 1038
SAMPLE TIME 24 12.5 (min/pi) = 60 Total min
ASSUMED MOISTURE 16 % FDA .84
NOMOGRAPH C₁ 2.6 PITOT CORR. .84
P_b 29.94 "Hg P_s 29.94 "Hg
WEATHER CLEAR TEMP °F
METER BOX NO. 1 H₂O₂ 1.004
NOZZLE CAL. = 1.300
STACK DIMENSIONS 36"
STACK AREA 7.07 ft² EFFECTIVE ft²
STACK HEIGHT ft.
STACK DIAMETER: UPSTRM. DNSTRM.
PORT SIZE in. NIPPLE LENGTH in.
U CORD LENGTH 125'
REMARKS:



MAT'L PROCESSING RATE
GAS METER READINGS: FINAL 735.268 ft³
INITIAL 703.280 ft³
NET ft³
FILTER NO. 3 IMP. VOL. GAIN 1.30 ml.
SIL GEL NO. 100 WT. GAIN 8.0 ml.
TOTAL CONDENSATE 138 ml.

ORSAT

	1	2	3	4	AVG.
% CO ₂					5.8
% O ₂					13.3
% CO					
% N ₂					

F₀ = F₀ RANGE =

ORSAT ANALYZER

LEAK CHECKS

PRE 0.00 cfm 15 "Hg POST 0.00 cfm 13 "Hg
METER BOX/PUMP GAS SAMPLE SYST.
ORSAT BAG
PITOT TUBE NO. PRE-TEST
POST-TEST(+) 3.0 / 1 / 0 H₂O/Sec
POST-TEST(-) 3.2 / 1 / 0 H₂O/Sec
PYROMETER NO. ATKINS 2 GERARD
BOX OPERATOR NECK PROBE HOLDER CHUCK

PORT AND TRAVERSE POINT NUMBER	DISTANCE FROM INSIDE STACK WALL / COMMENTS	CLOCK TIME	GAS METER READING (FT. ³)	STACK VELOCITY HEAD	METER ORIFICE PRESS. DIFF. ("H ₂ O)		STACK GAS TEMP (°F)	SAMPLE BOX TEMP (°F)	LAST IMPINGER TEMP (°F)	DRY GAS METER TEMP (°F)	VACUUM ON SAMPLE TRAIN ("Hg)
					CALC.	ACTUAL					
1-1			705.06	.78	2.0	2.0	1267	228	51	88	6.5
2		0935	706.91	.76	2.0	2.0	1284	225	51	88	7.0
3			708.62	.64	1.7	1.7	1280	229	51	88	6
4		0940	710.16	.52	1.35	1.35	1279	237	51	88	5
5			711.23	.23	.6	.6	1259	242	52	88	3.5
6		0945	712.16	.20	.52	.52	1251	261	52	88	3



PORT AND TRAVERSE POINT NUMBER	DISTANCE FROM INSIDE STACK WALL /COMMENTS	CLOCK TIME	GAS METER READING (ft ³)	STACK VELOCITY HEAD	METER ORIFICE PRESS. DIFF. ("H ₂ O)		STACK GAS TEMP (°F)	SAMPLE BOX TEMP (°F)	LAST IMPINGER TEMP (°F)	DRY GAS METER TEMP (°F)	VACUUM ON SAMPLE TRAIN ("Hg)	
					CALC.	ACTUAL						
1-7	1008		713.07	.18	.47	.47	1201	265	52	89	3.5	
8		0950	713.97	.18	.47	.47	1211	265	52	90	3.5	
9			715.0	.24	.62	.62	1223	267	52	90	3.5	
10		0955	716.05	.24	.62	.62	1232	265	52	90	3.5	
11			717.25	.30	.78	.78	1235	273	52	90	4.0	
12		1000	718.44	.30	.78	.78	1235	272	52	91	4.0	
2-1				720.18	.72	1.9	1.9	1277	222	52	92	6.5
2		1013		721.73	.52	1.35	1.35	1269	228	52	92	5.5
3				723.27	.52	1.35	1.35	1266	229	52	92	5.5
4		1018		724.41	.27	.70	.70	1261	225	52	92	4
5				725.54	.27	.70	.70	1171	231	52	93	4
6		1023		726.65	.27	.70	.70	1181	256	52	93	4
7			727.73	.23	.60	.60	1217	258	52	93	4	
8	1028		728.83	.23	.60	.60	1261	269	52	93	4	
9			730.10	.36	.94	.94	1267	271	53	94	5	
10	1033		731.62	.50	1.30	1.30	1274	270	53	94	6	
11			733.37	.68	1.8	1.8	1285	268	53	95	7.0	
12	1038		735.268	.80	2.1	2.1	1270	277	53	95	8	

APPENDIX D
LABORATORY DATA

ORLANDO LABORATORIES, INC.
 Received: 07/03/91

REPORT OF ANALYSIS
 Results by Sample

Work Order # 91-07-035

SAMPLE ID Comp-1
 DATE COLLECTED 07/02/91
 TEST NAME Purgeable Aromatics/Soil

SAMPLE# 01A
 MATRIX SOIL
 TEST CODE 80205

SAMPLE TYPE SOIL
 UNITS UG/KG ^{g/g}
 ANALYST RC
 METHOD 8020

DATE EXTRACTED _____
 DATE RUN 07/09
 DILUTION FACTOR 11
 % MOISTURE 90.

	RESULT/QUALIFIER
Benzene	<u>300</u>
Toluene	<u>100 U</u>
Chlorobenzene	<u>100 U</u>
Ethylbenzene	<u>1300</u>
Styrene	<u>100 U</u>
Total Xylenes	<u>5800</u>
1,2-Dichlorobenzene	<u>100 U</u>
1,3-Dichlorobenzene	<u>100 U</u>
1,4-Dichlorobenzene	<u>100 U</u>
MTBE	<u>100 U</u>

$$24.66 \text{ TPH} \times 2000 \times 7400 / 100,000,000 = 365 \text{ lb/hr}$$

Note:
 Elevated detection limits caused by dilution of sample.
 Dilution was necessary because compound concentrations
 were outside calibration range.

ORLANDO LABORATORIES, INC.
Received: 07/03/91

REPORT OF ANALYSIS
Results by Sample

Work Order # 91-07-03

SAMPLE ID	Comp-1						SAMPLE #	01A,B			
DATE COLLECTED	07/02/91						MATRIX	SOIL			
AG_FUR	<2.2	AS_FUR	<2.2	EA_ICP	<2.2	CD_ICP	<1.1	CR_ICP	3.6	FLASHP	>65
	mg/kg		mg/kg		mg/kg		mg/kg		mg/kg		Degrees Celsius
HG_CV	<0.28	PB_FUR	7.5	SE_FUR	<1.1	TPH907	128				
	mg/kg		mg/kg		mg/kg		mg/kg				

$$24.66 \text{ TPH} \times 2000 \times \frac{128}{10000000} = 6.316/10^2$$

6.313

AIR CONSULTING & ENGINEERING, inc.

PARTICULATE LAB DATA

SOURCE Mobile Reclaim

PROBE RINSE	RUN <u>1</u>	RUN <u>2</u>	RUN <u>3</u>	BLANK	
CONTAINER NUMBER	27	28	29		
TOTAL VOLUME (ml)	150	175	150		LIQUID LEVEL <input checked="" type="checkbox"/>
1st GROSS WEIGHT (g)	104.1398	101.1076	99.3083		DATE & TIME: 7/26/91 12:05
2nd GROSS WEIGHT (g)	104.1397	101.1071	99.3078		DATE & TIME: 7/30/91 46:50
AVERAGE GROSS WEIGHT (g)	104.1398	101.1074	99.3081		
TARE WEIGHT (g)	104.1042	101.0752	99.2857		
SUB NET WEIGHT (g)	0.0356	0.0322	0.0224		
ACETONE BLANK (g)					
TOTAL NET WEIGHT (mg)	35.6	32.2	22.4		

NOTE: In no case should a blank residue >0.01 mg/g or 0.001% of the weight of acetone used be subtracted from the sample weight.

FILTER	RUN <u>1</u>	RUN <u>2</u>	RUN <u>3</u>	BLANK	
FILTER NUMBER	3335	3336	3334		
1st GROSS WEIGHT (g)	0.4667	0.4197	0.4247		DATE & TIME: 7/25/91 10:50
2nd GROSS WEIGHT (g)	0.4662	0.4192	0.4247		DATE & TIME: 7/26/91 12:00
AVERAGE GROSS WEIGHT (g)	0.4665	0.4195	0.4247		
TARE WEIGHT (g)	0.3913	0.3907	0.3920		
SUB NET WEIGHT (g)	0.0752	0.0289	0.0327		
TOTAL NET WEIGHT (mg)	75.2	28.8	32.7		

TARE
BALANCE CHECK

SEE LAB BOOK

1st GROSS WEIGHT
BALANCE CHECK

0 10.0g
 0.5g 100.0g
 %RH 46 DATE 7/25/91
 Signature Charles P. Smeyers

2nd GROSS WEIGHT
BALANCE CHECK

0 10.0g
 0.5g 100.0g
 %RH 47 DATE 7/30/91
 Signature Charles P. Smeyers

APPENDIX E
VOC EMISSION DATA
AND STRIP CHART COPIES

Best Available Copy

```

*****
Run statistics N=00065
  Min  Avg  Max
1  47.430 69.042 92.320
2  020.78 020.80 020.93

09:38:55 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming

***** RUN *****
09:39:10 07/22/91

***** STOP *****
09:40:27 07/22/91
Run statistics N=00015
  Min  Avg  Max
1  90.480 90.558 90.645
2  020.80 020.89 020.90

09:40:29 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming

***** OFF *****

***** ON *****
***** RUN *****
09:43:50 07/22/91

***** STOP *****
09:45:30 07/22/91
Run statistics N=00020
  Min  Avg  Max
1  50.730 50.802 50.845
2  020.75 020.75 020.78

09:45:32 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming

***** OFF *****

***** ON *****
***** RUN *****
09:49:40 07/22/91

***** STOP *****
09:50:00 07/22/91
Run statistics N=00004
  Min  Avg  Max
1  27.110 27.111 27.115
2  020.73 020.72 020.73

09:50:01 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming

***** RUN *****
09:50:42 07/22/91

```

```

1  25.655 25.736 25.935
2  020.68 020.71 020.73

09:54:20 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming

***** OFF *****

***** ON *****
***** RUN *****
10:06:12 07/22/91

***** STOP *****
10:06:39 07/22/91
Run statistics N=00005
  Min  Avg  Max
1  25.275 25.320 25.355
2  021.18 021.18 021.18

10:06:41 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming

***** OFF *****

***** ON *****
***** RUN *****
10:08:41 07/22/91

***** STOP *****
10:09:25 07/22/91
Run statistics N=00009
  Min  Avg  Max
1  87.750 87.979 88.210
2  020.88 020.88 020.90

10:09:27 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming

***** OFF *****

***** ON *****
***** RUN *****
10:11:13 07/22/91

***** STOP *****
10:11:53 07/22/91
Run statistics N=00008
  Min  Avg  Max
1  49.160 49.252 49.320
2  020.85 020.86 020.88

10:11:55 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming

***** OFF *****

***** ON *****

```

```

*****
1 -00.825-00.769-00.710
2  021.73 021.76 021.80

12:02:38 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming

***** RUN *****
12:03:07 07/22/91

***** STOP *****
12:07:03 07/22/91
Run statistics N=00047
  Min  Avg  Max
1 -00.830-00.660-00.425
2  021.93 022.07 022.18

12:07:04 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming

***** OFF *****

***** ON *****
***** RUN *****
12:14:48 07/22/91

***** STOP *****
12:14:55 07/22/91
Run statistics N=00001
  Min  Avg  Max
1  07.165 07.165 07.165
2  022.40 022.40 022.40

12:14:56 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming

***** OFF *****

***** ON *****
***** RUN *****
12:19:00 07/22/91

***** STOP *****
13:20:08 07/22/91
Run statistics N=00734
  Min  Avg  Max
1  02.110 11.511 45.745
2  009.40 011.37 016.05

13:20:10 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming

***** OFF *****

***** ON *****
13:43:04 07/22/91
RUN starts lossing
STOP stops lossing
PROG starts programming
*****

```

copy

VOC Emission Results

```

      Min      Avg      Max
1  19.380 29.493 56.725
2  012.70 013.34 019.67

14:12:27 07/22/91
RUN starts logging
STOP stops logging
PROG starts programming

***** OFF *****

***** ON *****
***** RUN *****
17:37:13 07/22/91

***** STOP *****
17:55:38 07/22/91
Run statistics N=00221
  Min      Avg      Max
1  02.945 05.914 12.160
2  011.75 012.38 013.63

17:55:39 07/22/91
RUN starts logging
STOP stops logging
PROG starts programming

***** OFF *****

***** ON *****
***** RUN *****
18:04:07 07/22/91

***** STOP *****
18:29:22 07/22/91
Run statistics N=00303
  Min      Avg      Max
1  02.735 04.114 07.100
2  012.65 013.27 013.78

18:29:24 07/22/91
RUN starts logging
STOP stops logging
PROG starts programming

***** OFF *****

***** ON *****
***** RUN *****
07:33:29 07/23/91

***** STOP *****
07:34:02 07/23/91
Run statistics N=00007
  Min      Avg      Max
1  -01.850-00.265 01.610
2  021.53 021.64 021.78

07:34:04 07/23/91
RUN starts logging
STOP stops logging
PROG starts programming

```

```

***** RUN *****
09:30:25 07/23/91

***** STOP *****
10:01:14 07/23/91
Run statistics N=00370
  Min      Avg      Max
1  -01.810-01.026 00.065
2  011.20 012.01 012.75

10:01:16 07/23/91
RUN starts logging
STOP stops logging
PROG starts programming

***** OFF *****

***** ON *****
***** RUN *****
10:08:39 07/23/91

***** STOP *****
10:39:16 07/23/91
Run statistics N=00367
  Min      Avg      Max
1  -00.510 02.006 04.515
2  010.15 011.01 011.88

10:39:18 07/23/91
RUN starts logging
STOP stops logging
PROG starts programming

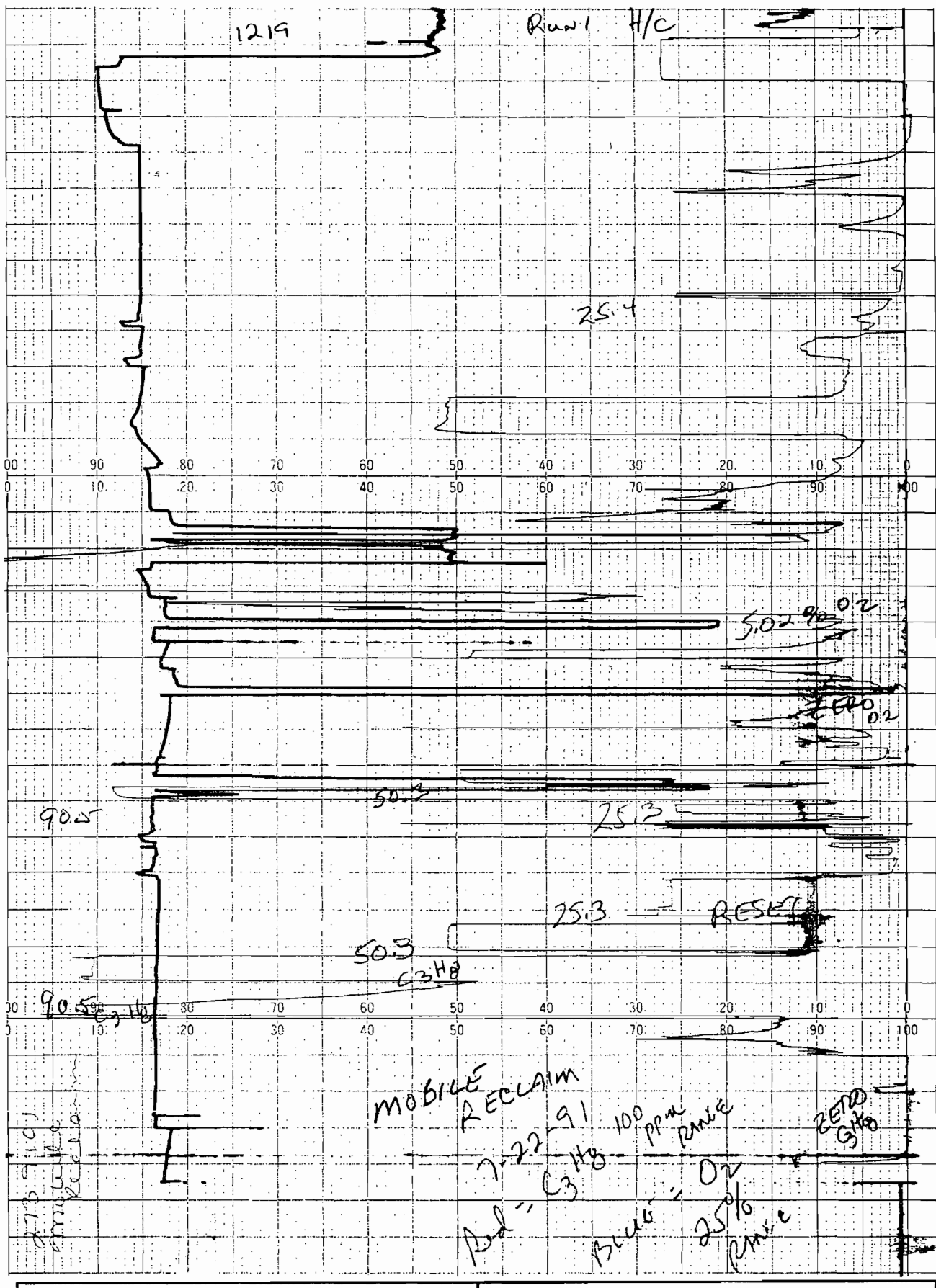
```

Run

Run

A

AIR CONSULTING & ENGINEERING, INC.



1219

Rawl H/c

25.4

00 90 80 70 60 50 40 30 20 10 0
 0 10 20 30 40 50 60 70 80 90 100

50.3 90.5

25.3

90.5

50.3

25.3

25.3

RESET

50.3
C3H8

30 90.5 80 70 60 50 40 30 20 10 0
 0 10 20 30 40 50 60 70 80 90 100

273.5 101
mobile reclaim

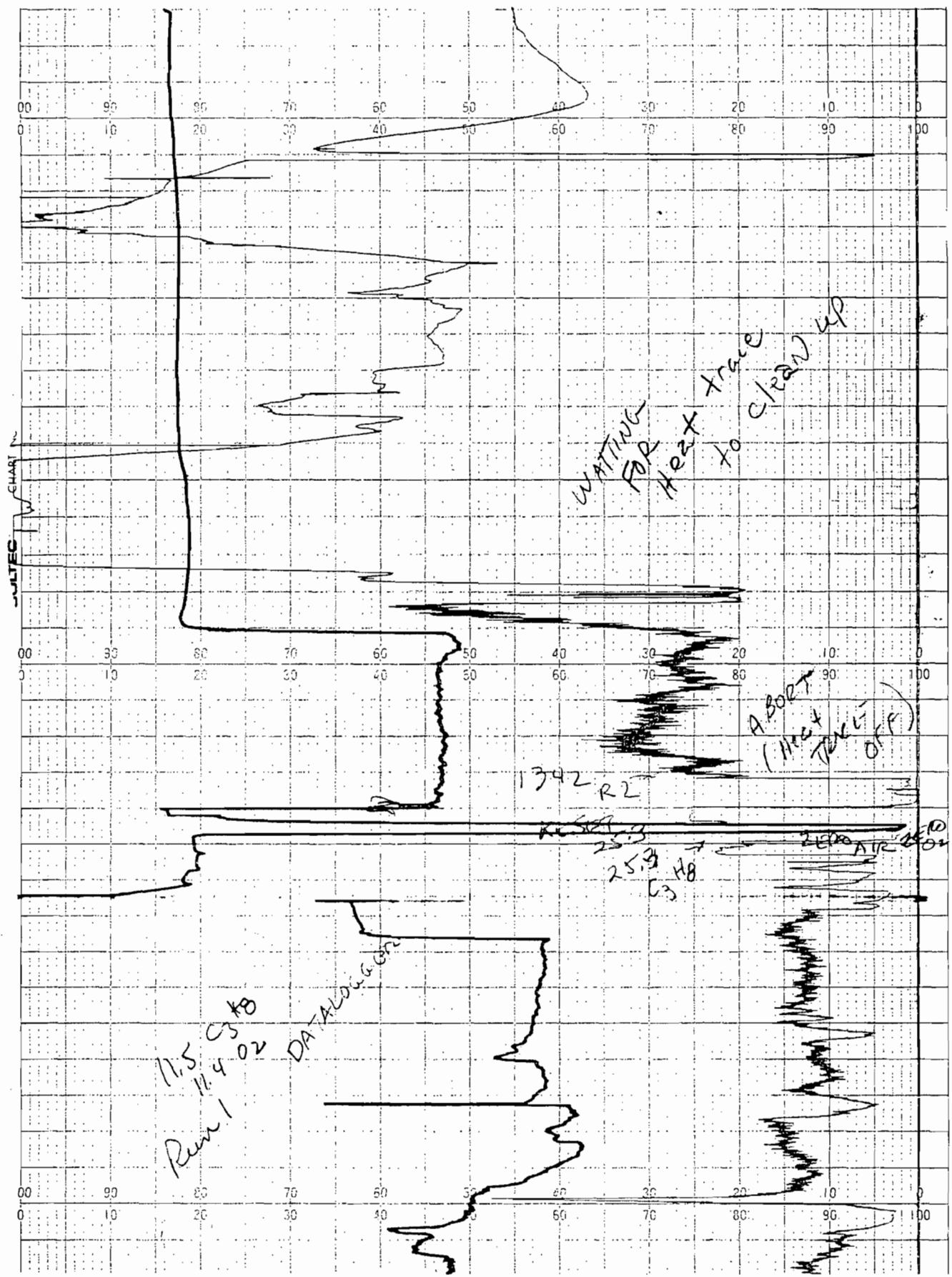
MOBILE RECLAIM

7-22-91
100 ppm RMSE
25% RMSE
ZERO 510

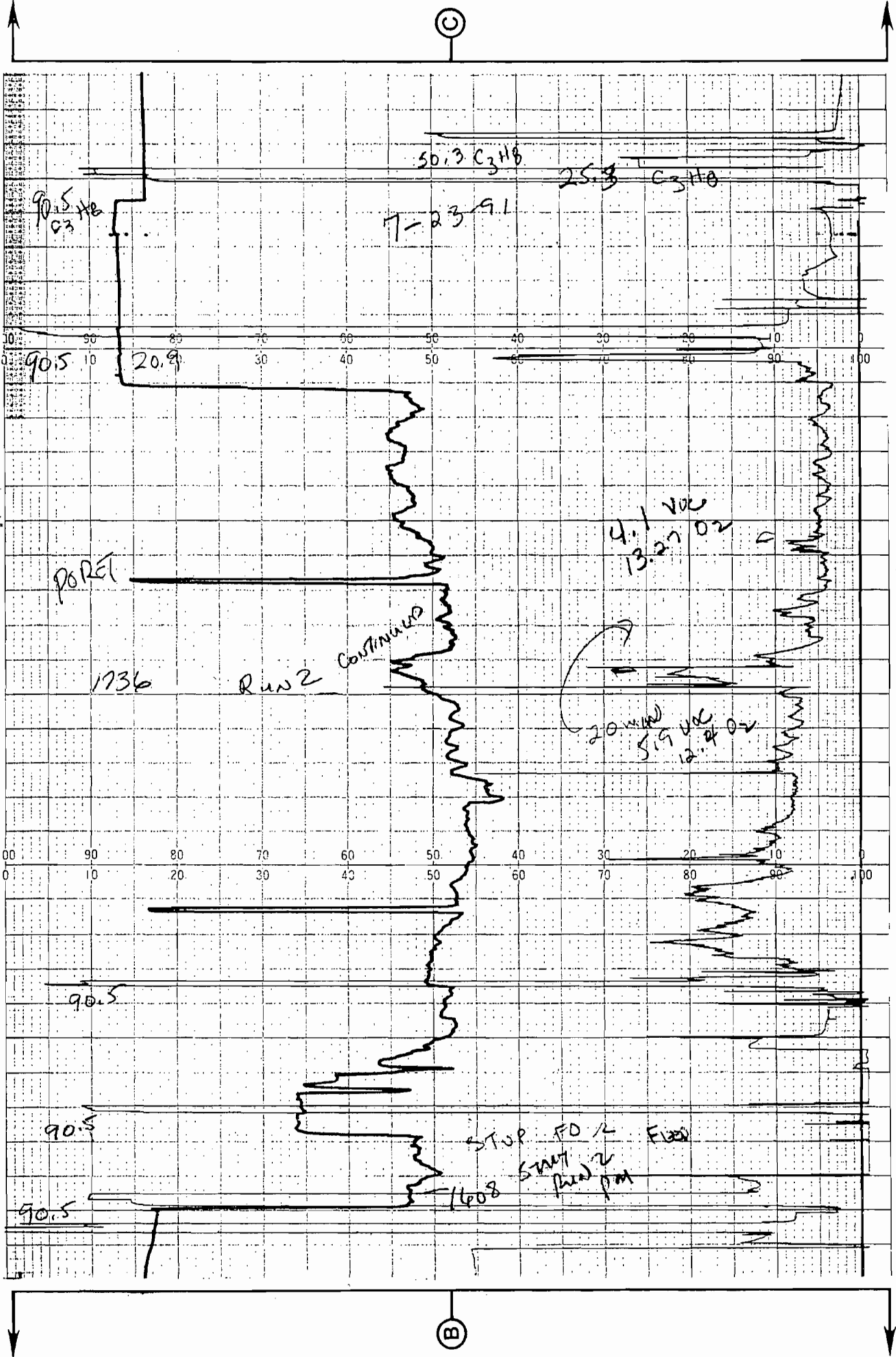
C3H8
100 ppm RMSE
25% RMSE

START

(B)



(A)



Date: _____

Name of User/Requisitioner: _____

Name of Organization: _____

Address: _____

City: _____ State: 2513 VOC Zip: 2500

Phone Number with Area Code: 209 02 _____

Purchase Order or Requisition #: _____

Signature of Requisitioner: _____

Complete Ship to Address if different from above (No P.O. Box Deliveries):

City: _____ State: _____ Zip: _____

Comments: _____

NOTE: THE ABOVE IS A PURCHASE ORDER OR REQUISITION FORM.
 PLEASE FILL IN AND SEND DIRECTLY TO SOLTEC CORPORATION
 OR YOUR PURCHASING DEPARTMENT. THIS FORM IS A FORMAT
 OF FIVE PAPER WITH MODEL = THANK YOU FOR YOUR PAST
 PATRONAGE

VOC 0
02 12.00
1st 11/11
0929 - Run 3

APPENDIX F
VISIBLE EMISSION DATA
AND OBSERVER'S CERTIFICATION

AIR CONSULTING AND ENGINEERING, INC.
 2106 N.W. 67TH PLACE, SUITE 4
 GAINESVILLE, FLORIDA 32606
 (904) 335-1889

VISIBLE EMISSION DATA SUMMARY

PLANT: MOBILE RECLAIM, INC.
 CITY/STATE: GAINESVILLE, FLORIDA
 SOURCE: INCINERATOR DRYER BAGHOUSE
 DATE: 07-22-1991
 START TIME: 1430 STOP TIME: 1530

MIN.	VISIBLE EMISSION DATA (SECONDS)				SIX-MIN AVG	MIN.	VISIBLE EMISSION DATA (SECONDS)				SIX-MIN AVG
	0	15	30	45			0	15	30	45	
1	0	0	0	0		31	0	0	0	0	0.00
2	0	0	0	0		32	0	0	0	0	0.00
3	0	0	0	0		33	0	0	0	0	0.00
4	0	0	0	0		34	0	0	0	0	0.00
5	0	0	0	0		35	0	0	0	0	0.00
6	0	0	0	0	0.00	36	0	0	0	0	0.00
7	0	0	0	0	0.00	37	0	0	0	0	0.00
8	0	0	0	0	0.00	38	0	0	0	0	0.00
9	0	0	0	0	0.00	39	0	0	0	0	0.00
10	0	0	0	0	0.00	40	0	0	0	0	0.00
11	0	0	0	0	0.00	41	0	0	0	0	0.00
12	0	0	0	0	0.00	42	0	0	0	0	0.00
13	0	0	0	0	0.00	43	0	0	0	0	0.00
14	0	0	0	0	0.00	44	0	0	0	0	0.00
15	0	0	0	0	0.00	45	0	0	0	0	0.00
16	0	0	0	0	0.00	46	0	0	0	0	0.00
17	0	0	0	0	0.00	47	0	0	0	0	0.00
18	0	0	0	0	0.00	48	0	0	0	0	0.00
19	0	0	0	0	0.00	49	0	0	0	0	0.00
20	0	0	0	0	0.00	50	0	0	0	0	0.00
21	0	0	0	0	0.00	51	0	0	0	0	0.00
22	0	0	0	0	0.00	52	0	0	0	0	0.00
23	0	0	0	0	0.00	53	0	0	0	0	0.00
24	0	0	0	0	0.00	54	0	0	0	0	0.00
25	0	0	0	0	0.00	55	0	0	0	0	0.00
26	0	0	0	0	0.00	56	0	0	0	0	0.00
27	0	0	0	0	0.00	57	0	0	0	0	0.00
28	0	0	0	0	0.00	58	0	0	0	0	0.00
29	0	0	0	0	0.00	59	0	0	0	0	0.00
30	0	0	0	0	0.00	60	0	0	0	0	0.00

AVERAGE OPACITY: 0.00

HIGHEST SIX MINUTE AVERAGE: 0.00

RANGE OF OPACITY READINGS
 MINIMUM: 0 MAXIMUM: 0

VISIBLE EMISSION
OBSERVATION FORM

OBSERVATION DATE				START TIME				STOP TIME					
7-22-91				1430				1530					
SEC MIN	0	15	30	45	SEC MIN	0	15	30	45				
	1	0	0	0		0	31	0	0	0	0		
2	0	0	0	0	32	0	0	0	0				
3	0	0	0	0	33	0	0	0	0				
4	0	0	0	0	34	0	0	0	0				
5	0	0	0	0	35	0	0	0	0				
6	0	0	0	0	36	0	0	0	0				
7	0	0	0	0	37	0	0	0	0				
8	0	0	0	0	38	0	0	0	0				
9	0	0	0	0	39	0	0	0	0				
10	0	0	0	0	40	0	0	0	0				
11	0	0	0	0	41	0	0	0	0				
12	0	0	0	0	42	0	0	0	0				
13	0	0	0	0	43	0	0	0	0				
14	0	0	0	0	44	0	0	0	0				
15	0	0	0	0	45	0	0	0	0				
16	0	0	0	0	46	0	0	0	0				
17	0	0	0	0	47	0	0	0	0				
18	0	0	0	0	48	0	0	0	0				
19	0	0	0	0	49	0	0	0	0				
20	0	0	0	0	50	0	0	0	0				
21	0	0	0	0	51	0	0	0	0				
22	0	0	0	0	52	0	0	0	0				
23	0	0	0	0	53	0	0	0	0				
24	0	0	0	0	54	0	0	0	0				
25	0	0	0	0	55	0	0	0	0				
26	0	0	0	0	56	0	0	0	0				
27	0	0	0	0	57	0	0	0	0				
28	0	0	0	0	58	0	0	0	0				
29	0	0	0	0	59	0	0	0	0				
30	0	0	0	0	60	0	0	0	0				
AVERAGE OPACITY FOR HIGHEST PERIOD						0				NUMBER OF READINGS ABOVE WERE 0			
RANGE OF OPACITY READINGS													
MINIMUM					MAXIMUM								
0					0								
OBSERVER'S NAME (PRINT)													
Sid Carter													
OBSERVER'S SIGNATURE								DATE					
S. D. Carter								7-22-91					
ORGANIZATION													
A.C.E.													
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE								CERTIFIED BY		DATE			
F.T.A.													
TITLE								VERIFIED BY		DATE			

SOURCE NAME: Mobile Reclaim

ADDRESS: 4131 NW 13th ST Suite 105

CITY: Gainesville STATE: FL ZIP: _____

PHONE: _____ SOURCE I.D. NUMBER: _____

PROCESS EQUIPMENT: Incinerator OPERATING MODE: _____

CONTROL EQUIPMENT: BA house OPERATING MODE: _____

DESCRIBE EMISSION POINT: Round Metal Stack same

HEIGHT ABOVE GROUND LEVEL: START 20' STOP 20' HEIGHT REL. TO OBSERVER: START 20' STOP 20'

DISTANCE FROM OBSERVER: START 60' STOP 60' DIRECTION FROM OBSERVER: START East STOP _____

DESCRIBE EMISSIONS: START Clear STOP _____

EMISSION COLOR: START Clear STOP Clear PLUME TYPE: CONT. FUGITIVE INTER.

