



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Trevor Cook
Vice President
KleenSoil International, Inc.
13838 Harlee Road
Palmetto, Florida 34221

DEP File No. 7775002-001-AC
Relocatable Facility

NOTICE OF PERMIT DENIAL

The applicant, KleenSoil International, Inc., 13838 Harlee Road, Palmetto, Florida 34221, applied on December 14, 1995 to the Department of Environmental Protection for a permit to construct a mobile soil thermal treatment facility.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes (F.S.), and Chapter 62-210, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

The Department issued an Intent to Issue the construction permit on April 16, 1996. The applicant published the Intent to Issue instead of the required Public Notice of Intent to Issue Permit. In a letter dated May 23, 1996, the applicant was asked to publish the Notice of Intent to Issue Permit and provide the Department with the Proof of Publication of this Notice. In a letter dated April 11, 1997, the applicant was asked what the plans were for this unit. The applicant has not responded to these letters.

The Department hereby denies the permit for the following reasons:

1. The applicant failed to publish the Public Notice of Intent to Issue Permit.
2. The applicant failed to furnish proof of publication of the Public Notice of Intent to Issue Permit.
3. The applicant did not respond to the April 11, 1997 letter from the Department.

A person whose substantial interests are affected by this Notice may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 850/488-9730, fax: 850/487-4938. Petitions must be filed within fourteen days of receipt of this Notice. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only

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

at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the action or proposed action.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available for this action.

A person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this Notice.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This Notice constitutes final agency action and is effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this Notice will not be effective until further order of the Department.

Any party to this Notice of Permit Denial has the right to seek judicial review 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 Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Sincerely,



Howard L. Rhodes, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT DENIAL was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 7-29-97 to the person(s) listed:

Mr. Trevor Cook, KleenSoil International, Inc. *
Mr. Mark Hagmann, Koogler & Associates
District Air Program Administrators
County Air Program Administrators

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52(7), Florida
Statutes, with the designated Department Clerk,
receipt of which is hereby acknowledged.



Heidi Jober
(Clerk)

7-29-97
(Date)

Memorandum

Florida Department of Environmental Protection

TO: Howard L. Rhodes

THRU: Clair Fancy 
Al Linero  7/24

FROM: Willard Hanks

DATE: July 24, 1997

SUBJECT: KleenSoil International, Inc.
Denial of Permit
File No. 7775002-001-AC

Attached for approval and signature is a Notice of Permit Denial for the referenced application for permit to construct a mobile soil thermal treatment facility.

In May, 1996 the applicant published the Intent to Issue instead of the Public Notice of Intent to Issue Permit. In a letter dated May 23, 1996, the applicant was notified of this error and asked to publish the Public Notice of Intent to Issue Permit. After receiving no response to this letter, the applicant was asked to provide the Department with his plans on permitting this unit within 30 days in a letter dated April 11, 1997. The applicant did not respond to this letter.

I recommend your approval and signature of the Notice of Permit Denial.

Attachment

CHF/wh

Memorandum

Florida Department of
Environmental Protection

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

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

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Trevor Cook, VP
Kleensail Int'l, Inc
13838 Harlee Rd
Palmetto, FL 34221

4a. Article Number
P 265 659 192

4b. Service Type

<input type="checkbox"/> Registered	<input checked="" type="checkbox"/> Certified
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured
<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> COD

7. Date of Delivery
4-16-97

5. Received By: (Print Name)
[Signature]

6. Signature: (Addressee or Agent)
[Signature]

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

PS Form 3817, December 1994

Return Address completed on the reverse side?

Thank you for using Return Receipt Service.

Domestic Return Receipt

P 265 659 192

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	Trevor Cook
Street & Number	Kleensail
Post Office, State, & ZIP Code	Palmetto, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	4-14-97
	775000-00-AC

PS Form 3800, April 1995



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 11, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Trevor Cook, Vice President
KleenSoil International, Inc.
13838 Harlee Road
Palmetto, Florida 34221

Re: DRAFT Permit No. 7775002-001-AC

Dear Mr. Cook:

The Department mailed you a Technical Evaluation and Preliminary Determination, Intent to Issue, Notice of Intent, and Draft permit for a mobile soil thermal treatment facility on April 16, 1996. In a Department letter dated May 23, 1996, you were asked to publish the Notice of Intent to Issue Permit. As of this date, the Department has not received the Proof of Publication of this Notice.

Please let the Department know within 30 days of receipt of this letter if you still intend to obtain a permit to construct and operate this mobile unit in Florida. If your plans have changed, we request you withdraw the application for permit for this unit. The Department will deny this permit if you do not withdraw this application, provide Proof of Publication of the Notice of Intent to Issue Permit, or respond to this letter in a timely manner.

If you have any questions on this matter, please write to me or call Willard Hanks, review engineer, at 904/488-1344.

Sincerely,

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

AAL/wh

cc: Dr. John Koogler, P.E.

Jan A. Zysko
725 Lakewood Circle
Merritt Island, FL 32952

May 11, 1996

Florida Department of Environmental Protection
C. H. Fancy, P.E. Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32599

RECEIVED

MAY 15 1996

**BUREAU OF
AIR REGULATION**

REF: DEP File No. 7775002-001-AC Mobile Soil

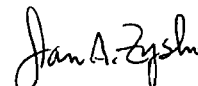
Pursuant to a NOTICE OF INTENT TO ISSUE a construction permit for the referenced project which was published in a Florida Today - Brevard Edition on 5/11/96, please provide any other information relative to this project which may serve to document the technical details of the mobile treatment facility; the location, time and place of operation; the chemical and physical characteristics of the material treated; and the expected emission products and quantities.

Specifically, a copy of the following would be appreciated:

- the permit application as submitted by Mr. Trevor Cook, President KleenSoil International, Inc.
- the technical evaluation and preliminary determination
- the proposed construction permit
- the proposed air operating permit if existing
- specific conditions of the proposed permit(s)

Please mail the requested information to me at the address above. You may contact me at (407) 452-0139 should you need any additional information.

Sincerely,


Jan A. Zysko

sent copy to her 5/24

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

Is your RETURN ADDRESS completed on the reverse side?

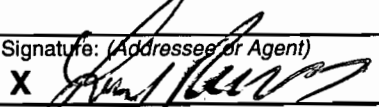
SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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: Invernal Cook, U.P. Klean Soil Int'l, Inc. 13838 Harlee Rd Palmetto, FL 34221	4a. Article Number P 265 659 244
5. Received By: (Print Name) _____	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
6. Signature: (Addressee or Agent) X 	7. Date of Delivery 7/31/97
8. Addressee's Address (Only if requested and fee is paid) _____	

Thank you for using Return Receipt Service.

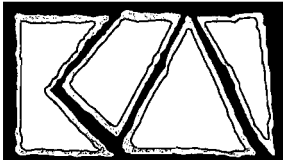
PS Form 3811, December 1994 Domestic Return Receipt

P 265 659 244

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	Invernal Cook
Street & Number	Klean Soil
Post Office, State, & ZIP Code	Palmetto, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	7-29-97
7775002-001-AC	

PS Form 3800, April 1995



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

RECEIVED

KA 450-95-05
April 25, 1996

MAY 03 1996

BUREAU OF
AIR REGULATION

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

Subject: KleenSoil International, Inc.
Mobile Soil Remediation Plant
7775002-001-AC (Notice of Intent to Issue)-Additional Information

Dear Mr. Hanks:

KleenSoil International requests that certain Specific Conditions of the draft permit (7775002-001-AC) be revised. The proposed changes to the Specific Conditions are set forth in the following paragraphs with new language indicated by underlining. Following each amendment is a rationale for the proposed change. On behalf of KleenSoil International, I would appreciate it if you will review the following proposed amendments and incorporate these amendments into the issued permit.

1. Specific Conditions Nos. 1-5 (No Changes)
2. Specific Condition No. 6a-

From: Total recoverable petroleum hydrocarbon (TRPH) concentration of the contaminated soil shall not exceed 27,500 ppm by weight (daily average). The dryer process rate shall not exceed 65 TPH. These limits will produce estimated VOC emissions of 4.3 lbs/hr.

To: The dryer process rate shall not exceed 65 TPH. These limits will produce estimated VOC emissions of 4.3 lbs/hr.

Rational: It is our understanding that FLPRO has replaced TRPH.

3. Specific Conditions No. 6b-IIb (No Changes)

4. Specific Condition No. 11c -

From: Estimated total sulfur dioxide emissions from the unit resulting from the sulfur in the fuel and soil is 96.9 TPY.

To: Estimated total sulfur dioxide emissions from the unit resulting from the sulfur in the fuel and soil is 95.8 TPY.

Rational: It is our understanding that only emissions from stationary sources should be considered when estimating total emissions from the unit. Any equipment used in conjunction with this unit to transfer treated and untreated soil is considered exempt under F.A.C. 62-210.300(3)e: "Internal combustion engines in boats, aircraft and vehicles used for transporting of passengers or freight."

5. Specific Conditions Nos. 12-20 (No Changes)

6. Specific Condition No. 21 -

From: As proposed by the permittee, only new No. 2 fuel oil containing a maximum of 0.75 percent sulfur and 0.35 percent sulfur, monthly average, and propane (LPG) shall be used as fuel for the kiln and afterburner. Only diesel fuel shall be burned by the diesel generator. The maximum permitted fuel consumption for the kiln is 41 MMBtu/hr, which is approximately 455 gallons per hour (GPH) No. 2 fuel oil or 290 GPH LPG. The maximum permitted fuel consumption of the afterburner is 42 MMBtu/hr, which is approximately 465 GPH No. 2 fuel oil or 300 GPH LPG. The generator is allowed to burn 13.2 GPH diesel fuel.


To: As proposed by the permittee, only new No. 2 fuel oil containing a maximum of 0.75 percent sulfur and 0.35 percent sulfur, monthly average, and propane (LPG) shall be used as fuel for the kiln and afterburner. Only diesel fuel shall be burned by the diesel generator. The maximum permitted fuel consumption for the kiln is 41 MMBtu/hr, which is approximately 290 gallons per hour (GPH) No. 2 fuel oil or 455 GPH LPG. The maximum permitted fuel consumption of the afterburner is 42 MMBtu/hr, which is approximately 300 GPH No. 2 fuel oil or 465 GPH LPG. The generator is allowed to burn 13.2 GPH diesel fuel.

Rationale: It appears that the gallons per hour for propane and No. 2 diesel fuel oil were switched. Documentation in both the permit application and the submitted additional information support the proposed usage rates.

7. Specific Conditions Nos. 22-35 (No Changes)

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

Sincerely,



Mark A. Hagmann
KOOGLER & ASSOCIATES

CC: DAPA'S
LAPA'S

Get top of envelope to the

Is your RETURN ADDRESS completed on the reverse side?

- SENDER:**
- Complete items 1 and/or 2 for additional services.
 - Complete items 3, and 4a & b.
 - Print your name and address on the reverse of this form so that we can return this card to you.
 - Attach this form to the front of the mailpiece, or on the back if space does not permit.
 - Write "Return Receipt Requested" on the mailpiece below the article number.
 - The Return Receipt will show to whom the article was delivered and the date delivered.

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

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Trevor Cook, VP
 Kleen Soil Int'l
 13838 Harlee Rd
 Palmetto, FL 34221

4a. Article Number
 Z 127 633 214

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

7. Date of Delivery
 5/30/96


5. Signature (Addressee)

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

6. Signature (Agent)

Thank you for using Return Receipt Service.

Z 127 633 214

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

Sent to		Trevor Cook
Street and No.		Kleen Soil Int'l
City, State and ZIP Code		Palmetto, FL
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	5-23-96	
7775002-001-AC		

PS Form 3800, March 1993



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

May 23, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Trevor Cook, Vice President
KleenSoil International, Inc.
13838 Harlee Road
Palmetto, Florida 34221

Dear Mr. Cook:

Re: Mobile Soil Thermal Treatment Facility
DEP File No. 7775002-001-AC

State regulations require a Notice of Intent to Issue Permit be published in a newspaper having circulation in each county a facility is operated in. Proof of these publications must be furnished to the Department prior to issuance of a construction permit.

The wrong document was published for your proposed 65 ton per hour mobile petroleum-contaminated soil thermal treatment unit. A copy of the document that should have been published is enclosed for your information.

To continue the permitting process for the proposed unit, you must publish a copy of the attached Notice of Intent to Issue Permit in a newspaper having circulation in each county you intend to operate the unit in. We request that you obtain from the newspaper and submit to the Department, the original copies of the proofs of publication. Retain copies of the proof of publication for your file.

The Department will resume processing your application after receipt of the proofs of publication of the Notice of Intent to Issue Permit. If you have any questions on this matter, please call Willard Hanks at (904)488-1344.

Sincerely,

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

AAL/wh/t

Enclosure

cc: Mark Hagmann, Koogler & Assoc.

