



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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To: _____	Location: _____
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To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Dale Twachtmann

*for* FROM: Steve Smallwood *ott*

DATE: December 18, 1989

SUBJ: Amendment of Construction Permits  
TPS Technologies, Inc.

Attached for your approval and signature is a letter that will amend eleven permits issued to the above mentioned company for portable soil remediation units. The amendments will make the construction permit notification requirements for relocation of the portable units consistent, clarify that system destruction efficiency for VOC is to be used to determine emissions, and authorize the use of other approved test methods to measure the emissions from the units.

The amendments are not controversial.

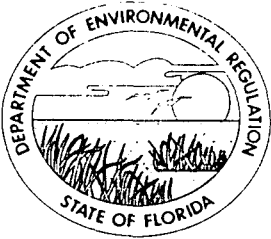
I recommend your approval and signature.

Attachment

SS/WH/plm

RECEIVED  
DEC 20 1989

Office of the Secretary



# 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

December 19, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Kenneth L. Wood, Vice-President  
TPS Technologies, Inc.  
2070 S. Orange Blossom Trail  
Apopka, Florida 32703

Dear Mr. Wood:

Re: Amendment of Construction Permits

The Department is in receipt of Mr. Blair Dominiak's December 14, 1989, letter requesting the permits to construct your portable soil decontamination units be amended to make the notification requirements for relocation of the portable units consistent, clarify that the system destruction efficiency for VOC is to be used to determine emissions, and authorize the use of other approved test methods to measure the emissions of the units. These requests are acceptable and TPS Technologies, Inc. construction permits are amended as follows.

Construction Permits Nos. AC 48-150356, 48-150358, and 48-150360

Specific Conditions Nos. 9 and 23 are revised to:

9. Benzene emissions shall not exceed 1.52 lb/hr. Total VOC emissions shall not exceed 200 lbs/hr. Compliance shall be determined from soil analysis and production rate or Method 18, 25, or 25A tests (40 CFR 60, Appendix A, revised as of July 1, 1988). If credit is taken for VOC destruction by the afterburner, the permittee must establish its efficiency by making a material balance using soil analysis and EPA Method 18, 25, or 25A test data.

23. This unit shall not be operated at any other site until the applicant has requested authorization to operate 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 Air Program Administrator in the appropriate Department district office and approved local air program that the unit is being relocated. This notification shall provide the permit number of the unit, a copy of the last stack test report, the

Page 2  
December 19, 1989

date of the proposed move, the new site for the unit, and the locations and contamination levels of the soils to be treated. The district shall notify the permittee of any new conditions the unit must meet within 15 days of the receipt of the relocation notice. The unit is permitted to operate in any county in Florida.

These conditions replace the requirement that the permits be transferred prior to operation at the new location that was on the first sheets of these permits.

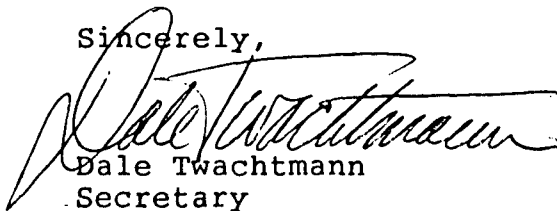
Construction Permits Nos. AC 48-166172, 48-166605 thru 48-166611

Specific Condition No. 9 is revised to:

9. Benzene emissions shall not exceed 6.3 lbs/hr. Total VOC emissions shall not exceed 25 lbs/hr. Compliance shall be determined from soil analysis, production rate, and the system destruction efficiency which is established by Method 18, 25, or 25A tests (40 CFR 60, Appendix A, revised as of July 1, 1988).

A copy of this letter must be filed with each of the soil remediation unit permits and shall become part of those permits.