WATER DROPLETS PRESENT: NO YES IF WATER DROPLET PLUME: ATTACHED DETACHED

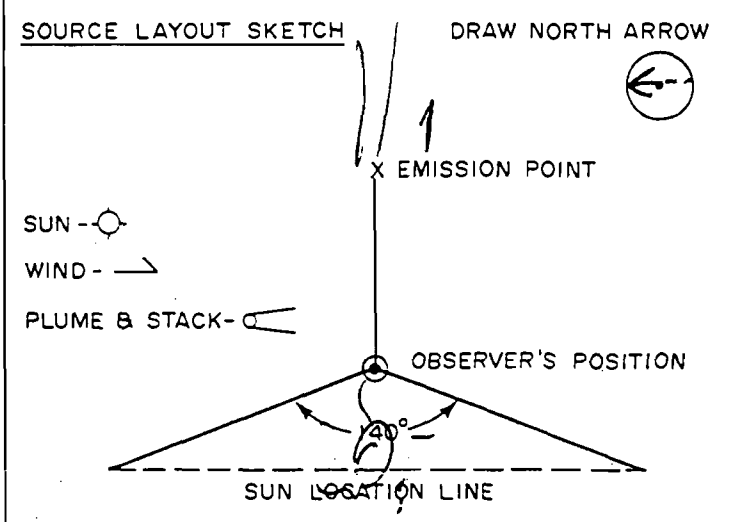
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED: START Opening STOP same

DESCRIBE BACKGROUND: START Blue Sky STOP same

BACKGROUND COLOR: START Blue STOP Blue SKY CONDITIONS: START P. Cloud STOP same

WIND SPEED: START 0-5 STOP 0-5 WIND DIRECTION: START East STOP East

AMBIENT TEMP: START 89 STOP 89 WET BULB TEMP. _____ RH % _____



COMMENTS:

I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE

TITLE _____ DATE _____

BEST AVAILABLE COPY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

THIS IS TO CERTIFY THAT

SIDNEY J. CARTER

has completed the
STATE OF FLORIDA visible emissions evaluation training and is a qualified
observer of visible emissions as specified by EPA reference method 9.

THIS CERTIFICATE EXPIRES Aug 28 1991

Michael P. Clark
CERTIFICATE OFFICER

S. J. Carter
BEARER'S SIGNATURE

VISIBLE EMISSIONS EVALUATOR

This is to certify that

Kidney J. Carter

met the specifications of Federal Reference Method 9 and qualified as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, North Carolina. This certificate is valid for six months from date of issue.

Thomas Hlose
President

Willie J. Hise
Vice President

David Savage
Program Manager

228558
Certificate Number

Oslando
Location

February 27, 1991
Date of Issue

APPENDIX G
QUALITY ASSURANCE

STANDARD METER CALIBRATION
Meter Number 1040616

Air Consulting and Engineering, Inc. (ACE) uses a dry gas meter for the calibration standard. This meter has been calibrated against a wet test meter in triplicate. This data was used to generate a standard meter calibration curve (see next page). Field meter calibrations are corrected to this curve using the following formula:

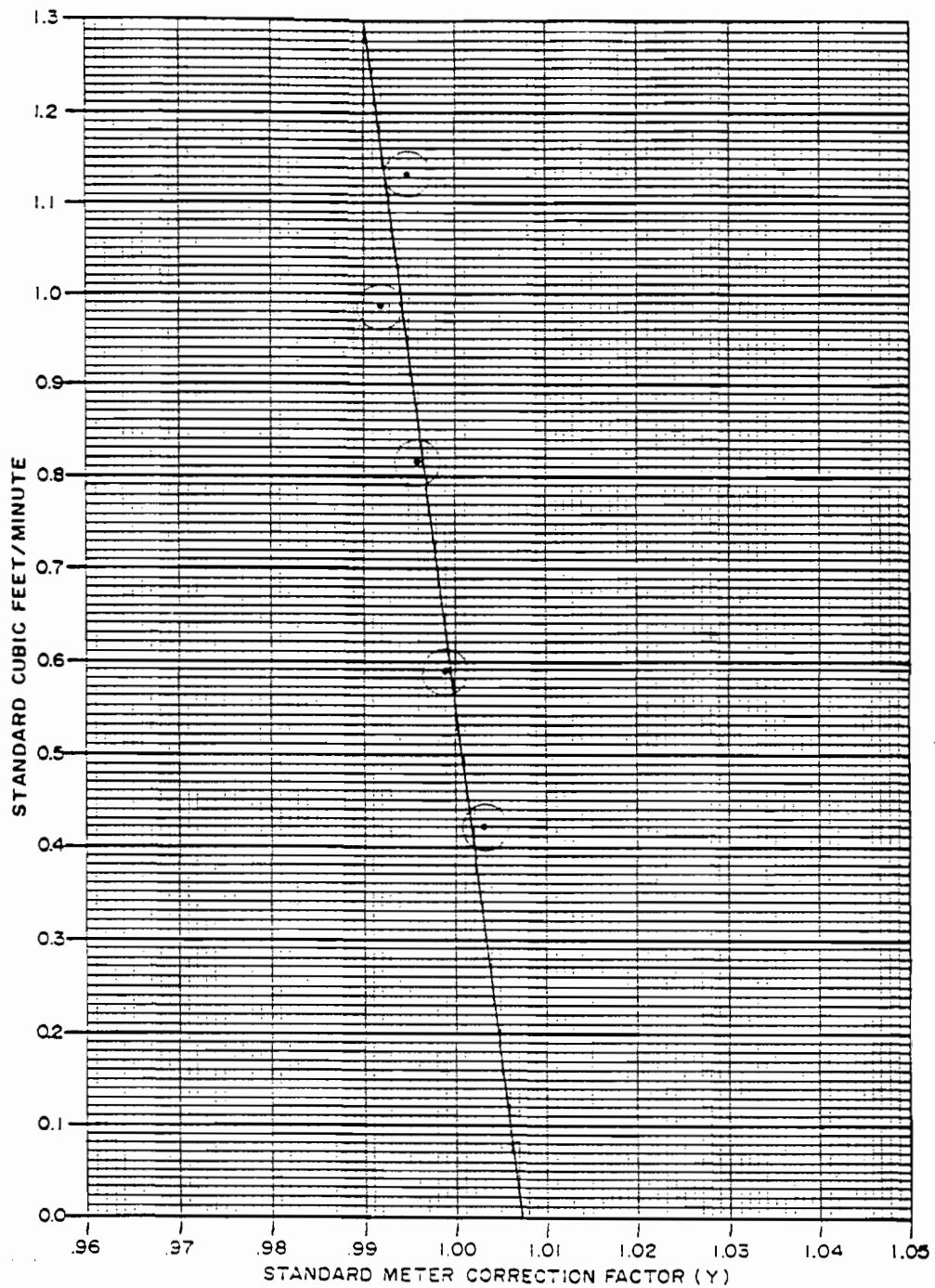
$$Y_a \times Y_s = Y$$

Y_a = actual ratio of field meter to standard meter

Y_s = ratio of standard meter to wet test meter at a given
flow rate (from Calibration Curve)

Y = corrected ratio of field meter

The dry standard meter was calibrated on June 11, 1991, and is checked and/or recalibrated at least annually.



STANDARD METER CALIBRATION
CURVE

JUNE 11, 1991

AIR CONSULTING
and
ENGINEERING

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AIR CONSULTING & ENGINEERING

STANDARD METER CALIBRATION

DATE 6-13-91

LEAK CHECK 0.000 CFM at 10 in. Hg.

METER SERIAL NUMBER 1040616

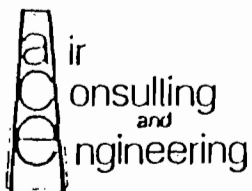
BAROMETRIC PRESSURE 30.12 in. Hg.

STD GAS METER TEMPERATURE 74 °F / ASTM GLASS THERMOMETER TEMPERATURE 74 °F

WET ΔH	STD ΔH	GAS VOLUME, WET TEST METER			GAS VOLUME, STD GAS METER			TEMP WET TEST METER (°F)	TEMP OF STD. METER (°F)	TIME (Minutes)
		INITIAL	FINAL	ACTUAL ft ³	INITIAL	FINAL	ACTUAL ft ³			
-0.3	-0.60	6.042	11.553	5.511	0.003	5.500	5.497	74	74	13
-0.3	-0.60	1.553	7.032	5.479	5.500	10.979	5.479	75	75	13
-0.3	-0.60	7.032	11.509	5.477	10.979	16.450	5.471	75	75	13
-0.35	-0.96	0.853	8.143	5.290	16.804	22.127	5.323	75	76	9
-0.35	-0.96	8.143	13.430	5.287	22.127	27.442	5.315	75	76	9
-0.35	-0.96	3.430	8.703	5.273	27.442	32.753	5.311	75	77	9
-0.4	-1.6	9.252	14.995	5.743	33.311	39.123	5.812	76	78	7
-0.4	-1.6	4.995	10.713	5.718	39.123	44.909	5.786	76	78	7
-0.4	-1.6	0.713	6.445	5.732	44.909	50.707	5.798	76	78	7
-0.55	-2.1	6.941	12.917	5.976	51.214	57.292	6.078	76	78	6
-0.55	-2.1	2.917	8.898	5.981	57.292	63.375	6.083	76	78	6
-0.55	-2.1	8.898	14.873	5.975	63.375	69.452	6.077	76	78	6
-0.7	-2.7	5.278	10.988	5.710	69.866	75.663	5.797	76	78	5
-0.7	-2.7	0.988	6.708	5.720	75.663	81.474	5.811	76	78	5
-0.7	-2.7	6.708	12.386	5.678	81.474	87.247	5.773	76	78	5

CALIBRATED BY: A. F. Habel

	Y	SCFM	Y	SCFM	Y	SCFM	Y	SCFM	Y	SCFM
Run 1	1.004	0.422	0.998	0.584	0.996	0.814	0.992	0.988	0.995	1.132
Run 2	1.001	0.419	0.999	0.584	0.996	0.810	0.992	0.989	0.995	1.134
Run 3	1.003	0.419	0.999	0.582	0.996	0.812	0.992	0.988	0.994	1.126
Average	1.003	0.420	0.999	0.583	0.996	0.812	0.992	0.988	0.995	1.131



AIR CONSULTING & ENGINEERING

ANNUAL METER CALIBRATION

DATE 6-14-91

LEAK CHECK 0.000 CFM at 14 In. Hg.

METER BOX NUMBER #1

BAROMETRIC PRESSURE 30.10 In. Hg.

DRY GAS METER TEMPERATURE 87 °F / ASTM GLASS THERMOMETER TEMPERATURE 88 °F

ΔHS	AVERAGE ΔHD	GAS VOLUME, STANDARD METER			GAS VOLUME, DRY GAS METER			TEMP STD METER	TEMP OF DRY METER	TIME (Minutes)	TIMER
		INITIAL	FINAL	ACTUAL ft ³	INITIAL	FINAL	ACTUAL ft ³				
-06	.5	977.651	983.301	5.650	884.756	890.239	5.483	87	88	15	15
-12	1.0	971.708	977.548	5.840	878.739	884.547	5.808	86	87	11	11
-16	1.5	985.835	993.630	7.795	892.764	900.523	7.759	88	89	12	12
-23	2.0	993.630	1000.397	6.767	900.523	907.262	6.739	88	89	9	9
-33	3.0	1000.397	1006.790	6.393	907.262	913.626	6.364	89	90	7	7
-47	4.0	1007.008	1012.339	5.331	913.950	919.144	5.194	89	91	5	5

DELTA H	Y _a	SCFM	Y _s	Y
2.026	1.031	0.366		
2.036	1.005	0.516	1.000	1.031
2.048	1.003	0.630	0.998	1.003
2.038	1.001	0.729	0.996	0.999
2.076	0.999	0.884	0.994	0.995
2.027	1.020	1.032	0.991	0.990
			0.988	1.008
			0.995	1.004

MEAN:

2.042 1.010

CALIBRATED BY:

Greg R. Brown

AIR CONSULTING & ENGINEERING, inc.

POST TEST CALIBRATION

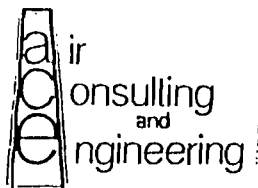
DATE 7-29-91 METER BOX NUMBER 1 LEAK CHECK 0.000 CFM at 12 In. Hg.
 CLIENT MOBILE RECLAIM SOURCE INCINERATOR THERMOCOUPLE NUMBER 59 PYROMETER NUMBER ATK-2
 FLIGHT SERVICE P_b 30.02 In. Hg. ACE BAROMETER P_b 30.02 In. Hg.
 ASTM GLASS THERMOMETER _____ °F / THERMOCOUPLE 1250 °F ASTM GLASS THERMOMETER 86 °F / METER TEMP 86 °F

ΔHS	AVERAGE ΔHD	GAS VOLUME, STANDARD METER			GAS VOLUME, DRY GAS METER			TEMP STANDARD METER	TEMP OF DRY METER	TIME (Minutes)	MAX. VACUUM In. Hg.
		INITIAL	FINAL	ACTUAL ft ³	INITIAL	FINAL	ACTUAL ft ³				
-11	1.1	910.244	915.247	5.003	849.345	854.438	5.093	86	90	9	8
-11	1.1	915.247	920.799	5.552	854.438	860.109	5.671	85	90	10	8
-11	1.1	920.799	926.314	5.515	860.109	865.751	5.642	84	91	10	8

CALIBRATED BY: Greg R. Brown

DELTA H	Y _a	SCFM	Y _s	Y
2.037	0.987	0.539	0.997	0.984
2.035	0.985	0.540	0.997	0.982
2.051	0.987	0.537	0.997	0.984

MEAN: 2.041 0.987 0.997 0.984



DATE 10-1-90PYROMETER NUMBER Atkins # 2

SOURCE (SPECIFY)	GLASS THERMOMETER WITH NBS MERCURY (°F)	PYROMETER (°F)	DEGREE DIFFERENCE	PERCENT DIFFERENCE
ICE BATH	<u>42</u>	<u>41</u>	<u>1</u>	<u>0.2</u>
AMBIENT	<u>88</u>	<u>88</u>	<u>0</u>	<u>0.0</u>
HOT OVEN	<u>345</u>	<u>344</u>	<u>1</u>	<u>0.2</u>

FDER - MAXIMUM 5° DIFFERENCE

$$\text{EPA} \left[\frac{(\text{REF. TEMP. } ^\circ\text{F} + 460^\circ) - (\text{PYROMETER TEMP. } ^\circ\text{F} + 460^\circ)}{\text{REF. TEMP. } ^\circ\text{F} + 460^\circ} \right] 100 \leq 1.5\%$$

CALIBRATED BY:

S. J. Carter

AIR CONSULTING & ENGINEERING, INC.

PITOT TUBE CALIBRATION

DATE CALIBRATED 2-22-91

PITOT TUBE 36

IS PITOT TUBE ASSEMBLY LEVEL YES

ARE PITOT TUBE OPENINGS DAMAGED NO

$\alpha_1 = \underline{2}^\circ (<10^\circ)$, $\alpha_2 = \underline{3}^\circ (<10^\circ)$, $\beta_1 = \underline{0}^\circ (<5^\circ)$, $\beta_2 = \underline{1}^\circ (<5^\circ)$

$\gamma = \underline{0}^\circ$, $\theta = \underline{3}^\circ$ $A = \underline{1.025}$ in. = (Pa + Pb)

$z = A \sin \gamma = \underline{.018}$ in.; $<0.32 / <1/8$ in.

$w = A \sin \theta = \underline{.054}$ in.; $<0.08 / <1/32$ in.

$P_a = \underline{.5125}$ in. $P_b = \underline{.5125}$ in. $D_t = \underline{.375}$

WAS CALIBRATION REQUIRED NO

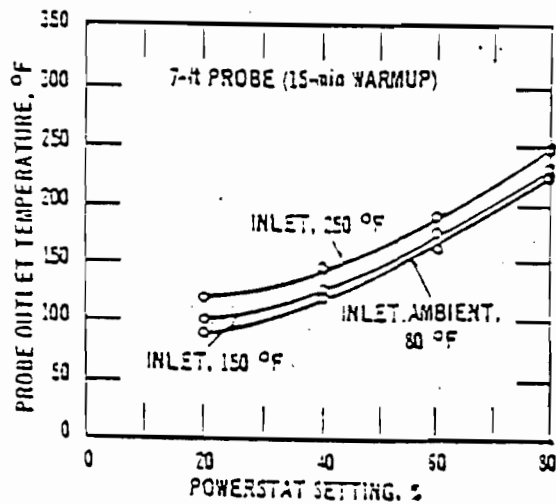
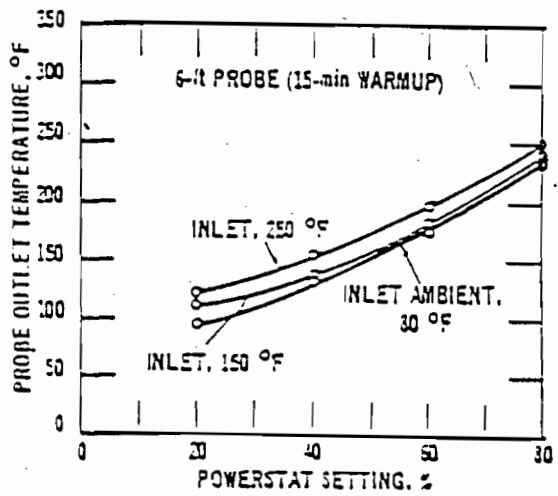
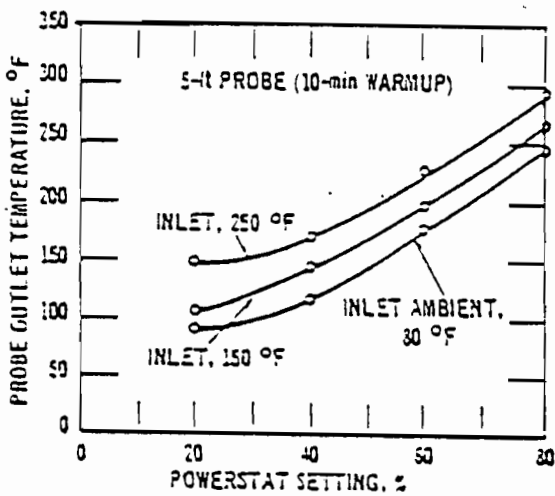
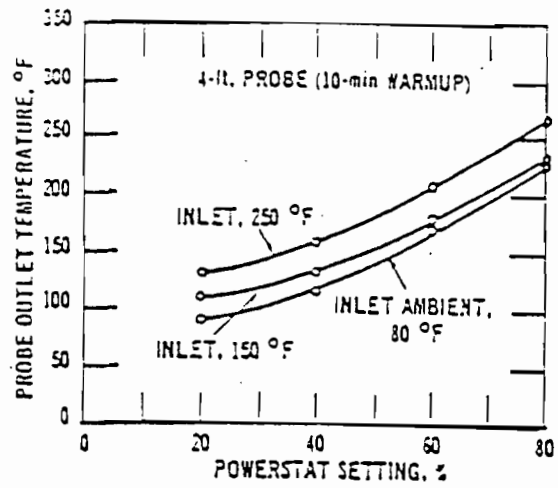
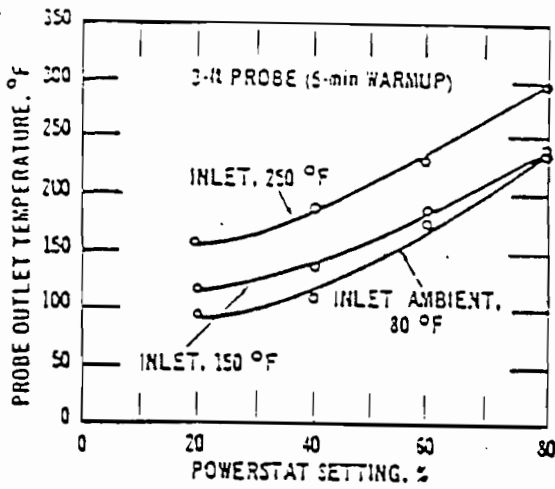
THERMOCOUPLE CALIBRATION

SOURCE (SPECIFY)	ASTM GLASS THERMOMETER WITH MERCURY (°F)	PYROMETER (°F)	DEGREE DIFFERENCE	PERCENT DIFFERENCE
ICE BATH	<u>37</u>	<u>37</u>	<u>0</u>	<u>0.00</u>
AMBIENT	<u>75</u>	<u>77</u>	<u>2</u>	<u>0.038</u>
HOT OVEN	<u>326</u>	<u>329</u>	<u>3</u>	<u>0.41</u>

CALIBRATED BY: S. Carter

FDER - MAXIMUM 5° DIFFERENCE

EPA $\left[\frac{(\text{REF. TEMP. } ^\circ\text{F} + 460^\circ) - (\text{PYROMETER TEMP. } ^\circ\text{F} + 460^\circ)}{\text{REF. TEMP. } ^\circ\text{F} + 460^\circ} \right] 100 \leq 1.5\%$

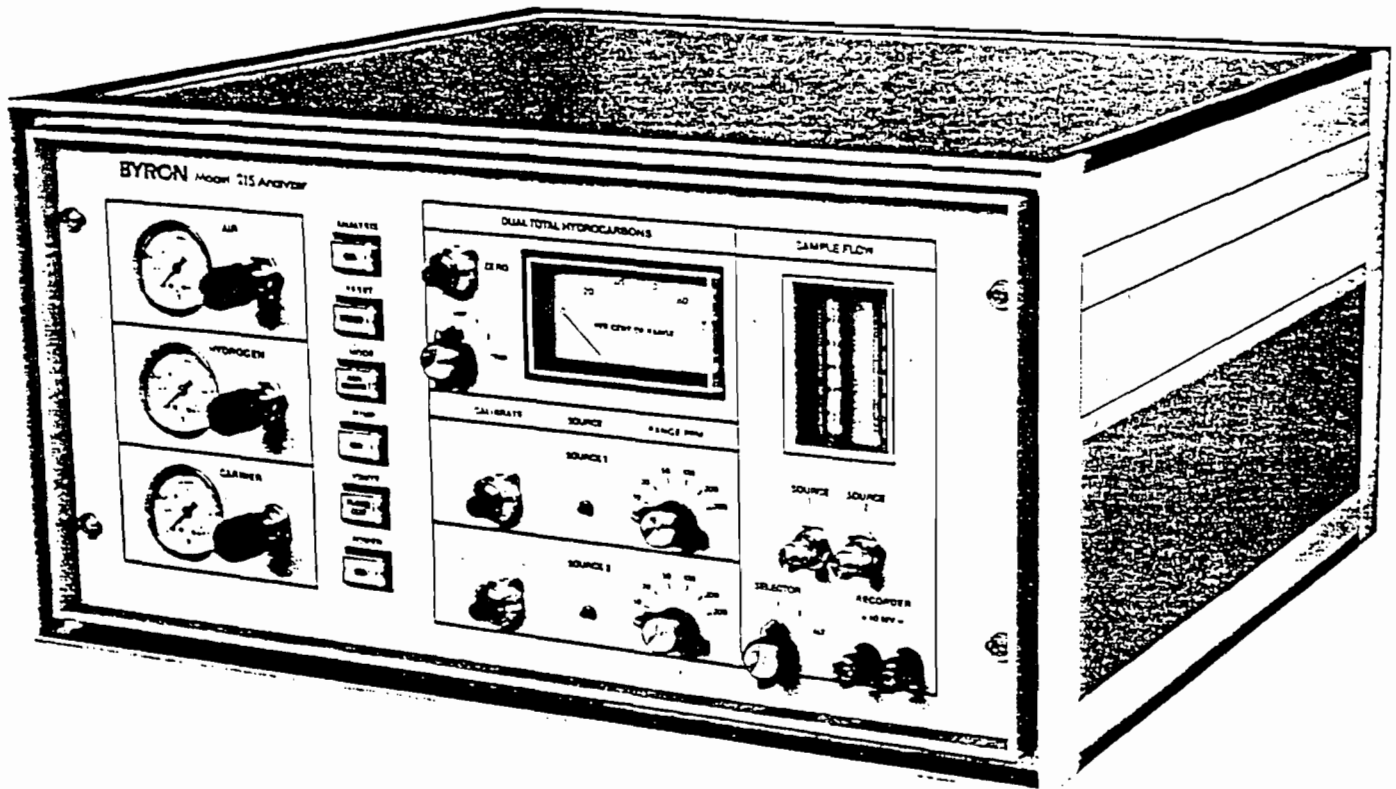


NOTE: Flow rate held constant at 0.75; 50% change in flow rate has little effect on probe temperature.

Probe temperatures.

Byron Model 215

DUAL TOTAL HYDROCARBON ANALYZER



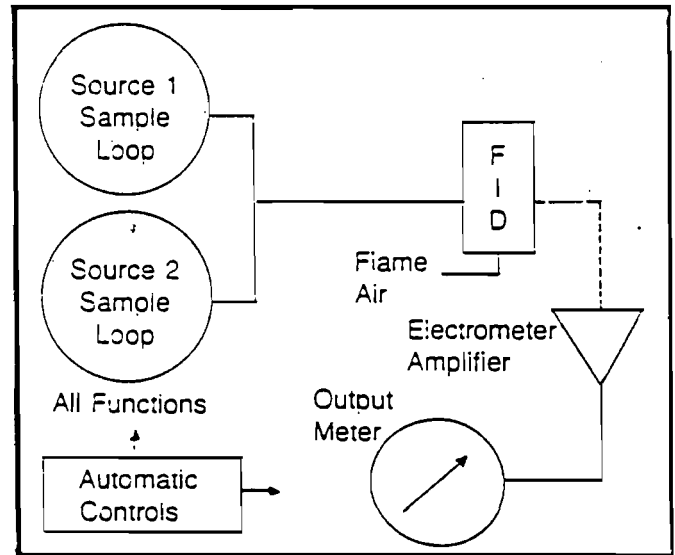
Byron Model 215 is two complete total hydrocarbon analyzers built into a single cabinet. Whenever two separate sources need to be monitored for hydrocarbon levels, Model 215 Dual Total Hydrocarbon Analyzer solves the problem. While the analyzer was designed for accuracy, it is in fact a very convenient analyzer to use. All pressure regulators, sampling, calibrating and operating controls are located on the front panel. The function of the unit, from sampling to analysis, is fully automatic. An internal vacuum pump draws sample from the two sources. The operator can select either source exclusively or both sources alternately for analysis. The total hydrocarbon level is detected in a single hydrogen flame ionization detector. By using the same detector, the sources can be compared accurately, eliminating errors caused by individual FID characteristics. Peak heights for both sources are presented on the front panel output meter and recorder terminals. Each peak is electronically integrated to increase accuracy of the measurement. This integrated value is stored in memory and is updated as each peak is completed. The integrated value of the total hydrocarbon measurement for each source can be read on the front panel output meter and recorder terminals by selector switch. Both peak height and peak area data are available by rear panel connector.

Separate calibration, controls, range selectors, flowmeters and valves for each source allow two sources with varying characteristics to be measured accurately. Standard ranges are from 0-10 ppm full scale up to 0-500 ppm with optional X1 and X100 multipliers. Sample flow rates up to more than 1 LPM usually can be attained, depending upon the distance and impedance of the sample flow line.