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

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

7775002-001-AC

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit to KleenSoil International, Incorporated, 13838 Harlee Road, Palmetto, Florida 34221, which will authorize the construction of a 65 ton per hour mobile petroleum-contaminated soil thermal treatment facility equipped with a baghouse and thermal oxidizer (afterburner). The unit will be allowed to operate anywhere in Florida except Hernando County and may not process hazardous wastes or PCB-containing materials. The regulations do not require a Best Available Control Technology (BACT) determination or Lowest Achievable Emission Rate (LAER) determination. The unit has the potential to emit a total of 25 tons per year (TPY) particulate matter, 97 TPY sulfur dioxide, 37 TPY nitrogen oxides, 12 TPY volatile organic compounds, and 34 TPY carbon monoxide throughout the state from its operation. 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 (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification

of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The 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 the Department offices located:

160 Governmental Center, Pensacola, FL 32501-5794
8407 Laurel Fair Drive, Tampa, FL 33619
2295 Victoria Avenue, Suite 364, Ft. Myers, FL 33901
7825 Baymeadows Way, Ste. B200, Jacksonville, FL 32256-7577
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767
400 N. Congress Avenue, Ste. A, West Palm Beach, FL 33406
111 S. Magnolia, Tallahassee, FL 32301

The County Environmental offices located at:

218 S.W. First Ave., Ft. Lauderdale, FL 33301
33 S.W. Second Ave., Ste. 9-223, Miami, FL 33130
421 W. Church St., Ste. 412 Jacksonville, FL 32202-4111
1410 N 21st St., Tampa, FL 33605
315 Court Street, Clearwater, FL 34616
901 Evernia St., West Palm Beach, FL 33401
300 South Garden St., Clearwater, FL 34616
1301 Cattleman Rd., Bldg. A, Sarasota, FL 34232
202 Sixth Ave. E., Bradenton, FL 34208
4177 Ben Durrance Rd., Bartow, FL 33830
123 W. Indiana Ave., Deland, FL 32720-4621

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

Is your RETURN ADDRESS completed?	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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
	3. Article Addressed to: Mr. Trevor Cook, VP Klean Soil Int'l, Inc 13838 Harlee Rd Palmetto, FL 34221	4a. Article Number Z 27633 198
	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	
	5. Signature (Addressee) [Signature]	7. Date of Delivery 4-18-96
	6. Signature (Agent) [Signature]	8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

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

Z 127 633 198



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

Sent to	Trevor Cook
Street and No.	Klean Soil Int'l
P.O., State and ZIP Code	Palmetto, FL
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	4-16-96
7775002-001-AC Mobile	

PS Form 3800, March 1993



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

April 15, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Trevor Cook, Vice President
KleenSoil International, Inc.
13838 Harlee Road
Palmetto, Florida 34221

Dear Mr. Cook:

Enclosed is a copy of the Technical Evaluation and Preliminary Determination, Intent to Issue, Notice of Intent to Issue (for publication by KleenSoil) and draft permit to construct a mobile petroleum-contaminated soil thermal treatment facility.

Submit any written comments you wish to have considered concerning the Department's proposed action to Mr. A. A. Linero, Administrator, New Source Review Section, of the Bureau of Air Regulation. If you have any questions regarding this matter, please call Willard Hanks at (904)488-1344.

Sincerely,

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

CHF/wh/t

Enclosure

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

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an
Application for Permit

DEP File No. 7775002-001-AC
Mobile Operation

Mr. Trevor Cook, President
KleenSoil International, Inc.
13838 Harlee Road
Palmetto, Florida 34221

INTENT TO ISSUE

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

The applicant, KleenSoil International, Inc. applied on December 14, 1995 for a permit to construct a 65 TPH mobile soil thermal treatment facility.

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

Pursuant to Section 403.815, Florida Statutes and DER Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in 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. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the department at the address or

telephone number listed below. The applicant shall provide proof of publication to the Department, at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

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

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000 Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



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

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this **INTENT TO ISSUE** and all copies were mailed by certified mail before the close of business on 4-16-96 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT

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

Karin Ober 4-16-96
Clerk Date

Copies furnished to:

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

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

7775002-001-AC

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit to KleenSoil International, Incorporated, 13838 Harlee Road, Palmetto, Florida 34221, which will authorize the construction of a 65 ton per hour mobile petroleum-contaminated soil thermal treatment facility equipped with a baghouse and thermal oxidizer (afterburner). The unit will be allowed to operate anywhere in Florida except Hernando County and may not process hazardous wastes or PCB-containing materials. The regulations do not require a Best Available Control Technology (BACT) determination or Lowest Achievable Emission Rate (LAER) determination. The unit has the potential to emit a total of 25 tons per year (TPY) particulate matter, 97 TPY sulfur dioxide, 37 TPY nitrogen oxides, 12 TPY volatile organic compounds, and 34 TPY carbon monoxide throughout the state from its operation. 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 (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification

of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The 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 the Department offices located:

160 Governmental Center, Pensacola, FL 32501-5794
8407 Laurel Fair Drive, Tampa, FL 33619
2295 Victoria Avenue, Suite 364, Ft. Myers, FL 33901
7825 Baymeadows Way, Ste. B200, Jacksonville, FL 32256-7577
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767
400 N. Congress Avenue, Ste. A, West Palm Beach, FL 33406
111 S. Magnolia, Tallahassee, FL 32301

The County Environmental offices located at:

218 S.W. First Ave., Ft. Lauderdale, FL 33301
33 S.W. Second Ave., Ste. 9-223, Miami, FL 33130
421 W. Church St., Ste. 412 Jacksonville, FL 32202-4111
1410 N 21st St., Tampa, FL 33605
315 Court Street, Clearwater, FL 34616
901 Evernia St., West Palm Beach, FL 33401
300 South Garden St., Clearwater, FL 34616
1301 Cattleman Rd., Bldg. A, Sarasota, FL 34232
202 Sixth Ave. E., Bradenton, FL 34208
4177 Ben Durrance Rd., Bartow, FL 33830
123 W. Indiana Ave., Deland, FL 32720-4621

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

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

KleenSoil International, Inc.
Palmetto, Florida

65 TPH Soil Mobile Thermal Treatment Facility
Statewide Operation

Department File No. 7775002-001-AC

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

April 15, 1996

I. GENERAL INFORMATION

A. Applicant

KleenSoil International, Inc.
13838 Harlee Road
Palmetto, Florida 34221

B. Request

On December 14, 1995, KleenSoil International, Inc. submitted an application for a permit to construct a 65 ton per hour (TPH) mobile soil thermal treatment facility (rotary kiln with emissions controlled by a baghouse and afterburner). This equipment is also referred to as a low temperature thermal desorption treatment unit. The application was considered complete on February 13, 1996 when additional information requested by the Department was received.

C. Project

The applicant is requesting permission to construct and operate an Industrial Waste, Inc. 65 TPH mobile soil thermal treatment facility (SIC 1629) in Florida. The unit contains a petroleum contaminated soil feed bin, a 41 million British thermal unit per hour (MMBtu/hr) rotary drum dryer, a 99 percent efficient baghouse, a 42 MMBtu/hr afterburner, a 4.8 feet diameter by 23 feet high stack, a diesel generator, No. 2 fuel oil and propane fuel systems, and associated equipment. To comply with Florida regulations for soil thermal treatment facilities (Rule 62-296.415, F.A.C.), the unit will be equipped with a 42 MMBtu/hr thermal oxidizer (afterburner), estimated to have a 99 percent destruction efficiency. The kiln and afterburner will use propane or No. 2 oil fuels. The diesel engine will use diesel fuel (0.35 sulfur average).

D. Emissions

The unit is being permitted to treat petroleum contaminated soil as defined in Chapter 62-775, F.A.C., only. The unit will emit particulate matter (PM), volatile organic compounds (VOC), and the products of combustion of the petroleum products, including sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon monoxide (CO).

A 99 percent efficient baghouse will be used to control particulate matter emissions. A baghouse can meet the particulate matter emissions standard of 0.04 grains per dry standard cubic foot (gr/dscf) for these units in Rule 62-296.415(2), F.A.C. Approximately 79,741 actual cubic feet per minute (acfm) or 15,329 dry standard cubic feet per minute (dscfm) of air flows through the baghouse and afterburner resulting in an estimated PM emissions of 5.3 lbs/hr. The unit

is limited to treating 357,500 tons of contaminated soil during any 12 month period. As the unit may operate 8,760 hours per year, the potential PM emissions will be 23 TPY.

The VOC is evaporated from the contaminated soil in the kiln and burned in the thermal oxidizer (afterburner) which operates at a minimum temperature of 1,600°F with a retention time of 0.5 seconds. The applicant estimated the destruction efficiency of the afterburner will be 99 percent. The VOC emissions, based on treating soil containing 27,000 mg/kg petroleum, would be 4.3 lbs/hr and, for treating a maximum of 357,500 TPY of soil, 12 TPY. Hexane emissions are estimated to be 0.4 TPY. Other hazardous air pollutant (HAP) emissions are estimated to be approximately 1 TPY. Visible emissions from the afterburner cannot exceed 5 percent opacity.

Department regulations (Rule 62-296.415(1)(b), F.A.C.) limit carbon monoxide (CO) emissions to 100 parts per million by volume, dry, (ppmvd), 1-hour average.

The following table gives a summary of the allowable emissions requested by the applicant.

	Source	Drum	Afterburner	Generated	Front End Loader	Soil	Total
PM	lbs/hr		5.26 ^a	0.58			
	TPY ^c		23.02	1.59			24.61
SO ₂	lbs/hr	15.27	15.64	0.54	0.42	20.8	
	TPY ^c	18.32	18.77	1.48	1.16	57.20	96.93
VOC ^b	lbs/hr	0.07	0.08	0.65		3.48	
	TPY ^c	0.09	0.09	1.79		9.58	11.55
NOx	lbs/hr	5.82	5.96	8.2			
	TPY ^c	6.98	7.15	22.57			36.7
CO	lbs/hr		6.69	1.77			
	TPY ^c		29.30	4.86			34.16

a-PM emissions based on 0.04 gr/dscf

b-BTEX emissions estimated at 0.21 TPY benzene, 0.38 TPY toluene, 0.05 TPY ethylbenzene, and 0.14 TPY xylene

c-TPY based on treating a maximum of 357,500 tons soil/year and using a maximum of 1,412,766 GPY No. 2 fuel.

II. RULE APPLICABILITY

The proposed project, construction of a mobile soil thermal treatment facility, is subject to preconstruction review under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.).

The plant may be operated in areas designated attainment for all criteria air pollutants (Rule 62-275.400, F.A.C.), nonattainment for ozone and particulate matter (Rule 62-275.410, F.A.C.), unclassified for PM10 and sulfur dioxide (Rule 62-275.420, F.A.C.), and maintenance for ozone (Rule 62-275.600, F.A.C.).

The plant is a synthetic minor source of regulated air pollutants.

The plant is subject to Rule 62-212.300, F.A.C., which pertains to sources not subject to the Prevention of Significant Deterioration (PSD) or nonattainment review. Some of the regulations the plant is subject to are Rule 62-296.415, F.A.C., Soil Thermal Treatment Facilities, Rule 62-296.310(3), F.A.C., Unconfined Emissions, and Rule 62-210.900(3), F.A.C., Notification of Intent to Relocate Requirements.

III. TECHNICAL EVALUATION

The baghouse on the proposed unit is capable of meeting the particulate matter emission standard in the rules.

The thermal oxidizer (afterburner) is capable of meeting the temperature/retention times specified in the regulations. The afterburner will be equipped with a temperature and CO continuous emissions monitor as required by the regulation.

Reasonable precautions are required to control unconfined particulate emissions. This will involve wetting the treated soil prior to discharge from the unit and during transfer and storage of this soil prior to final disposal as needed.

The facility is a synthetic non-Title V source. The permit will limit volatile organic compound (VOC) emissions, which are considered equivalent to total recoverable petroleum hydrocarbon (TRPH) emissions, and will limit hazardous air pollutant (HAP) emissions to less than the 10/25 tons per year (TPY) limitations that trigger Title V permitting requirements. The rationale that HAP emissions will not trigger the Title V permitting requirements, since VOC emissions are limited to a maximum of 12 TPY, is based on the Department memorandum dated August 3, 1995, from Clair Fancy titled Methods of Determining/ Quantifying HAP's. Total HAPs emissions for petroleum contaminated soil will

be approximately 11 percent of the VOC emissions or, for this unit, 1.3 TPY.

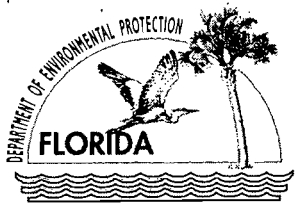
IV. Air Quality

Based on the Department's experience with similar units, there is reasonable assurance that operation of this unit will not cause a violation of any ambient air quality standard or create an unreasonable health risk to the general public.

V. Conclusion

Based on the information provided by KleenSoil International, Inc., the Department has reasonable assurance that the proposed operation of the mobile soil thermal treatment facility, 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, or any other technical provision of Chapters 62-212 and 62-4 of the Florida Administrative Code.





Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:
KleenSoil International, Inc.
13838 Harlee Road
Palmetto, FL 34221

Permit Number: 7775002-001-AC
Expiration Date: May 1, 1997
County: Statewide Operation

Project: Mobile Soil Thermal
Treatment Facility

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

Authorization to construct an Industrial Waste, Inc. 65 ton per hour (TPH) mobile soil thermal treatment facility/unit (SIC 1629) in Florida. The unit will contain a petroleum-contaminated soil feed bin, a 41 million British thermal unit per hour (MMBtu/hr) rotary drum dryer (kiln), a 99 percent efficient baghouse, a 4.8 feet diameter by 23 feet high stack, a diesel generator, and associated equipment. To comply with Florida regulations for soil thermal treatment facilities (Rule 62-296.415, F.A.C.), the unit will be equipped with a 42 MMBtu/hr thermal oxidizer (afterburner) estimated to have a 99 percent destruction efficiency. The unit will discharge approximately 79,741 actual cubic feet per minute (acfm) of gases at 1,600 °F to the atmosphere. The kiln and afterburner will use propane (LPG) and/or new No. 2 oil as fuels. The diesel engine will use diesel fuel.