Sincerely,



Dale Twachtmann  
Secretary

Attachment:  
TPS December 14, 1989 letter

DT/plm

**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. 2.  Restricted Delivery (Extra charge)

<p>3. Article Addressed to:</p> <p>Mr. Kenneth L. Wood, Vice-Pres. TPS Technologies, Inc. 2070 S. Orange Blossom Trail Apopka, FL 32703</p>	<p>4. Article Number</p> <p>P 938 762 797</p> <p>Type of Service:</p> <p><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</p> <p>Always obtain signature of addressee for agent and <b>DATE DELIVERED.</b></p>
<p>5. Signature - Address</p> <p>X</p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature - Agent</p> <p>X <i>J. Sellers</i></p>	<p>7. Date of Delivery</p> <p><i>1/4</i></p>

PS Form 3811, Mar. 1988 \* U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 938 762 797

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
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(See Reverse)

PS Form 3800, June 1985

Sent to	
Mr. Kenneth L. Wood, TPS Tech-	
Street and No. nologies	
2070 S. Orange Blossom Trail	
P.O., State and ZIP Code	
Apopka, FL 32703	
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: 1-2-90	

December 14, 1989

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Twin Towers Office Building  
Tallahassee, Florida 32399-2400

RECEIVED  
DEC 15 1989  
DER-BAQM

Attention: Mr. Willard Hanks  
Engineer

Re: **Request for Permit Amendment**  
**Soil Remediation Units**  
**Permit Nos. AC48-150356, AC48-150358,**  
**AC48-150360, AC48-166172, and**  
**AC48-166605 through AC48-166611**

Dear Mr. Hanks:

Confirming several recent telephone conversations, TPS Technologies wishes to amend the above-referenced permits by changing the required EPA Method 25 test for total hydrocarbons to a Method 25A test. Since total hydrocarbon test results are used to calculate a system destruction efficiency, TPS would like to utilize the test method with the lowest detection limit. In very clean stack gases, low detection limits enable us to calculate high destruction efficiencies.

Another important advantage of Method 25A testing is the elimination of the more serious sampling and analysis errors that so often result from Method 25 testing. Not only are Method 25A results instantaneous, but they also avoid the cumbersome analytical procedures required with Method 25.

With your prior approval, as discussed in our telephone conversation of November 16, 1989, Method 25A was successfully substituted for Method 25 in the compliance tests conducted at the Enron site in Caryville, Florida on December 1, 1989, for SRU-200P-103 (AC48-166172). Mr. Rick Prusa of the Northwest District Office was also in agreement with this change in test methods.



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From (Your Name) Please Print Mr. W. Dominick		Recipient's Phone Number (Very Important)	
Your Phone Number (Very Important) 313-591-1000		Company Fla. Dept. of Environmental Regulation	
Company CROFT/LOFTUS		Department/Floor No.	
Street Address 68 MARKET ST		Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) 2600 Blair Stone Road	
City ONIA		City Tallahassee, Florida	
State MI		State Florida	
ZIP Required 48150		ZIP Required 32399-2401	

YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.) Florida Permit Amendment		IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address City State ZIP Required	
PAYMENT <input checked="" type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card		5 <input type="checkbox"/> Cash	