APPLICATIONS:

1. Monitoring inlet and outlet on carbon bed absorbers and incinerators for efficiency calculations
2. Measuring one carbon bed absorber for breakthrough while measuring a second during steam cleaning
3. Analyzing two related sources for cause and effect
4. Analyzing two nearby but unrelated sources
5. Monitoring a single process at two different points for time changes
6. Meeting the requirements of Method 25A for certain applications of measuring volatile organics
7. Rapid measurement of a single ambient or stack source

MODEL 215 BLOCK DIAGRAM



SPECIFICATIONS:

MEASUREMENTS:

Source 1 total hydrocarbons, Source 2 total hydrocarbons

DETECTOR:

Hydrogen flame ionization

RANGES:

0-10, 0-20, 0-50, 0-100, 0-200, 0-500 ppm (standard); other ranges available

RANGE MULTIPLIERS:

X1, X100 (optional)

ANALYSIS TIME:

Either source exclusively, 1 minute; both sources alternately, 2 minutes

ACCURACY:

1% full scale all ranges when calibrated in accordance with operating manual

LINEARITY:

1% full scale all ranges

REPRODUCIBILITY:

1/2 of 1% full scale

RANDOM NOISE:

Less than 1/2 of 1% most sensitive range

ZERO DRIFT:

None in bargraph mode; zero is automatically adjusted before each peak

SPAN DRIFT:

Less than 1% in a 24 hour period on any range

CONTROLS:

All normal sampling, calibrating and operating controls are located on the front panel

AMBIENT OPERATING TEMPERATURE:

5°-40° C

OUTPUT:

0-10 mv front panel recorder terminals;
0-1 VDC rear panel connector (0-5VDC,
0-20ma and 4-20ma, optional)

OPERATING GASES REQUIRED:

Zero air, 400 cc/min; UHP Hydrogen, 40 cc/min

EXTERNAL GAS CONNECTIONS:

1/8" tube, Swagelok (stainless, optional)

HYDROGEN CUT-OFF:

Automatic upon flame-out or extended loss of power

CABINET DIMENSIONS:

20" wide X 10 1/2" high X 18 1/2" deep; 8 3/4" panel fits standard 19" rack. Analyzer is available with rack mounting slides without cabinet (optional)

WEIGHT INCLUDING CABINET:

60 pounds

POWER REQUIREMENTS:

105/125 VAC, 60 Hz, 200 W max.; plus 0.8 amp pump motor; 210/250 VAC, 50/60 Hz (optional)

SAMPLING VACUUM:

Up to 22" HG depending upon flowrate

SAMPLING FLOW METERS:

0-1 LPM (other ranges optional)

WARRANTY:

Workmanship and parts are guaranteed for a period of one year from date of shipment

BYRON INSTRUMENTS

520 S. Harrington Street.

Raleigh, NC 27601,

919-832-7501

Byron Model 25 Ultra Pure Air Supply

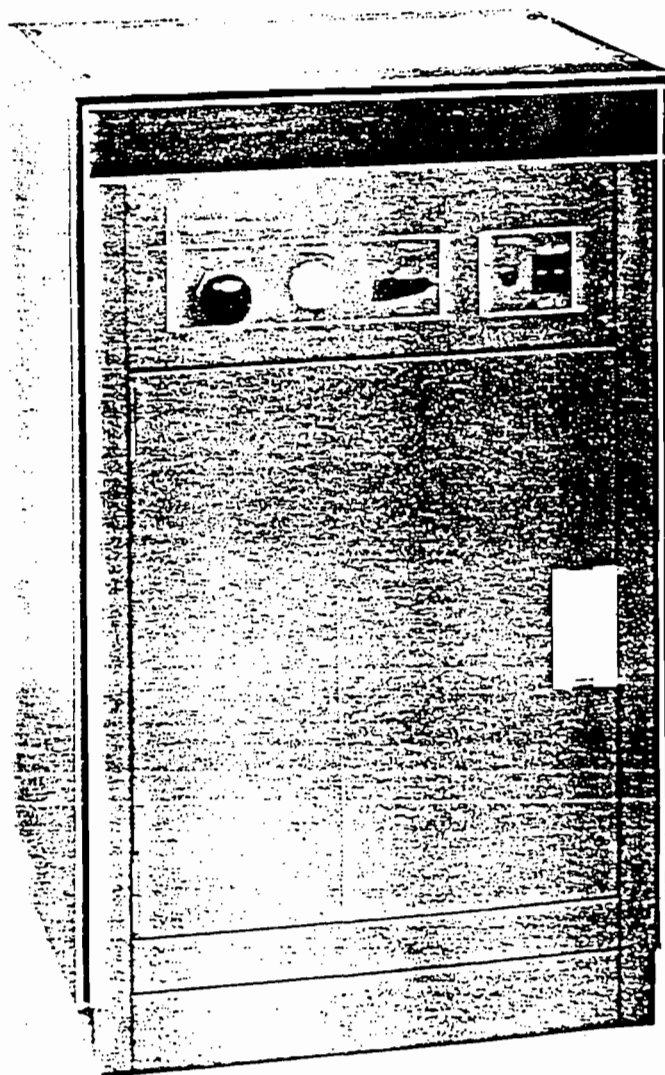
The Byron Model 25 Ultra Pure Air Supply is a completely self-contained source of ultra pure air at standard flowrates of up to 3 liters per minute. An internal air compressor capable of producing up to 0.5 scfm at 80 psig compresses ambient air. The compressed air is demoiustrized and then flows into a prescrubber. Organics, moisture, and other contaminants are partially removed. Prescrubbers alternate so that one is in use and the other is being cleaned every 30 minutes. The air then passes through a catalytic oxidizer where all hydrocarbons are oxidized into carbon dioxide, water, and other by-products. From the oxidizer, the air flows into one of two scrubbing columns where the remaining carbon dioxide, water, and other contaminants are removed. While one scrubber is in use supplying ultra pure output air, the other scrubber is itself being cleaned by heat and reversed flow. A solid state programmer controls operation of the columns to allow for a continuous output of pure air. Unlike typical air supplies with heatless dryers, the Model 25 will not upset the baseline of sensitive analyzers, even during scrubber change-overs.

A pressure regulator and valve on the output permit any pressure from 0 to 50 psig. When used as an air supply for Byron analyzers, Model 25 can supply enough air for six analyzers. Air from the Model 25 Ultra Pure Air Supply is unsurpassed in its freedom from contaminants and may be used for any chromatograph requiring pure air. As long as there is a source of 120 VAC power, Model 25 may be used for laboratory, mobile van or remote applications.

After start-up, the Model 25 system is fully automatic and requires no operator assistance. Aside from periodically draining the compressor surge tank, the Model 25 requires little or no routine maintenance.

Under most ambient atmospheres (free from heavily chlorinated solvents) the oxidizer catalyst will last several years and may be replaced when necessary.

Using Model 25 as a source of zero air eliminates problems of inconsistent quality, high gas expense, and inconvenience of using cylinder air. In most areas of the country, the initial cost of the Model 25 may be amortized in less than a year when it is used to replace cylinder zero air for the Byron analyzer's continuous service.



MODEL 25 SPECIFICATIONS:

OUTPUT PRESSURE:

0-50 psig

FLOW RATE:

3 liters per minute, standard; up to 10 LPM, optional

HYDROCARBONS IN OUTPUT AIR:

Less than 0.1 PPM

CARBON MONOXIDE IN OUTPUT AIR:

Less than 0.1 PPM

CARBON DIOXIDE IN OUTPUT AIR:

Less than 0.1 PPM

OTHER CONTAMINANTS IN OUTPUT AIR:

Less than 0.1 PPM

DEW POINT:

Below -75° C

POWER REQUIREMENTS:

120 VAC 60 Hz 300 W plus
1/6 HP motor, standard;

240 VAC 60/60 Hz optional

DUAL SCRUBBING SYSTEM:

Alternate scrubbing columns provided for continuous pure air output in a self-cleaning configuration

CABINET DIMENSIONS:

24 1/4" wide x 36 1/2" high x 20" deep

WEIGHT:

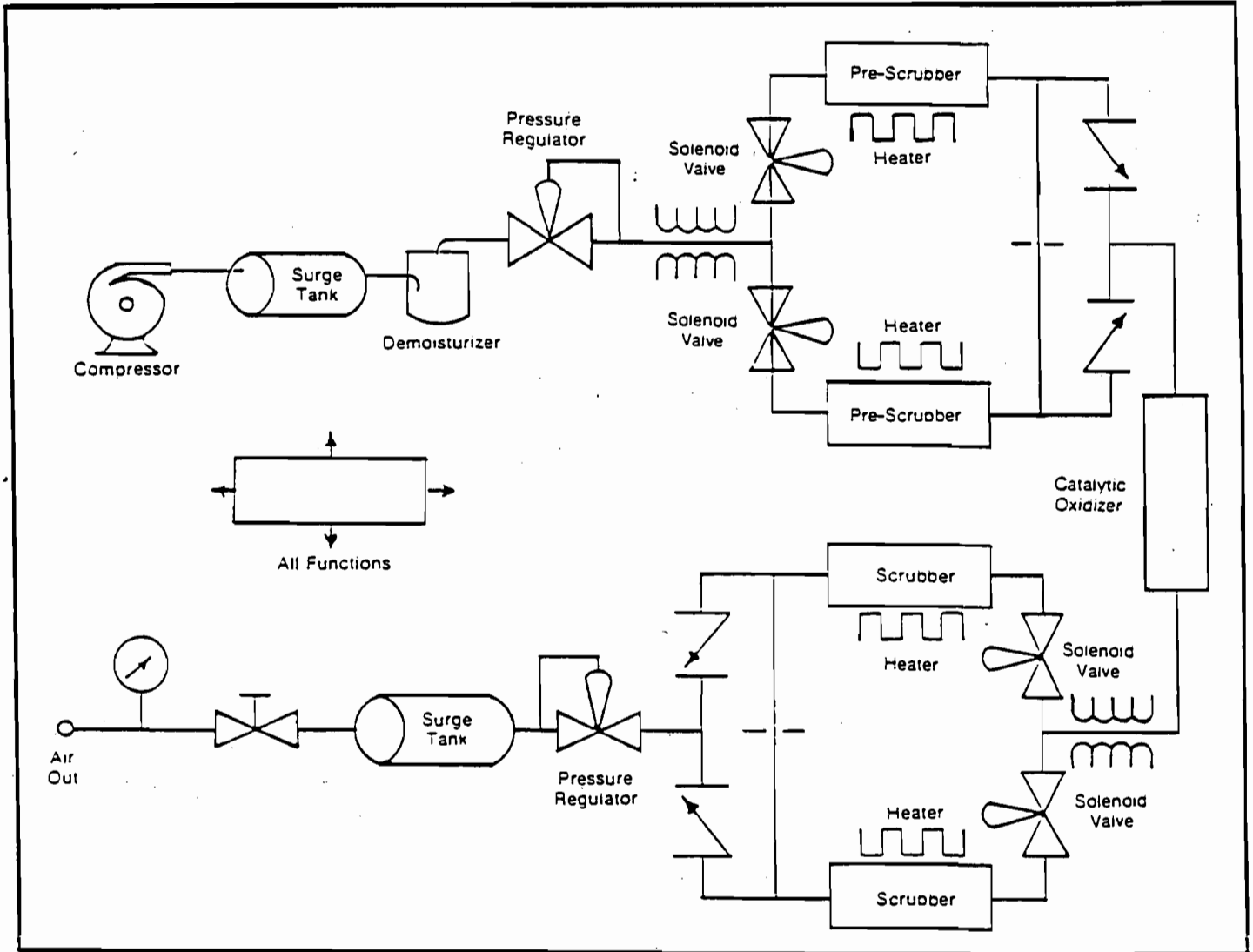
145 pounds

EXTERNAL GAS CONNECTION:

1/4" tube, Swagelok

WARRANTY:

Workmanship and parts guaranteed for a period of one year from date of shipment



BYRON INSTRUMENTS

520 S. Harrington Street. Raleigh, NC 27601, 919-832-7501



ALPHAGAZ

DIVISION OF LIQUID AIR CORPORATION

P.O. Box 5548
Long Beach, CA 90805

Phone (213) 492-5340
FAX (213) 492-5349

20-Mar-91
GATOR OXYGEN

P.O. 6212
GAINESVILLE, FL.

CERTIFICATION OF CYLINDER # CC 97082

COMPONENT:

MEAN CONCENTRATION:

OXYGEN
NITROGEN

5.21 +/- 0.18 %
BALANCE

Cylinder pressure:
Expiration date:

@2000 psi
19-Sep-92

This mixture was prepared and analyzed following EPA Revised Traceability Protocol No.1, Section 3.0.4, Procedure G1. The Oxygen concentration was determined by direct comparison with NBS SRM 2658, Sample No.72-41, S/N CAL-2661, 9.561 +/- 0.09 % Oxygen in Nitrogen, dated April 10, 1990. The analysis was done on a Varian 6500 TCD gas chromatograph, S/N 2619, using a 6' x 10' MSEA column @140 deg.C, isothermal, @0.5@0.05 ranges, and 250ul sample loop. The last multipoint calibration was done on March 10, 1991.

Moses Elwin
Analyst



Scott Specialty Gases, Inc.

PLUMSTEADVILLE, PA 18949

PHONE: 215-766-8861

FAX: 215-766-0320

AIR CONSULTING & ENGR
SUITE # 4
2106 NW 67th PLACE
GAINSVILLE FL 32606

Date Shipped 9-14-90

Our Project No: 22078

Your P.O. No: 3724

Page 2 of 6

ATTN: LARRY WURTS

CERTIFICATE OF ANALYSIS - EPA PROTOCOL GASES*

(Concentrations are in mole % or ppm)

Cylinder Number AAL-9032 Certified Accuracy ±1 % NBS Traceable Analysis Dates: First 9-10-90 Last N.R.
CP=2000 psig

COMPONENTS	CERTIFIED CONC	EXPIRATION DATE	ANALYTICAL PRINCIPLE	PRIMARY STANDARD NBS/SRM's	REPLICATE CONCENTRATIONS	
					FIRST	SECOND
PROPANE	50.3 ppm	3-10-92	F.I.D.	2651	50.60 ppm	
					50.02 ppm	
					50.22 ppm	
AIR	BALANCE					

Cylinder Number _____ Certified Accuracy _____ % NBS Traceable Analysis Dates: First _____ Last _____

COMPONENTS	CERTIFIED CONC	EXPIRATION DATE	ANALYTICAL PRINCIPLE	PRIMARY STANDARD NBS/SRM's	REPLICATE CONCENTRATIONS	
					FIRST	SECOND

*We hereby certify the cylinder gas has been analyzed according to EPA Protocol No:

1 Procedure G1

Analyst [Signature]

Approved By [Signature]

Mark S. Sirinides

The only liability of this Company for gas which fails to comply with this analysis shall be replacement thereof by the Company without extra cost.

CERTIFIED REFERENCE MATERIALS ■ EPA PROTOCOL GASES ■ ACUBLENDSM ■ CALIBRATION & SPECIALTY GAS MIXTURES
PURE GASES ■ ACCESSORY PRODUCTS ■ CUSTOM ANALYTICAL SERVICES

TROY, MICHIGAN / SAN BERNARDINO, CALIFORNIA / HOUSTON, TEXAS
SOUTH PLAINFIELD, NEW JERSEY / FREMONT, CALIFORNIA / WAKEFIELD, MASSACHUSETTS / LONGMONT, COLORADO



PLUMSTEADVILLE, PA 18949

PHONE: 215-766-8861

FAX: 215-766-0320

Date Shipped 9-14-90Our Project No: 22078Your P.O. No: 3724Page 1 of 6

AIR CONSULTING & ENGR
 SUITE #4
 2106 NW 67th PLACE
 GAINSVILLE FL 32606

ATTN: LARRY WURTS

CERTIFICATE OF ANALYSIS – EPA PROTOCOL GASES*

(Concentrations are in mole % or ppm)

Cylinder Number AAL-17972 Certified Accuracy ±1 % NBS Traceable Analysis Dates: First 9-6-90 Last N.R.
 CP = 2000 psig

COMPONENTS	CERTIFIED CONC	EXPIRATION DATE	ANALYTICAL PRINCIPLE	PRIMARY STANDARD NBS/SRM's	REPLICATE CONCENTRATIONS	
					FIRST	SECOND
PROPANE	90.9 ppm	3-6-92	F.I.D.	2651	90.95 ppm	
					90.86 ppm	
					90.74 ppm	
AIR	BALANCE					

Cylinder Number _____ Certified Accuracy _____ % NBS Traceable Analysis Dates: First _____ Last _____

COMPONENTS	CERTIFIED CONC	EXPIRATION DATE	ANALYTICAL PRINCIPLE	PRIMARY STANDARD NBS/SRM's	REPLICATE CONCENTRATIONS	
					FIRST	SECOND

*We hereby certify the cylinder gas has been analyzed according to EPA Protocol No:

1 Procedure G1

Analyst [Signature]Approved By [Signature]

Mark S. Sirinides

The only liability of this Company for gas which fails to comply with this analysis shall be replacement thereof by the Company without extra cost.

CERTIFIED REFERENCE MATERIALS ■ EPA PROTOCOL GASES ■ ACUBLEND[®] ■ CALIBRATION & SPECIALTY GAS MIXTURES
 PURE GASES ■ ACCESSORY PRODUCTS ■ CUSTOM ANALYTICAL SERVICES

TROY, MICHIGAN / SAN BERNARDINO, CALIFORNIA / HOUSTON, TEXAS
 SOUTH PLAINFIELD, NEW JERSEY / FREMONT, CALIFORNIA / WAKEFIELD, MASSACHUSETTS / LONGMONT, COLORADO



CONTINUOUS MONITOR ACCURACY CERTIFICATION

PLANT Mobile Reclaim
LOCATION Gainesville, FL
SOURCE ID SRU 202 outlet
DATE 7/22/91

<u>NO.</u>	CALIBRATION GAS	MONITOR VALUE ppm	DIFFERENCE ppm	%SPAN
<u>VOC</u>				
	<u>90.5</u>	<u>88.5</u>	<u>2</u>	<u>2</u>
	<u>50.3</u>	<u>50.8</u>	<u>0.5</u>	<u>0.5</u>
	<u>25.3</u>	<u>25.6</u>	<u>0.3</u>	<u>0.3</u>

<u>O₂</u>	CALIBRATION GAS	MONITOR VALUE %	DIFFERENCE %	% SPAN
	<u>20.9</u>	<u>21.0</u>	<u>0.1</u>	<u>0.4</u>
	<u>5.02</u>	<u>5.15</u>	<u>0.13</u>	<u>0.5</u>

<u>CO</u>	CALIBRATION GAS	MONITOR VALUE	DIFFERENCE	% SPAN



CONTINUOUS MONITOR DRIFT CERTIFICATION

PLANT Mobile Reclaim
 LOCATION Gainesville, Florida
 SOURCE ID SRU 202 Outlet
 DATE 7/22/91 - 7/23/91
 GAS ID C₃H₈, O₂

RUN NUMBER	TIME	SPAN DRIFT			% SPAN	ZERO DRIFT			% SPAN
		INITIAL	FINAL	DRIFT		INITIAL	FINAL	DRIFT	
1-C ₃ H ₈		25.5	25.3	0.2	0.2	0	0	0	0
1-O ₂		20.9	20.3	0.6	2.4	1.3	1.3	0	0
2-C ₃ H ₈		90.5	89.5	1.0	1.0	0	0	0	0
2-O ₂		20.3	21.5	0.8	3.2	1.3			
3-C ₃ H ₈		25.7	26.0	0.3	0.3	0	0	0	0
3-O ₂		20.6	20.6	0	0	0	0	0	0

7/23

APPENDIX H
PRODUCTION DATA

AM

TEST TOWN #3

START TIME	A/R TRAP	PRIM TEMP	DISCHARGE TEMP	EXH. DAMP	AP	FIELD
9:20	1445°F	264°F	367°F	-1.5	/ 2	
9:25	1427	259	335	-1.5	/ 2	
9:30	1425	274	355	-1.5	/ 2	1
9:35	1444	280	440	-1.5	/ 2.2	1
9:40	1445	279	349	-1.5	/ 2.2	1
9:45	1413	289	339	-1.5	/ 2.2	11
9:50	1420	290	400	-1.4	/ 2.2	1
9:55	1443	299	504	-1.4	/ 2.4	11
10:00	1451	320	320	-1.4	/ 2.4	1
10:05	1443	308	396	-1.3	/ 2.4	1
10:10	1447	303	462	-1.3	/ 2.4	11
10:15	1459	316	364	-1	/ 3.1	1
10:20	1411	312	382	-1.5	/ 4	11
10:25	1428	355	380	-1.5	/ 4.2	1
10:30	1425	358	378	-1	/ 4	11
10:35	1404	298	362	-1.5	/ 4	18
10:40						

Certified
 Agency 9 Hour
 7-23-91
 Mobile Reclaim

24.66
 Ton/Hr

1.37 Ton / 410

APPENDIX I
PROJECT PARTICIPANTS

PROJECT PARTICIPANTS

AIR CONSULTING AND ENGINEERING, INC.

Stephen L. Neck, P.E.
Project Manager
Field Testing

Gerard Gauthreaux
Field Testing

Sidney J. Carter
Visible Emissions Observer

Charles P. Sneeringer
Field Testing
Laboratory Analysis

Dagmar Neck
Report Preparation

Candace V. Taylor
Computer Analysis
Document Production

MOBILE RECLAIM, INC.

Craig Hedgecock
Test Coordinator

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 next to the article number.



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

- Addressee's Address
 - Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:
 Mr. W. Arnold Dinkins, President
 Mobile Reclaim, Inc.
 P. O. Box 41489
 Gainesville, FL 32613-4189

4a. Article Number
 P 832 539 852

- 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)
Joanne Dinkins

6. Signature (Agent)
6-27-91

PS Form 3811, October 1990 ☆ U.S. GPO: 1990-273-861

DOMESTIC RETURN RECEIPT

P 832 539 852

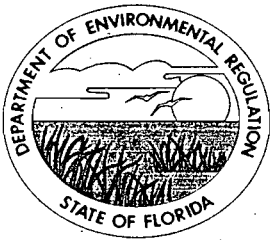


Certified Mail Receipt

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

Sent to	
Mr. W. Arnold Dinkins, Mobile Reclaim	
Street & No. P. O. Box 4189	
P.O., State & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 6-21-91	
Permit: AC 01-179694	

PS Form 3800, June 1990



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 4, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Arnold Dinkins, President
Mobile Reclaim, Inc.
P. O. Box 4189
Gainesville, Florida 32613-4189

Dear Mr. Arnold:

Re: Amendment of Construction Permit AC 01-179694
25 TPH Mobile Soil Remediation Unit .

The Department is in receipt of Mr. Craig Hedgecock's May 23 letter, requesting an extension of the expiration date for the construction permit referenced above. The extension is needed so that the 25 TPH mobile soil remediation unit can be refurbished prior to being placed in operation in Florida and obtaining the test data required for the application for permit to operate. This request is acceptable and the expiration date of construction permit AC 01-179694 is extended from July 31, 1991 to April 30, 1992.

A copy of this letter must be attached to the above construction permit and shall become a part of that permit.

Sincerely,

Carol M. Browner
Secretary

CMB/WH/plm

Attach: Mobile Reclaim, Inc.'s May 23, 1991 letter

c: Pam Houmère, DARM
Dist. Air Program Administrators
County Air Program Administrators



MOBILE RECLAIM INC.

MAY 23, 1991

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
BUREAU OF AIR REGULATION
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

ATTENTION: MR. C. H. FANCY, P.E.

RE: PERMIT NUMBER AC 01-179694

DEAR MR. FANCY:

ON DECEMBER 20, 1990, A CONSTRUCTION PERMIT WAS APPROVED BY THE STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION FOR A 25 TPH PORTABLE ROTARY KILN/AFTERBURNER SYSTEM, SERIAL NUMBER: SRU-202, PERMIT NUMBER: AC 01-179694, EXPIRATION DATE: JULY 31, 1991.

AS PER SPECIFIC CONDITION NUMBER 31 ON PAGE 12 OF 12 OF SAID CONSTRUCTION PERMIT, WE RESPECTFULLY REQUEST THAT THIS CONSTRUCTION PERMIT BE EXTENDED FOR A PERIOD OF NINE (9) MONTHS.

THE EQUIPMENT HAS BEEN OPERATING OUT OF THE STATE OF FLORIDA AND HAS BEEN DELAYED IN SHIPMENT FROM THE STATE OF ALASKA VIA THE STATE OF WASHINGTON. THEREFORE, THE TIME EXTENSION WILL AFFORD US ADEQUATE TIME TO RETURN THE EQUIPMENT TO THE STATE OF FLORIDA, PERFORM ANY NECESSARY MAINTENANCE, OBTAIN A CONTRACT TO REMEDIATE PETROLEUM CONTAMINATED SOIL, PERFORM THE REQUIRED COMPLIANCE TESTING, APPLY FOR THE OPERATION PERMIT, AND ALLOW THE DEPARTMENT ADEQUATE TIME TO PROCESS THE APPLICATION.

THANK YOU FOR YOUR CONSIDERATION OF THIS REQUEST. SHOULD YOU HAVE ANY QUESTIONS OR DESIRE ANY ADDITIONAL INFORMATION, PLEASE DO NOT HESITATE TO CONTACT US.

RESPECTFULLY SUBMITTED,

MOBILE RECLAIM, INC.

BY: CRAIG R. HEDGECK, PE/PLS
VICE-PRESIDENT OF OPERATIONS

✓ XC: WILLARD HANKS, DER/BAR



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Carol M. Browner
FROM: Steve Smallwood *[Signature]*
DATE: June 4, 1991
SUBJ: Amendment to Construction Permit AC 01-179694
Mobile Reclaim, Inc.

Attached for your approval and signature is a letter extending the expiration date for the above referenced construction permit.

This request is not controversial.

The Bureau recommends approval of this amendment.

SS/WH/plm

Attachment



MOBILE RECLAIM INC.

MAY 23, 1991

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
BUREAU OF AIR REGULATION
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RECEIVED
MAY 24 1991
Division of Air
Resources Management

ATTENTION: MR. C. H. FANCY, P.E.

RE: PERMIT NUMBER AC 01-179694

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RESPECTFULLY SUBMITTED,

MOBILE RECLAIM, INC.

BY: CRAIG R. HEDGECKOCK, PE/PLS
VICE-PRESIDENT OF OPERATIONS

XC: WILLARD HANKS, DER/BAR



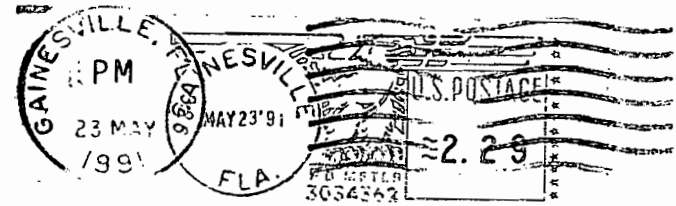
MOBILE RECLAIM INC.

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

CERTIFIED

P 852 064 009

MAIL



RETURN RECEIPT REQUESTED

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
BUREAU OF AIR REGULATION
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

ATTENTION: MR. C. H. FANCY, P.E.

P.O. Box 4189
Gainesville, FL 32613-4189



MOBILE RECLAIM INC.

RECEIVED

JUL 24 1991

Division of Air
Resources Management

JULY 16, 1991

FACSIMILE TRANSMITTAL

TO: MR. WILLARD HANKS, FDER/BAR
FAX NO. 904-922-6979

FROM: CRAIG R. HEDGECOCK, PE/PLS *CRH*

RE: NOTIFICATION OF RELOCATION

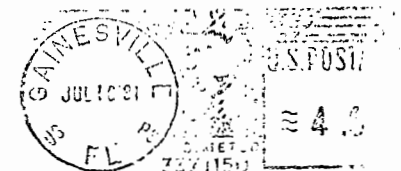
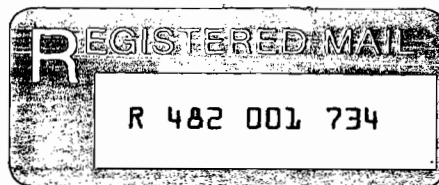
AS PER OUR TELEPHONE CONVERSATION THIS AFTERNOON, TRANSMITTED
HEREWITH IS OUR LETTER REQUESTING AUTHORIZATION TO COMMENCE
TREATMENT IN ALACHUA COUNTY.

HARD COPY TO FOLLOW BY REGISTERD MAIL TODAY.

THANK YOU FOR YOUR UNDERSTANDING.



MOBILE RECLAIM INC.



**RETURN RECEIPT
REQUESTED**

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
BUREAU OF AIR REGULATION
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

ATTENTION: MR. C. H. FANCY, P.E.

P.O. Box 4189
Gainesville, FL 32613-4189



MOBILE RECLAIM INC.

JULY 16, 1991

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
BUREAU OF AIR REGULATION
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

ATTENTION: MR. C. H. FANCY, P.E.

RE: PERMIT NUMBER AC 01-179694

DEAR MR. FANCY:

AS PER ADMINISTRATIVE REQUIREMENT NUMBER 24, WE HEREBY REQUEST AUTHORIZATION TO TREAT PETROLEUM CONTAMINATED SOIL IN ALACHUA COUNTY, FLORIDA FOR ALACHUA COUNTY COMMENCING ON JULY 18, 1991 AT THE FOLLOWING SITE:

POP-A-TOP NO. 2 - 930 EAST UNIVERSITY AVENUE, GAINESVILLE
525 TONS - CONTAMINANT LEVELS ARE SHOWN ON ATTACHED SUMMARY

UPON COMPLETION OF THE ABOVE SITE, WE ARE SCHEDULED TO TREAT THE PETROLEUM CONTAMINATED SOIL AT THE FOLLOWING SITES AND ALSO REQUEST AUTHORIZATIONS TO DO SAME:

POP-A-TOP NO. 1 - 1030 S.E. 4TH AVENUE, GAINESVILLE
450 TONS - CONTAMINANT LEVELS UNKNOWN AT THIS TIME
(APPROXIMATE COMMENCEMENT DATE - JULY 24, 1991)

BIELLING SITE - 200 BLOCK OF NORTH JOHNSON STREET, HAWTHORNE
150 TONS - CONTAMINANT LEVELS UNKNOWN AT THIS TIME
(APPROXIMATE COMMENCEMENT DATE - JULY 30, 1991)

EDDIE'S GARAGE - HIGHWAY 301 NORTH, HAWTHORNE
900 TONS - CONTAMINANT LEVELS UNKNOWN AT THIS TIME
(APPROXIMATE COMMENCEMENT DATE - AUGUST 1, 1991)

AT THIS TIME WE HAVE NOT COMPLETED OUR COMPLIANCE STACK TEST. THE TEST IS SCHEDULED FOR MONDAY, JULY 22, 1991 AT THE POP-A-TOP NO. 2 SITE. WE WERE SCHEDULED TO COMPLETE THE TEST AT THE POP-A-TOP NO. 1 SITE ON THAT DATE BUT A SCHEDULING CONFLICT WILL REQUIRE US TO UTILIZE POP-A-TOP NO. 2 SITE.

PAGE 2
STATE OF FLORIDA D.E.R. BAR
JULY 16, 1991

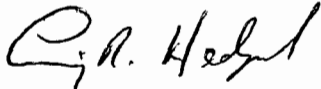
THE ABOVE PROJECTS ARE TO BE PERFORMED FOR ALACHUA COUNTY UNDER THE DIRECTION OF THEIR ENVIRONMENTAL CONSULTANT, ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC. THEREFORE, THE ALACHUA COUNTY ENVIRONMENTAL PROTECTION DEPARTMENT HAS APPROVED OUR CONTRACT. WE APOLOGIZE FOR THE SHORT NOTIFICATION TIME. HOWEVER, THE PRE-BURN TEST REPORTS WERE JUST PROVIDED TO US THIS MORNING.

BY COPY OF THIS LETTER, I AM ALSO NOTIFYING THE NORTHEAST DISTRICT BRANCH OFFICE OF OUR INTENTIONS.

THANK YOU FOR YOUR CONSIDERATION OF THIS REQUEST. SHOULD YOU HAVE ANY QUESTIONS OR DESIRE ANY ADDITIONAL INFORMATION, PLEASE DO NOT HESITATE TO CONTACT US.

RESPECTFULLY SUBMITTED,

MOBILE RECLAIM, INC.