The unit is authorized to operate anywhere in Florida except Hernando County.

The unit shall be constructed and operated in accordance with the permit applications, plans, documents, amendments, and drawings, except as otherwise noted in the Technical Evaluation and Preliminary Determination, General Conditions, or Specific Conditions.

Facility ID: 7775002-001-AC
Emission Unit ID: 002

PERMITTEE:
KleenSoil International, Inc.

Permit Number: 7775002-001-AC
Expiration Date: May 1, 1997

Note: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

Attachments:

1. Application received December 14, 1995.
2. DEP letter dated January 2, 1996.
3. Koogler & Associate letter received February 2, 1996.
4. Koogler & Associate letter received February 13, 1996.
5. List DEP District and county air programs.
6. DEP August 3, 1995, Memo.

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 acknowledgment 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

PERMITTEE:
KleenSoil International, Inc.

Permit Number: 7775002-001-AC
Expiration Date: May 1, 1997

GENERAL CONDITIONS:

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.

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.

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.

PERMITTEE:
KleenSoil International, Inc.

Permit Number: 7775002-001-AC
Expiration Date: May 1, 1997

GENERAL CONDITIONS:

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 62-4.120 and 62-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and 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;

PERMITTEE:
KleenSoil International, Inc.

Permit Number: 7775002-001-AC
Expiration Date: May 1, 1997

GENERAL CONDITIONS:

- 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 unit shall reasonably conform to the plan and schedule submitted in the application.
2. The afterburner (thermal oxidizer) for this unit shall be equipped with a stack having a minimum elevation of 23 feet above ground level and be designed for at least 0.5 second retention time.
3. The stack sampling facilities must comply with Rule 62-297.345, F.A.C.
4. The unit shall be equipped with means to measure the process feed rate of contaminated soil to the kiln, the pressure drop across the baghouse, and with continuous monitors and recorders to measure the hot zone temperature and the carbon monoxide (CO) concentration (Rule 62-296.415(1)(c), F.A.C.). The temperature and CO monitors shall be co-located.
5. No alterations shall be made to this unit that has the potential to increase air pollutant emissions without the prior written approval from the Department's Bureau of Air Regulation (BAR).

EMISSION LIMITATIONS

6. Total volatile organic compounds (VOC) emissions shall be limited as follows:
 - (A) Total recoverable petroleum hydrocarbon (TRPH) concentration of the contaminated soil shall not exceed 27,500 ppm by weight (daily average). The dryer process rate shall not exceed 65 TPH. These limits will produce estimated VOC emissions of 4.3 lbs/hr.

PERMITTEE:
KleenSoil International, Inc.

Permit Number: 7775002-001-AC
Expiration Date: May 1, 1997

SPECIFIC CONDITIONS:

- (B) This unit shall not treat more than 357,500 tons of contaminated soil during any 12 month consecutive period. This limit will produce estimated VOC emissions of 12 TPY.
7. Carbon monoxide (CO) emissions from the afterburner stack shall not exceed the following (Rule 62-296.415(1)(b), F.A.C.):
- (A) 100 parts per million (ppm) by volume, dry basis, from the afterburner stack during all 60 consecutive minutes periods of plant operation. The average CO emissions is the arithmetic mean of all CO concentration measurements during any consecutive 60 minutes of plant operation that were recorded by the continuous emission monitor required pursuant to Rule 62-296.415(1)(c), F.A.C.
- (B) This concentration is equivalent to a CO emission rate of 6.7 lbs/hr and 29.3 TPY from the afterburner stack.
8. Visible emissions (VE) from the afterburner stack shall not exceed 5 percent opacity (Rule 62-296.415(2), F.A.C.).
9. VE from the diesel generator shall not exceed 20 percent opacity (Rule 62-296.310(2), F.A.C.).
10. Total particulate matter (PM) emissions from the afterburner stack shall not exceed any of the following:
- (A) 0.04 grains per dry standard cubic foot.
- (B) 5.3 lbs/hr
- (C) 23.0 tons in any 12 consecutive month period.
11. Sulfur dioxide (SO₂) emissions shall be controlled by limiting the sulfur content of the fuel (Rule 62-4.050(4)(a)1.c., F.A.C.).
- (A) Sulfur content of the fuel shall not exceed 0.75 percent by weight maximum and 0.35 percent, 30-day average.
- (B) Calculated sulfur dioxide emissions from the fuel are 31.5 lbs/hr. An additional 20.8 lbs/hr may be caused by the background level of sulfur in the soil.
- (C) Estimated total sulfur dioxide emissions from the unit resulting from the sulfur in the fuel and soil is 96.9 TPY.
12. The unit shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor (Rule 62-296.320, F.A.C.).

PERMITTEE:
KleenSoil International, Inc.

Permit Number: 7775002-001-AC
Expiration Date: May 1, 1997

SPECIFIC CONDITIONS:

PLANT OPERATION REQUIREMENTS

13. The unit shall only treat petroleum contaminated soil as defined in Rule 62-775, F.A.C. (Rule 62-296.415, F.A.C.).

14. Hazardous waste as defined in 40 CFR 261.3 shall not be processed by this unit (Rule 62-775, F.A.C.).

15. This unit shall not treat soil contaminated with polychlorobiphenyls (PCB) (Rule 62-775, F.A.C.).

16. Based on data in the application, the TRPH contaminants in the soil treated by this unit shall not exceed 27,500 ppm by weight (daily avg.) without prior approval by the Department.

17. The afterburner shall be operated at or above 1,600 °F with a minimum of 0.5 second retention time (Rule 62-296.415, F.A.C.).

18. The unit may operate continuously, 24 hours per day, 7 days per week, and 52 weeks per year. It shall not be operated at a site with another soil thermal treatment facility without prior approval from the Department.

19. The maximum contaminated soil charging rate to this unit shall not exceed 65 TPH (daily average) and 357,500 tons during any consecutive 12 month period. Soil nodules entering the kiln cannot be larger than 2 inches in diameter (Rule 62-775, F.A.C.).

20. Reasonable precautions shall be used to minimize unconfined emissions of particulate matter generated by the operation. Reasonable precautions shall be defined as keeping the work areas wet where the soil is being removed, treated, handled, stored, and disposed of. Untreated soil removed from the ground shall be stored under waterproof covers to minimize unconfined emissions of petroleum products (Rule 62-296.310, F.A.C.).

21. As proposed by the permittee, only new No. 2 fuel oil containing a maximum of 0.75 percent sulfur and 0.35 percent sulfur, monthly average, and propane (LPG) shall be used as fuel for the kiln and afterburner. Only diesel fuel shall be burned by the diesel generator. The maximum permitted fuel consumption for the kiln is 41 MMBtu/hr, which is approximately 455 gallons per hour (GPH) No. 2 fuel oil or 290 GPH LPG. The maximum permitted fuel consumption of the afterburner is 42 MMBtu/hr, which is approximately 465 GPH No. 2 fuel oil or 300 GPH LPG. The generator is allowed to burn 13.2 GPH diesel fuel.

PERMITTEE:
KleenSoil International, Inc.

Permit Number: 7775002-001-AC
Expiration Date: May 1, 1997

SPECIFIC CONDITIONS:

MONITORING AND RECORD REQUIREMENTS

22. To document compliance with Specific Condition No. 21, each new No. 2 fuel oil shipment received from the vendor/supplier shall include a record showing the quantity of fuel oil received and a laboratory report showing the fuel oil sulfur content in percent by weight as determined by the appropriate ASTM test method contained in Rule 623-297.440, F.A.C.

23. Pursuant to Rule 62-296.415, and 62-4.070(3), F.A.C., the permittee shall comply with the following monitoring and associated recording requirements:

- (A) The pressure drop across the baghouse shall be monitored and recorded at least daily.
- (B) The temperature of the afterburner and the CO emissions shall be determined by continuous monitors.

RECORDKEEPING REQUIREMENTS

24. Pursuant to Rule 62-4.070(3), F.A.C., in order to document compliance with the Specific Condition Nos. 16, 19, and 21, the permittee shall maintain the following additional recordkeeping log which may be include DEP Form 62-775.900(2):

- (A) Date
- (B) Amount of contaminated soil treated in tons per day.
- (C) The pre-acceptance analysis from DEP Form 62-775.900(2) shall be used to document compliance with the PCB and metal limitations of Rule 62-775.400(3), F.A.C. See Specific Condition No. 29(D), regarding soils that are blended to meet the metal limitations.
- (D) Monthly calculations and records for the previous consecutive 12 month period of the quantity of soil treated in tons per year.
- (E) Fuel oil sulfur limits based on analysis referenced in 40 CFR 60.17 or other methods after Department approval. A certified analysis by the fuel oil supplier and documentation that diesel fuel is used in the generator will also be acceptable.

PERMITTEE:
KleenSoil International, Inc.

Permit Number: 7775002-001-AC
Expiration Date: May 1, 1997

SPECIFIC CONDITIONS:

(F) Contaminated soil analysis for volatile organic aromatics (VOA), TRPH, volatile organic halogens (VOH), polynuclear aromatic hydrocarbons (PAH), and metals as required by Rule 62-775.410, F.A.C. of the soil being treated.

25. All records required by Specific Condition Nos. 22, 23, and 24 shall be recorded in a permanent form suitable for inspection, retained for at least 3 years and available to the Department upon request. (Rule 62-4.070(3). F.A.C.).

26. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by rule or this permit; recorded in a permanent form suitable for inspection. The file shall be retained for at least 5 years following the date of such measurements, maintenance, reports, and records and made available to the Department upon request. (Rule 62-4.070(3), F.A.C.).

COMPLIANCE TESTING REQUIREMENTS

27. Conduct a VE test at each new operation site. Test this source prior to the expiration date of this construction permit and annually thereafter for the following pollutants and performance parameters. Test reports shall be submitted to the District and County, if applicable, that the test is conducted in within 45 days of testing. (Rule 62-297.340(1)(d) and 62-297.540(2), F.A.C.).

(A) CO (average CO monitor readings during the PM test).

(B) Visible emissions.

(C) PM.

(D) Temperature in the afterburner (average temperature monitor readings during the PM test).

(E) Residence time of the afterburner.

(F) Stack gas airflow rate.

(G) For each day the required tests were conducted, a copy of the records required to document the fuel oil used during the tests was in compliance with the sulfur content limit.

PERMITTEE:
KleenSoil International, Inc.

Permit Number: 7775002-001-AC
Expiration Date: May 1, 1997

SPECIFIC CONDITIONS:

(H) For each day the required tests were conducted, a copy of the records required by Specific Conditions Nos. 22 and 24.

(I) A copy of the calculations showing the residence time in the afterburner based upon actual measured operating parameters.

28. Compliance with the limitations of Specific Conditions Nos. 7, 8, 9, and 10 shall be determined by the following test methods contained in 40 CFR 60, Appendix A, (July 1, 1994) and adopted by reference in Rule 62-297.401, F.A.C.

- (A) Average CO monitor readings during the PM test.
- (B) EPA Method 9 for visible emissions.
- (C) EPA Method 5 for particulate matter.
- (D) EPA Method 2 for stack gas airflow rate and stack gas exit velocity. The Method 2 test shall be conducted at a point which is downstream of the afterburner. The test report shall include the calculations showing the residence time in the afterburner. The calculations shall be based upon actual measured operating parameters.

The minimum requirements for stationary point source emissions test procedures and reporting shall be in accordance with Rules 62-297.401 and 62-297.570(b), F.A.C., and 40 CFR 60, Appendix A (July 1, 1994).

29. Testing of emissions shall be conducted with the source operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit. (Rule 62-297.310, F.A.C.)

EXCESS EMISSION REQUIREMENTS

30. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of this unit which results in excess emissions; and any periods during which a continuous monitoring system or monitoring device is inoperative (Rules 62-4.070(3) and 62-210.700, F.A.C.).

PERMITTEE:
KleenSoil International, Inc.

Permit Number: 7775002-001-AC
Expiration Date: May 1, 1997

SPECIFIC CONDITIONS:

NOTIFICATION REQUIREMENTS

31. The permittee shall notify the District and county, if applicable, having jurisdiction over the site of the test at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted (Rule 62-297.340(1)(i), F.A.C.).

32. Regarding the CO monitor, the permittee shall notify the District and county, if applicable, having jurisdiction over the site of the test as required by Performance Specification 4 of 40 CFR 60, Appendix B, (July 1, 1994).

33. At least 7 days prior to relocating the plant, the permittee shall notify the air program administrator for the Department's District and, if applicable, county air program administrator of the next site where the unit will be operated. The notification shall be on DEP Form 62-210.900(3), F.A.C. The notification shall include the permit number of the facility, a copy of the last stack test results, the date of the proposed move, the new work site for the facility, the amount of contaminated soil at the new site, and the locations and contamination levels of the soils to be treated. Unless notified otherwise by an environmental agency, the unit may be relocated and operated at the new site. The Department will notify the permittee of any new restrictions for the facility that will apply while it is operating at the new site (Rule 62-775.700(1), F.A.C.).

