

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

February 10, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Elford, General Manager
Soil Solutions
P. O. Box 26104
Winston-Salem, NC 27114

Dear Mr. Elford:

Re: Permit Exemption Request for the CleanSoil Process

The Department has reviewed your January 10, 1993, letter requesting that the soil treating unit referred to as the CleanSoil Process be exempted from the permitting requirements of Florida (Chapter 17-4, F.A.C.). As we understand the process, the unit uses steam to vaporize petroleum products from contaminated soil and condenses, or captures, the petroleum products in activated carbon. The activated carbon is regenerated by back flushing with steam from a boiler. The steam or condensate is then passed through oilphillic filters which trap the petroleum product. The oilphillic filters are disposed of in a RCRA permitted facility. Water is recycled; resulting in no discharge.

Our findings are:

1. Treatment of soil by the CleanSoil Process will emit air pollutants. Air pollution emitted during the treatment of contaminated soil is regulated in Florida.
2. The boiler in the CleanSoil Process is a source of air pollution because it burns a fossil fuel.
3. The atmospheric vent for the activated carbon adsorption unit has the potential to emit air pollutants.
4. The treatment of contaminated soil is also regulated by Chapter 17-775, F.A.C., which will require the operator to obtain a general permit from the Bureau of Waste Cleanup.
5. The disposal of contaminated filters are subject to other Department regulations.

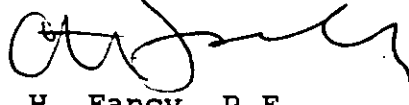
Mr. John Elford
Permit Exemption Request
Page 2

6. Soil thermal treatment processes, a similar operation, are required to be permitted in Florida.

The Department has concluded that the CleanSoil Process will require an air permit prior to operating in Florida. Any permits issued by Florida will require compliance with the applicable restrictions in the Department's regulations. Any air permit issued for this process will require monitoring of the atmospheric vent from the activated carbon adsorption unit to assure no breakthrough of hydrocarbons has occurred. Also, the sulfur content of the No. 2 fuel oil used in the boiler will be limited.

For your convenience, we are enclosing an application for an air permit to construct an air pollution source, a map showing the District offices, and a permit fee schedule. If you wish to operate at a specific site, you should contact the air engineer in the District office having jurisdiction over the site. If you want to operate at several sites in different Districts, please contact the Bureau of Air Regulation office at (904) 488-1344 for guidance. Any questions on general air permitting requirements should be directed to Mr. Preston Lewis of the Bureau of Air Regulation. You should also contact the Bureau of Waste Cleanup at (904) 488-0190 for their requirement on the treatment of contaminated soil.

Sincerely,



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

CHF/WH/plm

Attach: Application
Map
Fee Schedule
Chapter 17-775, F.A.C.
Air Regulations

cc: Tom Conrardy, BWC w/ Soil Solutions' Jan. 10, 1993, letter

P 062 921 967



Receipt for Certified Mail

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

PS Form 3800, June 1991

Sent	John Elford	
Street and No.	Self Solutions	
P.O., State and ZIP Code	Winston Salem, NC	
Postage		\$
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, and Addressee's Address		
TOTAL Postage & Fees		\$
Postmark or Date	2-10-93	

SENDER: • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece below the article number. • The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.		I also wish to receive the following services-(for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: John Elford, Gen. Mgr. Self Solutions P.O. BOX 26104 Winston-Salem, NC 27114		4a. Article Number P 062 921 967	
5. Signature (Addressee)		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	
6. Signature (Agent) 		7. Date of Delivery 	
PS Form 3811, November 1990 * U.S. GPO: 1991-287-066		8. Addressee's Address (only if requested and fee is paid)	

DOMESTIC RETURN RECEIPT