BY: CRAIG R. HEDGECK, PE/PLS
VICE-PRESIDENT OF OPERATIONS

XC: NORTHEAST DISTRICT BRANCH OFFICE

Summary of Preburn Samples, Pop-A-Top II

Parameter	COMP-1	COMP-2	COMP-3
	PPB	PPB	PPB
Benzene	300	ND	ND
Toluene	N.D.	63	ND
Chlorobenzene	N.D.	N.D.	ND
Ethylbenzene	1300	ND.	590
styrene	ND	ND.	N.D.
Total Xylene	5800	89	1400
1,2-Dichlorobenzene	ND	ND	ND
1,3-Dichlorobenzene	ND	ND	ND
1,4-Dichlorobenzene	ND	ND	ND
MTBE	ND	ND	ND.
	PPM	PPM	PPM
Silver	N.D.	N.D.	ND
Arsenic	N.D.	N.D.	ND
Barium	N.D.	N.D.	ND
Cadmium	N.D.	N.D.	ND
Chromium	3.6	2.6	4.6
Mercury	N.D.	N.D.	N.D.
Lead	7.5	3.0	5.0
Selenium	N.D.	N.D.	N.D.
Total Recoverable Petroleum Hydrocarbons	128	99.5	122
Flashpoint	>65°C	>65°C	>65°C

 T R A N S M I T T A L M E M O

NO. OF PAGES	1
TO: Craig Hedgcock	FAX #: 373-4628
DEPT:	FROM: John Showairphone: 336-0444
	CO: ECT FAX #: 335-0373

Post-it brand fax transmittal memo 7871



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
AIR POLLUTION SOURCES
CERTIFICATE OF COMPLETION OF CONSTRUCTION*

PERMIT NO. AC 01-179694 DATE: December 20, 1990

Company Name: Mobile Reclaim, Inc. County: Statewide

Source Identification(s): 25 TPH Portable Rotary Kiln/Afterburner System

Actual costs of serving pollution control purpose: \$ ≈ \$140,000

Operating Rates: 20-25 TPH Design Capacity: 25 TPH

Expected Normal 20-25 TPH During Compliance Test 24.66

Date of Compliance Test: July 22, 1991 (Attach detailed test report)

Test Results:	Pollutant	Actual Discharge	Allowed Discharge
	PM	<u>0.535 gr/SCF - 2.52 lbs/Hr</u>	<u>0.08 gr/SCF - 5.1 lbs/Hr</u>
	VOC	<u>0.38 lbs/Hr</u>	<u>20 lbs/Hr - 6 lbs/Hr Benzene</u>
	VE	<u>0%</u>	<u>< 5%</u>

Date plant placed in operation: July 18, 1991

This is to certify that, with the exception of deviations noted**, the construction of the project has been completed in accordance with the application to construct and Construction Permit No. AC01-179694 dated December 20, 1990.

A. Applicant:
Arnold Dinkins
Name of Person Signing (Type)

W. Arnold Dinkins
Signature of Owner or Authorized Representative and Title

Date: _____ Telephone: (904) 373-4614

B. Professional Engineer:
Stephen L. Neck, P.E.
Name of Person Signing (Type)

Stephen L. Neck
Signature of Professional Engineer

Air Consulting and Engineering, Inc.
Company Name

Florida Registration No. 20020

Date: 7/26/91

2106 NW 67th Place, Suite 4
Gainesville, Florida 32606
Mailing Address

(Seal)

(904) 335-1889
Telephone Number

*This form, satisfactorily completed, submitted in conjunction with an existing application to construct permit and payment of application processing fee will be accepted in lieu of an application to operate.

**As built, if not built as indicated include process flow sketch, plot plan sketch, and updates of applicable pages of application form.

$$\text{Retention Time: } \frac{8309 \text{ SCFMD}}{839 \text{ FDA}} \times \frac{1885^\circ\text{R}}{528^\circ\text{R}} = 35356 \text{ ACFM}$$

$$289.34 \text{ Ft}^3 \text{ chamber } \frac{35356 \text{ Ft}^3}{\text{min.}} \times 60 = 0.5 \text{ seconds}$$

$$\text{Destruction Efficiency} = \frac{6.31 - 0.10}{6.31} \times 100 = 98.4\% \text{ after}$$



QUESTIONS? CALL 800-238-5335 TOLL FREE

PACKAGE TRACKING NUMBER

1170955251

1170955251

BEST AVAILABLE COPY

RECIPIENT'S COPY

Date: 9-9-91

From (Your Name) Please Print: **W. ARNOLD DINKINS**
 Your Phone Number (Very Important): **(904) 373-4614**
 To (Recipient's Name) Please Print: **MR. WILIARD HANKS**
 Recipient's Phone Number (Very Important): **904 488-1344**

Company: **MOBILE RECLAIM GROUP INC**
 Department/Floor No.:
 Company: **STATE OF FLORIDA BUREAU OF AIR REG.**
 Department/Floor No.:

Street Address: **4131 NW 13TH ST STE 105**
 Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.): **2600 BLAIR STONE ROAD**

City: **GAINESVILLE FL** State: **FL** ZIP Required: **3 2 6 0 9**
 City: **TALLAHASSEE FLORIDA** State: **FLORIDA** ZIP Required: **32399-2400**

OUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.)

IF HOLD FOR PICK-UP, Print FEDEX Address Here
 Street Address:
 City: State: ZIP Required:

PAYMENT: Bill Sender Bill Recipient's FedEx Acct. No. Bill 3rd Party FedEx Acct. No. Bill Credit Card
 Cash/Check

SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING (Check services required)		PACKAGES	WEIGHT in Pounds
Priority Overnight (every 1st business morning)	Standard Overnight (Delivery by next business afternoon)	1 <input type="checkbox"/> HOLD FOR PICK-UP (F&H in Box H)	2 <input checked="" type="checkbox"/> DELIVER WEEKDAY		
<input type="checkbox"/> YOUR PACKAGING	<input type="checkbox"/> YOUR PACKAGING	3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations)	4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge)		
<input type="checkbox"/> FEDEX LETTER*	<input type="checkbox"/> FEDEX LETTER*	5 <input type="checkbox"/>	6 <input type="checkbox"/> DRY ICE _____ Lbs	Total	Total
<input checked="" type="checkbox"/> FEDEX PAK*	<input type="checkbox"/> FEDEX PAK*	7 <input type="checkbox"/> OTHER SPECIAL SERVICE _____			
<input type="checkbox"/> FEDEX BOX	<input type="checkbox"/> FEDEX BOX	8 <input type="checkbox"/>	DIM SHIPMENT (Chargeable Weight)		
<input type="checkbox"/> FEDEX TUBE	<input type="checkbox"/> FEDEX TUBE	9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge)	<input type="checkbox"/> _____ lbs.		
Economy Two-Day (every 2nd business day)	Government Overnight (Reserved to authorized users only)	10 <input type="checkbox"/>	Received At:		
<input type="checkbox"/> ECONOMY	46 <input type="checkbox"/> GOVT LETTER	11 <input type="checkbox"/>	<input type="checkbox"/> Regular Stop	<input type="checkbox"/> Drop Box	
	41 <input type="checkbox"/> GOVT PACKAGE	12 <input type="checkbox"/> HOLIDAY DELIVERY (if allowed) (Extra charge)	<input checked="" type="checkbox"/> On-Call Stop	<input type="checkbox"/> BSC	
	80 <input type="checkbox"/> TWO-DAY FREIGHT**			<input type="checkbox"/> Station	

Emp. No. _____ Date _____ Federal Express Use
 Cash Received
 Return Shipment
 Third Party Chg To Del. Chg To Hold
 Street Address _____
 City _____ State _____ Zip _____
 Received By: _____
 Date/Time Received _____ FedEx Employee Number _____
 Release Signature: _____ Date/Time _____
 Emp. No. _____

REVISION DATE 4/91
 PART #137204 FXEM 7/91
 FORMAT #082
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STATE OF FLORIDA
 DEPARTMENT OF ENVIRONMENTAL REGULATION
Nº 151297

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Mobile Reclaim, Inc. Date Sept. 9, 1991
 Address 31615 NW 13th St, Gainesville, FL 32609 Dollars \$ 4,500.00
 Applicant Name & Address Arnold Dinkins, President, P.O. Box 4189, Gainesville
FL 32613-4189
 Source of Revenue Ch # 1749
 Revenue Code 001032 Application Number AO 01-202044
 By Patricia G. Adams

1-26-91
 Patty,
 You can send this to print shop now.
 make several extra copies. (I want to send 1 to Susan Thomas of EPA)
 I am send MRI a letter related to stack test which you can include with distribution of the application.

9-13-91
 Syd,
 Most of this is a test report on a soil remediation unit.
 Can you "skim" the report to see if it looks ok?

- destruction eff. < 95%
 - Sampling port does not meet the minimum criteria (1/2 dia, 2 dia)
 - Stack height does not meet the permit requirement.

und

Willard

MOBILE RECLAIM, INC.
3615 NW. 13TH ST. PH. 904-373-4614
GAINESVILLE, FL 32609

63-1024
631

9/4 1991

PAY TO THE ORDER OF

Florida Department of Environmental Regulation

\$ 1,500⁰⁰

Fifteen Hundred and no/100

DOLLARS

G/SB Gainesville State Bank
GAINESVILLE, FLORIDA 32602 Member FDIC

W. Arnold Dinkins

FOR

[Redacted]

Source Identification(s): 25 TPH Portable Rotary Kiln/Afterburner System

Actual costs of serving pollution control purpose: \$ ≈ \$140,000

Operating Rates: 20-25 TPH Design Capacity: 25 TPH

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Date plant placed in operation: July 18, 1991

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A. Applicant:
Arnold Dinkins
Name of Person Signing (Type)

W. Arnold Dinkins
Signature of Owner or Authorized Representative and Title

Date: Telephone: (904) 373-4614

B. Professional Engineer:
Stephen L. Neck, P.E.
Name of Person Signing (Type)
Air Consulting and Engineering, Inc.
Company Name

Stephen L. Neck
Signature of Professional Engineer
Florida Registration No. 20020
Date: 7/26/91

2106 NW 67th Place, Suite 4
Gainesville, Florida 32606
Mailing Address
(904) 335-1889
Telephone Number

(Seal)

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**As built, if not built as indicated include process flow sketch, plot plan sketch, and updates of applicable pages of application form.

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$289.34 \text{ Ft}^3 \text{ chamber} \times \frac{35356 \text{ Ft}^3}{\text{min.}} \times 60 = 0.5 \text{ seconds}$

Destruction Efficiency = $\frac{6.31 - 0.10}{6.31} \times 100 = 98.4\%$ after

Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. *Chair Nancy*
2. *Air Quality Room*
3. *306 F*
4. ~~*Bureau*~~

Remarks: *Willard
Pattis*

RECEIVED
NOV 6 1990
DER-BAQM

From: <i>Jris-ogc</i>	Date <i>11/06/90</i>
	Phone <i>8-9730</i>

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

JOHN N. AUSTIN,

Petitioner,

vs.

DOAH CASE NO. 90-5114
OGC CASE NO. 90-1130

MOBILE RECLAIM, INC., and
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION,

Respondents.

FINAL ORDER

On July 16, 1990, the State of Florida Department of Environmental Regulation ("Department") received a letter requesting an administrative hearing from Petitioner, John N. Austin ("Austin"). The letter challenged the Department's decision to issue Permit No. AC01-179694 to Mobile Reclaim, Inc., ("Mobile") to construct a portable soil remediation unit for operation throughout the state of Florida. Upon Mobile's Motion to Dismiss the Petition, the Hearing Officer entered an Order Dismissing the Petition With Leave to Amend. An amended petition was filed and Mobile again moved to dismiss it. On October 9, 1990, the Hearing Officer entered a Recommended Order of Dismissal of the Amended Petition. (Exhibit 1) Austin filed Exceptions to that Recommended Order.

On October 29, 1990, after Austin and Mobile reached a settlement concerning the issues herein, Austin filed a pleading titled "Petitioner's Motion To Withdraw His Amended

Best Available Copy

Petition For Administrative Proceeding And His Motion
Requesting Recommended Order Of Dismissal Be Set Aside."

(Exhibit 2) Because of the withdrawal of Austin's petition,
there are no further matters to consider. Therefore,

IT IS ORDERED:

The petition is hereby dismissed and the Department's
Northeast District Office is directed to issue Permit No.
AC01-179694 to Mobile Reclaim, Inc., consistent with the terms
of the parties Ancillary Agreement, as soon as possible.

Any party to this Order has the right to seek judicial
review of the Order 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 Order is filed with the clerk of the Department.

DONE AND ORDERED this 5 day of November, 1990, in
Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

RETURN AND ACKNOWLEDGEMENT

On this date, pursuant to S120.52
Florida Statutes, with the designated Depart-
ment Clerk, receipt of which is hereby acknow-
ledged.

Franky C. Carter 11-6-90
Clerk Date

Dale Twachtmann
DALE TWACHTMANN
Secretary

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy hereof has been furnished to:


John N. Austin
6356 Sundown Drive
Jacksonville, Florida 32244

Mr. W. Arnold Dinkins, President
Mobile Reclaim, Inc.
3120 Northwest 37th Street
Gainesville, Florida 32605

Diane K. Kiesling, Hearing Officer
Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, Florida 32399-1550

by U.S. Mail on this 6th day of November, 1990.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



WILLIAM H. CONGDON
Assistant General Counsel

2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-9730

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

JOHN N. AUSTIN,

Petitioner,

vs.

CASE NO. 90-5114

MOBILE RECLAIM, INC., and
DEPARTMENT OF ENVIRONMENTAL
REGULATION,

Respondents.

RECOMMENDED ORDER OF DISMISSAL

This cause comes on for consideration on the Motion to Dismiss the Amended Petition of John N. Austin, Objecting to the Issuance by the Co-Respondent, State of Florida Department of Environmental Regulation, of a Permit, with Statewide Application, Pursuant to the Application by Respondent, Mobile Reclaim, Inc., in Such Regard [sic] filed by Mobile Reclaim, Inc. By its Motion, Mobile Reclaim apparently seeks the dismissal of the Amended Petition filed by John N. Austin. Petitioner Austin filed no response to the Motion to Dismiss. Upon consideration, it is found:

1. By Order Granting Motion to Dismiss and Leave to Amend dated August 30, 1990, the undersigned dismissed the petition filed by Austin and granted leave to file an amended petition "stating allegations which adequately support the standing of Petitioner to bring this action."

2. The Amended Petition was timely filed on September 17, 1990. The Amended Petition incorporated the original petition in its entirety into the Amended Petition. It also set forth a number of general allegations regarding the potential adverse affects of the proposed project on the air and water quality and the natural environment of Duval County and other counties in Florida.

3. The Amended Petition then went on to argue extensively that Petitioner has standing to bring the action under Agrico Chemical Company v. Department of Environmental Regulation, 406 So.2d 478 (Fla. 2d DCA 1981) and its progeny.

4. The Amended Petition mentions sections of Chapter 403, Florida Statutes, but simply states that the interests alleged by Austin fall within the zone of interest of that chapter.

5. The Amended Petition is not filed pursuant to Chapter 403 and is not a verified petition.

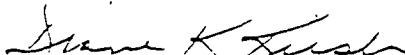
6. The Amended Petition contains no allegations of fact to support Austin's standing which were not already contained in the original petition which was dismissed.

Based on the foregoing, it is concluded that the Motion to Dismiss the Amended Petition is well founded and should be granted. The Amended Petition contains insufficient allegations to show standing under Section 120.57(1), Florida Statutes. The Amended Petition is inadequate as a matter of law to establish standing to bring this action under Chapter 403 and is not verified.

For the foregoing reasons, it is

RECOMMENDED that the Department of Environmental Regulation enter a Final Order and therein DISMISS the Amended Petition filed by John N. Austin.

DONE and ORDERED this 9th day of October, 1990, at Tallahassee, Florida.


DIANE K. KIESLING, Hearing Officer
Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, Florida 32399-1550
(904) 488-9675

Filed with the Clerk of the Division
of Administrative Hearings this 9th
day of October, 1990.

Copies furnished to:

Henry L. Gray, Jr.
Attorney at Law
Post Office Box 23879
Gainesville, FL 32602

William H. Congdon
Assistant General Counsel
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Leslie Goller Dillingham
Attorney at Law
2644 Hedrick Street
Jacksonville, FL 32205

Dale H. Twachtman, Secretary
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Case No. 90-5114

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

RECEIVED
OCT 30 1990

JOHN N. AUSTIN,)
)
Petitioner,)
)
vs.)
)
MOBILE RECLAIM, INC., and)
DEPARTMENT OF ENVIRONMENTAL)
REGULATION,)
)
Respondents.)
_____)

Dept. of Environmental Reg.
Office of General Counsel

CASE NO. 90-5114

PETITIONER'S MOTION TO WITHDRAW HIS
AMENDED PETITION FOR ADMINISTRATIVE
PROCEEDING AND HIS MOTION REQUESTING
RECOMMENDED ORDER OF DISMISSAL BE SET ASIDE

Petitioner, John N. Austin, by and through his undersigned attorney, hereby moves to withdraw his Amended Petition for Administrative Proceeding upon the issuance of an air pollution permit to Mobile Reclaim, Inc., and his Motion Requesting Recommended Order of Dismissal Be Set Aside. This motion is conditional on the addition of the Special Conditions enumerated in the Ancillary Agreement, attached to and marked as Exhibit A, to the construction and operating permits issued by the Department of Environmental Regulation to Mobile Reclaim, Inc., and the satisfaction by Mobile Reclaim, Inc. of all terms and conditions contained in the Ancillary Agreement.

Respectfully Submitted,

Leslie Goller Dillingham

LESLIE GOLLER DILLINGHAM
Florida Bar No. 393932
3644 Hedrick Street
Jacksonville, Florida 32205
(904) 388-8968
Attorney for Petitioners

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. Mail to Secretary Dale Twachtmann, Florida Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; Henry L. Gray, Jr., Esq., Chandler, Gray, Lang & Haswell, P.A., Post Office Box 23879, Gainesville, Florida 32602; William H. Congdon, Esq., Assistant General Counsel, Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; Diane K. Kiesling, Hearing Officer, Division of Administrative Hearings, The DeSoto Building, 1230 Apalachee Parkway, Tallahassee, Florida 32399-1550, this 20th day of October, 1990.

Leslie Goller Dillingham
Attorney

EXHIBIT A

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

RECEIVED
OCT 28 1990

Dept. of Environmental Reg.
Office of General Counsel

JOHN N. AUSTIN,

Petitioner,

vs.

Case No. 90-5114
(OGC Case No. 90-1130)

MOBILE RECLAIM, INC. and
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION,

Respondents.

ANCILLARY AGREEMENT BETWEEN JOHN N. AUSTIN
AND MOBILE RECLAIM, INC.

This Ancillary Agreement, made this 24th day of October, 1990, by and between JOHN N. AUSTIN, Petitioner ("AUSTIN"), and Respondent, MOBILE RECLAIM, INC. ("MOBILE"), in settlement of the issues raised by AUSTIN in his Amended Petition objecting to the issuance by the Co-Respondent, STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION ("DER"), of a permit, with statewide application, pursuant to the application by Respondent, MOBILE, in such regard;

W I T N E S S E T H

WHEREAS, heretofore, AUSTIN instituted this proceeding by filing a hand-written petition, pro se, objecting to the issuance by the Co-Respondent, DER, of a permit with statewide application, pursuant to the application by Respondent, MOBILE, in such regard, and,

WHEREAS, MOBILE filed and served its Motion to Dismiss AUSTIN's Petition, and

WHEREAS, pursuant to such Motion to Dismiss, the Hearing

Officer rendered an order granting MOBILE's Motion to Dismiss with Leave to Amend on August 30, 1990, and

WHEREAS, AUSTIN, through counsel, then filed his Amended Petition objecting to the issuance of the Permit for which MOBILE has applied, and

WHEREAS, MOBILE thereupon responded thereto by filing its Motion to Dismiss such Amended Petition, and

WHEREAS, the Hearing Officer on October 9, 1990, rendered her Recommended Order of Dismissal of such Amended Petition, to which AUSTIN has now filed Exceptions, and

WHEREAS, on October 16, 1990, counsel for AUSTIN and MOBILE, together with representatives of the parties, met for the purpose of discussing (and in a joint effort to amicably resolve) all issues raised by AUSTIN's objections to DER's issuance to MOBILE of said Permit pursuant to MOBILE's application therefor, and

WHEREAS, pursuant to negotiations and discussions which have ensued between the Petitioner (AUSTIN) and the Respondent (MOBILE), they have reached this Ancillary Agreement incident to such objections and a resolution thereof as follows:

NOW, THEREFORE, it is agreed:

1. MOBILE's operation of its soil remediation unit in the State of Florida is conditioned upon the baghouse and the afterburner of the unit being fully operational, as demonstrated by continuous monitoring instrumentation upon the unit. This provision shall be included by DER as a special condition of the Permit.

2. Within five days of placing the unit in commercial operation in Florida, MOBILE shall test samples of the unit's baghouse dust in order to ascertain contaminant levels. MOBILE shall collect dust samples at one-half hour intervals during the compliance testing. The incremental samples shall be composited and tested by TCLP methods for toxic metal contaminants. The samples of the mixed soil and baghouse dust shall also be composited and tested in the manner above-described. The above test results shall be provided to DER and AUSTIN within 5 days of receipt. If levels of TCLP contaminants exceed the levels listed in 40 CFR 261, the test materials shall be handled as required by law under RCRA, CERCLA, or other applicable programs. If either sample regime shall indicate levels of TCLP contaminants in excess of those listed in 40 CFR 261, then a panel of DER and MOBILE representatives shall discuss and determine appropriate operating procedures for the unit. AUSTIN shall be notified at least five days prior to the meeting of such panel. Recommendations and directives of the panel shall be added to MOBILE's permit as a special condition, as required by DER.

3. MOBILE shall perform its own maintenance upon the soil remediation unit and have quarterly inspections performed by a qualified representative of the manufacturer, complying with recommendations made by the manufacturer regarding any additional maintenance, if and when necessary. This provision shall be included by DER as a special condition of the Permit.

4. "Reasonable assurance" that the soil is contaminated with

only virgin and/or "on specification" petroleum products, and not classified as a hazardous waste pursuant to the federal regulations cited in Specific Condition No. 14 of the proposed Permit, may be obtained by the sampling of the soil, by certification from owners regarding the history of the site, or by any other documentation or submission approved by the DER in such regard; PROVIDED, however, that MOBILE's standard of performance shall not exceed any objective standard utilized by the DER in the State of Florida for providing "reasonable assurance." This provision shall be included by DER as a special condition of the Permit.

5. AUSTIN shall forthwith dismiss his Petition concerning issuance by the DER of a permit to MOBILE to construct (and subsequently operate) a 25 TPH soil remediation unit for operation throughout the State of Florida and withdraw forthwith his Motion Requesting Recommended Order of Dismissal (by the Hearing Officer) be set aside. Such dismissal shall be with prejudice as to all counties within the State of Florida except Duval County. Such dismissal shall be without prejudice as the same relates to his objection to the operation of such unit within Duval County, Florida. Attached hereto as Exhibit A to this Agreement is a true copy of a draft of such permit, reflecting Permit No. AC 01-179694, for statewide operation, and reflecting, on page 1, that "the unit may be used throughout the state (all counties) after receiving Department authorization to operate at a new location. MOBILE's utilization of such unit in Duval County shall abide MOBILE's fulfillment of the obligations hereinafter set forth in paragraphs

2, 6, and 7 hereof.

6. MOBILE will provide AUSTIN and DER with New York test results documenting actual performance of a functionally identical unit within seven days of the test results becoming a public record in the State of New York.

7. MOBILE shall notify AUSTIN in writing at least seven days prior to placing MOBILE's unit in commercial operation in the State of Florida. AUSTIN's engineer is authorized to make an on-site inspection of the unit and monitor compliance testing thereof. Such on-site inspection of the unit shall be limited to observation and certification that the compliance testing is conducted in a manner which will provide valid data for examination by AUSTIN or his agents. Compliance testing will not be discontinued, nor interrupted, nor will the unit be measured nor disassembled for inspection. It may, however, be photographed.

8. The parties, and each of them, expressly waive the assessment of attorneys' fees or costs against the other party, pursuant to statute, rule of court, or otherwise.

IN WITNESS WHEREOF, AUSTIN and MOBILE, through counsel, have agreed to the provisions hereof on October 24, 1990, and have executed this Agreement on the dates noted.

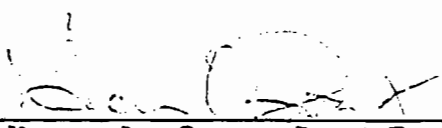
October 25, 1990

Leslie Goller Dillingham
Leslie Goller Dillingham, Esq.
Fla. Bar No. 393932
3644 Hedrick Street
Jacksonville, FL 32205
(904) 388-8968
Attorney for John N. Austin

CHANDLER, GRAY, LANG & HASWELL, P.A.

October 24, 1990

By:

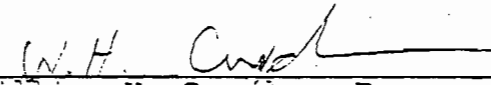

Henry L. Gray, Jr., Esq.
Fla. Bar No. 0030969
211 N.E. 1st Street
PO Box 23879
Gainesville, FL 32601
(904) 376-5226
Attorney for Mobile Reclaim,
Inc.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION hereby
consents and agrees to the above.

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

October 26, 1990

By:


William H. Congdon, Esq.
Fla. Bar No. 283606
Assistant General Counsel
2600 Blair Stone Road
Tallahassee, FL 32399-2400
(904) 488-9730
Attorney for State of Florida
Department of Environmental
Regulation

MOBILE\AUSTIN\ANCAGREE



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Barry Andrews, BAR
Clair Fancy, BAR
Gary Smallridge, OGC

FROM: Willard Hanks *wh*

DATE: August 13, 1990

SUBJ: Hearing Request on Soil Remediation Units Statewide Permits

Mr. Herbert Huelsman has requested a hearing on the proposed air construction permits Nos. AC 16-180823 and -180824 for EnviroTech SE, Inc. and Mr. John Austin has requested a hearing on the same permits and permit No. AC 01-179694 for Mobile Reclaim, Inc. I do not believe the issues will be resolved prior to the hearings. I have outlined the issues mentioned in the hearing requests and commented on each issue.

I recommend that the Department staff that may be involved in the proceedings meet soon to plan and coordinate our position on this matter. If each of you will tell me what dates (through the middle of September) that you are and are not available for such a meeting, I will try to schedule one at a time we can all attend.

WH/plm

Attachment

Comments	Responses
<p style="text-align: center;">Material Facts Disputed</p> <p>1) Units will not reach temperatures needed to decontaminate soil (evaporate petroleum or incinerate in afterburner).</p> <p>2) Emissions greater 1 gram/second and ambient air impact greater than $12.1 \times 10^{-3} \text{ ug/m}^3$.</p> <p>3) Max. BTEX greater than stated in evaluation.</p> <p>4) Less 20,000 PPM VOC can be treated in SRU.</p> <p>5) VOC emissions greater than 99.98 TPY.</p> <p>6) DER unable to restrict benzene and VOC content of the soil. Unit will cause AAQS and health hazard problems.</p> <p>7) F.A.C. Chapter 17-2 will be violated.</p>	<p>Satisfactory operation to be based on tests. BTEX analysis on soil before and after treatment. DE of afterburner.</p> <p>Units will emit 2.9 g/s VOC. Each 1 g/s emission has an AAQ impact of $12.1 \times 10^{-3} \text{ ug/m}^3$ (8 hr. avg.) according to the EPA Screening Model.</p> <p>Basic material balance showed soils containing 542,877^{270,000} PPM xylene can be treated without exceeding AAC. ²⁷ Unlikely soil will be 54.3% xylene. Expected 2% total VOC in soil (uncontrollable).</p> <p>Material balance shows 20,000 PPM VOC in 25 TPH soil can be handled with 97.71% AB without exceeding 22.89 lbs/hr VOC emissions.</p> <p>Limits in permit restrict unit to 99.98 TPY VOC emission.</p> <p>DER is unable to control contaminants in soil but does restrict their treatment in SRU when specified conc. are exceeded. No AAQS or health problem with emission limits specified.</p> <p>Compliance with permit restriction results in compliance with rule.</p>
<p style="text-align: center;">Reversal/Modification Requested</p> <p>1) Temperature required to decontaminate soil not specified.</p> <p>2) Max. Press. drop baghouse not specified.</p>	<p>DER not concerned with quantity propane burned and will raise heat input if needed to properly treat 25 TPH soil.</p> <p>High press. drop restricts capacity. DER concerned with emissions. Feel VE tests best indicator baghouse performance.</p>

- 3) Afterburner will not achieve 1600°F and 97.71% destruction (S.C. #3). VE exceeds 5% opacity (S.C. #4). Emissions will exceed 4.7 lbs BZ/hr and 22.89 lbs VOC/hr (S.C. #5).

Not enough propane burned for afterburner to reach 1600°F.

Objectionable odors caused by incomplete combustion.

VOC emissions will exceed 100 TPY, subjecting source to new regulations.

- 4) Spec. for impermeable surface to store soil and protective measures for liner not given.
- 5) DER does not list chemicals that cannot be treated in SRU.
- 6) Additives in virgin petroleum projects not addressed.
- 7) Level of contaminants in virgin petroleum product not addressed as it did for "on-spec" oil.
- 8) Level of other contaminants that may be present are not addressed.
- 9) Does not restrict employee to 8 hr work day that OEL based on.
- 10) Site could be cleaned up before the DER confirmed prohibited soils not treated.

97.71% destruction efficiency and emission limits are requirements that must be proved by tests. 1600°F is not an operation requirement. Practice is to specify temperature compliance test performed at as minimum. Test will show if emission stds. met.

If more fuel and higher temperature is needed to properly treat soil, DER will amend permit.

Incomplete combustion will not be a problem with a properly designed and operated unit. If problem, will violate std. in permit.

If unit has potential to exceed 100 TPY VOC emissions, permit will be amended by adding additional restrictions.

Expect applicant to use reasonable precautions to prevent additional soil contamination. If fails to (BWC rule violation), it endangers air permit.

CFR includes list ch. that cannot be treated. Intended to limit SRU to gasoline, diesel fuel, and motor oil contaminated soil. DER will clarify.

Products normally burned and additives not considered a problem.

See above (6) "On-spec" same spec. as virgin petroleum oil.

See above (5)

Toxic eval. limit exposure of public to small % OEL. No limit on employee exposure (OSHA regulates).

Permittee must obtain permission from DER before treating "off-spec" oil. Analysis required prior to treatment.

Statement of Relief

- 1) Unit unable to achieve temperatures needed to operate at (1600°F).
- 2) Provide burners to achieve temperatures.
- 3) Address other concerns listed.

1600°F operation temp. not a requirement (97.71% DE is). Test confirm performance.

DER modify permit if different burners/add. fuel req'd.