34. The permittee shall submit to the Bureau of Air Regulation (BAR) each calendar year, on or before March 1, an Annual Operation Report DEP Form 62-1.202(c) for this facility for the preceding calendar year containing at least the following information pursuant to Subsection 403.061(13), F.S.:

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

PERMITTEE:
KleenSoil International, Inc.

Permit Number: 7775002-001-AC
Expiration Date: May 1, 1997

SPECIFIC CONDITIONS:

35. An application for an operating permit shall be submitted to the BAR at least 90 days prior to the expiration date of this permit. To apply for an operation permit, the applicant shall submit the appropriate application form, fee, a report on any physical change or major maintenance to the facility, and compliance test reports as required by this permit (Rule 62-4.220, F.A.C.).

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION**

Howard L. Rhodes
Director
Division of Air Resources
Management

Florida Department of
Environmental Protection

Memorandum

To: Clair Fancy
Through: A. A. Linero *A. A. Linero* (Clair - I reviewed a draft, send it back for some changes)
From: Willard Hanks
Date: March 26, 1996
Subject: Intent to Issue
Kleen Soil International, Incorporated

Attached is an Intent to Issue, Public Notice, Technical Evaluation and Preliminary Determination, and draft construction permit for a 65 TPH mobile petroleum-contaminated soil thermal treatment facility. No hazardous wastes or PCBs will be treated. Pollution control equipment consists of a baghouse for particulate matter and an afterburner for VOC destruction.

This unit will be allowed to operate anywhere in Florida except Hernando County.

I recommend approval of the proposal.

WH/t

Attachment



"Setting the standard for Soil Treatment"

March 5, 1996

RECEIVED

MAR 08 1996

**BUREAU OF
AIR REGULATION**

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

Dear Mr. Hanks:

Please find enclosed proof of publication of Notice of Application. This should cover the counties listed in our application.

Sincerely

Trevor Cook
V.P. Operations

enc.

TC/ljr

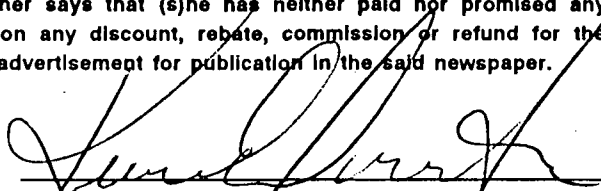
Florida Freedom Newspapers, Inc.

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

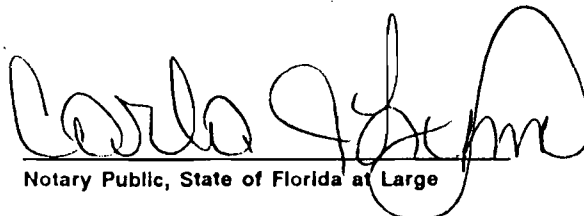
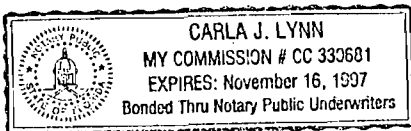
State of Florida }
County of Bay }

Before the undersigned authority appeared _____
Ken Carpenter, who on oath says that (s)he
is Advertising Director of the News Herald, a daily
newspaper published at Panama City, in Bay County, Florida; that the attached copy
of advertisement, being a Legal Advertisement
in the matter of Notice of Application
Mobile Soil Thermal Treatment Facility
in the _____
Court, was published in said newspaper in the issues of February 7, 1996

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



State of Florida
County of Bay
Sworn to and subscribed before me this 7th day of February,
A. D., 1996 by Ken Carpenter, Advertising Director of The
News Herald. He is personally known to me or has produced _____
as identification.



Notary Public, State of Florida at Large

4821 NOTICE OF APPLICATION

The Department of Environmental Protection announces receipt of an application for a permit from CleanSoil International, Incorporated of Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incinerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: Throughout Florida except Hernando county.

The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2800 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00 a.m. - 5:00 p.m., Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located at:

160 Governmental Center
Pensacola, FL 32501-5794

8407 Laurel Fair Drive,
Tampa, FL 33619

2295 Victoria Avenue,
Ste 364,
FL Myers, FL 33901

7825 Baymeadows Way,
Ste B200
Jacksonville, FL 32256-7577

3319 Maquire Blvd.
Ste. 232,
Orlando, FL 32803-3787

1900 C. Congress Ave.
Ste. A
West Palm Beach, FL 33406

The County Environmental
offices located at:

218 SW First Ave.
FL, Lauderdale, FL 33301

33 SW Second Ave.
Ste. 9-223
Miami, FL 33130

421 W. Church St.
Ste. 412
Jacksonville, FL 32256-7577

1410 N. 21st St.
Tampa, FL 33605

315 Court Street
Clearwater, FL 34616

901 Evernia
West Palm Beach, FL 33402-0029

123 W. Indiana Avenue
Deland, FL 32720

202 6th Avenue E
Bradenton, FL 34206-1000

300 S. Garden Avenue,
Clearwater, FL 34616

1301 Cattleman Road,
Building B
Sarasota, FL 34232-6299

2002 E. Michigan Avenue
Orlando, FL 32806
February 7, 1996

**PUBLISHED DAILY
MIAMI-DADE-FLORIDA**

**STATE OF FLORIDA
COUNTY OF DADE**

Before the undersigned authority personally
appeared:

SILVIA ACOSTA

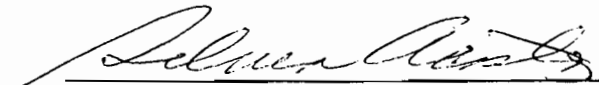
who on oath says that he/she is"

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:

FEBRUARY 5, 1996

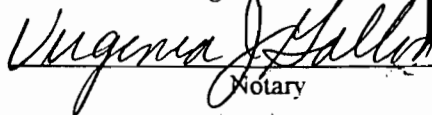
Affiant further says that the said The Miami Herald
is a newspaper published at Miami, in the said Dade
County, Florida and that the said newspaper has
heretofore been continuously published in said Dade
County, Florida each day and has been entered as
second class mail matter at the post office in Miami,
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
newspapers(s).



Sworn to and subscribed before me this

6TH day of FEBRUARY, 1996

My Commission
Expires: October 17, 1997
Virginia J. Gallon


Notary

**OFFICIAL NOTARY SEAL
VIRGINIA J. GALLON
NOTARY PUBLIC STATE OF FLORIDA
COMMISSION NO. CC323442
MY COMMISSION EXP. OCT. 17, 1997**

NOTICE OF APPLICATION

The Department of Environmental Protection announces receipt of an application for a permit from KleenSoil International, incorporated in Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incinerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: Throughout Florida except Hernando County.

The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32398-2400. The application is available for public inspection during normal business hours, 8:00am - 5:00pm Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located at:

- 180 Governmental Center, Pensacola, FL 32501-6794
- 8407 Laurel Fair Drive, Tampa, FL 33619
- 2295 Victoria Avenue, Ste. 364, Ft. Myers, FL 33901
- 7825 Baymeadows Way, Ste. B200, Jacksonville, FL 32256-7577
- 3319 Macuire Blvd, Ste. 232, Orlando, FL 32803-3767
- 1900 S. Congress Ave., Ste. A, West Palm Beach, FL 33406

The County Environmental offices located at:

- 218 S.W. First Ave., Fort Lauderdale, FL 33301
- 33 S.W. Second Ave., Ste., 9-223, Miami, FL 33130
- 421 W. Church St., Ste. 412, Jacksonville, FL 32256-7577
- 1410 N. 21st St., Tampa, FL 33605
- 315 Court Street, Clearwater, FL 34616
- 901 Evernia, West Palm Beach, FL 33402-0029
- 123 W. Indiana Avenue, Deland, FL 32720
- 202 6th Avenue East, Bradenton, FL 34206-1000
- 300 S. Garden Avenue, Clearwater, FL 34616
- 1301 Cattleman Road, Building B, Sarasota, FL 34232-6299
- 2002 E. Michigan Avenue, Orlando, FL 32806

PENSACOLA
**News
Journal**

PUBLISHED DAILY

Pensacola, Escambia County, Florida

STATE OF FLORIDA
County of Escambia

Before the undersigned authority personally appeared

Glenda Nall

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

Notice of Application

_____ in the _____ Court, was

published in said newspaper in the issues of

Feb. 3, 1996

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

Sworn to and subscribed before me this 14th

day of Feb A.D., 1996

Dianne Suchcicki Cross

Notary Public

DIANNE SUCHCICKI CROSS
"Notary Public-State of FL"
Comm Exp. March 5, 1999
Comm. No. CC 443356

LEGAL NOTICE LEGAL NOTICE

NOTICE OF APPLICATION

The Department of Environmental Protection announces receipt of an application for a permit from KleanSoil International, Incorporated of Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incinerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: Throughout Florida except Hernando County.

The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal for holidays, at the Department of Environmental Protection offices located at:

- 160 Governmental Center
Pensacola, Florida 32501-5794
- 8407 Laurel Fair Drive
Tampa, FL 33619
- 2295 Victoria Avenue, Ste 364
Fort Myers, FL 33901
- 7825 Baymeadows Way, Ste B200
Jacksonville, FL 32256-7577
- 3319 Maguire Blvd., Ste 232
Orlando, FL 32803-3767
- 1900 S. Congress Ave., Ste A
West Palm Beach, FL 33406

The County Environmental offices located at:

- 218 S.W. First Ave
Fort Lauderdale, FL 33301
- 33 S.W. Second Ave., Ste. 9-223
Miami, FL 33130
- 421 W. Church St., Ste. 412
Jacksonville, FL 32256-7577
- 1410 N. 21st St.
Tampa, FL 33605
- 315 Court Street
Clearwater, FL 34616
- 901 Evemia
West Palm Beach, FL 33402-0029
- 123 W. Indiana Avenue
Deland, FL 32720
- 202 6th Avenue East
Bradenton, FL 34206-1000
- 300 S. Garden Avenue
Clearwater, FL 34616
- 1301 Cattleman Road, Building B
Sarasota, FL 34232-6299
- 2002 E. Michigan Avenue
Orlando, FL 32806

Legal No. 47848 1T
February 3, 1996

NOTICE OF APPLICATION

The Department of Environmental Protection processes receipt of an application for a permit from Green Soil International Incorporated of Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incinerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: Throughout Florida except Hernando County.

The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00 am-5:00pm, Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located at:

160 Governmental Center, Pensacola, FL 32501-5794
8407 Laurel Fair Drive, Tampa, FL 33619

ALACHUA

No 11032

THE GAINESVILLE SUN
Published Daily and Sunday
GAINESVILLE, FLORIDA

Authorized authority personally appeared Naomi Williams-Jordan

at he/she is Assistant Classified Mgr. of THE GAINESVILLE SUN, a daily

published at Gainesville in Alachua County, Florida, that the attached copy of advertisement, being a
Notice of Application

..... Court, was published in said newspaper in the issue of,

February 7, 19 96

Affiant further says that the said THE GAINESVILLE SUN is a newspaper published at Gainesville, in said Alachua County, Florida, and that the said newspaper has heretofore been continuously published in said Alachua County, each day, and has been entered as second class mail matter at the post office in Gainesville, in said Alachua 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 for publication in the said newspaper.

Sworn to and subscribed before me this

8 day of Feb. A.D., 19 96

Martha A. Sutton
(Seal) Notary Public



Naomi Williams-Jordan

CAPE PUBLICATIONS, INC.

The Times
Published Weekly on Wednesday

The Star Advocate
Published Weekly on Wednesday



The Tribune
Published Weekly on Wednesday

The Bay Bulletin
Published Weekly on Wednesday

Published Daily

STATE OF FLORIDA
COUNTY OF BREVARD

Before the undersigned authority personally appeared SANDRA N. THOMAS who on

oath says that she is LEGAL ADVERTISING CLERK

of the FLORIDA TODAY, a newspaper published in Brevard County,

Florida; that the attached copy of advertising being a LEGAL NOTICE

in the matter of

NOTICE OF APPLICATION - Department of Environmental Protection - Permit from Kleensoil International Corp.

in the Court

was published in the FLORIDA TODAY NEWSPAPER

in the issues of FEBRUARY 9, 1996

Affiant further says that the said FLORIDA TODAY NEWSPAPER

is a newspaper published in said Brevard County, Florida and that the said newspaper has heretofore been continually

published in said Brevard County, Florida, regularly as stated above, and has not been entered as second class mail matter

at the post office in MELBOURNE said Brevard County, Florida, for a period of one year next preceeding

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 advertisement

for publication in said newspaper.

Signature of Sandra N. Thomas

(Signature of Affiant)

Sworn to and subscribed before me this 9 day of FEBRUARY

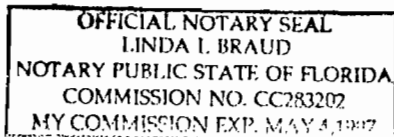
19 96

Signature of Linda L. Braud

(Signature of Notary Public)

LINDA L. BRAUD

(Name of Notary Typed, Printed or Stamped)



Personally Known or Produced Identification

Type of Identification Produced

TO-722378-1T-2/9, 1996, Fri.

NOTICE OF APPLICATION
The Department of Environmental Protection announces receipt of an application for a permit from Kleensoil International, Incorporated of Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incinerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: Throughout Florida except Hernando County.