<b>4 SERVICES</b> (Check only one box)		<b>DELIVERY AND SPECIAL HANDLING</b>		PACKAGES WEIGHT YOUR DECLARED VALUE OVER SIZE		Emp. No. _____ Date _____		Federal Express Use Base Charges			
Priority Overnight Service (Delivery by next business morning) 11 <input type="checkbox"/> YOUR PACKAGING 51 <input type="checkbox"/> 16 <input checked="" type="checkbox"/> FEDEX LETTER 56 <input type="checkbox"/> FEDEX LETTER * 12 <input type="checkbox"/> FEDEX PAK * 52 <input type="checkbox"/> FEDEX/PAK * 13 <input type="checkbox"/> FEDEX BOX 53 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE 54 <input type="checkbox"/> FEDEX TUBE  Economy Service (formerly Standard Air) (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY SERVICE 70 <input type="checkbox"/> HEAVYWEIGHT ** 80 <input type="checkbox"/> DEFERRED HEAVYWEIGHT **		Standard Overnight Service (Delivery by next business afternoon) 51 <input type="checkbox"/> 56 <input type="checkbox"/> FEDEX LETTER * 52 <input type="checkbox"/> FEDEX/PAK * 53 <input type="checkbox"/> FEDEX BOX 54 <input type="checkbox"/> FEDEX TUBE  Heavyweight Service (for Extra Large or any package over 150 lbs.) 70 <input type="checkbox"/> HEAVYWEIGHT ** 80 <input type="checkbox"/> DEFERRED HEAVYWEIGHT **		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box H) 2 <input type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) (CSS not available for Dangerous Goods Shipments) 5 <input type="checkbox"/> CONSTANT SURVEILLANCE SVC. (CSS) (Extra charge) (Release Signature Not Applicable) 6 <input type="checkbox"/> DRY ICE Lbs. 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)		DIM SHIPMENT (Heavyweight Services Only) Received At 1 <input type="checkbox"/> Regular Stop 3 <input type="checkbox"/> Drop Box 2 <input type="checkbox"/> On-Call Stop 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station FedEx Emp. No. _____		Street Address _____ City _____ State _____ Zip _____ Received By _____ Date/Time Received _____ FedEx Employee Number _____ 5 Release Signature _____ Date/Time _____		Declared Value Charge Other 1 _____ Other 2 _____ Total Charges _____ REVISION DATE 10/89 PART #119501 FXEM 10/89 FORMAT #014 014 © 1989 FEDEX PRINTED IN U.S.A.	

\*Delivery commitment may be later in some areas.  
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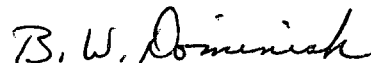
Mr. Willard Hanks  
December 14, 1989  
Page 2

Because our SRU heating chamber can be credited with the combustion of a percentage of the vaporized soil contaminants, we request the permit be modified to state that a system destruction efficiency should be calculated, not an afterburner destruction efficiency.

In addition, Specific Condition 23 of permits AC48-150356, AC48-150358, and AC48-150360 states that the "unit cannot operate at any other site until its operation permit is amended to authorize its use at the new site." This sentence has caused confusion with some district and regional programs that insist we cannot move the SRU to a new site until they first issue a relocation approval letter. We request that the language of Specific Condition 23 be amended to reflect the relocation wording used in our new permits (AC48-166172 and AC48-166605 through AC48-166611).

Our next compliance tests are scheduled for December 22, 1989 at GATX Terminals Corporation in Tampa using SRU-200P-104. TPS would like to utilize the Method 25A procedure for these tests, if at all possible. Please let me know if we could obtain either written or verbal approval for a permit amendment to conduct a Method 25A test by that date.

Respectfully,



Blair W. Dominiak  
Manager, Regulatory Compliance

BWD:sev

cc: Rick Prusa - Northwest District Office  
William Schroeder - Hillsborough Co. EPC  
J.L. Powell - TPS Technologies  
K.L. Wood - TPS Technologies  
D.A. Frick - TPS Technologies

**TPS** Thermo Process Systems Inc.  
Holcroft Inc.  
Thermo Incineration Inc.

12068 Market Street  
Livonia, Michigan 48150

(313) 591-1000  
Fax: (313) 591-6443

COVER SHEET

RECEIVED

Please deliver the following pages to:

DEC 14 1989

NAME: MR. WILLARD HANIKS 8-1344

DER-BAQM

COMPANY: FBI

LOCATION: TALLAHASSEE, FL

FAX #: 904-487-4938

TEL #: \_\_\_\_\_

FROM: BLAIR W. DOMINIAK

EXT.: 218

TOTAL NUMBER OF PAGES 3 (including cover sheet)

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TIME TRANSMITTED: 4:50 pm

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