See all of above

Comments	Responses
1) SRU will adversely affect air and water quality by air pollution.	Emission comply with regulations. Purpose of unit is to clean soil to prevent ground water pollution.
2) Emissions contain heavy metals, VOC, dioxins, furans which harm health.	At allowable emission levels, emissions of trace material should not create a health hazard.
3) Dust from baghouse added to finished product contaminating the ground and drinking water.	Dust is basically same material as treated soil. Analysis required to show it meets BWC standards prior to disposal.
4) LAER not applied.	LAER only applies to major sources (100 TPY + emissions) operating in nonattainment areas.
5) VOC not listed as a nonattainment pollutant.	No area designation for VOC in rule. VOC regulated in O ₃ nonattainment areas.
6) New Source Performance Standard not applied.	No applicable NSPS for SRU. PM emission standard based on NSPS for incinerators.
7) No time requirement to test after-burner for VOC and benzene emissions (S.C. #22).	Compliance test must be done prior to expiration of the construction permit (see last S.C.).
8) Want testing at each site.	BETX (min) and VE test required at each site believed to be adequate.
9) Objects to S.C. #3 that says after-burner capable of 1600°F. Wants temp. specified.	Afterburner temperature not specified in construction permit. Policy is to set minimum temp. based on test that shows compliance with permit.
10) Ask for 1800°F minimum temp. and 1 second retention time (S.C. #3).	Min. temp. based on tests. Will become condition of operation permit.
11) Object to continuous operation (S.C. #11) which is impossible.	Continuous operation impossible but if unit operated continuously, it would still be in compliance with regulations. If time restrictions imposed, unit may be able to emit more pollutant hourly.

Hearing Request by Mr. John Austin
Mobile Reclaim, Inc. - Permit No. AC 01-179694

Comments	Responses
1) No plans for baghouse included in the application. Won't comply with regulations without baghouse.	Baghouse "specs" in application. PM control is needed to comply with rule.
2) Objects (S.C. #3) not giving specific afterburner temperature.	Min. temp. will be established during compliance tests.
3) Wants 1800°F instead of 1400°F afterburner temp.	Test will show temp. needed to comply. Could be below 1400°F (auto combustion of BZ = 1076°F).
4) Wants 1 second instead of 0.5 second retention time for the afterburner.	Afterburner must meet 95% DE. Test confirm if it can. DE function of time, temp., and turbulence.
5) Objects to 4.7 lbs/hr benzene emission (S.C. #5).	AAC met at 4.7 lbs/hr BZ.
6) Objects (S.C. #11) which allows continuous operation which is impossible.	Unit complies with rule when operated continuously. Time restrictions could allow higher emission and still comply with rules.
7) Objects (S.C. #14) that certification only needed for virgin petroleum products instead of testing.	DER believes certif. adequate for abandon service stations, spills, terminals, etc. Permit requires additional tests where justified.
8) Objects (S.C. #21) which requires only annual test PM and VE. Wants testing at each site.	Annual test consistent with rules and policy. VE test at each site.
9) Objects (S.C. #22) no time required to do compliance tests.	Compliance test must be done prior to the expiration date of the construction permit (see last S.C.).
10) Concluded application fails to provide reasonable assurance that it will comply with regulations.	If SRU complies with permit restrictions, it will be in compliance with all applicable rules.

12) Objects (S.C. #14) on reasonable assurance soil contains virgin petroleum product only. Wants test results.

13) Objects (S.C. #21) on annual requirement only for PM and VE.

14) Objects to baghouse soil being dumped on treated soil.

DER believes this is adequate for abandoned service station site, spills, terminals, etc. Permit requires additional test where justified.

Annual test consistent with rule/policy. VE tests at each site. Can require test anytime violation suspected.

Same material. Tests required prior to disposal.

Mr. Barry Andrews
July 24, 1990

Page 2

13. The News Journal, Pensacola, FL, published July 2, 1990.

These proofs of publication are being submitted to you pursuant to the above-referenced file, upon receipt, this date, of the last of the proofs of the publication from the newspapers as set forth hereinabove.

We have received no information, whatsoever, from any source regarding objections to, or inquiries concerning, the application process. Trusting everything herein set forth is satisfactory, and that the permit application will be acted upon favorably, I am

Very truly yours,

CHANDLER, GRAY, LANG & HASWELL, P.A.



Henry L. Gray, Jr.

Enclosures

HLG/kwb
cc: Mobile Reclaim, Inc.
MOBILE\ANDREWS.LTR

PENSACOLA News Journal

PUBLISHED DAILY PENSACOLA, ESCAMBIA COUNTY, FLORIDA

RECEIVED

State of Florida, County of Escambia.

JUL 25 1990

Before the undersigned authority personally appeared

Cindy Vance who on oath says that she is Legal Advertising Supervisor of the Pensacola News Journal, a daily newspaper published at Pensacola in Escambia County, Florida; with general circulation in Escambia, Santa Rosa, Okaloosa and Walton Counties that the attached copy of advertisement, being a NOTICE in the matter of

Intent to Issue

in the Court.

was published in said newspaper in the issues of

July 2, 1990

Affiant further say that the said The 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 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.

Cindy Vance

Sworn to and subscribed before me this 5th

day of July, 1990

[Signature]

NOTARY PUBLIC.

State of Florida Department of Environmental Regulation Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (AC 01-179694) to construct a 25 TPH soil remediation unit with air pollution controlled by a baghouse and afterburner to Mobile Reclaim, Inc., 3120 NW 37th Street, Gainesville, Florida 32605. Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) determinations were not required. The unit may emit 22.5 TPY particulate matter, 87.6 TPY VOC, 60.1 TPY SO2, and 17.6 TPY NOx. 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 fourteen (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 application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation Bureau of Air Regulation 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Department of Environmental Regulation
Southwest District
4520 Oaks Fair Boulevard
Tampa, Florida 33610-7347

Department of Environmental Regulation
South District
2269 Bay Street
Ft. Myers, Florida 33901-2896

Department of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Department of Environmental Regulation
Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Department of Environmental Regulation
Southeast District
1900 S. Congress Avenue, Suite A
West Palm Beach, Florida 33406

Broward County Environmental
Quality Control Board
621 South Andrews Avenue
Ft. Lauderdale, Florida 33310

Dade County Dept. of Environmental
Resources Management
Jose Marti Building
801 S. W. 3rd Avenue, 2nd Floor
Miami, Florida 33130

Duval County Dept. of Health, Welfare
& Bio-Environmental Services
421 West Church Street, Suite 412
Jacksonville, Florida 32202

Hillsborough County Environmental
Protection Commission
1410 North 21st Street
Tampa, Florida 33605

Palm Beach County Health Dept.
Division of Environmental Science
and Engineering
901 E. Evernia Street
West Palm Beach, Florida 33402

Pinellas County Department of
Environmental Management
315 Court Street
Clearwater, Florida 34616

Sarasota County Environmental
Services Department
1301 Cattleman Road
Sarasota, Florida 33582-9631

Orange County Environmental
Protection Department
2002 E. Michigan Avenue
Orlando, Florida 32806

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

Legal No. 37960 1T
July 2, 1990

The News-Journal

Published Daily and Sunday
Daytona Beach, Volusia County, Florida

RECEIVED

JUL 25 1990

State of Florida,
County of Volusia:

Before the undersigned authority ^{DER - BAOM} personally appeared
C. Morgan Miller

who, on oath says that he is.....
Classified Manager

of The News-Journal, a daily and Sunday newspaper, published
at Daytona Beach in Volusia County, Florida; that the
attached copy of advertisement, being a.....

Intent to Issue

in the matter of.....
Mobile Reclaim Inc.

in the.....Court, was published

in said newspaper in the issues.....
July 2, 1990

Affiant further says that The News-Journal is a newspaper
published at Daytona Beach, in said Volusia County, Florida,
and that the said newspaper has heretofore been continuously
published in said Volusia County, Florida, each day and
Sunday and has been entered as second-class mail matter at the
post office in Daytona Beach, in said Volusia 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 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.

C. Morgan Miller

Sworn to and subscribed before me

this 2nd day of July

A.D. 1990

Patricia L. Bay

NOTARY PUBLIC, State of Florida at Large
My Commission Expires December 30, 1990
Bonded By AMERICAN PIONEER CASUALTY INS. CO.



State of Florida
Department of
Environmental Regulation
Notice of Intent to Issue

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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 fourteen (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 application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Northwest Division
160 Governmental Center
Pensacola, Florida 32501-5794

Department of Environmental Regulation
Southwest Division
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

PROOF OF PUBLICATION

IN RE

NEWS-JOURNAL CORPORATION
Daytona Beach, Florida
Publication Fee, \$

BEST AVAILABLE COPY

Department of Environmental
Regulation
South District
2269 Bay Street
Ft. Myers, Florida 33901-2896

Department of Environmental
Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Department of Environmental
Regulation
Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Department of Environmental
Regulation
Southeast District
1900 S. Congress Avenue, Suite A
West Palm Beach, Florida 33406

Broward County Environmental
Quality Control Board
621 South Andrews Avenue
Ft. Lauderdale, Florida 33310

Dade County Dept. of Environmental
Resources Management
Jose Marti Building
801 S.W. 3rd Avenue, 2nd Floor
Miami, Florida 33130

Duval County Dept. of Health, Wel-
fare & Bio-Environmental Services
421 West Church Street, Suite 412
Jacksonville, Florida 32202

Hillsborough County Environmental
Protection Commission
1410 North 21st Street
Tampa, Florida 33605

Palm Beach County Health Dept.
Division of Environmental Science
and Engineering
901 E. Evernia Street
West Palm Beach, Florida 33402

Pinellas County Department of
Environmental Management
315 Court Street
Clearwater, Florida 34616

Sarasota County Environmental
Services Department
1301 Cattleman Road
Sarasota, Florida 33582-9631

Orange County Environmental
Protection Department
2002 E. Michigan Avenue
Orlando, Florida 32806

Any person may send written com-
ments on the proposed action to Mr.
Barry Andrews at the Department's
Tallahassee address. All comments
mailed within 14 days of the publica-
tion of this notice will be considered
in the Department's final determina-
tion.

Legal 548. July 2, 1990 It

RECEIVED

JUL 25 1990

DER - BAQM

THE TAMPA TRIBUNE

Published Daily
Tampa, Hillsborough County, Florida

State of Florida
County of Hillsborough } ss.

Before the undersigned authority personally appeared
R. Putney, who on oath says that he is Accounting Manager of The Tampa
Tribune, a daily newspaper published at Tampa in Hillsborough County, Flori-
da; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of

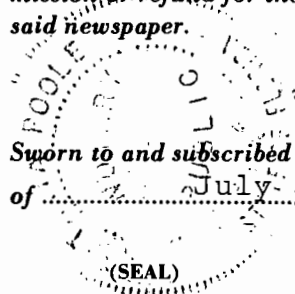
BAGHOUSE

was published in said newspaper in the issues of

July 2, 1990

Affiant further says that the said The Tampa Tribune is a newspaper published at
Tampa, in said Hillsborough County, Florida, and that the said newspaper has here-
tofore been continuously published in said Hillsborough County, Florida, each day
and has been entered as second class mail matter at the post office in Tampa, in said
Hillsborough County, Florida, for a period of one year next preceding the first pub-
lication of the attached copy of advertisement; and affiant further says that he has
neither paid nor promised any person, firm, or corporation any discount, rebate, com-
mission or refund for the purpose of securing this advertisement for publication in the
said newspaper.

Sworn to and subscribed before me, this 6 day
of July, A.D. 19 90



Signature of R. Putney

Janya Poole
Notary Public, State of Florida
My Commission Expires Sept. 8, 1992
Bonded Thru Troy Fain - Insurance Inc.

State of Florida
Department of
Environmental Regulation
Notice of Intent to Issue
The Department of Environ-
mental Regulation hereby
gives notice of its intent to
issue a permit (AC 01-179694)
to construct a 25 TPH soil
remediation unit with air pollu-
tion controlled by a baghouse
and afterburner to Mobile
Reclaim, Inc., 3120 NW 37th
Street, Gainesville, Florida
32605. Best Available Control
Technology (BACT) and Low-
est Achievable Emission Rate
(LAER) determinations were
not required. The unit may
emit 22.5 TPY particulate mat-
ter, 87.6 TPY VOC, 60.1 TPY
SO2, and 17.6 TPY Nox. These
emissions will not cause a
violation of any ambient air
quality standard or Preven-
tion of Significant
Deterioration (PSD)
Increment. The Department is
issuing this intent to issue for
the reasons stated in the Tech-
nical Evaluation and Prelimi-
nary Determination.
A person whose substantial
interests are affected by the
Department's proposed per-
mitting decision may petition
for an administrative proceed-
ing (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 Gen-
eral Counsel of the Depart-
ment at 2600 Blair Stone Road,
Tallahassee, Florida 32399-
2400, within fourteen (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 waver
of any right such person
may have to request an admin-
istrative 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 Depart-
ment Permit File Number and
the county in which the proj-
ect is proposed;
(b) A statement of how and
when each petitioner received
notice of the Department's ac-
tion or proposed action;
(c) A statement of how each
petitioner's substantial
interests are affected by the
Department's action or pro-

posed action,
(d) A statement of the mate-
rial facts disputed by
Petitioner, if any;
(e) A statement of facts
which petitioner contends
warrant reversal or modifica-
tion of the Department's ac-
tion or proposed action;
(f) A statement of which
rules or statutes petitioner
contends require reversal or
modification of the Depart-
ment's action or proposed ac-
tion; and
(g) A statement of the relief
sought by petitioner, stating
precisely the action petitioner
wants the Department to take
with respect to the Depart-
ment's action or proposed ac-
tion.
If a petition is filed, the ad-
ministrative hearing process
is designed to formulate agen-
cy action. Accordingly, the
Department's final action may
be different from the position
taken by it in this Notice. Per-
sons whose substantial
interests will be affected by
any decision of the Depart-
ment with regard to the applica-
tion have the right to
petition to become a party to
the proceeding. The petition
must conform to the require-
ments 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 waver
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 application 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 Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida -
32399-2400
Dept. of
Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida
32501-5794
Department of
Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347
Department of
Environmental Regulation
South District
2269 Bay Street
Ft. Myers, Florida
33901-2896
Department of
Environmental Regulation
Northeast District
3426 Billis Road
Jacksonville, Florida
32207
Department of
Environmental Regulation
Central District
3319 Maguire Blvd.,
Suite 232
Orlando, Florida
32803-3767
Department of
Environmental Regulation
Southeast District
1900 S. Congress Avenue,
Suite A
West Palm Beach,
Florida 33406
Broward County
Environmental
Quality Control Board
621 South Andrews Avenue
Ft. Lauderdale, Florida
33310
Dade County Dept. of
Environmental
Resources Management
Jose Marti Building
801 S.W. 3rd Avenue,
2nd Floor
Miami, Florida 33130
Duval County Dept. of
Health, Welfare
& Bio-Environmental
Services
421 West Church Street,
Suite 412
Jacksonville, Florida 32202
Hillsborough County
Environmental
Protection Commission
1410 North 21st Street
Tampa, Florida 33605
Palm Beach County Health
Dept. Division of
Environmental Science
and Engineering
901 E. Evernia Street
West Palm Beach, Florida
33402
Pinellas County Department
of Environmental
Management
315 Court Street
Clearwater, Florida 34616
Sarasota County
Environmental
Services Department
1301 Cattleman Road
Sarasota, Florida 33582-9631
Orange County
Environmental Protection
Department
2002 E. Michigan Avenue
Orlando, Florida 32806
Any person may send writ-
ten comments on the pro-
posed action to Mr. Barry An-
drews at the Department's
Tallahassee address. All
comments mailed within 14
days of the publication of this
notice will be considered in
the Department's final determi-
nation.
3399 7/2/90

SARASOTA HERALD-TRIBUNE
PUBLISHED DAILY
SARASOTA, SARASOTA COUNTY, FLORIDA

AD NUMBER 11658492

RECEIVED

JUL 25 1990

DER-BAQM

CHANDLER, GRAY & LANG
ATTN: HENRY L. GRAY, JR.
POST OFFICE BOX 23879
GAINESVILLE, FL 32602

STATE OF FLORIDA
COUNTY OF SARASOTA

BEFORE THE UNDERSIGNED AUTHORITY PERSONALLY APPEARED
VALENTINAS L. KURAPKA, WHO ON OATH SAYS HE IS CLASSIFIED
ADVERTISING MANAGER OF THE SARASOTA HERALD-TRIBUNE, A
DAILY NEWSPAPER PUBLISHED AT SARASOTA, IN SARASOTA COUNTY
FLORIDA; AND CIRCULATED IN SARASOTA COUNTY DAILY; THAT
THE ATTACHED COPY OF ADVERTISEMENT, BEING A NOTICE IN
THE MATTER OF: STATE OF FLORIDA

IN THE COURT, WAS PUBLISHED IN SARASOTA EDITION
OF SAID NEWSPAPER IN THE ISSUES OF:

JUL 2, 1990

AFFIANT FURTHER SAYS THAT THE SAID SARASOTA HERALD-
TRIBUNE IS A NEWSPAPER PUBLISHED AT SARASOTA, IN SAID
SARASOTA COUNTY, FLORIDA, AND THAT THE SAID NEWSPAPER
HAS THERETOFORE BEEN CONTINUOUSLY PUBLISHED IN SAID
SARASOTA COUNTY, FLORIDA, EACH DAY, AND HAS BEEN
ENTERED AS SECOND CLASS MAIL MATTER AT THE POST OFFICE IN
SARASOTA, IN SAID SARASOTA 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 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.

SIGNED

Valentinus Kurapka

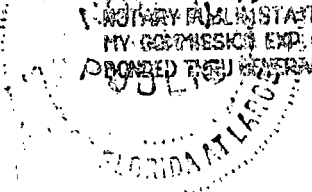
SWORN TO AND SUBSCRIBED BEFORE ME THIS 2ND DAY OF
JULY A.D., 1990.

(SEAL)

Notary Public

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXPIRES OCT. 11, 1992
BONDED TO THE GENERAL INS. CO.

NOTARY PUBLIC



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

The Department gives notice of its intent to issue a (AC 01-179694) to construct a 25 TPH soil remediation unit with air pollution controlled by a baghouse and afterburner to Mobile Reclaim, Inc., 3120 NW 37th Street, Gainesville, Florida, 32605. Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) determinations were not required. The unit may emit 22.5 TPY particulate matter, 87.6 TPY VOC, 60.1 TPY SO₂, and 17.6 TPY NO_x. 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, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within fourteen (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 which 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 application 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 Regulation, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Department of Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347
Department of Environmental Regulation,
South District
2269 Bay Street
Ft. Myers, Florida 33901-2896

Department of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Department of Environmental Regulation
Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Department of Environmental Regulation
Southeast District
1900 S. Congress Avenue, Suite A
West Palm Beach, Florida 33406

Broward County Environmental
Quality Control Board
621 South Andrews Avenue
Ft. Lauderdale, Florida 33310

Dade County Dept. of Environmental
Resources Management
Jose Marti Building
801 S.W. 3rd Avenue, 2nd Floor
Miami, Florida 33130

Duval County Dept. of Health, Welfare
& Bio-Environmental Services
421 West Church Street, Suite 412
Jacksonville, Florida 32202

Hillsborough County Environmental
Protection Commission
1410 North 21st Street
Tampa, Florida 33605

Palm Beach County Health Dept.
Division of Environmental Science and Engineering
901 E. Evernia Street

Pinellas County Department of
Environmental Management
315 Court Street
Clearwater, Florida 34616

Sarasota County Environmental
Services Department
1301 Cattleman Road
Sarasota, Florida 33582-9631

Orange County Environmental
Protection Department
2002 E. Michigan Avenue
Orlando, Florida 32806

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

Published: July 2, 1990

AFFIDAVIT OF PUBLICATION

THE LEDGER Lakeland, Polk County, Florida

Case No. **RECEIVED**

STATE OF FLORIDA)
COUNTY OF POLK)

JUL 25 1990

DER - BAQM

Before the undersigned authority personally appeared Stephen DeWitt, who on oath says that he is Controller of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

Notice of Intent

in the matter of

Mobil

in the

Court, was published in said newspaper in the issues of

July 2;

1990

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk 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 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.

Signed

Controller

Sworn to and subscribed before me this 7th

July

1990

day of

A.D. 19

Sealy

Barbara Skypen
Notary Public

NOTARY PUBLIC, STATE OF FLORIDA,
MY COMMISSION EXPIRES: NOV. 11, 1990.

My Commission Expires

R 231

Grey

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (AC 01-179694) to construct a 25 TPH soil remediation unit with air pollution controlled by a bag house and afterburner to Mobile Reclaim, Inc., 3120 NW 37th Street, Gainesville, Florida 32605. Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) determinations were not required. The unit may emit 22.5 TPY particulate matter, 87.6 TPY VOC, 60.1 TPY SO₂, and 17.6 TPY NO_x. 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 fourteen (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 285.207, F.A.C.

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

- Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
- Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
- Department of Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347
- Department of Environmental Regulation
South District
2269 Bay Street
Ft. Myers, Florida 33901-2896
- Department of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207
- Department of Environmental Regulation
Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767
- Department of Environmental Regulation
Southeast District
1900 S. Congress Avenue, Suite A
West Palm Beach, Florida 33406
- Broward County Environmental
Quality Control Board
621 South Andrews Avenue
Ft. Lauderdale, Florida 33340
- Dade County Dept. of Environmental
Resources Management
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Miami, Florida 33130
- Duval County Dept. of Health, Welfare
& Bio-Environmental Services
421 West Church Street, Suite 412
Jacksonville, Florida 32202
- Hillsborough County Environmental
Protection Commission
1410 North 21st Street
Tampa, Florida 33605
- Palm Beach County Health Dept.
Division of Environmental Science
and Engineering
901 E. Evernia Street
West Palm Beach, Florida 33402
- Pinellas County Department of
Environmental Management
315 Court Street
Clearwater, Florida 34616
- Sarasota County Environmental
Services Department
1301 Cattleman Road
Sarasota, Florida 33582-9631
- Orange County Environmental
Protection Department
2002 E. Michigan Avenue
Orlando, Florida 32806

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

THE PALM BEACH POST

Published Daily and Sunday
West Palm Beach, Palm Beach County, Florida

RECEIVED

PROOF OF PUBLICATION

JUL 25 1990

DER-BAQM

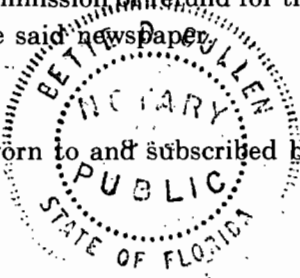
STATE OF FLORIDA

COUNTY OF PALM BEACH

Before the undersigned authority personally appeared Chris Bull
 who on oath says that she/he is Class. Sales Mgr. of The Palm Beach Post,
 a daily and Sunday newspaper published at West Palm Beach in Palm Beach County,
 Florida; that the attached copy of advertising, being a Notice
intent to issue
 in the matter of _____
 in the _____ Court, was published in said newspaper in
 the issues of July 2, 1990

Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach 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/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.

Sworn to and subscribed before me this 2 day of July A.D. 1990



Chris Bull
Bette D. Cullen

NOTARY PUBLIC STATE OF FLORIDA
 MY COMMISSION EXP. DEC 14, 1990
 BONDED THRU GENERAL INS. UND.

NO. 294643
 State of Florida
 Department of
 Environmental Regulation
 Notice of Intent to Issue
 The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (AC 01-179694) to construct a 25 TPH soil remediation unit with air pollution controlled by a baghouse and afterburner to Mobile Reclaim, Inc., 3120 NW 37th Street, Gainesville, Florida 32605. Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) determinations were not required. The unit may emit 22.5 TPY particulate matter, 87.6 TPY VOC, 60.1 TPY SO₂, and 17.6 TPY NO_x. 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 fourteen (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 (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.
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 The application 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 Regulation
 Bureau of Air Regulation
 2600 Blair Stone Road
 Tallahassee, FL 32399-2400
 Department of Environmental Regulation
 Northwest District
 160 Governmental Center
 Pensacola, FL 32501-5794
 Department of Environmental Regulation
 Southwest District
 4520 Oak Fair Boulevard
 Tampa, FL 33610-7347
 Department of Environmental Regulation
 South District
 2269 Bay Street
 Ft. Myers, FL 33901-2896
 Department of Environmental Regulation
 Northeast District
 3426 Billis Road
 Jacksonville, FL 32207
 Department of Environmental Regulation
 Central District
 3319 Maguire Blvd., Suite 232
 Orlando, FL 32803-3767
 Department of Environmental Regulation
 Southeast District
 1900 S. Congress Avenue,
 Suite A
 West Palm Beach, FL 33406
 Broward County Environmental Quality Control Board
 621 South Andrews Avenue
 Ft. Lauderdale, FL 33310

Dade County Dept. of Environmental Resources Management
 Jose Marti Building
 801 S.W. 3rd Avenue, 2nd Floor
 Miami, FL 33130
 Duval County Dept. of Health, Welfare & Bio-Environmental Services
 421 West Church Street, suite 412
 Jacksonville, FL 32202
 Hillsborough County Environmental Protectional Commission
 1410 North 21st Street
 Tampa, FL 33605
 Palm Beach County Health Dept.
 Division of Environmental Science and Engineering
 901 E. Evernia Street
 West Palm Beach, FL 33402
 Pinellas County Department of Environmental Management
 315 Court Street
 Clearwater, FL 34616
 Sarasota County Environmental Services Department
 1301 Cattleman Road
 Sarasota, FL 33582-9631
 Orange County Environmental Protection Department
 2002 E. Michigan Avenue
 Orlando, FL 32806
 Any person may send written comments of the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.
 PUB: Palm Beach Post
 July 2, 1990

ST. PETERSBURG TIMES

STATE OF FLORIDA }
 COUNTY OF PINELLAS }

S.S.

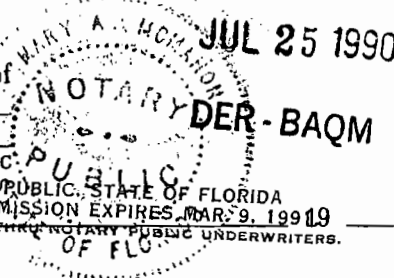
Published Daily
 St. Petersburg, Pinellas County, Florida

Before the undersigned authority personally appeared A. Reider
 who on oath says that he is Legal Clerk
 of the St. Petersburg Times
 a daily newspaper published at St. Petersburg, in Pinellas County, Florida: that
 the attached copy of advertisement, being a Legal Notice
 in the matter RE: Notice of intent to issue

_____ in the _____ Court
 was published in said newspaper in the issues of July 2, 1990

Affiant further says the said St. Petersburg Times
 is a newspaper published at St. Petersburg, in said Pinellas County, Florida, and
 that the said newspaper has heretofore been continuously published in said
Pinellas County, Florida, each day and has been entered as second class mail
 matter at the post office in St. Petersburg, in said Pinellas 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 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. A. Reider

Sworn to and subscribed before
 me this 2nd day of July
July A.D. 1990
Mary A. McMahon
 (SEAL) Notary Public
 NOTARY PUBLIC, STATE OF FLORIDA
 MY COMMISSION EXPIRES MAR 9, 1991
 My commission expires _____



State of Florida
 Department of Environmental Regulation
 Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (AC 01-179694) to construct a 25 TPH soil remediation unit with air pollution controlled by a baghouse and afterburner to Mobile Reclaim, Inc., 3120 NW 37th Street, Gainesville, Florida 32605. Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) determinations were not required. The unit may emit 22.5 TPY particulate matter, 87.6 TPY VOC, 60.1 TPY SO₂ (sulfur dioxide), and 17.6 TPY NOX (nitric + nitrate). 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 fourteen (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 application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through

Friday, except legal holidays, at:
 Department of Environmental Regulation
 Bureau of Air Regulation
 2600 Blair Stone Road
 Tallahassee, Florida 32399-2400
 Department of Environmental Regulation
 Northwest District
 160 Governmental Center
 Pensacola, Florida 32501-5794
 Department of Environmental Regulation
 Southwest District
 4520 Oak Fair Boulevard
 Tampa, Florida 33610-7347
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 South District
 2269 Bay Street
 Ft. Myers, Florida 33901-2896
 Department of Environmental Regulation
 Northeast District
 3426 Bills Road
 Jacksonville, Florida 32207
 Department of Environmental Regulation
 Central District
 3319 Maguire Blvd., Suite 232
 Orlando, Florida 32803-3767
 Department of Environmental Regulation
 Southeast District
 1900 S. Congress Avenue, Suite A
 West Palm Beach, Florida 33406
 Broward County Environmental
 Quality Control Board
 621 South Andrews Avenue
 Ft. Lauderdale, Florida 33310
 Dade County Dept. of Environmental
 Resources Management
 Jose Marti Building
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 Sarasota County Environmental
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 1301 Cattleman Road
 Sarasota, Florida 33582-9631
 Orange County Environmental
 Protection Department
 2002 E. Michigan Avenue
 Orlando, Florida 32806

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.
 (901792013) 7/02

JUL 25 1990

ADVERTISING CHARGE

\$247.44

State of Florida) ss.
COUNTY OF ORANGE

DER - BAQM

Before the undersigned authority personally appeared
Juanita Rosado

who on oath says that she is the Legal Advertising Representative of the Orlando Sentinel, a Daily newspaper published at Orlando, in Orange County, Florida; that the attached copy of advertisement, being a Notice of Intent to Issue in the matter of Mobile Reclaim, Inc.

in the Court, was published in said newspaper in the issues of July 3, 1990

Affiant further says that the said Orlando Sentinel is a newspaper published at Orlando, in said Orange County, Florida, and that the said newspaper has heretofore been continuously published in said Orange County, Florida, each Week Day and has been entered as second-class mail matter at the post office in Orlando, in said Orange 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.

Juanita Rosado

3rd day

July 19 90

Virginia E. Shuman

Notary Public

Notary Public, State of Florida at Large
My Commission Expires February 9, 1993
Bonded thru Brown & Brown, Inc.

FORM NO. AD-262

State of Florida
Department of Environmental
Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to (AC 01-179694) to construct a 25 TPH soil remediation unit with air pollution controlled by a baghouse and afterburner to Mobile Reclaim, Inc., 3120 NW 37th Street, Gainesville, Florida 32605. Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) determinations were not required. The unit may emit 22.5 TYP particulate matter, 87.6 TYP VOC, 60.1 TYP SO2, and 17.6 TYP NOx. 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 fourteen (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 application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:
Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
Department of Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347
Department of Environmental Regulation
South District
2269 Bay Street
Ft. Myers, Florida 33901-2896
Department of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207
Department of Environmental Regulation

Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767
Department of Environmental Regulation
Southeast District
1900 S. Congress Avenue,
Suite A
West Palm Beach, Florida 33406
Broward County Environmental Quality Control Board
621 South Andrews Avenue
Ft. Lauderdale, Florida 33310
Dade County Dept. of Environmental Resources Management
Jose Marti Building
801 S.W. 3rd Avenue, 2nd Floor
Miami, Florida 33130
Duval County Dept. of Health, Welfare & Bio-Environmental Services
421 West Church Street,
Suite 412
Jacksonville, Florida 32202
Hillsborough County Environmental Protection Commission
1410 North 21st Street
Tampa, Florida 33605
Palm Beach County Health Dept. Division of Environmental Science and Engineering
901 E. Evernia Street
West Palm Beach, Florida 33402
Pinellas County Department of Environmental Management
315 Court Street
Clearwater, Florida 34616
Sarasota County Environmental Services Department
1301 Cattleman Road
Sarasota, Florida 33582-9631
Orange County Environmental Protection Department
2002 E. Michigan Avenue
Orlando, Florida 32806
Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.
CL-237 Jul.3,1990

State of Florida
 Department of
 Environmental
 Regulation
**Notice of Intent
 to Issue**
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RECEIVED

JUL 25 1990

DER-BAQM

FORT LAUDERDALE NEWS/SUN-SENTINEL
 PUBLISHED DAILY
 FORT LAUDERDALE, BROWARD COUNTY, FLORIDA
 BOCA RATON, PALM BEACH COUNTY, FLORIDA
 MIAMI, DADE COUNTY, FLORIDA

STATE OF FLORIDA
 COUNTY OF BROWARD/PALM BEACH/DADE
 BEFORE THE UNDERSIGNED AUTHORITY PERSONALLY
 APPEARED *Shepard* WHO ON
 OATH SAYS THAT HE/SHE IS A DULY AUTHORIZED
 REPRESENTATIVE OF THE CLASSIFIED DEPARTMENT OF
 THE FORT LAUDERDALE NEWS/SUN-SENTINEL, DAILY
 NEWSPAPERS PUBLISHED IN BROWARD/PALM BEACH/DADE
 COUNTY, FLORIDA THAT THE ATTACHED COPY OF
 ADVERTISEMENT, BEING A

NOTICE

IN THE MATTER OF

MOBILE RECLAIM, INC.