The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00am - 5:00pm, Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located at:

- 160 Governmental Center, Pensacola, FL 32501-5794
8407 Laurel Fair Drive, Tampa FL 33619
2295 Victoria Avenue, Ste 364, Ft Myers, FL 33901
7825 Baymeadows Way, Ste B200, Jacksonville, FL 32256-7577
3319 Maguire Blvd., Ste 232, Orlando, FL 32803-3747
1900 C. Congress Ave., Ste. A, West Palm Beach, FL 33406

- The County Environmental offices located at:
218 S.W. First Ave., Fort Lauderdale, FL 33301
33 S.W. Second Ave., Ste. 9-223, Miami, FL 33130
421 W. Church St., Ste. 412, Jacksonville, FL 32256-7577
1410 N. 21st St., Tampa, FL 33605
315 Court Street, Clearwater, FL 34616
901 Eversia, West Palm Beach, FL 33402-0029
123 W. Indiana Avenue, Deland, FL 32720
202 6th Avenue East, Bradenton, FL 34206-1000
300 S. Garden Avenue, Clearwater, FL 34616
1301 Carleton Road, Building B, Sarasota, FL 34232-4299
2002 E. Michigan Avenue, Orlando, FL 32806

The Orlando Sentinel

Published Daily
\$99.02

State of Florida } s.s.
COUNTY OF ORANGE

Before the undersigned authority personally appeared Kelly Demmo, who on oath says that he/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 APPLICATION in the matter of MOBILE SOIL THERMAL TREATMENT FACILITY in the ORANGE Court, was published in said newspaper in the issue; of 02/06/96

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.

The foregoing instrument was acknowledged before me this 7 day of February, 19 96, by Kelly Demmo, who is personally known to me and who did take an oath.

(SEAL)



BEVERLY C. SIMMONS
My Comm. Exp. 3/10/97
Bonded By Service Inc
No. 00263539

Notary Public

NOTICE OF APPLICATION
The Department of Environmental Protection announces receipt of an application for a permit from KleenSoil International, Incorporated of Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incinerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: Throughout Florida except Hernando County.
The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00 am - 5:00 pm, Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located:
160 Governmental Center, Pensacola, FL 32501-5794
8407 Laurel Fair Drive, Tampa, FL 33619
2295 Victoria Avenue, Ste 364, Ft Myers, FL 33901
7825 Baymeadows Way, Ste B200, Jacksonville, FL 32256-7577
3319 Maguire Blvd., Ste 232, Orlando, FL 32803-3767
1900 C. Congress Ave., Ste. A, West Palm Beach, FL 33406
The County Environmental offices located at:
218 W.E. First Ave., Fort Lauderdale, FL 33301
33 S.W. Second Ave., Ste. 9-223 Miami, FL 33130
421 W. Church St., Ste. 412, Jacksonville, FL 32256-7577
1410 N. 21st St., Tampa, FL 33605
315 Court Street, Clearwater, FL 34616
901 Evernia, West Palm Beach, FL 33402-0029
123 W. Indiana Avenue, DeLand, FL 32720
202 6th Avenue East, Bradenton, FL 34206-1000
300 S. Garden Avenue, Clearwater, FL 34616
1301 Cattlemen Road, Building B, Sarasota, FL 34232-6299
2002 E. Michigan Avenue, Orlando, FL 32806
COR771146 FEB. 06, 1996

Daily News

NORTHWEST FLORIDA

Published Daily
Fort Walton Beach, Florida

State of Florida }
County of Okaloosa }

Before the undersigned authorized personally appeared _____

Joseph Pupo, who on oath says that (s)he
is Ast. Bookkeeper of the Northwest Florida Daily News, a daily

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

that the attached copy of advertisement, being a legal ad (1874)

in the matter of Notice of Application

in the _____

Court, was published in said newspaper in the issues of February 6, 1996

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

STATE OF FLORIDA
COUNTY OF OKALOOSA

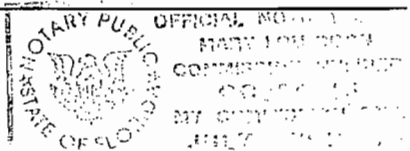
Subscribed and sworn to (or affirmed) before me this 2/6/96
(Date)

by Joseph Pupo, who is/are personally known to me or
has/have produced _____ as identification.

(Type of identification)

Mary Lou Coor Notary Public, Commission No. _____
(Signature)

(Name of Notary typed, printed or stamped)



Leg. 1874
NOTICE OF APPLICATION
The Department of Environmental Protection announces receipt of an application for a permit from KleenSoil International, Incorporated of Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incinerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: Throughout Florida except Hernando county. The application is being reviewed at the Department of Environmental protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00am - 5:00pm, Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located at:
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8407 Laurel Fair Drive, Tampa, FL 33619
2295 Victoria Avenue, Ste. 364, Ft. Myers, FL 33901
7825 Baymeadows Way, Ste. B200, Jacksonville, FL 32256-7577
3319 Maquire Blvd., Ste. 232, Orlando, FL 32803-3767
1900 C. Congress Ave., Ste. A, West Palm Beach, FL 33406
The County Environmental offices located at:
218 S.W. First Ave., Fort Lauderdale, FL 33301
33 S.W. Second Ave., Ste. 9-223, Miami, FL 33130
421 W. Church St., Ste. 412, Jacksonville, FL 32256-7577
1410 N. 21st St., Tampa, FL 33605
315 Court Street, Clearwater, FL 34616
901 Evernia, West Palm Beach, FL 33402-0029
123 W. Indiana Avenue, DeLand, FL 32720
202 6th Avenue East, Bradenton, FL 34206-1000
300 S. Garden Avenue, Clearwater, FL 34616
1301 Cattleman Road, Building B, Sarasota, FL 34232-6299
2002 E. Michigan Avenue, Orlando, FL 32806
Leg. 1874 February 6, 1996.

PROOF OF PUBLICATION

STAR-BANNER

Published — Daily

OCALA, MARION COUNTY, FLORIDA

STATE OF FLORIDA,
COUNTY OF MARION

Before me the undersigned authority personally appeared Butch
Peiker, who on oath says that he is Display Manager

of the Star-Banner, a daily newspaper published at Ocala, in Marion County, Florida; that

the attached copy of advertisement, being a notice in the matter of _____

#25042 Notice of Application

_____ in the _____ Court.

was published in said newspaper in the issues of _____

February 9, 1996

Affiant further says that the said STAR-BANNER is a daily newspaper published at Ocala, in said Marion County, Florida, and that the said newspaper has heretofore been continuously published in said Marion County, Florida, daily, and has been entered as second class mail matter at the post office in Ocala, in said Marion 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.

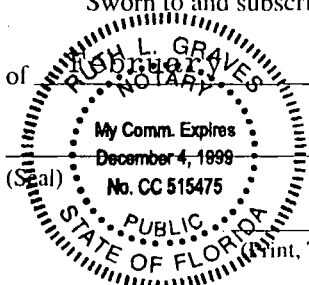
Butch Peiker

Sworn to and subscribed before me this 9 day

of _____, A.D., 19 96

Ruth L. Graves
Notary Public

RUTH L. GRAVES
(Print, Type or Stamp Commissioned Name of Notary Public)



NOTICE OF APPLICATION
The Department of Environmental Protection announces receipt of an application for a permit from KleenSoil International, Incorporated of Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incinerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spill, etc. This unit may, upon permit issuance, be operated in the following counties: Throughout Florida except Hernando county. The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00 am-5:00pm, Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located at:
160 Governmental Center, Pensacola, FL 32501-5794
8407 Laurel Fair Drive, Tampa, FL 33619
2295 Victoria Avenue, Ste 364, Ft. Myers, FL 33901
7825 Baymeadows Way, Ste B200, Jacksonville, FL 32256-7577
3319 Mcquire Blvd, Ste 232, Orlando, FL 32803-3767
1900 C. Congress Ave., Ste. A, West Palm Beach, FL 33406
The County Environmental offices located at:
218 S.W. First Ave. Ft. Lauderdale, FL 33301
33 SW. Second Ave., Ste 9-223, Miami, FL 33130
421 W. Church St., Ste 412, Jacksonville, FL 32256-7577
1410 N. 21st St., Tampa, FL 33609
315 Court Street, Clearwater, FL 33416
901 Evernia, West Palm Beach, FL 33402-0029
123 W. Indiana Avenue, Deland, FL 32720
202 6th Avenue East, Bradenton, FL 34206-1000
300 S. Garden Avenue, Clearwater, FL 34616
1301 Cattlemen Road, Building 5, Sarasota, FL 34232-6299
2002 E. Michigan Avenue, Orlando, FL 32806
No. 25042 — February 9, 1996

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, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of _____

NOTICE OF APPLICATION

was published in said newspaper in the issues of _____

FEBRUARY 7, 1996

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 heretofore 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 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.

Sworn to and subscribed before me, this 12 day
of FEBRUARY, A.D. 86

Personally Known _____ or Produced Identification _____
Type of Identification Produced _____

(SEAL)



INA S. KENNEDY
Notary Public, State of Florida
My comm. expires Mar. 22, 1999
No. CC187731

NOTICE OF APPLICATION
The Department of Environmental Protection announces receipt of an application for a permit from KleenSoil International, Incorporated of Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incinerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: Throughout Florida, except Hernando county. The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00am - 5:00pm, Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located at: 160 Governmental Center, Pensacola, FL 32501-5794; 8407 Laurel Fair Drive, Tampa FL 33619; 2295 Victoria Avenue, Ste 364, Ft Myers, FL 33901; 7825 Baymeadows Way, Ste B200, Jacksonville, FL 32256-7577; 3319 Maquire Blvd., Ste 232, Orlando, FL 32803-3767; 1900 C. Congress Ave., Ste. A, West Palm Beach, FL 33406. The County Environmental offices located at: 218 S.W. First Ave., Fort Lauderdale, FL 33301; 33 S.W. Second Ave., Ste. 9223, Miami, FL 33130; 421 W. Church St., Ste. 412, Jacksonville, FL 32256-7577; 1410 N. 21st St., Tampa, FL 33605; 315 Court Street, Clearwater, FL 34616; 901 E. Evernia, West Palm Beach, FL 33402-0029; 123 W. Indiana Avenue, Deland, FL 32720; 202 6th Avenue East, Bradenton, FL 34206-1000; 300 S. Garden Avenue, Clearwater, FL 34616; 1301 Cattleman Road, Building B, Sarasota, FL 34232-6299; 2002 E. Michigan Avenue, Orlando, FL 32806. 2/7/96

TALLAHASSEE DEMOCRAT
PUBLISHED DAILY
TALLAHASSEE - LEON - FLORIDA

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

NOTICE OF APPLICATION

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

FEBRUARY 7, 1996

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

Christie Stephens
CHRISTIE STEPHENS
LEGAL ADVERTISING REPRESENTATIVE

Sworn To And Subscribed Before Me *12*

Day of *February*

Lee Preece
Notary Public



KLEENSOIL INTERNATIONAL
TREVOR COOK
13838 HARLEE RD
PALMETTO FL 34221

Notice of Application
The Department of Environmental Protection announces receipt of an application for a permit from KleenSoil International, Incorporated of Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incenerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: Throughout Florida except Hernando county.
The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00am - 5:00 pm; Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located at:
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8407 Laurel Fair Drive, Tampa, FL 33619
2295 Victoria Avenue, Ste 364, Ft Myers, FL 33901
7825 Baymeadows Way, Ste B200, Jacksonville, FL 32256-7577
3319 Maquire Blvd, Ste 232, Orlando, FL 32803-3767
1900 C Congress Ave, Ste A, West Palm Beach, FL 33506
The County Environmental offices located at:
218 S.W. First Ave, Fort Lauderdale, FL 33301
33 S.W. Second Ave, Ste. 9-223, Miami, FL 33130
421 W. Church St., Ste. 412, Jacksonville, FL 32256-7577
1410 N. 21st St., Tampa, FL 33605
315 Court Street, Clearwater, FL 34616
901 Evernia, West Palm Beach, FL 33402-0029
123 W. Indiana Avenue, Deland, FL 32720
202 6th Avenue East, Bradenton, FL 34206-1000
300 S. Garden Avenue, Clearwater, FL 34616
1301 Cattleman Road, Building B, Sarasota, FL 34232-6299
2002 E. Michigan Avenue, Orlando, FL 32806
FEBRUARY 7, 1996

ST. PETERSBURG TIMES

STATE OF FLORIDA }
COUNTY OF PINELLAS } S.S.

Published Daily
St. Petersburg, Pinellas County, Florida

Before the undersigned authority personally appeared C. Egan
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 Application

_____ in the _____ Court
was published in said newspaper in the issues of February 6, 1996

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.