IN THE CIRCUIT COURT, WAS PUBLISHED IN SAID
 NEWSPAPER IN THE ISSUES OF
 C.7/2.1X

6S490130

AFFIANT FURTHER SAYS THAT THE SAID FORT
 LAUDERDALE NEWS/SUN-SENTINEL ARE NEWSPAPERS
 PUBLISHED IN SAID BROWARD/PALM BEACH/DADE
 COUNTY, FLORIDA, AND THAT THE SAID NEWSPAPERS
 HAVE HERETOFORE BEEN CONTINUOUSLY PUBLISHED IN
 SAID BROWARD/PALM BEACH/DADE COUNTY, FLORIDA,
 EACH DAY, AND HAVE BEEN ENTERED AS SECOND
 CLASS MATTER AT THE POST OFFICE IN FORT
 LAUDERDALE, IN SAID BROWARD 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 SAID NEWSPAPERS.

Shepard

 AUTHORIZED REPRESENTATIVE

SWORN TO AND SUBSCRIBED BEFORE ME
 THIS 02 DAY OF JULY
 A.D. 1990

James A. ...
 (SEAL) NOTARY PUBLIC
 Notary Public, State of Florida
 My Commission Expires Aug. 22, 1992
 Bonded thru Troy Fain - Insurance Inc.

RECEIVED

JUL 22 1990

DER-BAOM

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 application 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 Regulation
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2600 Blair Stone Road
Tallahassee, Florida
32399-2400
- Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida
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Division of Environmental Science and Engineering
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34616
 - Sarasota County Environmental Services Department
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Sarasota, Florida
33582-9631
 - Orange County Environmental Protection Department
2002 E. Michigan Avenue
Orlando, Florida 32806
- Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.
July 2, 1990

RECEIVED

JUL 25 1990

DER - BAQM

FLORIDA PUBLISHING COMPANY

Publisher

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared _____

Ronald Clark who on oath says that he is

Legal Advertising Rep. of The Florida Times-Union,

a daily newspaper published at Jacksonville in Duval County, Florida; that the
attached copy of advertisement, being a _____

_____ in the matter of State of Florida

_____ in the _____ Court,

was published in THE FLORIDA TIMES-UNION in the issues of _____

July 2, 1990

Affiant further says that the said The Florida Times-Union is a newspaper published at Jacksonville, in said Duval County, Florida, and that the said newspaper has heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval 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 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 said newspaper.

Sworn to and subscribed before me
this July 19th day of 1990

Mary Ann Wash R Clark

Notary Public,
State of Florida at Large.

My Commission Expires
Notary Public, State of Florida
My Commission Expires Feb. 7, 1993
DA 444 Bonded Thru Troy Fain - Insurance Inc.

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (AC 01-179694) to construct at 25 TPH soil remediation unit with air pollution controlled by a baghouse and afterburner to Mobile Reclaim, Inc., 3120 NW 37th Street, Gainesville, Florida 32605. Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) determinations were not required. The unit may emit 22.5 TPY particulate matter, 87.6 TPY VOC, 60.1 TPY SO₂, and 17.6 TPY NO_x. 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.

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Protection Department
2002 E. Michigan Avenue
Orlando, Florida 32806

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

The Miami Herald
A KNIGHT-RIDDER NEWSPAPER
PUBLISHED DAILY
MIAMI - DADE - FLORIDA

STATE OF FLORIDA
COUNTY OF DADE:

Before the undersigned authority personally appeared

ANN MARTULA

who on oath says that he/she is

CUSTODIAN OF RECORDS

of The Miami Herald, a daily newspaper published at Miami in Dade County, Florida; that the attached copy of advertisement was published in said newspaper in the issues of

JULY 3, 1990

Affiant further says that the said The Miami Herald is a newspaper published at Miami, in the said Dade County, Florida and that the said newspaper has heretofore been continuously published in said Dade County, Florida, each day and has been entered as second class mail matter at the post office in Miami, in said Dade 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 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.

Ann Martula

Sworn to and subscribed before me this.....3rd

day ofJuly.....A.D. 19 90

My commission expires.....

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP. MAR 15, 1991
BONDED THRU GENERAL INS. UGD.

RECEIVED

JUL 25 1990

DER - BAQM

Hillsborough County
Environmental
Protection Commission
1410 North 21st Street
Tampa, Florida 33605

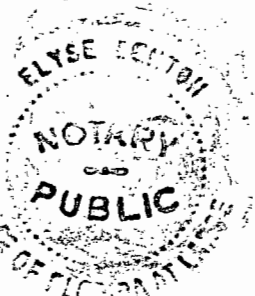
Palm Beach County
Health Dept.
Division of
Environmental Science
and Engineering
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33402

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315 Court Street
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Environmental Services
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Orange County
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2002 E. Michigan Avenue
Orlando, Florida 32805

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



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

Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida
32399-2400

Department of
Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida
32501-5794

Department of
Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7437

Department of
Environmental Regulation
South District
2269 Bay Street
Ft. Myers, Florida
33901-2896

Department of
Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida
32207

Department of
Environmental Regulation
Central District
3319 Maguire Blvd.,
Suite 232
Orlando, Florida
32803-3767

Department of
Environmental Regulation
Southeast District
1900 S. Congress Avenue,
Suite A
West Palm Beach, Florida
33406

Broward County
Environmental Quality
Control Board
621 South Andrews Avenue
Ft. Lauderdale, Florida
33310

Dade County Dept. of
Environmental
Resources Management
Jose Mari Building
801 S.W. 3rd Avenue,
2nd Floor
Miami, Florida 33130

Duval County Dept. of
Health, Welfare &
Bio-Environmental
Services
421 West Church Street,
Suite 412
Jacksonville, Florida
32202

State of Florida
Department of
Environmental
Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (AC 01-179694) to construct a 25 TPH soil remediation unit with air pollution controlled by a baghouse and afterburner to Mobile Reclaim, Inc., 3120 NW 37th Street, Gainesville, Florida 32605. Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) determinations were not required. The unit may emit 22.5 TPY particulate matter, 87.6 TPY VOC, 60.1 TPY SO2 and 17.6 TPY NOX. 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 at the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (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:

- 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;
- A statement of how and when each petitioner received notice of the Department's action or proposed action;
- A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- A statement of the material facts disputed by Petitioner, if any;
- A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- 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 with regard to the application have the right to petition to become a party to the proceeding. The

Tallahassee Democrat

PUBLISHED DAILY

TALLAHASSEE - LEON - FLORIDA

STATE OF FLORIDA COUNTY OF LEON:

Before the undersigned authority personally appeared Carrie Coons 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

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
in the
Court, was published in said newspaper in the
issues of:

JULY 2, 1990

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.

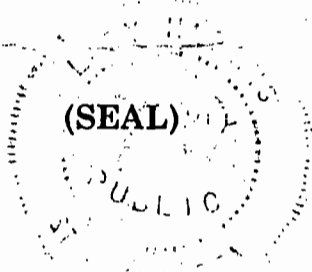
Carrie Coons

Carrie Coons,
Legal Advertising Representative

Sworn To And Subscribed Before Me
This 2nd

Day of July

A.D. 1990



Lady Perkins
Notary Public

Notary Public, State of Florida
My Commission Expires Sept. 27, 1992
Bonded Thru Troy Fain - Insurance Inc.

RECEIVED

JUL 25 1990

DER - BAQM

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

The Department of Environmental Regulation hereby gives notice of its intent to issue permit (AC 01-179694) to construct a 25 TPH soil remediation unit with air pollution controlled by a baghouse and afterburner to Mobile Reclaim, Inc., 3120 NW 37th Street, Gainesville, Florida 32605. Best Available Control Technology (BACT) and Lowest Achievable Emission Rate (LAER) determinations were not required. The unit may emit 22.5 TPY particulate matter, 87.6 TPY VOC, 60.1 TPY SO₂, and 17.6 TPY NO_x. 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.

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Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400.

Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Department of Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Department of Environmental Regulation
South District
2269 Bay Street
Ft. Myers, Florida 33901-2896

Department of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Department of Environmental Regulation
Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Department of Environmental Regulation
Southeast District
1900 S. Congress Avenue, Suite A
West Palm Beach, Florida 33406

Broward County Environmental
Quality Control Board
621 South Andrews Avenue
Ft. Lauderdale, Florida 33310

Dade County Dept. of Environmental
Resources Management
Jose Marti Building
801 S.W. 3rd Avnue, 2nd Floor
Miami, Florida 33130

Duval County Dept. of Health Welfare
& Bio-Environmental Services
421 West Church Street, Suite 412
Jacksonville, Florida 32202

Hillsborough County Environmental
Protection Commission
1410 North 21st Street
Tampa, Florida 33605

Palm Beach County Health Dept.
Division of Environmental Science
and Engineering
901 E. Evernia Street
West Palm Beach, Florida 33402

Pinellas County Department of
Environmental Management
315 Court Street
Clearwater, Florida 34616

Sarasota County Environmental
Services Department
1301 Cattleman Road
Sarasota, Florida 33582-9631

Orange County Environmental
Protection Department
2002 E. Michigan Avenue
Orlando, Florida 32806

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

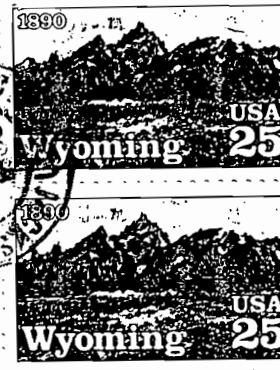
July 2, 1990

Ad No. 6S640090

ENVIRONMENTAL
HEALTH
DEPARTMENT

Original carried
to OSC 7-16-90
Pat

John N. Austin
6356 Sundown Drive
Jacksonville, Fla. 32244



Mr. Barry Andrews
Office of General Counsel
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

JUL 13 1990

DER-BAQM

John N. Austin
6356 Sundoran Drive
Jacksonville, Florida 32244
(904) 771-3098

July 12, 1990

Department of Environmental Regulation
Office of General Counsel
2600 Blair Stone Road
Twin Towers Office Building
Tallahassee, Florida 32309-2400

Dear Sirs:

Pursuant to Section 120.57, Florida Statutes, I petition for an administrative proceeding on the permit application to construct a soil remediation unit by Mobile Reclaim, Inc., 3120 NW 37th Street, Gainesville, Florida 32605, Permit No.: AC 01-179694. This project is for a mobile unit, but apparently Duval County is one county in which the project will be located and operated.

Petitioners received notice of the Dept.'s proposed action by publication in the Florida Times Union.

Petitioner is a resident of Duval County, is a certified asbestos lung disease victim, breathes the air and drinks the water in Duval County, utilizes the natural environment of Duval County, and therefore has a substantial interest in the air and water quality of Duval County. DER's proposed intent to issue a permit to Mobile Reclaim to construct a soil remediation incinerator for operation in Duval County will

substantially, materially, and adversely affect, i.e. injure, the air and water quality and the environment of Dural County by allowing the introduction of an additional source of air pollution. The emissions from Mobile Reclaim's proposed soil remediation incinerator will contain heavy metals, dioxins, furans, and volatile organic compounds, which will detrimentally affect, i.e. injure, the health of persons exposed, of which Petitioner is one. In fact, as a certified asbestos lung disease victim Petitioner has a special interest, above that of the average citizen in the air quality of his environment and in the detrimental and injurious health consequences produced by Mobile Reclaim's increased air pollution.

Petitioner objects to the issuance of this permit because it is based on the false premise that the project will be equipped with a baghouse and afterburner. Mobile Reclaim has submitted no plans of a baghouse and lists its sole pollution control equipment as a VOC afterburner in Section II. (A.) of its permit application. Without the baghouse as pollution control equipment on this project, Mobile Reclaim did not provide reasonable assurance that the construction and operation of the soil incinerator will be in accord with all applicable emissions laws or rules, as required by Rule 17-4.070, F.A.C.

Petitioner objects to Specific Condition 3 with the indefinite language of "the afterburner

shall be capable of operating above 1400°F...", when the language should be in the imperative, "the afterburner must be operated at the required minimum temperature of _____°F at all times. Further, Petitioner objects to the 1400°F temperature and states that the temperature requirement must be minimally 1800°F to insure compliance with applicable emissions level as required by laws and rules. Petitioner also objects to the 0.5 second retention time on the same grounds and states that the retention time must be minimally 1 second.

Petitioner objects to Specific Condition 5 and states that Benzene emissions must not exceed at the maximum 4.7 lbs/hr.

Petitioner objects to Specific Condition 11 in that Mobile Reclaim is being permitted to operate these soil incinerators for continuous, non-stop operation when this is an impossibility due to its proposed mobility and when there has been no showing that there is a need for nor a demand for such endless operation.

Petitioner objects to Specific Condition 14 in that the definition of what constitutes reasonable assurance that the soil is contaminated with only virgin petroleum products is merely certification from the generator — not actual testing of the soil. Petitioner states that actual testing of the soil must be a requirement.

Petitioner objects to Specific Condition 21 in that testing for particulate matter and visible emissions compliance will only occur

annually. Petitioner asserts that given the variable nature of the soil to be incinerated, the testing for particulate matter and visible emissions must be required on a per site basis.

Petitioner objects to Specific Condition 22 in that there is no timing variable for efficiency testing of the afterburner for benzene and VOC emissions.

Based on the above facts, Mobile Reclaim's permit application fails to provide reasonable assurance that construction of the proposed soil incinerator will be in accord with all applicable rules and laws, as does the proposed permit, and must be denied in accordance with Rule 17-4.070(2).

Wherefore, I request an administrative proceeding on Mobile Reclaim's soil remediation incinerator permit application.

John N. Austin
John N. Austin

RECEIVED

JUL 11 1990

DER - BAQM

Mary L. Jelks, M.D.
1930 Clematis Street
Sarasota, Florida 34239-3813
phone (813) 366-0446
July 6, 1990

Mr. Barry Andrews
Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-5794

Dear Mr. Andrews:

Re: Intent to Issue Permit (AC 01-179694), a 25 TPH Soil remediation Unit with air pollution controlled by a baghouse and afterburner.

Incineration of any material is counter productive to the environmental stability of this state bordered on three sides with the sea. We have three regions with non-attainment of ambient air standards and to emit any materials into the atmosphere is irresponsible. Monitoring emissions from this mobile unit is probably very difficult and the toxicity of remaining ash with a problem of disposing of same is an added problem.

In that there is an alternate method of removing hydrocarbons that is safer for the environment, this permit should be given only in very extreme circumstances.

In our county oil spills are removed from contaminated soil by bacteria. This operation has been quite successful under the good guidance of Dr. Fred Farley, Biodyne, Ph 813-351-1558. The soil is removed and treated at the local Solid Waste Department and when the ppm of hydrocarbons reaches a safer level the soil is used for landfill cover.

I can not imagine it will be easy to site where the mobile unit will be acceptable and it is doubtful that transportation of the contaminated soil can be avoided.

Please make it necessary to consider this biological, safer method in all instances.

Sincerely,



Mary L. Jelks, M.D.



RECEIVED

JUL 6 1990



METRO-DADE CENTER

DER-BAQM

ENVIRONMENTAL RESOURCES MANAGEMENT
SUITE 1310
111 N.W. 1st STREET
MIAMI, FLORIDA 33128-1971
(305) 375-3376

June 28, 1990

CERTIFIED MAIL NO. P 289 538 240
RETURN RECEIPT REQUESTED

W. Arnold Dinkins, President
MOBILE RECLAIM, INC.
3120 N.W. 37th Street
Gainesville, Florida 32605

Dear Mr. Dinkins:

The Florida Administrative Code and the Metropolitan Dade County Environmental Protection Ordinance both require that major air pollution sources in Dade County satisfy the appropriate pollution control regulations and operate within the Code provisions of the governing regulatory agencies. Please be advised that the operation of soil remediation unit in Dade County requires permitting by the Department of Environmental Resources Management (DERM).

We have received notification from the Florida Department of Environmental Regulation, (FDER), that the FDER intends to issue permit AC-01-179694 to construct a 25 TPH portable soil remediation unit which could be operated in any county in the state. This facility cannot legally operate in Dade County without Dade County Pollution Control Permits.

Please submit to DERM Plan Review at 111 N.W. First Street, Suite 1010, Miami, Florida 33128 Attn: Vince Arrebola, Chief, two copies of the FDER permit application and two sets of the appropriate engineering drawings for the subject plant for DERM plan review.

For clarification of any of the above, please contact the DERM Air Section at telephone (305) 858-0601.

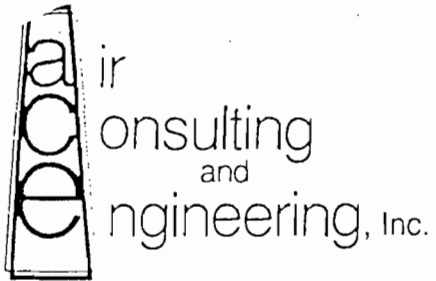
Sincerely,

A handwritten signature in cursive script that reads "Ewart L. Anderson".

Ewart L. Anderson, P.E.
Air Permitting Engineer
Environmental Monitoring Division

ELA/aas

cc: C.H. Fancy, P.E. ✓
Michael Graham
File P-701



July 5, 1990
273 90 01

Mr. Steve Smallwood, P.E.
Northwest District Branch Office
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: AC 01-179694 Mobile Reclaim Systems
Soil Remediation Unit

Dear Mr. Smallwood:

I wish to request, on the behalf of Mr. Arnold Dinkins, that Specific Condition 22 be amended to allow EPA Method 25A test methodology. Recent testing of similar Soil Remediation Units indicate stack gas concentrations of 1 ppm VOC or less, making other test methods inappropriate.

EPA Method 25A has also been the compliance tool for the TPS Technologies, Inc. permits. VOC destruction efficiency, and VOC/benzene emission rates can be determined through use of EPA Method 25A outlet values and inlet soil analyses.

Respectfully,

AIR CONSULTING AND ENGINEERING, INC.

Stephen L. Neck, P.E.

SLN/cvt

cc: Mr. W. Arnold Dinkins, Mobile Reclaim, Inc.

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services



July 2, 1990

Mr. Barry Andrews
Bureau of Air Regulation
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJECT: MOBILE RECLAIM, INC. - AC01-179694

Dear Mr. Andrews:

Bio-Environmental Services Division (BESD) has reviewed the above referenced permit and does not have any comments for consideration.

Very truly yours,

Ronald L. Roberson
Associate Engineer

RLR/ea

cc: Mr. Andrew G. Kutyna, P.E., DER
BESD Air Permitting File
BESD File NP - Soil Remediation

A. Hamba
disc/rlr/20



● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 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 additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. W. Arnold Dinkins, President Mobile Reclaim, Inc. 3120 N.W. 37th Street Gainesville, FL 32605	4. Article Number P 256 396 126 Type of Service: <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
Always obtain signature of addressee or agent and DATE DELIVERED .	
5. Signature — Addressee X <i>W. Arnold Dinkins</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X <i>Donna McArthur</i>	
7. Date of Delivery <i>6/21</i>	

P 256 396 126
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to Mr. W. Arnold Dinkins, Mobile Reclaim	
Street and No. 3120 N.W. 37th St.	
P.O., State and ZIP Code Gainesville, FL 32605	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 6-19-90 Permit: AC 01-179694	

U.S.G.P.O. 1989-234-555
 PS Form 3800, June 1985



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 18, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

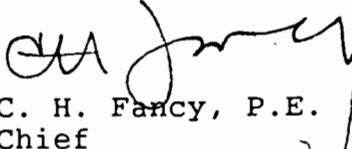
Mr. W. Arnold Dinkins, President
Mobile Reclaim, Inc.
3120 NW 37th Street
Gainesville, Florida 32605

Dear Mr. Dinkins:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to construct a soil remediation unit for operation throughout Florida.

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

Sincerely,



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

CHF/WH/plm

Attachments

c: Don Ehlenbeck, BWC
District Air Program Directors
County Program Air Sections
Stephen L. Neck, P.E.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Mobile Reclaim, Inc.
3120 NW 37th Street
Gainesville, Florida 32605

DER File No. AC 01-179694

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a 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, Mobile Reclaim, Inc., applied on April 26, 1990, to the Department of Environmental Regulation for a permit to construct a 25 TPH portable soil remediation unit for operation throughout Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER 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, at the address specified 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 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.

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Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

Don Ehlenbeck, BWC
District Air Program Directors
County Program Air Sections
Stephen L. Neck, P.E.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 6-19-90.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Karin Jones
Clerk

6-19-90
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

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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 fourteen (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 application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Department of Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Department of Environmental Regulation
South District
2269 Bay Street
Ft. Myers, Florida 33901-2896

Department of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Department of Environmental Regulation
Central District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Department of Environmental Regulation
Southeast District
1900 S. Congress Avenue, Suite A
West Palm Beach, Florida 33406

Broward County Environmental
Quality Control Board
621 South Andrews Avenue
Ft. Lauderdale, Florida 33310

Dade County Dept. of Environmental
Resources Management
Jose Marti Building
801 S.W. 3rd Avenue, 2nd Floor
Miami, Florida 33130

Duval County Dept. of Health, Welfare
& Bio-Environmental Services
421 West Church Street, Suite 412
Jacksonville, Florida 32202

Hillsborough County Environmental
Protection Commission
1410 North 21st Street
Tampa, Florida 33605

Palm Beach County Health Dept.
Division of Environmental Science
and Engineering
901 E. Evernia Street
West Palm Beach, Florida 33402

Pinellas County Department of
Environmental Management
315 Court Street
Clearwater, Florida 34616

Sarasota County Environmental
Services Department
1301 Cattleman Road
Sarasota, Florida 33582-9631

Orange County Environmental
Protection Department
2002 E. Michigan Avenue
Orlando, Florida 32806

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

Technical Evaluation
and
Preliminary Determination

Mobile Reclaim, Inc.
Gainesville, Alachua County, Florida.

25 TPH Soil Remediation Units
Statewide Operation
File No. AC 01-179694

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

June 18, 1990

I. General Information

A. Applicant

Mobile Reclaim, Inc.
3120 NW 37th Street
Gainesville, Florida 32605

B. Request

On April 26, 1990, Mobile Reclaim, Inc. submitted an application for a permit to construct a 25 TPH portable soil remediation unit (rotary kiln/afterburner system) which could be operated in any county in the state. The application was considered complete on June 1, 1990, when additional information requested by the Department was received.

C. Project

The applicant is requesting permission to construct a 25 TPH portable rotary kiln/afterburner system (SIC 1629) for operation throughout the state. The unit will be mounted on trailers so that it can be transported to various sites. It will be equipped with a baghouse and afterburner. The unit is to be used to decontaminate soil containing virgin petroleum products and "on-spec" used oil.

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% efficient custom baghouse will be used to control PM emissions. The baghouse has been designed to meet the particulate matter emissions standard of 0.08 grain/dscf corrected to 50% excess air (F.A.C. Rule 17-2.600(1)(c)1.) that the Department will impose on this unit. Approximately 6963 dscfm flow through the baghouse and afterburner resulting in an estimated PM emission of up to 5.13 lbs/hr. As the unit will not be restricted by an annual operating hour limit, the maximum PM emissions can be 22.5 TPY.

The VOC evaporates from the contaminated soil and passes through the baghouse to the afterburner. The applicant estimates that up to 500 lbs/hr of VOC will enter the afterburner and, after incineration, 20 lbs/hr of VOC will be discharged to the atmosphere. Based on continuous operation, this is equivalent to 87.6 TPY VOC emissions.

No. 2 oil is the primary fuel. The maximum heat input to the rotary kiln/afterburner system is 27.8 MMBtu/hr (201 GPH) from No. 2 fuel oil. Maximum emissions from this fuel and the

hydrocarbons destroyed in the afterburner are estimated to be 13.7 lbs/hr (60.1 TPY) SO₂, 4.0 lbs/hr (17.6 TPY) NO_x, and 1.0 lbs/hr (4.4 TPY) CO.

Reasonable precautions will be required to control the unconfined emissions from the 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 this source.

II. Rule Applicability

The proposed project, construction and operation of a 25 TPH portable rotary kiln/afterburner system, is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code.

The source may be operated in areas designated nonattainment for particulate matter, ozone, and sulfur dioxide (F.A.C. Rule 17-2.410), unclassifiable for particulate matter and sulfur dioxide (F.A.C. Rule 17-2.430), attainment for all criteria pollutants (F.A.C. Rule 17-2.420), and maintenance for ozone (F.A.C. Rule 17-2.460).

The unit is a minor source (F.A.C. Rule 17-2.100) 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 17-2.500(5) and F.A.C. Rule 17-2.510(4) 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 source is subject to F.A.C. Rule 17-2.520, which pertains to sources not subject to PSD or nonattainment review. The unit is classified as an incinerator. Allowable particulate matter emissions are limited to 0.08 grains/dscf corrected to 50% excess air (F.A.C. Rule 17-2.600(1)(c)1.) and the emissions cannot cause objectionable odors (F.A.C. Rule 17-2.600(1)(c)2.). Chapter 17-2, F.A.C., does 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 17-2.620, General Pollutant Emission Limiting Standards, which restricts emissions to control by systems deemed necessary by the Department. The Department deems 95% destruction of the VOC air pollutants is a minimum standard for these units. The discharge of pollutants 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 from a newspaper of general circulation in each county on the list (F.A.C. Rule 17-2.220).

III. Technical Evaluation

Soil contaminated with petroleum products will be sampled and tested for the presence of PCB's (polychlorobiphenyls), BTEX (benzene, toluene, ethyl benzene, and xylene), and RCRA materials prior to decontamination. The PCB and RCRA tests may be waived if the applicant can provide the Department with reasonable assurance that the soil is contaminated only with "on-spec" and virgin petroleum products. The soil will be decontaminated in a No. 2 fuel oil fired rotary kiln/afterburner system. Up to 25 TPH of soil will be heated in the rotary kiln to evaporate the petroleum products (VOC). The gases from the rotary kiln will pass through a baghouse that removes 99 percent of the particulate matter and then through a 95% efficient afterburner (0.5 second retention time at 1400°F) to burn the VOC. Higher temperatures and/or residence time than proposed for the afterburner may be needed to achieve this destruction efficiency. Maximum heat input to the rotary kiln/afterburner system is 27.8 MMBtu/hr.

At an allowable particulate matter emission rate of 0.08 gr/dscf corrected to 50% excess air (EA) and a volumetric flow of 7,500 dscfm corrected to 50% EA, the process would emit 5.13 lbs/hr.

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 ACGHI, 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	AAC (24 hr/day operation)
	mg/m ³	mg/m ³
Benzene	3	0.0071
Toluene	375	1.786
Ethyl Benzene	435	2.071
Xylene	435	2.071

Calculations, using the EPA approved Screen - 1.1 Model (updated PTPLU6 Model) and the stack parameters listed in the application, show that an emission rate of 1 gram/sec will have a maximum ambient air impact of 9.4×10^{-3} mg/m³ (8 hr. avg.).

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 each unit (25 TPH), assuming all VOC in the contaminated soil is evaporated in the kiln, and that 95% 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 the BTEX compounds. The results are summarized in the following table.

Pollutant	Maximum Emissions		Maximum Soil Concentration PPM
	grams/second	lbs/hr	
Benzene	0.76	6.0	2,400
Toluene	190	1507	602,680
Ethyl Benzene	220	1747	698,852
Xylene	220	1747	698,852

Using a similar procedure, it can be shown that the maximum VOC content of the untreated soil cannot exceed 8,000 PPM when the emissions are 20 lbs/hr VOC.

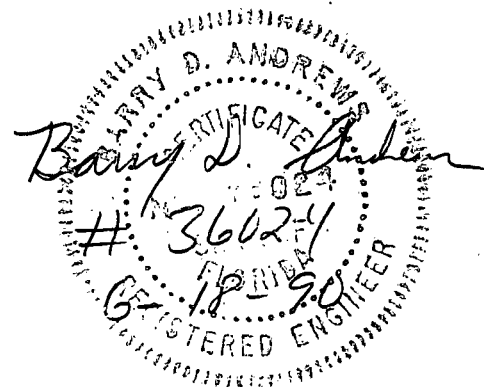
The Department has chosen to regulate benzene and total VOC only for soils contaminated with virgin petroleum products and "on-spec" used oil. For soil contaminated with other petroleum product components and derivatives, the applicant will be required to submit calculations showing the AAC or other concentrations required to protect public health and safety will not be exceeded before the soil can be treated in this unit.

IV. Air Quality Analysis

By restricting the benzene and VOC 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 Mobile Reclaim, Inc., the Department has reasonable assurance that the proposed construction/operation of the 25 TPH portable rotary kiln/afterburner system, as described in this evaluation, and subject to the 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 17-2 of the Florida Administrative Code.





Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
Mobile Reclaim, Inc.
3120 NW 37th Street
Gainesville, Florida 32605

Permit Numbers: AC 01-179694
Expiration Date: December 31, 1990
County: Statewide Operation
Project: 25 TPH Portable Rotary
Kiln/Afterburner Systems, Serial
Number SRU-202

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Authorization to construct a portable rotary kiln/afterburner system. The unit consists of a contaminated soil hopper and feed system, a 25 TPH rotary dryer with a No. 2 fuel oil burner, a 99% efficient baghouse, a 95% efficient No. 2 fuel oil fired afterburner (0.5 second retention time at 1400°F) and stack (3.0 ft. dia. by 20 ft. ht.) handling approximately 35,040 acfm (7,500 dscfm at 50% EA), and associated equipment, all of which is mounted on a truck.

The unit may be used throughout the state (all counties) after receiving Department authorization to operate at a new location.

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

Attachments are listed below:

1. Application received on April 26, 1990.
2. DER letter dated May 10, 1990
3. Air Consulting and Engineering, Inc. letter dated May 30, 1990.

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: December 31, 1990

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.

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: December 31, 1990

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: December 31, 1990

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 proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: December 31, 1990

GENERAL CONDITIONS:

- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

Construction Requirements

1. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.
2. The stack sampling facilities must comply with F.A.C. Rule 17-2.700(4).
3. The afterburner shall be capable of operating above 1400°F with a 0.5 second retention time and have a minimum VOC destruction efficiency of 95%.