Sworn to and subscribed before
me this 8th day of
Feb. A.D. 19 96
[Signature]
Notary Public

OFFICIAL NOTARY SEAL
JOSEPH FISH
NOTARY PUBLIC STATE OF FLORIDA
COMMISSION NO. CC348125
MY COMMISSION EXP. FEB. 13, 1998

[SEAL]

Legal Notices	Legal Notices
NOTICE OF APPLICATION	
The Department of Environmental Protection announces receipt of an application for a permit from KleenSoil International, Incorporated of Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incinerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: Throughout Florida, except Hernando County.	
The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00am - 5:00pm, Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located at:	
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8407 Laurel Fair Drive, Tampa, FL 33619	
2295 Victoria Avenue, Ste. 364, Ft. Myers, FL 33901	
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3319 Maquire Blvd., Ste. 232, Orlando, FL 32803-3767	
1900 C. Congress Ave., Ste. A, West Palm Beach, FL 33406	
The County Environmental offices located at:	
218 S.W. First Ave., Fort Lauderdale, FL 33301	
33 S.W. Second Ave., Ste. 9-223, Miami, FL 33130	
421 W. Church St., Ste. 412, Jacksonville, FL 32256-7577	
1410 N. 21st St., Tampa, FL 33605	
315 Court Street, Clearwater, FL 34616	
901 Evernia, West Palm Beach, FL 33402-0029	
123 W. Indiana Avenue, Deland, FL 32720	
202 6th Avenue East, Bradenton, FL 34206-1000	
300 S. Garden Avenue, Clearwater, FL 34616	
1301 Cattleman Road, Building B, Sarasota, FL 34232-6299	
2002 E. Michigan Avenue, Orlando, FL 32806	
(960333365) 2/6/96	

NOTICE OF APPLICATION

The Department of Environmental Protection announces the receipt of the application for a permit from KleanSoll International, Incorporated of Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incinerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: Throughout Florida except Hernando County.

The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00am-5:00pm, Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located at:

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- 8407 Laurel Fair Drive, Tampa, FL 33619
- 2295 Victoria Avenue, Ste. 364, Ft. Myers, FL 33901
- 7825 Baymeadows Way, Ste. B200, Jacksonville, FL 32256-7577
- 3319 Maquire Blvd., Ste. 232, Orlando, FL 32803-3767
- 1900 C. Congress Ave., Ste. A, West Palm Beach, FL 33406

- The County Environmental offices located at:
- 218 S. W. First Ave., Fort Lauderdale, FL 33301
 - 33 S.W. Second Ave., Ste. 9-223, Miami, FL 33130
 - 421 W. Church St., Ste. 412, Jacksonville, FL 32256-7577
 - 1410 N. 21st St., Tampa, FL 33605
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 - 901 Evernia, West Palm Beach, FL 33402-0029
 - 123 W. Indiana Avenue, DeLand, FL 32720
 - 202 6th Avenue East, Bradenton, FL 34206-1000
 - 300 S. Garden Avenue, Clearwater, FL 34616
 - 1301 Cattleman Road, Building B, Sarasota, FL 34232-6299
 - 2002 E. Michigan Avenue, Orlando, FL 32806

FLORIDA PUBLISHING COMPANY

Publisher

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared _____

Janice B. Kelly _____ who on oath says that he is

Legal Advertising Representative _____ of The Florida Times-Union,

a daily newspaper published at Jacksonville in Duval County, Florida; that the attached copy of advertisement, being a _____ Legal Notice

_____ in the matter of _____ Notice of Application

_____ in the _____ Court,

was published in THE FLORIDA TIMES-UNION in the issues of _____

February 5, 1996

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 preceeding 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 _____ 5 _____ day of

February _____ A.D. 19 _____ 96

[Signature]
Notary Public,
State of Florida at Large.

My Commission Expires _____ June 1, 1998
BONDED THRU TROY FAIR INSURANCE, INC.

[Signature]



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 ■ FAX 377-7158

RECEIVED

FEB 13 1996

**BUREAU OF
AIR REGULATION**

KA 450-95-03

February 12, 1996

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

Subject: Kleen Soil International, Inc.
Mobile Soil Remediation Plant
Air Construction Permit Application-Additional Information

Dear Mr. Hanks:

Enclosed is corrected Attachment 001 for the air construction permit application for the subject facility.

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

Sincerely,

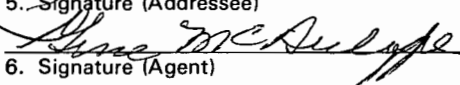
KOOGLER & ASSOCIATES

Mark A. Hagmann

Attachment 001
Mobile Soil Thermal Treatment Unit
Estimated Emissions
for #2 Fuel Oil

Pollutant	Emission Factor	Emissions (lb/hr)			Emissions (tons/yr)		
DRUM: (No. 2 fuel oil)							
Pollutant	(lb/1000gal)						
VOC	2.52E-01	0.07	AP-42		0.09		
NOX	2.00E+01	5.82	AP-42		6.98		
Pollutant	(%Sulfur)						
SO2	0.0035	15.27	Based on Stoichiometry		18.32		
AFTERBURNER: (No. 2 fuel oil)							
Pollutant	(lb/1000gal)						
VOC	2.52E-01	0.08	AP-42		0.09		
NOX	2.00E+01	5.96	AP-42		7.15		
Pollutant	(%Sulfur)						
SO2	0.0035	15.64	Based on Stoichiometry		18.77		
Pollutant	(grains/dscf)						
PM	4.00E-02	5.26	Process Knowledge;15,329 dscfm		23.02		
PM10	4.00E-02	5.26	Process Knowledge;15,329 dscfm		23.02		
Pollutant	(ppm CO/ft ³)						
CO	100	6.69	62-296.415(1)(b)		29.30		
GENERATOR: (No. 2 fuel oil)							
Pollutant	(lb/mmBtu)	(lb/hr)					
PM	0.31	0.5766	AP-42		1.59		
PM10	0.31	0.5766	AP-42		1.59		
NOX	4.41	8.2026	AP-42		22.57		
CO	0.95	1.767	AP-42		4.86		
SO2	0.29	0.5394	AP-42		1.48		
VOC	0.35	0.651	AP-42		1.79		
FRONT END LOADER: (No. 2 fuel oil)			Emissions Exempt under 62.210.3				
Pollutant	(%Sulfur)						
SO2	0.0035	0.42	Based on Stoichiometry		1.16		
SOIL:							
Pollutant	(TRPH =4000)	(lb/hr)					
SO2	80.00	20.8	Based on 2.0% sulfur fuel oil in soil		57.20		
VOC	2680.00	3.48	67 % VOC with afterburner efficiency of 99%		9.58		
Pollutant	Ratio (HAP/VOC)						
Hexane	0.044	0.15	FDEP Memo		0.42		
Benzene	0.022	0.08	FDEP Memo		0.21		
Toluene	0.040	0.14	FDEP Memo		0.38		
2,2,4 Trimethylpentane	0.026	0.09	FDEP Memo		0.25		
Xylenes	0.015	0.05	FDEP Memo		0.14		
Ethylbenzene	0.005	0.02	FDEP Memo		0.05		
Total HAPs	0.110	0.38	FDEP Memo		1.05		
Drum =	41	mmBtu/hr	Generator =	1.86	mmBtu/hr	10236.0	mmBtu/yr
gal =	290.78	gal/hr	gal =	13.2	gal/hr		
ann_gal =	697872.34	gal/yr	ann_gal =	72600.00	gal/yr		
Afterburner =	42	mmBtu/hr	Front End Loader =				
gal =	297.87	gal/hr	gal =	8.00	gal/hr		
ann_gal =	714893.62	gal/yr	ann_gal =	44000.00	gal/yr		
soil =	65.00	tph	sulfur in fuel =	0.35	% Sulfur		
ann_soil =	357500.00	tpy					

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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: <div style="border: 1px dashed black; padding: 5px;"> Mr. Trevor Cook, Vice President Kleen Soil International, Incorporated 13838 Harlee Road Palmetto, Florida 34221 </div>		4a. Article Number <div style="font-size: 1.5em; font-family: monospace;">2 127633231</div>	
		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 <div style="font-size: 1.5em; font-family: monospace;">1/5/96</div>	
5. Signature (Addressee) 		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature (Agent)			

Thank you for using Return Receipt Service.

2 127 633 231



Receipt for Certified Mail

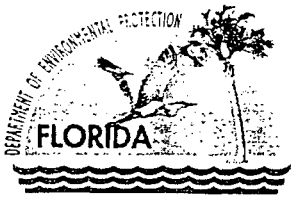
No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Mr. Trevor Cook, Vice President
 Kleen Soil International, Incorporated
 13838 Harlee Road
 Palmetto, Florida 34221

PS Form 3800, March 1993

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
 1/2/96 CW



Extra File

Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

January 2, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Trevor Cook, Vice President
Kleen Soil International, Incorporated
13838 Harlee Road
Palmetto, Florida 34221

Dear Mr. Cook:

RE: Kleen Soil, File No. 0810067-002-AC

7775002-001-AC

The Department has reviewed your application for permit to construct a mobile soil thermal treatment facility in Florida. We need additional information to process this application. Please provide this office with the following information:

1. Will "on-specification" used oil be burned in the afterburner?
2. If your office has an electronic copy of the application, please provide us with a copy of the application on a PC disk.
3. Will this unit be equipped with a power source (electric, hydraulic, etc.) operated by an internal combustion engine? If so, please provide the type fuel, maximum/annual fuel consumption rate, and emissions in lbs/hr and TPY.
4. Will a payloader or similar construction equipment be used in conjunction with this unit to transfer treated and untreated soil? If so, please provide the type fuel, maximum/annual fuel consumption rate, and emissions in lbs/hr and TPY.
5. Please clarify the maximum fuel oil (No. 2 and used oil) consumption rates for the kiln and afterburner. It was not clear if the fuel consumption rate will be 590, 664, or 920 GPH. Emission calculations should be based on the maximum fuel consumption rate.
6. Please account for the potential sulfur dioxide emissions from the unit caused by the sulfur in the contaminated soil.

Mr. Trevor Cook
Kleen Soil International
Page Two

7. Your calculations for sulfur dioxide emissions were based on the fuel oil containing 0.0035 pounds of sulfur per gallon of fuel (Section E., Page 39). This is approximately 0.05 percent sulfur. The application stated the oil would contain 0.35 percent sulfur. Please comment on these values or recalculate the sulfur dioxide emissions.

8. Our calculations show the carbon monoxide emissions from the unit is 29.3 TPY instead of the 23.0 TPY listed on page 33 of the application. Any comments?

9. What will be the maximum concentrations of halogens in the used oil? What will be the emissions of acid gases caused by these halogens?

10. Please summarize the total emissions (criteria and hazardous air pollutants) from the facility (kiln, afterburner, power generator, and any associated material handling equipment) in lbs/hr and TPY.

11. Please calculate the ambient impact of the metal and halogen emissions caused by burning used oil in the kiln and afterburner under the scenario having the maximum impact. We anticipate that this will occur when operating the unit next to a multistory building near the contaminated site. Compare the maximum impact for the metals and acid gases to the Ambient Reference Concentration (ARC). What precautions will be used to assure that the ARC are not exceeded?

12. Describe how the dust captured by the baghouse will be handled and disposed of.

13. Describe the instruments that will be used to measure/record the contaminated soil feed rate, pressure drop across the baghouse, and the temperature in the afterburner.

14. Please complete the enclosed Notice of Application by listing the areas you intend to operate the proposed unit in - i.e., "Throughout Florida except Hernando and Osceola Counties." Furnish the proof of publication of the Notice of Application to this office.

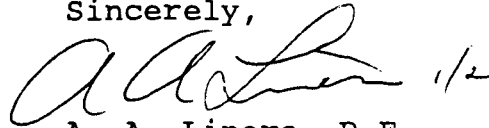
Applicants for permits to construct soil thermal treatment facilities are required to publish a Notice of Application in a newspaper having circulation in each county they intend to operate

Mr. Trevor Cook
Kleen Soil International
Page Three

and provide the Department with proof of each publication. A proposed Notice of Application is enclosed. You will also be required to publish a Notice of Intent to Issue in the same newspapers should the Department approve your application. Any construction permit issued will limit you to operating in these counties. To operate in any other county you must satisfy the public notice requirements for that county, and have your permit amended to authorize operation there. The public will have an opportunity to comment or petition for an administrative hearing in response to any public notice for your unit.

The Department will resume processing your application after the requested information is received. If you have any questions on the matter, please write to me at the letterhead address or call Willard Hanks at (904) 488-1344.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. A. Linero". To the right of the signature is a small handwritten mark that looks like "1/2".

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

AAL/wh/t

Enclosure

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

NOTICE OF APPLICATION

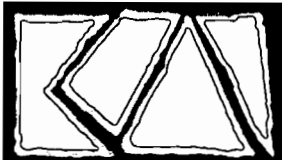
The Department of Environmental Protection announces receipt of an application for a permit from Kleen Soil International, Incorporated of Palmetto, Florida. The application is for the construction of a mobile soil thermal treatment facility that will evaporate and incinerate petroleum fuels and lubricants for soils contaminated by leaking fuel tanks, spills, etc. This unit may, upon permit issuance, be operated in the following counties: (applicant fills in prior to publication).

The application is being reviewed at the Department of Environmental Protection, Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, FL 32399-2400. The application is available for public inspection during normal business hours, 8:00am - 5:00pm, Monday through Friday, except for legal holidays, at the Department of Environmental Protection offices located at:

160 Governmental Center, Pensacola, FL 32501-5794
8407 Laurel Fair Drive, Tampa, FL 33619
2295 Victoria Avenue, Ste. 364, Fort. Myers, FL 33901
7825 Baymeadows Way, Ste. B200, Jacksonville, FL 32256-7577
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767
1900 S. Congress Ave., Suite A, West Palm Beach, FL 33406

The County Environmental offices located at:

218 S.W. First Ave., Fort. Lauderdale, FL 33301
33 S.W. Second Ave., Ste. 9-223, Miami, FL 33130
421 W. Church St., Ste. 412, Jacksonville, FL 32256-7577
1410 N. 21st St., Tampa, FL 33605
315 Court Street, Clearwater, FL 34616
901 Evernia, West Palm Beach, FL 33402-0029
123 W. Indiana Avenue, Deland, FL 32720
202 6th Avenue, East, Bradenton, FL 34206-1000
300 S. Garden Avenue, Clearwater, FL 34616
1301 Cattleman Road, Building B, Sarasota, FL 34232-6299
2002 E. Michigan Avenue, Orlando, FL 32806



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

KA 450-95-03
January 30, 1996

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

RECEIVED
FEB 02 1996
BUREAU OF
AIR REGULATION

Subject: Kleen Soil International, Inc.
Mobile Soil Remediation Plant
Air Construction Permit Application-Additional Information
Response to Request for Additional Information dated January 2, 1996

Dear Mr. Hanks:

This letter is in response to your Request for Additional Information dated January 2, 1996. All questions have been reproduced, preserving your order. The responses follow each question.

1. Will "on-specification" used oil be burned in the afterburner?

RESPONSE:

"On-specification" used oil is no longer being considered as an alternative fuel for this unit.

2. If your office has an electronic copy of the application, please provide us with a copy of the application on a PC disk.

RESPONSE:

A PC disk containing a copy of the application is included with this submittal of additional information.

3. Will this unit be equipped with a power source (electric, hydraulic, etc.) operated by an internal combustion engine? If so, please provide the type fuel, maximum/annual fuel consumption rate, and emissions in lbs/hr and TPY.

RESPONSE:

This unit will be connected with an off-site source of electricity where applicable. However, in the case where an off-site source of electricity is not available the unit will be equipped with a generator to power instruments to measure and record the feed rate to the kiln, the pressure drop across the baghouse, the temperature of the afterburner, and associated controls. The generator will use No. 2 diesel fuel. Calculations of consumption rates and emissions are documented in Attachment 001.

4. Will a payloader or similar construction equipment be used in conjunction with this unit to transfer treated and untreated soil? If so, please provided the type fuel, maximum/annual fuel consumption rate, and emissions in lbs/hr and TPY.

RESPONSE:

It is our understanding that only emissions from stationary sources should be considered when estimating total emissions from the unit. Any equipment used in conjunction with this unit to transfer treated and untreated soil is considered exempt under F.A.C. 62-210.300(3): "Internal combustion engines in boats, aircraft and vehicles used for transporting of passengers or freight." However, calculations of consumption rates and emissions for the front end loader are documented in Attachment 001.

5. Please clarify the maximum fuel oil (No. 2 and used oil) consumption rates for the kiln and afterburner. It was not clear if the fuel consumption rate will be 590, 664, or 920 GPH. Emission calculations should be based on the maximum fuel consumption rate.

RESPONSE:

The maximum fuel consumption rates for the kiln and afterburner are 917 gallons per hour for propane and 589 gallons per hour for # 2 fuel oil.

6. Please account for the potential sulfur dioxide emissions from the unit caused by the sulfur in the contaminated soil.

RESPONSE:

17-770.200(2) F.A.C defines "excess soil contamination" or "excessively contaminated soil" as soil saturated with petroleum or petroleum products or soil which causes a total hydrocarbon reading of 500 ppm for Gasoline Analytical Group. Soil treated by the

proposed unit will have an expected typical average soil TRPH reading of 700 ppm. Calculations of emissions from contaminated soil with TRPH readings of 4,000 are demonstrated in Attachment 001.

7. Your calculations for sulfur dioxide emissions were based on the fuel oil containing 0.0035 pounds of sulfur per gallon of fuel (Section E., Page 39). This is approximately 0.05 percent sulfur. The application stated the oil would contain 0.35 percent sulfur. Please comment on these values or recalculate the sulfur dioxide emissions.

RESPONSE:

The sulfur content of No. 2 fuel oil will be 0.75% maximum and 0.35% on a 30-day running average. Calculations for sulfur dioxide emissions are based on No. 2 fuel oil containing 0.35% sulfur and are in Attachment 001.

8. Our calculations show the carbon monoxide emissions from the unit is 29.3 TPY instead of the 23.0 TPY listed on page 33 of the application. Any comments?

RESPONSE:

The correct carbon monoxide emission rate from this unit is 29.3 tpy.

9. What will be the maximum concentrations of halogens in the used oil? What will be the emissions of acid gases caused by these halogens?

RESPONSE:

Used oil is no longer being considered as an alternative fuel for this unit.

10. Please summarize the total emissions (criteria and hazardous air pollutants) from the facility (kiln, afterburner, power generator, and any associated material handling equipment) in lbs/hr and TPY.

RESPONSE:

Kleen Soil International, Inc. is proposing to use propane and No. 2 fuel oil. Below is a estimated emissions summary. Emissions from Attachment 001 represent conditions where No. 2 fuel oil is the only fuel being used. Emissions from Attachment 002 represent conditions where propane will be fired in the drum and afterburner.

Emissions Summary

Pollutant	Emissions from Attachment 001		Emissions from Attachment 002	
	lb/hr	tpy	lb/hr	tpy
PM	5.84	24.6	5.84	24.6
PM-10	5.84	24.6	5.84	24.6
NOX	19.98	36.7	25.63	98.9
SO2	52.67	96.9	21.75	59.8
VOC	4.28	11.6	4.59	13.4
CO	8.46	34.2	8.46	34.2
Hexane	0.15	0.42	0.15	0.42
Benzene	0.08	0.21	0.08	0.21
Toluene	0.14	0.38	0.14	0.38
2,2,3 Trimethylpentane	0.09	0.25	0.09	0.25
Xylenes	0.05	0.14	0.05	0.14
Ethylbenzene	0.02	0.05	0.02	0.05
Total HAPs	0.38	1.05	0.38	1.05

11. Please calculate the ambient impact of the metal and halogen emissions caused by burning used oil in the kiln and afterburner under the scenario having the maximum impact. We anticipate that this will occur when operating the unit next to a multistory building near the contaminated site. Compare the maximum impact for the metals and acid gases to the Ambient Reference Concentration (ARC). What precautions will be used to assure that the ARC are not exceeded?

RESPONSE:

Used oil is no longer being considered as an alternative fuel for this unit.

12. Describe how the dust captured by the baghouse will be handled and disposed of.

RESPONSE:

The dust captured by the baghouse will be stored in a covered trailer. It will then either be mixed back into the pre-burned soil or properly disposed of in a Class I landfill.

13. Describe the instruments that will be used to measure/record the contaminated soil feed rate, pressure drop across the baghouse, and the temperature in the afterburner.

RESPONSE:

The soil feed rate will be controlled by a slow speed feed hopper and conveyor belt. Calculations of feed rates will be determined based on belt speed (ft/min) and weight of soil on belt (wt/ft). These rates will be physically checked and manually recorded.

The pressure drop across the baghouse will be measured using vacuum gauges and recorded manually.

The temperature in the afterburner will be measured using a thermocouple and recorded on a strip chart or a circular chart.

14. Please complete the enclosed Notice of Application by listing the areas you intend to operate the proposed unit in - i.e., "Throughout Florida except Hernando and Osceola Counties." Furnish the proof of publication of the Notice of Application to this office.

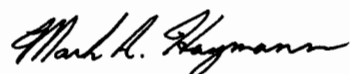
RESPONSE:

Kleen Soil International, Inc. intends to operate the proposed unit throughout Florida except in Hernando County. However, initially proof of publication for the Notice of Application will be provided for the following counties: Alachua, Bay, Brevard, Clay, Dade, Duval, Escambia, Hillsborough, Leon, Marion, Monroe, Okaloosa, Orange, and Pinellas.

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

Sincerely,

KOOGLER & ASSOCIATES



Mark A. Hagmann

Attachment 001
Mobile Soil Thermal Treatment Unit
Estimated Emissions
for #2 Fuel Oil

Pollutant	Emission Factor	Emissions (lb/hr)				Emissions (tons/yr)
DRUM: (No. 2 fuel oil)						
Pollutant	(lb/1000gal)					
VOC	2.52E-01	0.07	AP-42			0.09
NOX	2.00E+01	5.82	AP-42			6.98
Pollutant	(%Sulfur)					
SO2	0.0035	15.27	Based on Stoichiometry			18.32
AFTERBURNER: (No. 2 fuel oil)						
Pollutant	(lb/1000gal)					
VOC	2.52E-01	0.08	AP-42			0.09
NOX	2.00E+01	5.96	AP-42			7.15
Pollutant	(%Sulfur)					
SO2	0.0035	15.64	Based on Stoichiometry			18.77
Pollutant	(grains/dscf)					
PM	4.00E-02	2627.83	Process Knowledge;15,329 dscfm			26.09
PM10	4.00E-02	2627.83	Process Knowledge;15,329 dscfm			26.09
Pollutant	(ppm CO/ft ³)					
CO	100	6.69	62-296.415(1)(b)			29.30
GENERATOR: (No. 2 fuel oil)						
Pollutant	(lb/mmBtu)	(lb/hr)				
PM	0.31	0.5766	AP-42			1.59
PM10	0.31	0.5766	AP-42			1.59
NOX	4.41	8.2026	AP-42			22.57
CO	0.95	1.767	AP-42			4.86
SO2	0.29	0.5394	AP-42			1.48
VOC	0.35	0.651	AP-42			1.79
FRONT END LOADER: (No. 2 fuel oil)						
			Emissions Exempt under 62.210.3			
Pollutant	(%Sulfur)					
SO2	0.0035	0.42	Based on Stoichiometry			1.16
SOIL:						
Pollutant	(TRPH =4000)	(lb/hr)				
SO2	80.00	20.8	Based on 2.0% sulfur fuel oil in soil			57.20
VOC	2680.00	3.48	67 % VOC with afterburner efficiency of 99%			9.58
Pollutant	Ratio (HAP/VOC)					
Hexane	0.044	0.15	FDEP Memo			0.42
Benzene	0.022	0.08	FDEP Memo			0.21
Toluene	0.040	0.14	FDEP Memo			0.38
2,2,4 Trimethylpentane	0.026	0.09	FDEP Memo			0.25
Xylenes	0.015	0.05	FDEP Memo			0.14
Ethylbenzene	0.005	0.02	FDEP Memo			0.05
Total HAPs	0.110	0.38	FDEP Memo			1.05
Drum =	41	mmBtu/hr	Generator =	1.86	mmBtu/hr	10236.0
gal =	290.78	gal/hr	gal =	13.2	gal/hr	
ann_gal =	697872.34	gal/yr	ann_gal =	72600.00	gal/yr	
Afterburner =	42	mmBtu/hr	Front End Loader =			
gal =	297.87	gal/hr	gal =	8.00	gal/hr	
ann_gal =	714893.62	gal/yr	ann_gal =	44000.00	gal/yr	
soil =	65.00	tph	sulfur in fuel =	0.35	% Sulfur	
ann_soil =	357500.00	tpy				

Attachment 002
Mobile Soil Thermal Treatment Unit
Estimated Emissions
for Propane and #2 Diesel Fuel Oil

	Emission	Emissions					Emissions
Pollutant	Factor (Units)	(lb/hr)	Basis				(tons/yr)
DRUM: (Propane)							
Pollutant	(lb/1000gal)						
VOC	5.00E-01	0.23	AP-42				0.99
NOX	1.90E+01	8.61	AP-42				37.70
AFTERBURNER: (Propane)							
Pollutant	(lb/1000gal)						
VOC	5.00E-01	0.23	AP-42				1.02
NOX	1.90E+01	8.82	AP-42				38.62
Pollutant	(grains/dscf)						
PM	4.00E-02	5.26	Process Knowledge;15,329 dscfm				23.02
PM10	4.00E-02	5.26	Process Knowledge;15,329 dscfm				23.02
Pollutant	(ppm CO/ft ³)						
CO	100	6.69	62-296.415(1)(b)				29.30
GENERATOR: (No. 2 fuel oil)							
Pollutant	(lb/mmBtu)	(lb/hr)					
PM	0.31	0.5766	AP-42				1.59
PM10	0.31	0.5766	AP-42				1.59
NOX	4.41	8.2026	AP-42				22.57
CO	0.95	1.767	AP-42				4.86
SO2	0.29	0.5394	AP-42				1.48
VOC	0.35	0.651	AP-42				1.79
FRONT END LOADER: (No. 2 Fuel oil)				(Emissions Exempt under 62.210.3)			
Pollutant	(%Sulfur)						
SO2	0.0035	0.42	Based on Stoichiometry				1.16
SOIL:							
Pollutant	(TRPH =4000)	(lb/hr)					
SO2	80.00	20.8	Based on 2.0% sulfur fuel oil in soil				57.20
VOC	2680.00	3.48	67 % VOC with afterburner efficiency of 99%				9.58
Pollutant	Ratio (HAP/VOC)						
Hexane	0.044	0.15	FDEP Memo				0.42
Benzene	0.022	0.08	FDEP Memo				0.21
Toluene	0.040	0.14	FDEP Memo				0.38
2,2,4 Trimethylpentane	0.026	0.09	FDEP Memo				0.25
Xylenes	0.015	0.05	FDEP Memo				0.14
Ethylbenzene	0.005	0.02	FDEP Memo				0.05
Total HAPs	0.110	0.38	FDEP Memo				1.05
Drum =	41	mmBtu/hr	Generator =	1.86	mmBtu/hr	10236.0	mmBtu/yr
gal =	453.04	gal/hr	gal =	13.2	gal/hr		
ann_gal =	3968618.78	gal/yr	ann_gal =	72600.00	gal/yr		
Afterburner =	42	mmBtu/hr	Front End Loader =				
gal =	464.09	gal/hr	gal =	8.00	gal/hr		
ann_gal =	4065414.36	gal/yr	ann_gal =	44000.00	gal/yr		
soil =	65.00	tph	Propane	90500	Btu/gal		
ann_soil =	569400.00	tpy					



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

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AIR REGULATION

KA 450-95-03
December 18, 1995

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

Subject: Kleen Soil International, Inc.
Mobile Soil Remediation Plant
Air Construction Permit Application-Additional Information

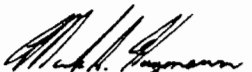
Dear Mr. Hanks:

Enclosed are corrected pages 6, 18, 29, 31, 37, 41, and 43 for the air construction permit application for the subject facility.