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: December 31, 1990

SPECIFIC CONDITIONS:

Emission Restrictions

4. Particulate matter emissions from this process shall neither exceed 0.08 grains/dscf corrected to 50% excess air nor 5.1 lbs/hr. Visible emissions from any part of the process shall not exceed 5% opacity.

5. Benzene emissions shall not exceed 6.0 lbs/hr. Total VOC emissions shall not exceed 20 lbs/hr. Compliance shall be determined from soil analysis, production rate, and the afterburner destruction efficiency.

6. The operation of this source shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor pursuant to F.A.C. Rule 17-2.600(c)2.

Operation Requirements

7. The system shall be properly operated and maintained (F.A.C. Rule 17-2.210(2)). No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly (F.A.C. Rule 17-2.240).

8. Reasonable precautions shall be used to minimize unconfined emissions of particulate matter generated by this operation (F.A.C. Rule 17-2.610(3)). This includes hauling the soil in covered trucks and keeping the work areas wet where the soil is being removed and treated.

9. The unit shall not be operated at a location or in a manner that may create a nuisance.

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

11. This unit shall be allowed to operate continuously, 24 hours per day, 7 days per week, and 52 weeks per year. The permittee shall maintain a log that shows the location, time and dates the unit was operated.

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: December 31, 1990

SPECIFIC CONDITIONS:

12. Maximum soil charging rate to the unit shall not exceed 25 TPH. The permittee shall have means to determine the feed or production rate on site.

13. Only No. 2 fuel oil containing a maximum of 0.5% sulfur shall be used as fuel for this unit. Maximum permitted fuel consumption is 27.8 MMBtu/hr (201 GPH No. 2 fuel oil).

14. Only soils contaminated with virgin (non-recycled) petroleum products and "on-spec" used oil (see Specific Condition No. 15) shall be treated in this unit unless otherwise approved by the Bureau of Air Regulation (BAR). The portable rotary kiln/afterburner system shall neither be used to thermally process materials that are listed in 40 CFR 261.31, 261.32, 261.33 (revised as of July 1, 1988) nor materials that have the hazardous characteristics of corrosivity, reactivity, EP toxicity, and ignitability. Prior to the acceptance of contaminated materials for processing, the permittee shall provide the Department with reasonable assurance that the soil is contaminated with only virgin petroleum products, i.e., certification from the generator that the material is not classified as a hazardous waste pursuant to the federal regulations cited in this specific condition. To obtain approval to treat soils contaminated with other materials, the permittee shall submit soil analysis results and calculations to the BAR which show the impact of the emissions will not exceed the acceptable ambient air concentration (AAC) or violate any permit condition or regulation.

15. The following constituents of the "on-spec" petroleum products that contaminated the soil shall not be exceeded:

<u>Constituent</u>	<u>Allowable Level (max. ppm in oil)</u>
Arsenic	5
Cadmium	2
Chromium	10
Lead	100
<u>Total Halogens</u>	<u>1000</u>

To demonstrate compliance with Specific Condition No. 15, the petroleum product(s) responsible for contamination of the soil shall be tested for the listed contaminants. Test results shall be sent to the BAR at least 15 days prior to any soil remediation. This test may be waived if the owner or operator of the site can demonstrate that only virgin petroleum products are responsible for contamination of the site.

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: December 31, 1990

SPECIFIC CONDITIONS:

16. Sampling and analysis of the contaminated soil at each site, based on the procedures prescribed in SW-846, shall be conducted prior to remediation. Minimum number of composite samples for analysis for benzene and volatile organic compounds (VOC) at each site prior to remediation shall be as follows:

<u>Soil Quantity (yards³)</u>	<u>No. of Composite Samples</u>
Less than 100	1
100 to 500	3
500 to 1000	5
Each additional 250 yds	1 additional sample

The degree of treatment of the soil and its disposal must comply with the Bureau of Waste Cleanup policy. Presently, this requires that the soil exiting the dryer be sampled on an hourly basis during operation and an analysis of a daily composite sample made up of the hourly samples shall be performed for benzene, toluene, ethyl benzene, and xylene concentration using EPA Method 5030/8020, and total recoverable petroleum hydrocarbon concentration using EPA Method 418.1.

17. Unless the Department has determined other concentrations are required to protect public health and safety, predicted ambient air impact of any toxic pollutant, as determined by the PTPLU 6 model or other DARM approved models, shall not exceed the concentration calculated by the following formula:

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

where,

AAC = acceptable ambient concentration

Safety Factor = 100 for category A substances and
50 for category B substances

X = 40 or the hours/week or actual operation,
whichever is larger

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

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: December 31, 1990

SPECIFIC CONDITIONS:

(TWA-TLV) is the threshold limit value (8 hrs/day, 40 hrs/wk) maximum exposure concentration considered safe for workers by the ACGIH.

Data in the application shows that, for continuous operation, an emission of 1 gram/sec will have a maximum ambient impact of 9.4×10^{-3} mg/m³ (8 hr. avg). If the stack parameters are different than the valued listed in the application, the applicant must determine and use the actual impact factor.

$$\text{Maximum Allowable Emissions (g/sec)} = \frac{\text{AAC mg/m}^3}{9.4 \times 10^{-3}}$$

18. Pressure drop across the baghouse and temperature of the afterburner shall be recorded continuously during operations. The instruments used to obtain these measurements shall be properly calibrated, maintained, and in operation any time the unit is in service.

Compliance Requirements

19. This source must be tested at the maximum process weight rate at which the permittee intends to operate. All compliance tests shall meet the requirements listed in F.A.C. Rule 17-2.700. Operation at rates that are more than 10 percent above the tested rate will require the Department to be notified and, within 15 days, the source must be tested for compliance at this higher rate by appropriate test methods. The unit shall not operate above the maximum permitted rate of 40 TPH.

20. When the Department, after investigation, has good reason (such as complaints, increased visible emissions, or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Chapter 17-2, F.A.C., or in this permit is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the Department.

21. The exhaust stack for this process must be tested concurrently for particulate matter and visible emissions by EPA Methods 5 and 9 pursuant to 40 CFR 60, Appendix A, revised as of July 1, 1988, within 5 days after placing the unit in commercial

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PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: December 31, 1990

SPECIFIC CONDITIONS:

operation under this permit and annually thereafter. Operation at each subsequent site requires an EPA Method 9 test to be performed within 3 days of placing the unit in service.

22. The afterburner destruction efficiency, benzene, and VOC emissions shall be established by a Method 18, or 25 test (40 CFR 60, Appendix A, revised as of July 1, 1988) or other test method as approved by the Department.

Administrative Requirements

23. The permittee shall furnish the available information listed in Specific Condition No. 24 prior to operating the portable rotary kiln/afterburner system at its initial site. This permit requires compliance with any applicable local (county) regulations.

24. This unit shall not be operated at any other site until the applicant has requested authorization at the new site. Whenever feasible, the request shall be at least 15 days prior to operation at the new site. The permittee shall notify the BAR by phone (confirm in writing at least 3 days prior to operation) that the unit is being relocated. The confirmation shall provide the permit number of the unit, a copy of the last stack test report, the date of the proposed move, the new site for the unit, and the locations and contamination levels of the soils to be treated. The Department shall notify the permittee of any new conditions the unit must meet within 15 days of the receipt of the relocation notice. This may include requirements for county operation permits and additional restrictions on the operation of this unit.

25. The permittee shall maintain a log that shows the unit's operation time during the preceeding 12 months. All required records must be available for inspection at the job site for the unit within 3 working days of a request by the Department.

26. The BAR shall be notified by phone (confirm in writing) at least 15 days in advance of any compliance test to be conducted on this source.

27. Any analysis required by Specific Condition No. 16 which indicates a potential violation of any condition in this permit shall be reported as soon as feasible to the BAR. An average concentration of benzene above 2,400 ppm in the soil or total hydrocarbons above 8,000 ppm indicate a potential violation of this permit. The soil may be decontaminated provided no condition of this permit is violated. This can be accomplished by operating

DRAFT

PERMITTEE:
Mobile Reclaim, Inc.

Permit Numbers: AC 01-179694
Expiration Date: December 31, 1990

SPECIFIC CONDITIONS:

at less than the 25 TPH production rate, or other means with prior approval of the Department. The permittee must propose the method of compliance with this permit.

28. Records shall be kept on the location, date, time, and number of samples taken for each composite sample. Soil analysis results shall be sent to the BAR within 15 working days of such testing. All soil samples taken at the remediation site and exiting the dryer shall be stored in a sealed glass container immediately upon sampling.

29. All required test reports, except stack tests for PM and VOC, shall be filed with the Department as soon as practical but no later than 15 working days after the last sampling run of each test is completed (F.A.C. Rule 17-2.700 (7)(a), (b) and (c)). Stack test results from PM and VOC shall be submitted within 45 days of the test.

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

31. An application for an operation permit must be submitted to the BAR at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this _____ day
of _____, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

DRAFT



STATE OF FLORIDA
DEPARTMENT OF HEALTH AND REHABILITATIVE SERVICES

RECEIVED

JUN 05 1990

May 31, 1990

DER - BAQM

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

Dear Mr. Fancy:

After review permit AC01-179694 for Mobile Reclaim, Inc. of
Gainesville, FL, the following has been determined:

That all information and calculations meet
the minimum requirements of Manatee County
Article I.

Please accept this letter as approval from this office for
permit AC01-179694.

Thank you,

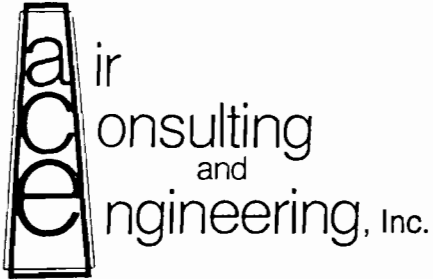
John A. Bruens
Engineer

xc: Mr. Bill Thomas, P.E., DER/Tampa

W. Hanks

DISTRICT SIX

MANATEE COUNTY PUBLIC HEALTH UNIT
410 SIXTH AVENUE EAST, BRADENTON, FLORIDA 34208-1986
(813) 748-0666



RECEIVED

JUN 01 1990

DER - BAQM

May 30, 1990
273 90 01

Mr. Willard Hanks
Florida Department of
Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: MOBILE RECLAIM, INC. (FDER PERMIT NUMBER AC01-179694)

Dear Mr. Hanks:

I wish to answer points addressed in your May 10, 1990, letter concerning the referenced permit (copy attached).

1. Two process diagrams are provided. Neither diagram is completely representative, however. An I.D. fan is located at the dryer exit that directs exhaust gases to the baghouse and afterburner. A large excess air blower is located at the afterburner entrance. This blower has two ducts which provide air for both the primary burner and the afterburner.
2. The afterburner dimensions are provided. Retention time is calculated as:
$$(20.67 \times 14 \text{ ft}^3) \div (35042 \text{ ft}^3/\text{min} @ 1400^\circ\text{F}) (60 \text{ sec}/\text{min}) = 0.5 \text{ seconds}$$
3. See 2.
4. The maximum soil temperature is 600°F. Normal soil temperature will be 450°F. Retention time will be about seven minutes. This time is adjustable by varying the dryer RPM from 1-10 and by an increase or decrease of the dryer slope.
5. I have attached a page from the SRU operation manual addressing fugitive dust. This SRU has two discharge augers. One handles the product soil while the second handles baghouse dust. Both augers are wetted at the entrance. The baghouse auger is responsible for most of the fugitive dust. In addition to wetting this auger, the discharge is fitted with a cloth, inverted funnel reaching to the ground. Periodically a front end loader scoops dust by reaching beneath the bag and backing up. If the amount of

Page 2

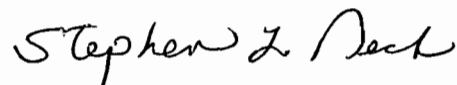
Mr. Willard Hanks

May 30, 1990

water necessary to control dust should cause a steam dust
entrainment problem, the augers will be placed under a 2" water
column negative pressure for venting to the baghouse.

Respectfully,

AIR CONSULTING AND ENGINEERING, INC.



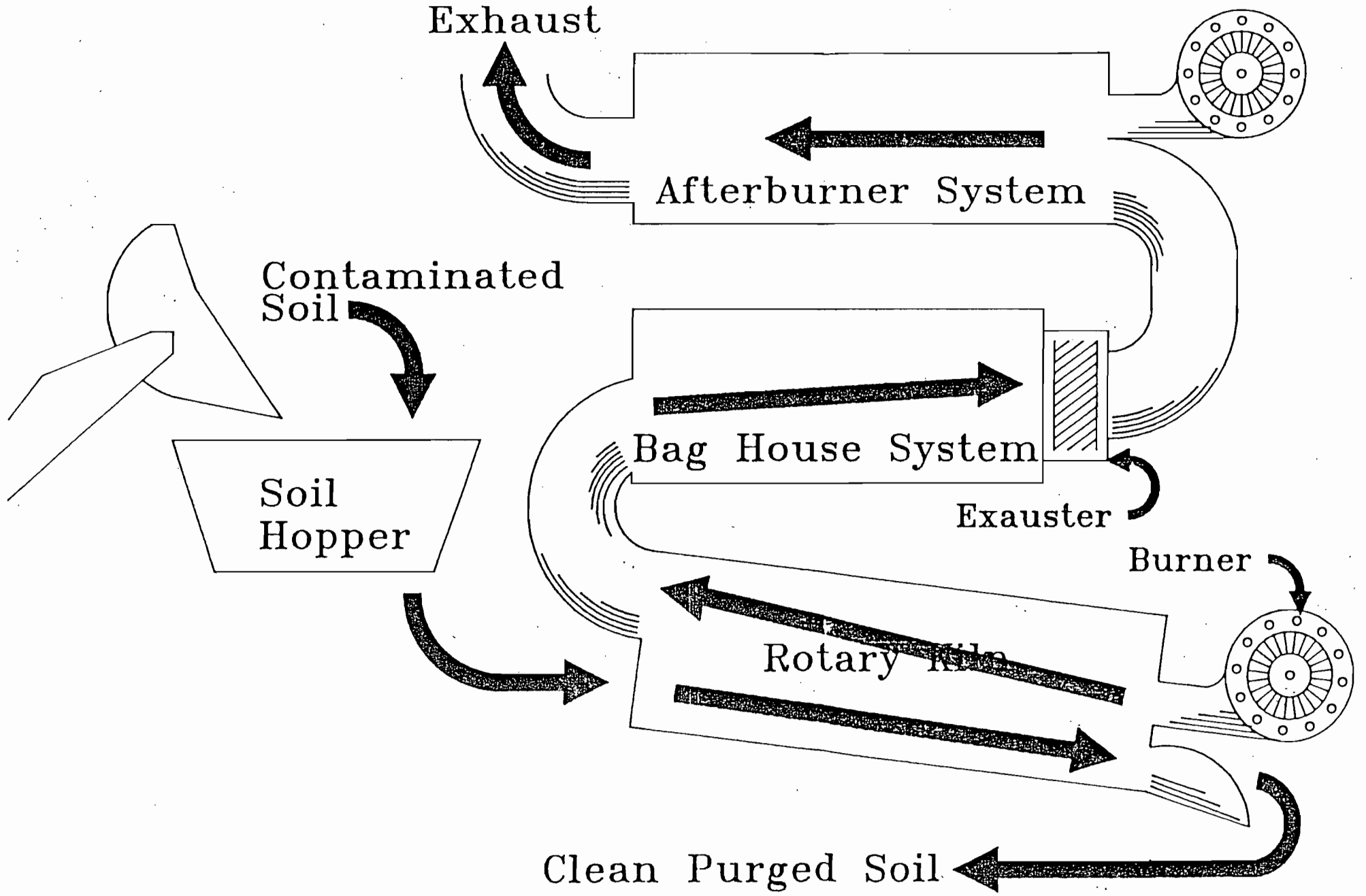
Stephen L. Neck, P.E.

SLN:klp

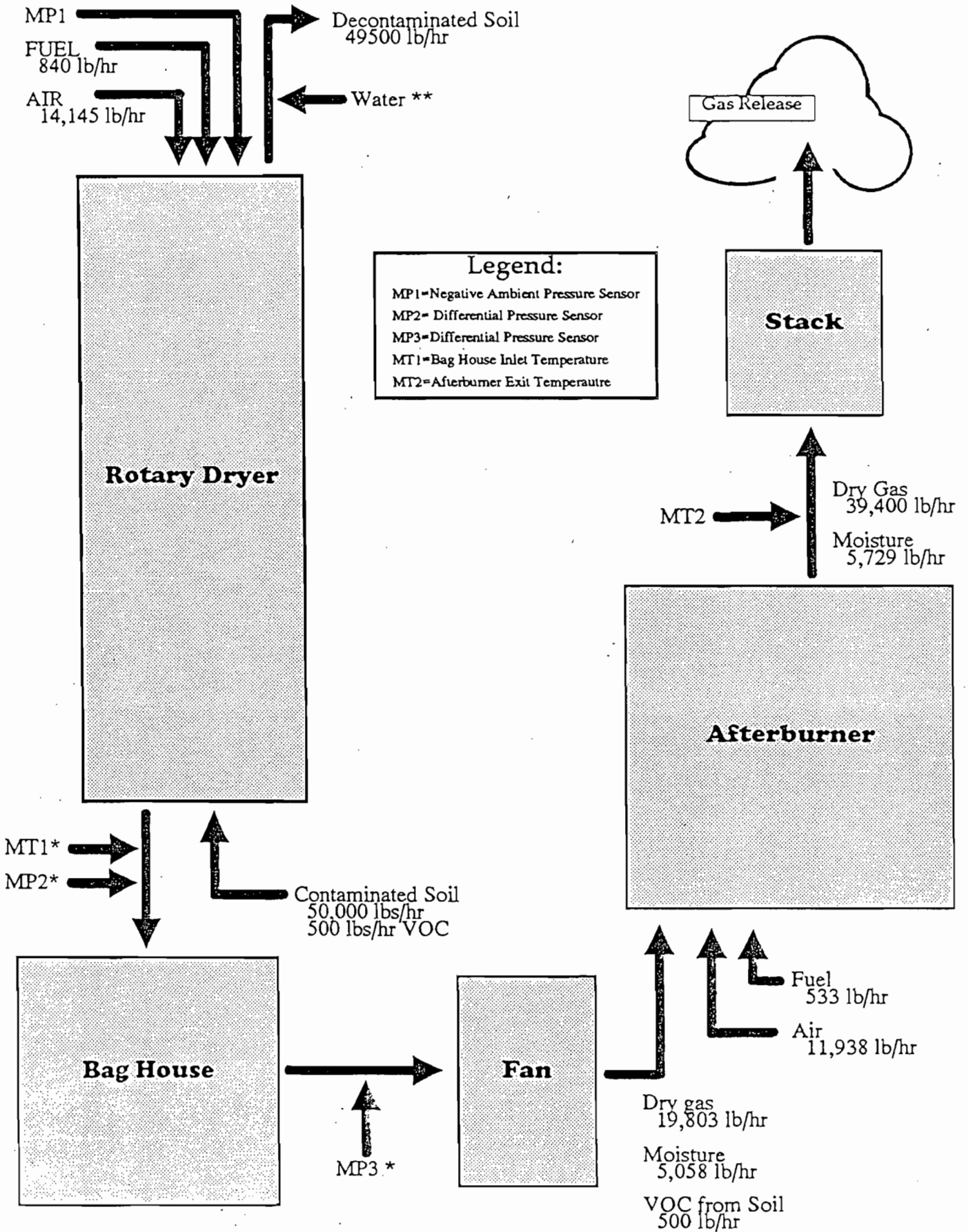
enclosures

cc: Mr. Arnold Dinkins (Mobile Reclaim, Inc.)





PROCESS FLOW DIAGRAM

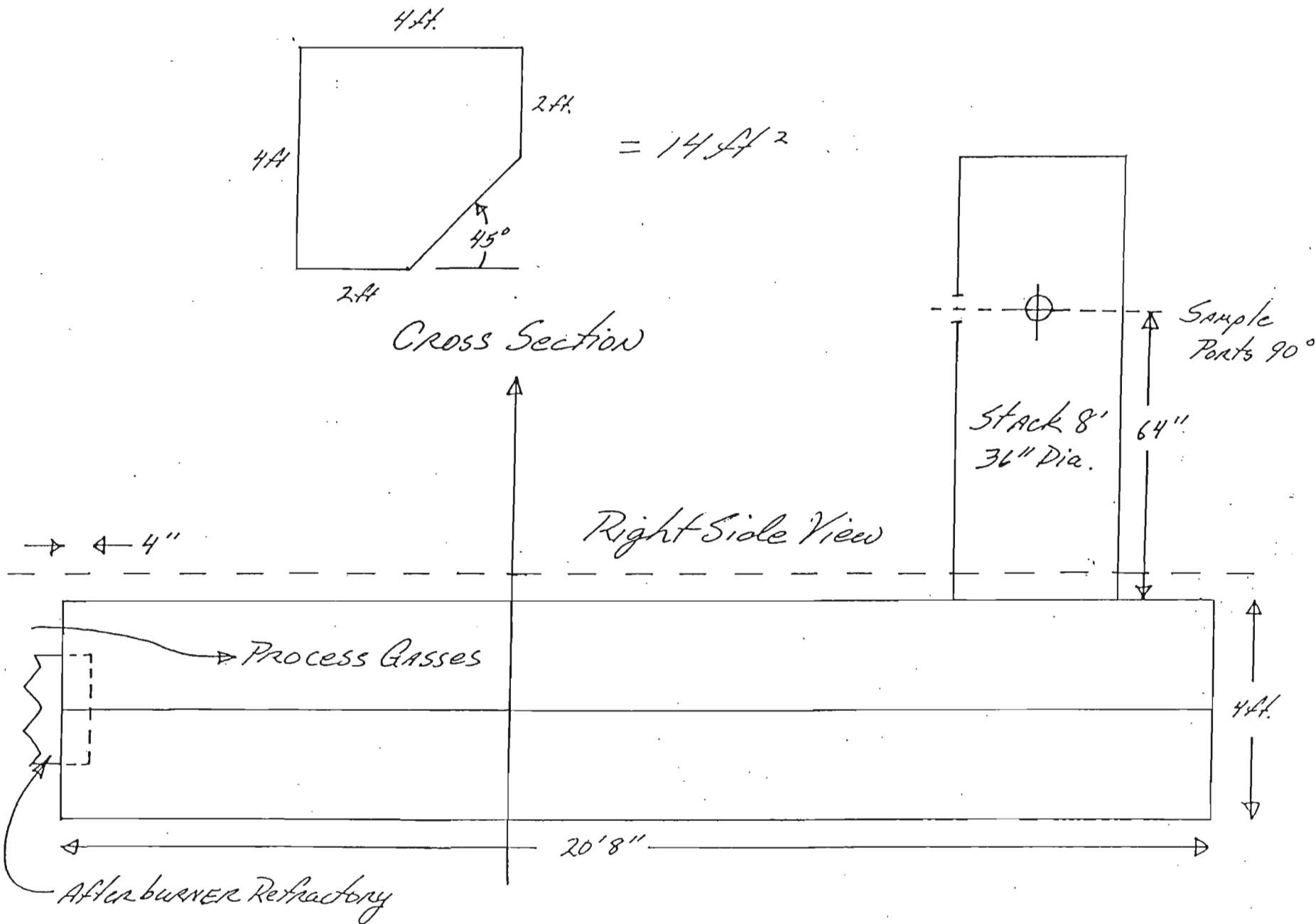


+ All Values at Process Maximum
 *These devices linked by P.I.D. Logic Device
 ** Particulate Control with Water Mist (No Leachate)

Attachment I, Fig. 2

Diagram for Afterburner Retention Time Vol. Calc.

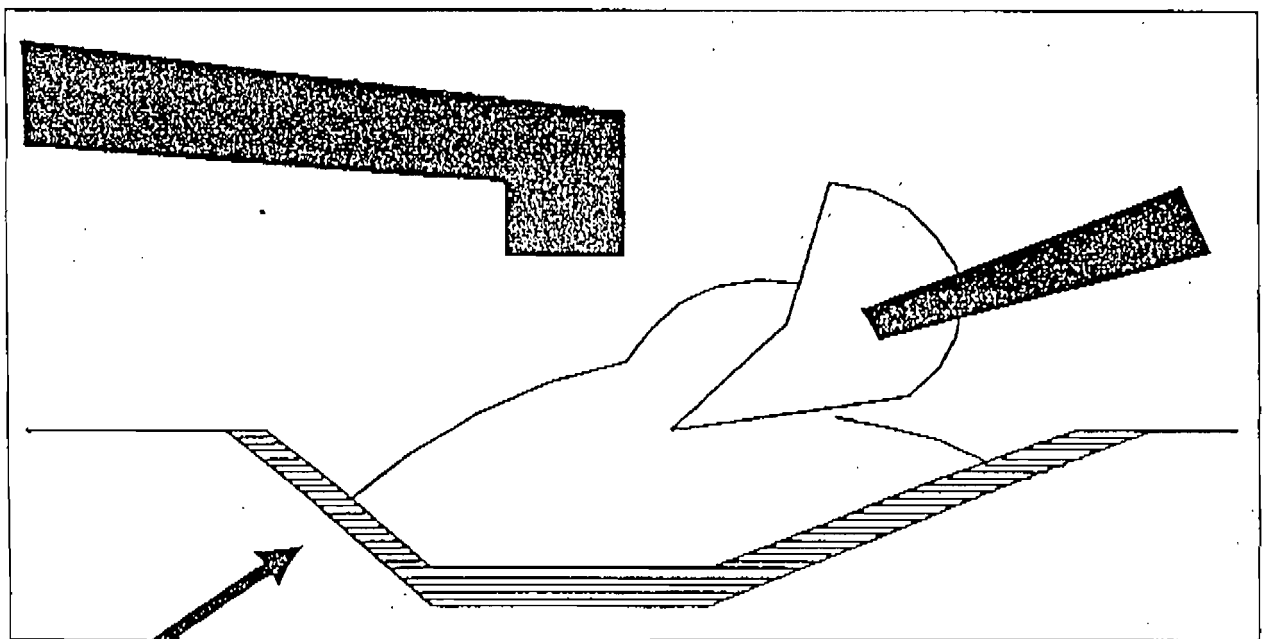
1-14-80
WMB
SR LGW



FUGITIVE DUST CONTROL

Mobile Soil Reclamation Units (M-SRU's) process 25 tons of soil an hour. Because of the large quantities tons of soil being dug, moved, dried, and moved again in this process of soil decontamination, dust is an unfortunate byproduct, particularly after the soils have been dried. It is important to keep in mind the temporary nature of these remediation operations and their similarity to other "dusty businesses." Dust is a familiar problem for most construction sites which move soils, producing dust, and finish their work in a few weeks or months. Just as do construction sites, M-SRU's control dust using water sprays to "wet down" soils. Proper use of wetting will not produce any run off or leachate because of the huge capacity of the dry soils to soak up eight to thirty-five percent water (8% - 35%).

Application of water to the hot dry soils at the discharge augers may produce steam (to which fine dust may hitch-hike a ride). Proper application can minimize the steam without creating a run-off or leachate. Proper construction of a depression below the discharge augers lined with clay material creates a convenient catch basin for waters which can soak into the super dry soils. This method of handling the dry, dusty, clean material is simple and effective.



Soil discharge Containment

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 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 additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. W. Arnold Dinkins Pres. Mobile Reclaim Inc. 3120 NW 37th St. Gainesville, FL 32605	4. Article Number P052 482 255 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
5. Signature - Address X <i>[Signature]</i>	Always obtain signature of addressee or agent and DATE DELIVERED.
6. Signature - Agent X	8. Addressee's Address (ONLY if requested and fee paid)
7. Date of Delivery 5/12	

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 052 482 255
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to	W. Arnold Dinkins	
Street and No.	3120 NW 37th St. →	
P.O., State and ZIP code	Gainesville, FL	
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt showing to whom and Date Delivered		
Return Receipt showing to whom, Date, and Address of Delivery		
TOTAL Postage and Fees	\$	
Postmark or Date	5-10-90	
	AC 01-179694	

PS Form 3800, June 1985

Mobile Reclaim Inc



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

May 10, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. W. Arnold Dinkins, President
Mobile Reclaim, Inc.
3120 N.W. 37th Street
Gainesville, Florida 32605

Dear Mr. Dinkins:

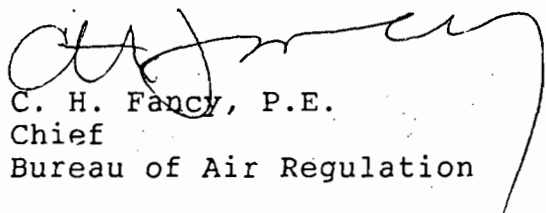
Re: File No. AC 01-179694, Mobile Reclaim, Inc.

The Department has made a preliminary review of your application for permit to construct a soil remediation unit for operation throughout Florida. Before this application can be processed, we need the following information:

1. A process diagram that clarifies how the gas flows through the rotary kiln dryer, baghouse, afterburner, and stack.
2. A general drawing of the afterburner giving actual dimensions that can be used to determine its volume.
3. The normal and maximum retention time and temperature of the gas in the afterburner.
4. Normal and maximum temperature and retention time of the soil in the rotary kiln.
5. Precautions to be used to minimize fugitive dust emissions from the treated soil.

We will resume processing the application after receipt of the requested information. If you have any questions on this matter, please call Willard Hanks at (904)488-1344.

Sincerely,


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

CHF/plm

c: Don Ehlenbech, BWC
District Air Program Administrators
County Air Program Administrators
Stephen Neck, P.E.

*** SCREEN-1.1 MODEL RUN ***
*** DRAFT VERSION XXXXX ***

mobile reclaim, inc.

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT
EMISSION RATE (G/S) = 1.000
STACK HEIGHT (M) = 6.10
STK INSIDE DIAM (M) = .91
STK EXIT VELOCITY (M/S) = 25.20
STK GAS EXIT TEMP (K) = 1033.00
AMBIENT AIR TEMP (K) = 293.00
RECEPTOR HEIGHT (M) = .00
IOPT (1=URB,2=RUR) = 2
BUILDING HEIGHT (M) = .00
MIN HORIZ BLDG DIM (M) = .00
MAX HORIZ BLDG DIM (M) = .00

BUOY. FLUX = 36.65 M**4/S**3; MOM. FLUX = 37.29 M**4/S**2.

*** FULL METEOROLOGY ***

*** SCREEN AUTOMATED DISTANCES ***

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
10.	.0000	0	.0	.0	.0	.0	.0	.0	
100.	.5184	6	1.0	1.0	5000.0	88.0	23.8	23.5	NO
200.	5.888	4	20.0	20.0	5000.0	21.6	15.8	8.9	NO
300.	12.60	4	20.0	20.0	5000.0	21.6	22.9	12.6	NO
400.	13.29	4	20.0	20.0	5000.0	21.6	29.7	15.8	NO
500.	12.01	4	20.0	20.0	5000.0	21.6	36.4	18.9	NO
600.	10.39	4	20.0	20.0	5000.0	21.6	43.0	21.7	NO
700.	9.387	4	15.0	15.0	4800.0	27.4	49.6	24.8	NO
800.	8.410	4	15.0	15.0	4800.0	27.4	55.9	27.5	NO
900.	7.720	4	10.0	10.0	3200.0	38.0	62.6	30.8	NO
1000.	7.253	4	10.0	10.0	3200.0	38.0	68.7	33.4	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 10. M:
367. 13.42 4 20.0 20.0 5000.0 21.6 27.6 14.8 NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** SUMMARY OF SCREEN MODEL RESULTS ***

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	13.42	367.	0.

** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **

W. Arnold Dinkins

Business Consulting & Investments
3120 N.W. 37th Street
Gainesville, FL 32605

RECEIVED
DER - MAIL ROOM
1990 APR 26 PM 1:41

4/24/90

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

Dear Mr. Hanks:

I am enclosing for your processing the following items:

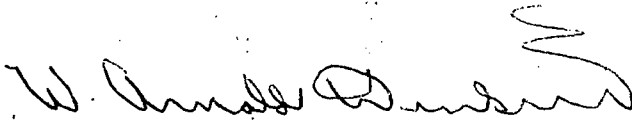
DER Form 17-1.202(1) - Application To Operate/Construct
Air Pollution Sources for Mobile Reclaim, Inc.,
Gainesville, Florida.

Letter of Authorization which shows my authority to sign the
application.

A check payable to the Florida Department of Environmental
Regulation in the amount of \$ 1,000.00.

If I can furnish any additional information, I will be happy to
do so on request.

Very truly yours,



W. Arnold Dinkins

00.1031

MOBILE RECLAIM, INC.

3120 NW. 37TH ST. PH. 904-378-7377
GAINESVILLE, FL 32605

1009

63-1024/631

April 23 1990

PAY
TO THE
ORDER OF

Florida Department Environmental Regulations

\$ *1000.00*

One thousand and 00/100

DOLLARS

GSB Gainesville State Bank
GAINESVILLE, FLORIDA 32602 Member FDIC

W. Andrew Dunder

FOR

[REDACTED]

TO WHOM IT MAY CONCERN:

Mobile Reclaim, Inc., a Florida corporation, hereby appoints its President, W. Arnold Dinkins, of 3720 NW 37 Street, Gainesville, Florida 32605, as its authorized agent to execute any and all documents as shall be reasonably necessary and appropriate on behalf of Mobile Reclaim, Inc. This authorization shall remain in full force and effect, and may be relied upon by any entity to whom it is submitted, unless and until such entity receives notice of the expiration of the authority herein given.

Dated this 23rd day of April, 1990.

MOBILE RECLAIM, INC.



By: W. Arnold Dinkins
W. Arnold Dinkins,
President

STATE OF FLORIDA
COUNTY OF ALACHUA

Before me, the undersigned authority, personally appeared W. Arnold Dinkins, well known by me to be the President of Mobile Reclaim, Inc., by me being first duly sworn, deposes and says that he executed the foregoing document for the uses and purposes therein expressed, with particularity.

Witness my hand and official seal this 23rd day of April, 1990.

[Signature]
Notary Public, State of Florida,
at Large



My Commission expires:

Notary Public, State of Florida
My Commission Expires Feb. 11, 1992
Bonded Thru Troy Fain - Insurance Inc.

W. Arnold Dinkins

Business Consulting & Investments
3120 N.W. 37th Street
Gainesville, FL 32605

RECEIVED
DER - MAIL ROOM
1990 APR 26 PM 1:41

4/24/90

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

Dear Mr. Hanks:

I am enclosing for your processing the following items:

DER Form 17-1.202(1) - Application To Operate/Construct
Air Pollution Sources for Mobile Reclaim, Inc.,
Gainesville, Florida.

Letter of Authorization which shows my authority to sign the
application.

A check payable to the Florida Department of Environmental
Regulation in the amount of \$ 1,000.00.

If I can furnish any additional information, I will be happy to
do so on request.

Very truly yours,



W. Arnold Dinkins

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 Stephen L. Neck

Stephen L. Neck, P.E.
Name (Please Type)

Air Consulting and Engineering, Inc.
Company Name (Please Type)

2106 N.W. 67th Place, Suite 4, Gainesville, FL 32606
Mailing Address (Please Type)

Florida Registration No. 20020 Date: 4/20/90 Telephone No. (904).335-1889

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.

Existing SRU #202 (FDER Permit Number AC35-149332 expired) is retrofitted with
a VOC afterburner to meet current FDER policy requirements.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction _____ Completion of Construction completed

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.)

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

FDER Permit Number AC35-149332 expiration July 1, 1989

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____ ; if seasonal, describe: _____
8760 hours per year

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? yes
(statewide)
a. If yes, has "offset" been applied? No
b. If yes, has "Lowest Achievable Emission Rate" been applied? Yes
c. If yes, list non-attainment pollutants. VOC, Particulate matter
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? Yes
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? No
 - a. If yes, for what pollutants? _____
 - 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.

Current FDER policy regulates SRU's to 0.8 gr/SCF @ 50% excess air for particulate
matter and 95% destruction of VOC.

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		
VOC contaminated soil	Particulate	1.0	50,000	
	VOC	1.0		

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 50,000

2. Product Weight (lbs/hr): ≈ 50,000

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	
particulate	5.13	22.5	0.08 gr/SCF @ 50% excess air	5.13	500	2190	
VOC	20.0	87.6	95% destruction efficiency	N/A	500	2190	
NO _x	4.02	17.6		N/A	4.02	17.6	
CO	1.005	4.4		N/A	1.005	4.4	
SO ₂	13.73	60.1		N/A	13.73	60.1	

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. See Attachment A

⁴Emission, if source operated without control (See Section V, Item 3).

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)
Custom--See Figure 1	Particulate	99%		engineering judgement

E. Fuels $\eta = \frac{500 - 5.13}{500} \times 100 = 99\%$

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Number 2 fuel oil	201 GPH	201 GPH	27.764

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: 0.5 Percent Ash: _____
 Density: 6.83 lbs/gal Typical Percent Nitrogen: _____
 Heat Capacity: _____ BTU/lb 138,000 BTU/gal
 Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

N/A

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 20' ft. Stack Diameter: 3.0 ft.

Gas Flow Rate: 35040 ACFM 6963 DSCFM Gas Exit Temperature: 1400 °F.

Water Vapor Content: 30 % Velocity: 82.6 FPS

Stack gas @ 6% O₂ by volume

SECTION IV: INCINERATOR INFORMATION

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

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.

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:

F. 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

(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

(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 A
PROCESS PARAMETERS

Number 2 Fuel Oil

Dryer Burner 17×10^6 BTUH @ 13800 BTU/GAL = 123 GAL/HR
Afterburner 10.764×10^6 BTUH = 78 GAL/HR

Total Dryer Off-Gases = 8904 ACFM @ 300°F

Total Stack Gases:

35042 ACFM @ 1400°F, 30% H₂O

Allowable Particulate Emissions

0.08 gr/SCF @ 50% excess air = 0.08 [150/139.7] = 0.086 gr/SCF @ 39.7% excess air

(0.086 gr/SCF) ÷ (7000 gr/lb) x 6963 ft³/Hr x 60 min/Hr
= 5.13 lb/Hr particulate matter

Allowable VOC Emissions

At maximum soil contamination of 1% by weight = 500 lb/Hr VOC as carbon
potential emission

Afterburner exhaust = (500) (0.04) @ 96% conservative destruction efficiency
= 20 lb/Hr as carbon

maximum allowable ppm C = 1538 @ maximum soil contamination rate

However, average soil contaminations are expected to be much less than this and outlet concentrations much less, therefore, EPA Method 25A is desired for compliance demonstration.

NO_x, SO₂, and CO Emissions

AP42, Table 1.3-1 Distillate 0.1

NO_x = 201 GAL/HR x 0.02 lb NO_x/GAL = 4.02 lb/Hr

SO₂ = 201 GAL/HR x 0.5 (0.142) lb SO₂/GAL = 14.27 lb/Hr

CO = 201 GAL/HR x 0.005 lb CO/GAL = 1.005 lb/Hr

ATTACHMENT B

COMPLIANCE DEMONSTRATION

Particulate Emissions = 0.08 gr/SCF @ 50% excess air
EPA Method 5, EPA Method 3

VOC Emissions = 20 lb/Hr maximum and minimum of 95% destruction efficiency

Visible emissions = ≤5% opacity
EPA Method 9

NOTES

NOMEX[®] BAGS - 16 oz./sq. yd.
PULSE JET CLEANING
240 BAGS at 6" DIA. X 7.5'
60 BAGS at 6" DIA. X 5.0'
60 BAGS at 6" DIA. X 4.0'
60 BAGS at 6" DIA. X 3.0'
3958 TOTAL SURFACE AREA
8904 ACFM
AIR TO CLOTH RATIO 2.25:1

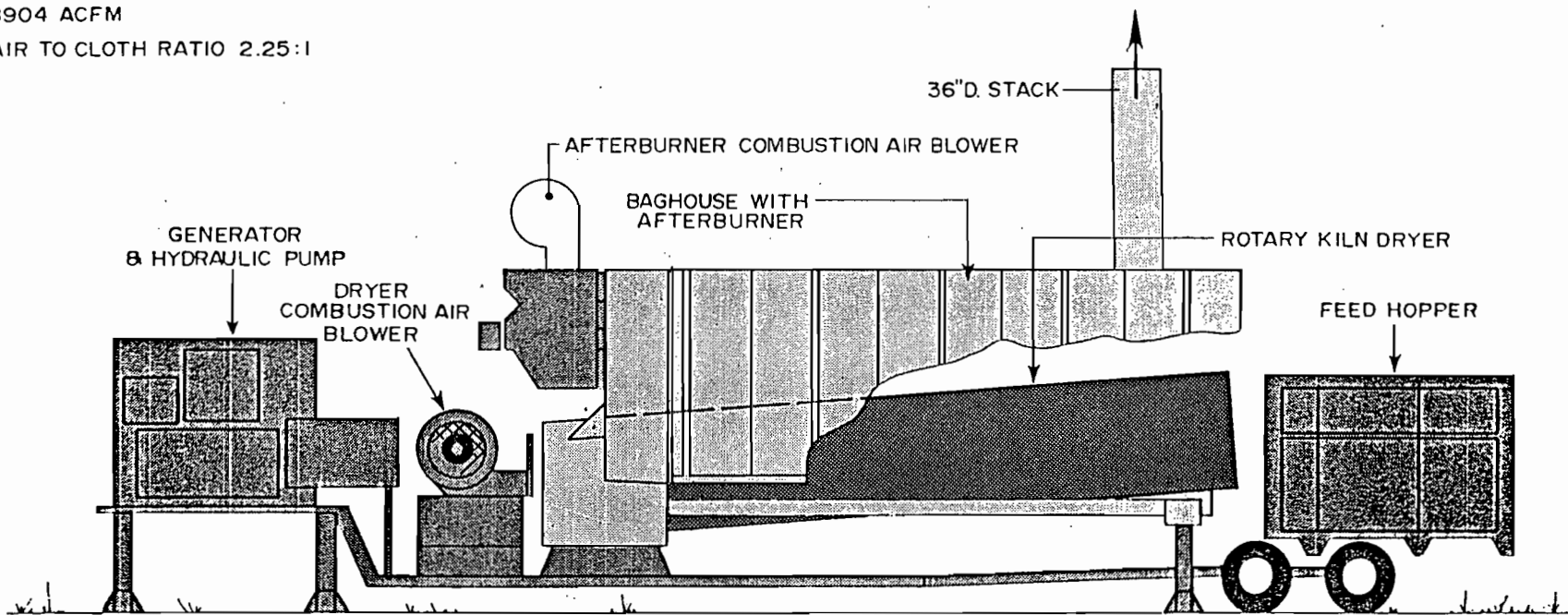


FIGURE I.
REMEDICATION UNIT WITH BAGHOUSE DETAIL.
MOBILE RECLAIM, INC.

AIR CONSULTING
and
ENGINEERING

DESIGN CALCULATIONS

SRS MOBILE SOIL TREATMENT UNIT WITH AFTERBURNER SYSTEM

Calculation #1: Fuel Consumption

Assume:#2 Fuel, Mid Continent @	143925 BTU/Gal
Assume:Burner Efficiency at 96%	0.96

Net BTU from fuel:	138000 BTU/Gal
Assume:Process Burner at:	17000000 BTU/hr
Fuel Consumption from Process Burner:	123 Gal/hr
Assume:Max Afterburner at:	22000000 BTU/hr
Fuel Consumption from Afterburner:	159 Gal/hr

WHB

8760 hrs/year

Calculation #2: Process Combustion Air Requirements

Air Requirements for Main Burner (at 10% over theoretical):

$$123 \text{ Gal/hr} \times 115 \text{ lb/Gal} = 14145 \text{ lb/hr}$$

Oxygen for Main Burner: $14145 \text{ lb/hr} \times$

$$\frac{385 \text{ ft}^3}{29 \text{ lb}} \text{ (Air)} \times 21\% \times \frac{32 \text{ lb}}{385 \text{ ft}^3} \text{ (O}_2\text{)} = 3278 \text{ lb/hr}$$

Air Requirements @50% Excess Air:

$$14145 \text{ lb/hr} \times 140\% = 19803 \text{ lb/hr}$$

WHB

Calculation #3: Volume of Process Gas

$$\begin{array}{rcl}
 \text{Volume Dry Gas:} & 300 \text{ F} & = 19803 \text{ lb/hr} \times \\
 & \frac{385 \text{ ft}^3}{29 \text{ lb}} \times \frac{1 \text{ hr}}{3600 \text{ sec}} & \times \frac{760 \text{ R}}{528 \text{ R}} = 105.1 \text{ ft}^3/\text{sec}
 \end{array}$$

Volume of Moisture formed during Combustion:

$$123 \text{ gal/hr} \times 8.6 \text{ lb/gal} = 1058 \text{ lb/hr}$$

Weight of Moisture from Soil: Assume: 8 percent

$$25 \text{ ton/hr} \times 2000 \text{ lb/ton} \times 8.00\% = 4000 \text{ lb/hr}$$

Total Process Moisture: 5058 lb/hr

Volume of Process Moisture: 5058 lb/hr X

$$\begin{array}{rcl}
 & \frac{385 \text{ ft}^3}{18 \text{ lb}} \times \frac{1 \text{ hr}}{3600 \text{ sec}} & \times \frac{760 \text{ R}}{528 \text{ R}} = 43.3 \text{ ft}^3/\text{sec}
 \end{array}$$

Total Volume:	From Dry Gas Volume		105.1 ft ³ /s
	From Moisture Volume	+	43.3 ft ³ /s
			148.4 ft ³ /sec
		X	60 min/hr
			8904 ft ³ /min

Process acfm: 8904 ft³/min

WHB

Calculation #4: Key Parameter Concentrations in Process Gas

Oxygen Concentration in Combustion Gasses:

Available O2 from incoming Air: 19803 lb/hr X

$$\frac{385 \text{ ft}^3}{29 \text{ lb}} \text{ (Air)} \times 21.00\% \times \frac{32}{385} \text{ (O}_2\text{)} = 4589 \text{ lbs/hr}$$

Less that used for Combustion: Calculation #2: -3278 lbs/hr

Leaves residual oxygen in gas stream: 1311 lbs/hr

"Inert" Gas (CO2,N2 ..) = Calculation #2: 19803 lb/hr
From previous line -1311 lb/hr

18492 lb/hr

Convert lbs of O2 to volume: 1311 lbs/hr X

$$\frac{385 \text{ ft}^3}{32 \text{ lb}} \text{ (Aver)} \times \frac{760 \text{ R}}{528 \text{ R}} \times \frac{1 \text{ hr}}{3600 \text{ sec}} = 6.3 \text{ ft}^3/\text{sec}$$

Concentration of O2 in Dry Gas = $\frac{6.3 \text{ ft}^3/\text{sec}}{105.1 \text{ ft}^3 \text{ (fm Calc \#3)}}$ = 5.99% O2

Moisture Concentration in Combustion Gasses =

$$\frac{43.3 \text{ ft}^3/\text{sec}}{148.4 \text{ ft}^3/\text{sec}} \text{ Calculation \#3:} = 29.18\% \text{ H}_2\text{O}$$

Total Moisture Vol.

WHB

Calculation #5: Afterburner Requirements

Heat in Process Gas: 32 F to 300 F

Dry Gas:	19803 lb/hr	X	64 BTU/lb	=	1.27E+06 MBTU
Water:	5058 lb/hr	X	1240 BTU/lb	=	6.27E+06 MBTU

Total Heat in Process Gas:					7.54E+06 MBTU

Afterburner Heat Requirements: 300 F to 1400 F

Dry Gas:	19803 lb/hr	X	265.1 BTU/lb	=	5.25E+06 MBTU
Water:	5058 lb/hr	X	1100 BTU/lb	=	5.56E+06 MBTU

Total Heat Required of Afterburner:					1.08E+07 MBTU

Fuel for Afterburner:	10813575 BTU			
	-----	=		78 gal/hr
	138000 BTU/gal			

WHB

Calculation #6: Afterburner Combustion Air

WHB

Assume:	10000 ppm	Contamination in Soil	
VOC loading from Process =	(Assuming	25 tons/hr)	
25 t/hr X	2000 lb/t X	0.01 %	= 500 lb/hr
VOC = gasoline	500 lb/hr		

	6.63 lb/gal gasoline		= 75 gal/hr
Air Required for Voc Combustion =			
75 gal/hr X	115 lb air/gal of fuel		= 8625 lb/hr
Oxygen for VOC Combustion =		8625 lb/hr X	
385 ft3		32 lb	
-----	X 21.00% O2 X	-----	= 1999 lb/hr
29 lb		385 ft3	
Air Required for Afterburner =	Max or Used?	Used	=
78 gal/hr (Calc. #5) X	115 lb/hr		= 8970 lb/hr
50 % Ex Air =	8970 lb/hr X	140.00%	= 12558 lb/hr
Weight of Excess air =			12558 lb/hr
			-8970 lb/hr

			3588 lb/hr
Oxygen for Afterburner =		8970 lb/hr X	
385 ft3		32 lb	
----- (AIR) X	21.00% X	----- (O2)	= 2079 lb/hr
29 lb		385 ft3	
Afterburner System Oxygen =	from VOC	1999 lb/hr	
	for Afterburner	2079 lb/hr	

		4078 lb/hr	
Air fm Atom Air=	2079 lb/hr X	40.00%	= -831.6 lb/hr

		3246 lb/hr	
Oxygen carryover from Bag house =		-1311 lb/hr	

Oxygen Needed as Make up =		1935 lb/hr	
Expressed as Needed Make up Air =	1935 lb/hr X		
385 ft3		29 lb	
----- (O2) /	21.00% X	----- (Air)	= 8350 lb/hr
32 lb		385 ft3	
Plus Excess air @			3588 lb/hr

Total Make up air =			11938 lb/hr

Calculation #7: Exhaust Gas Composition

Assume: 115 lb/gal of fuel is Dry Gas
 Assume: 8.6 lb/gal of fuel is Moisture

AB Moisture = 78 gal/hr X 8.6 lb/hr = 671 lb/hr
 Plus Moisture from Process = 5058 lb/hr

Total System Moisture = 5729 lb/hr

AB Dry Gas = 78 gal/hr X 115 lb/gal = 8970 lb/hr
 Plus Inert Gas from Process (calc. 4) = 18492 lb/hr
 Plus Make up Air for Voc's (Calc. 6) = 11938 lb/hr

Total System Dry Gas = 39400 lb/hr

Volume Dry Gas = 39400 lb/hr X

$$\frac{385 \text{ ft}^3}{32 \text{ lb}} \times \frac{1 \text{ hr}}{3600 \text{ sec}} \times \frac{1860 \text{ R}}{528 \text{ R}} \text{ (T)} = 464 \text{ ft}^3/\text{sec}$$

Volume Moisture = 5729 lb/hr X

$$\frac{385 \text{ ft}^3}{18 \text{ lb}} \text{ (H}_2\text{O)} \times \frac{1 \text{ hr}}{3600 \text{ sec}} \times \frac{1860 \text{ R}}{528 \text{ R}} \text{ (T)} = 120 \text{ ft}^3/\text{sec}$$

Total Volume = 584 ft³/sec

acfm = 584 ft³/s X 60 s/min = 35040 ft³/min

WHB

Calculation #8: Afterburner RT and Stack Velocities

Assume: 14 ft² AB Cross Sectional Area
Assume: 20.667 ft AB effective length
Assume: 7.069 ft² Stack Cross Sectional Area (36" dia.)

Retention time =

$$20.667 \text{ ft} \quad \times \quad \frac{1}{584 \text{ ft}^3/\text{sec}} \quad \times \quad 14 \text{ ft}^2 = 0.5 \text{ sec}$$

Stack Velocity =

$$\frac{584 \text{ ft}^3/\text{s}}{7.069 \text{ ft}^2} = 83 \text{ ft/sec}$$

WHB

35204

PROCESS EMISSIONS SUMMARY

----- Main Burner: -----
 17000000 BTU/hr @ 138000 BTU/gal = 123 Gal/hr

----- Afterburner: -----
 10764000 BTU/hr Afterburner Requirements = 78 Gal/hr

----- Gas Volumes: -----
 8904 acfm Process @ 300 deg. F (148.89 C)
 35042 acfm for both burners
 7900 scfm dry gas for total process
 3198 scfm Main
 9261 scfm Both Burners

----- Fuel and Ash Parameters: -----
 0.50% Sulphur
 20 lb NOx/1000 gal fuel 300 P. Temp 422 K
 5 lb CO/1000 gal fuel 1400 AB Temp 1033 K
 0.34 lb Particulates/1000 gal
 6.83 lb/gal # 2 Fuel Oil

----- Process Parameters: -----
 25 tons/hr
 10000 ppm Contamination in process materials 98.00% Control

----- Conversions: -----
 273 K = 0 C
 453.59 g/lb
 46 g/mol NO2 78 g/mol C6H6
 64 g/mol SO2 180 g/mol C12H36
 28 g/mol CO
 0.0283 m3/ft3

Particulates from fuel per AP42, Table 1.3-1, Distillate Oil (as PM10) =

PROCESS: 123 gal/hr X 0.00034 lb/gal = 0.04 lb/hr
AFTERBURNER: 78 gal/hr X 0.00034 lb/gal = 0.03 lb/hr

0.07 lb/hr

0.07 lb/hr X 7000 gr/lb = 478 gr/hr

Burner Particulates Uncontrolled = $\frac{478 \text{ gr/hr}}{474000 \text{ scf/hr}}$ = 0.001009 gr/dry cf

WHB

Allowable particulates at		0.03 gr/cm ³ dry	
-----	X	7900 scfm	X
0.03 gr			60 min/hr =
7000 gr/lb			2.03 lb/hr
		from fuel combustion (above) =	-----
			-1.4E-07 lb/hr
Total Allowable Uncontrolled Particulate from Soils =			-----
			2.03 lb/hr

WHB

Evaluation of VOC in Gasses:

Uncontrolled VOC from Soil Contaminants =

25 T/hr	X	2000 lb/ton	X	0.01 (Conc)	=	500 lb/hr VOC
500 lb/hr	X	453.59 g/lb			=	226795 g/hr
3198 scfm	X	0.0283 m3/ft3	X	60 min/hr	=	5430 m3/hr
2.3E+11 ug/hr				422.00 K		
-----	X	22.414 (G.C.)	X	-----		
180 g/mole	S			273 K		
-----						= 8039.22 ppm
5430.204 m3/hr	X	1000 l/m3				

Controlled VOC from Soil Contaminants = (at 98.00% Control)

500 lb/hr	X	2.00% uncontrolled			=	10 lb/hr VOC
10 lb/hr	X	453.59 g/lb			=	4536 g/hr
9261 scfm	X	0.0283 m3/ft3	X	60 min/hr	=	15725 m3/hr
4.5E+09 ug/hr				1033.00 K		
-----	X	22.414 (G.C.)	X	-----		
180 g/mole	S			273 K		
-----						= 135.91 ppm
15725.18 m3/hr	X	1000 l/m3				

Overall Efficiency =		135.91 ppm			=	98.31%

		8039.22 ppm				

WHB

Concentration of SO2 in Stack Gas =

$$\begin{aligned} \text{Afterburner SO2} &= 78 \text{ gal/hr} \times 0.50\% \text{S} \times \\ & 6.83 \text{ lb/gal} \times \frac{64 \text{ SO2}}{32 \text{ S}} = 5.33 \text{ lb/hr} \end{aligned}$$

Plus SO2 from Process Burner + 8.4 lb/hr

Total SO2 = 13.73 lb/hr

$$13.73 \text{ lb/hr} \times 453.59 \text{ g/lb} = 6228 \text{ g/hr}$$

$$9261 \text{ scfm} \times 0.0283 \text{ m3/ft3} \times 60 \text{ min/hr} = 15725 \text{ m3/hr}$$

$$\begin{aligned} & \frac{6.2\text{E}+09 \text{ ug/hr}}{64 \text{ g/mole S}} \times 22.414 \text{ (G.C.)} \times \frac{1033.00 \text{ K}}{273 \text{ K}} \\ & \text{-----} = 524.83 \text{ ppm} \\ & 15725.18 \text{ m3/hr} \times 1000 \text{ l/m3} \end{aligned}$$

WHB

Concentration of NOx in Stack Gas =

Afterburner NOx (as NO2) =

$$78 \text{ gal/hr} \times 0.02 \text{ lb NOx/gal fuel} = 1.56 \text{ lb/hr}$$

$$\text{Plus NOx from Process} + 2.46 \text{ lb/hr}$$

$$\text{-----}$$
$$4.02 \text{ lb/hr}$$

$$4.02 \text{ lb/hr} \times 453.59 \text{ g/lb} = 1823 \text{ g/hr}$$

$$9261 \text{ scfm} \times 0.0283 \text{ m}^3/\text{ft}^3 \times 60 \text{ min/hr} = 15725 \text{ m}^3/\text{hr}$$

$$\frac{1.8\text{E}+09 \text{ ug/hr}}{46 \text{ g/mole N}} \times 22.414 \text{ (G.C.)} \times \frac{1033.00 \text{ K}}{273 \text{ K}} = 213.79 \text{ ppm}$$
$$15725.18 \text{ m}^3/\text{hr} \times 1000 \text{ l/m}^3$$

WHB

Concentration of CO in Stack Gas =

Afterburner CO =

$$78 \text{ gal/hr} \times 0.005 \text{ lb CO/gal fuel} = 0.39 \text{ lb/hr}$$

$$\text{Plus CO from Process} + 0.615 \text{ lb/hr}$$

$$\text{Total Process NOx} = \text{-----} 1.005 \text{ lb/hr}$$

$$0.39 \text{ lb/hr} \times 453.59 \text{ g/lb} = 177 \text{ g/hr}$$

$$9261 \text{ scfm} \times 0.0283 \text{ m}^3/\text{ft}^3 \times 60 \text{ min/hr} = 15725 \text{ m}^3/\text{hr}$$

$$\begin{aligned} & \frac{1.8\text{E}+08 \text{ ug/hr}}{28 \text{ g/mole CO}} \times 22.414 \text{ (G.C.)} \times \frac{1033.00 \text{ K}}{273 \text{ K}} \\ & \text{-----} \\ & 15725.18 \text{ m}^3/\text{hr} \times 1000 \text{ l/m}^3 = 34.07 \text{ ppm} \end{aligned}$$

WHB

$$\begin{aligned}
 &\text{NOx per AP42, Table 1.3-1, Distillate Oil (as NO2) =} \\
 &123 \text{ gal/hr} \times 0.02 \text{ lb NOx/gal fuel} = 2.46 \text{ lb/hr} \\
 &2.46 \text{ lb/hr} \times 453.59 \text{ g/lb} = 1116 \text{ g/hr} \\
 &3198 \text{ scfm} \times 0.0283 \text{ m}^3/\text{ft}^3 \times 60 \text{ min/hr} = 5430 \text{ m}^3/\text{hr} \\
 &\frac{1.1\text{E}+09 \text{ ug/hr}}{46 \text{ g/mole N}} \times 22.414 \text{ (G.C.)} \times \frac{422.00 \text{ K}}{273 \text{ K}} \\
 &\text{-----} = 154.77 \text{ ppm} \\
 &5430.204 \text{ m}^3/\text{hr} \times 1000 \text{ l/m}^3
 \end{aligned}$$

WHB

CO per AP42, Table 1.3-1, Distillate Oil (as CO) =

$$\begin{aligned} & 123 \text{ gal/hr} \times 0.005 \text{ lb CO/gal fuel} = 0.615 \text{ lb/hr} \\ & 0.615 \text{ lb/hr} \times 453.59 \text{ g/lb} = 279 \text{ g/hr} \\ & 3198 \text{ scfm} \times 0.0283 \text{ m}^3/\text{ft}^3 \times 60 \text{ min/hr} = 5430 \text{ m}^3/\text{hr} \\ & \frac{2.8\text{E}+08 \text{ ug/hr}}{28 \text{ g/mole CO}} \times 22.414 \text{ (G.C.)} \times \frac{422.00 \text{ K}}{273 \text{ K}} \\ & \text{-----} = 63.57 \text{ ppm} \\ & 5430.204 \text{ m}^3/\text{hr} \times 1000 \text{ l/m}^3 \end{aligned}$$

WHB

$$\begin{aligned}
\text{SOx (as SO}_2\text{)} &= 123 \text{ gal/hr} \times 0.50\% \text{S} \times \\
& 6.83 \text{ lb/gal} \times \frac{64 \text{ SO}_2}{32 \text{ S}} = 8.4 \text{ lb/hr} \\
& 8.4 \text{ lb/hr} \times 453.59 \text{ g/lb} = 3810 \text{ g/hr} \\
& 3198 \text{ scfm} \times 0.0283 \text{ m}^3/\text{ft}^3 \times 60 \text{ min/hr} = 5430 \text{ m}^3/\text{hr} \\
& \frac{3.8\text{E}+09 \text{ ug/hr}}{64 \text{ g/mole S}} \times 22.414 \text{ (G.C.)} \times \frac{422.00 \text{ K}}{273 \text{ K}} \\
& \text{-----} = 379.85 \text{ ppm} \\
& 5430.204 \text{ m}^3/\text{hr} \times 1000 \text{ l/m}^3
\end{aligned}$$

WHB

Uncontrolled Concentration of Benzene if Contaminant is Gasoline =

2.90%	X	500	=	14.5 lb/hr
14.5 lb/hr	X	0.98 (CONTROL WITH AB)	=	0.29 lb/hr
0.29 lb/hr	X	453.59 g/lb	=	132 g/hr
9261 scfm	X	0.0283 m3/ft3 X	60 min/hr =	15725 m3/hr
1.3E+08 ug/hr				
-----	X	22.414 (G.C.) X	-----	
78 g/mole Benz			273 K	
-----			-----	= 9.1 ppm
15725.18 m3/hr	X	1000 l/m3		

WHB