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

Sincerely,

KOOGLER & ASSOCIATES


Mark A. Hagmann

*additional
info 12/19*

Application Processing Fee

Check one:

[X] Attached - Amount: \$ 4,500.00 [] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

The proposed project will be a mobile petroleum contaminated soil thermal treatment unit. It will consist of a rotary thermal processing kiln with an afterburner and a baghouse.

Pollutant emissions will be controlled by a baghouse and an afterburner.

This application shall establish the mobile unit authorization to operate in any county in which Kleen Soil International, Incorporated has published, in a local publication, the Notice of Intent to Issue Permit. A state-wide permit is requested to operate in all counties in the state of Florida except for Hernando and Okaloosa Counties where Kleen Soil International, Incorporated does not plan on operating the portable soil thermal treatment unit.

**Note: The Application Fee is Sub-Type 1C [62-4.050(4)(a)3.b].
Air Construction Permit - Source 50 tpy < 100 tpy = \$4,500.00**

2. Projected or Actual Date of Commencement of Construction (DD-MON-YYYY):
Upon FDEP Approval of Proposed Project

3. Projected Date of Completion of Construction (DD-MON-YYYY):
01-OCT-1996

Emissions Unit Information Section 1 of 1

Emissions Unit Control Equipment

A.

1. Description: Fabric Filters - High Temperature ($T > 250^{\circ}\text{F}$) Baghouse efficiency = 99%
2. Control Device or Method Code: 016

B.

1. Description: Direct-Flame Afterburner Afterburner efficiency $\geq 99\%$
2. Control Device or Method Code: 019

C.

1. Description: N/A
2. Control Device or Method Code: N/A

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 1 of 8

1. Pollutant Emitted: PM		
2. Total Percent Efficiency of Control: 99%		
3. Primary Control Device Code: 016		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	5.26 lb/hour	23.0 tons/year
6. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 0.04 grains/dscf Reference: Process Knowledge		
9. Emissions Method Code: <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: $15.329 \text{ dscfm} \times 0.04 \text{ gdscf} \times 1 \text{ lb}/7.000 \text{ grains} \times 60 \text{ min}/\text{hr} = 5.26 \text{ lbs}/\text{hr}$ $5.26 \text{ lbs}/\text{hr} \times 8760 \text{ hrs}/\text{yr} \times \text{ton}/2000 \text{ lbs} = 23.0 \text{ tons}/\text{yr}$		
11. Pollutant Potential/Estimated Emissions Comment: NA		

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 2 of 8

1. Pollutant Emitted: PM10		
2. Total Percent Efficiency of Control: N/A		%
3. Primary Control Device Code: 016		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	5.26 lb/hour	23.0 tons/year
6. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 0.04 grains/dscf Reference: Process Knowledge		
9. Emissions Method Code: <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: $15.329 \text{ dscfm} \times 0.04 \text{ gdscf} \times 1\text{lb}/7.000 \text{ grains} \times 60 \text{ min/hr} = 5.26 \text{ lbs/hr}$ $5.26 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times \text{ton}/2000 \text{ lbs} = 23.0 \text{ tons/yr}$		
11. Pollutant Potential/Estimated Emissions Comment: <p style="text-align: center;">PM10 emissions assumed the same as PM emissions.</p>		

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 5 of 8

1. Pollutant Emitted: VOC		
2. Total Percent Efficiency of Control: 99%		
3. Primary Control Device Code: 019		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	35.56 lb/hour	97.8 tons/year
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 27,000 PPM VOC x Soil x Efficiency Reference: Based on material balance analysis		
9. Emissions Method Code: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: (Afterburner destruction efficiency of 99% min.) From Soil: VOC = 65 tons/hr soil x 2,000 lbs/ton x 27,000 ppm VOC/1,000,000 x (1-.99) = 35.10 lbs/hr 357,500 tons/yr soil x 27,000 ppm VOC/1,000,000 x (1-0.99) x 1 ton/2,000 lbs = 96.5 tons/yr From Fuel: (Propane) VOC = 917.13 gal/hr x 0.5 lb/1000 gal = 0.46 lb/hr 5,044,199 gal/yr x 0.5 lb/1000 gal x 1 ton/2,000 lbs = 1.26 tons/yr		
11. Pollutant Potential/Estimated Emissions Comment: This pollutant is synthetically limited based on limiting annual fuel usage rate, soil processing rate and contaminant level in soil. VOC limit in soil of 27,000 ppm (2.7%) is proposed as daily average. Emission rates for other fuel types are located in Document 002.		

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 7 of 8

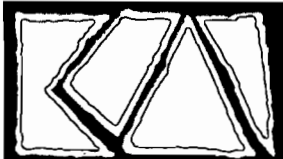
1. Pollutant Emitted: H104, Hexane		
2. Total Percent Efficiency of Control: 99%		
3. Primary Control Device Code: 019		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	1.56 lb/hour	4.3 tons/year
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 4.4 (Hexane to VOC ratio by weight) Reference: FDEP MEMO; Dated August 3, 1995, from C. H. Fancy Subject: Methods of Determining/Quantifying HAPs		
9. Emissions Method Code: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5		
10. Calculation of Emissions: (Afterburner destruction efficiency of 99% min.) $0.044 \times 35.56 \text{ lbs/hr VOC} = 1.56 \text{ lb/hr}$ $0.044 \times 97.8 \text{ tons/yr VOC} = 4.3 \text{ tons/yr}$		
11. Pollutant Potential/Estimated Emissions Comment: This pollutant is synthetically limited based on limiting annual contaminated soil process rate. Hexane is below the 10 tons per year for a single hazardous air pollutant threshold and not subject to Title V reporting requirements.		

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 8 of 8

1. Pollutant Emitted: HAPS		
2. Total Percent Efficiency of Control: 99%		
3. Primary Control Device Code: 019		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	3.91 lb/hour	10.8 tons/year
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 11.0 (HAPS to VOC ratio by weight) Reference: FDEP MEMO; Dated August 3, 1995, from C. H. Fancy Subject: Methods of Determining/Quantifying HAPs		
9. Emissions Method Code: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5		
10. Calculation of Emissions: (Afterburner destruction efficiency of 99% min.) 0.11 x 35.56 lbs/hr VOC = 3.91 lb/hr 0.11 x 97.8 tons/yr VOC = 10.8 tons/yr		
11. Pollutant Potential/Estimated Emissions Comment: This pollutant is synthetically limited based on limiting annual contaminated soil process rate. The total hazardous air pollutants are below the 25 tons per year threshold and not subject to Title V reporting requirements.		



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

KA 450-95-03
December 7, 1995

RECEIVED
DEC 14 1995
BUREAU OF
AIR REGULATION

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

Subject: Kleen Soil International, Inc.
Mobile Soil Remediation Plant
Air Construction Permit Application

Dear Mr. Hanks:

The proposed project will be a mobile petroleum contaminated soil thermal treatment unit. It will consist of a rotary thermal processing kiln with an afterburner and a baghouse.

This application shall establish the mobile unit authorization to operate in any county in which Kleen Soil International, Inc. has published, in a local publication, the Notice of Intent to Issue Permit. A state-wide permit is requested to operate in all counties in the state of Florida except for Hernando and Osceola Counties where Kleen Soil International, Inc. does not plan on operating the portable soil thermal treatment unit.

Enclosed is a check for the application fee in the amount of \$4,500.00.

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

Sincerely,

KOOGLER & ASSOCIATES



Mark A. Hagnmann



Department of Environmental Protection

DIVISION OF AIR RESOURCES MANAGEMENT

APPLICATION FOR AIR PERMIT - LONG FORM

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

This section of the Application for Air Permit form provides general information on the scope of this application, the purpose for which this application is being submitted, and the nature of any construction or modification activities proposed as a part of this application. This section also includes information on the owner or authorized representative of the facility (or the responsible official in the case of a Title V source) and the necessary statements for the applicant and professional engineer, where required, to sign and date for formal submittal of the Application for Air Permit to the Department. If the application form is submitted to the Department on diskette, this section of the Application for Air Permit must also be submitted in hard-copy.

Identification of Facility Addressed in This Application

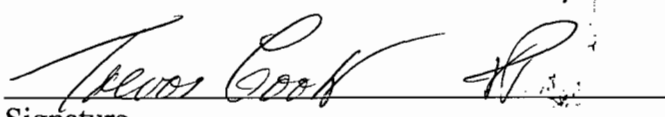
Enter the name of the corporation, business, governmental entity, or individual that has ownership or control of the facility; the facility name, if any; and a brief reference to the facility's physical location. If known, also enter the ARMS or AIRS facility identification number. This information is intended to give a quick reference, on the first page of the application form, to the facility addressed in this application. Elsewhere in the form, numbered data fields are provided for entry of the facility data in computer-input format.

**Kleen Soil International, Incorporated
Mobile Soil Remediation Plant
13838 Harlee Road
Palmetto, Florida 34221**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	12-14-95
2. Permit Number:	7775002-001-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Trevor Cook, Vice President
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Kleen Soil International, Incorporated Street Address: 13838 Harlee Road City: Palmetto State: Florida Zip Code: 34221
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (813) 723-1600 Fax: (813) 772-7743
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative* of the facility (non-Title V source) addressed in this Application for Air Permit or the responsible official, as defined in Chapter 62-213, F.A.C., of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described in this application so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. If the purpose of this application is to obtain an air operation permit or operation permit revision for one or more emissions units which have undergone construction or modification, I certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature _____ Date <u>12/15/95</u>

* Attach letter of authorization if not currently on file.

Scope of Application

This Application for Air Permit addresses the following emissions unit(s) at the facility (or Title V source). An Emissions Unit Information Section (a Section III of the form) must be included for each emissions unit listed.

Emissions Unit ID	Description of Emissions Unit
001	Mobile Thermal Soil Remediation Plant with a Baghouse and an Afterburner

Purpose of Application and Category

Check one (except as otherwise indicated):

Category I: All Air Operation Permit Applications Subject to Processing Under Chapter 62-213, F.A.C.

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Chapter 62-213, F.A.C., for an existing facility which is classified as a Title V source.
- Initial air operation permit under Chapter 62-213, F.A.C., for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: _____

- Air operation permit renewal under Chapter 62-213, F.A.C., for a Title V source.

Operation permit to be renewed: _____

- Air operation permit revision for a Title V source to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit to be revised: _____

- Air operation permit revision or administrative correction for a Title V source to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. Also check Category III.

Operation permit to be revised/corrected: _____

- Air operation permit revision for a Title V source for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit to be revised: _____

Reason for revision: _____

Category II: All Air Operation Permit Applications Subject to Processing Under Rule 62-210.300(2)(b), F.A.C.

This Application for Air Permit is submitted to obtain:

- Initial air operation permit under Rule 62-210.300(2)(b), F.A.C., for an existing facility seeking classification as a synthetic non-Title V source.

Current operation/construction permit number(s): _____

- Renewal air operation permit under Rule 62-210.300(2)(b), F.A.C., for a synthetic non-Title V source.

Operation permit to be renewed: _____

- Air operation permit revision for a synthetic non-Title V source. Give reason for revision; e.g., to address one or more newly constructed or modified emissions units.

Operation permit to be revised: _____

Reason for revision: _____

Category III: All Air Construction Permit Applications for All Facilities and Emissions Units

This Application for Air Permit is submitted to obtain:

- Air construction permit to construct or modify one or more emissions units within a facility (including any facility classified as a Title V source).

Current operation permit number(s), if any: _____

- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

Current operation permit number(s): _____

- Air construction permit for one or more existing, but unpermitted, emissions units.

Application Processing Fee

Check one:

[X] Attached - Amount: \$ 4,500.00 [] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

The proposed project will be a mobile petroleum contaminated soil thermal treatment unit. It will consist of a rotary thermal processing kiln with an afterburner and a baghouse.

Pollutant emissions will be controlled by a baghouse and an afterburner.

This application shall establish the mobile unit authorization to operate in any county in which Kleen Soil International, Incorporated has published, in a local publication, the Notice of Intent to Issue Permit. A state-wide permit is requested to operate in all counties in the state of Florida except for Hernando and Osceola Counties where Kleen Soil International, Incorporated does not plan on operating the portable soil thermal treatment unit.

Note: The Application Fee is Sub-Type 1C [62-4.050(4)(a)3.b].

Air Construction Permit - Source 50 tpy < 100 tpy = \$4,500.00

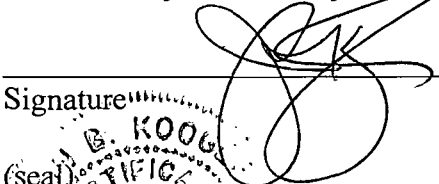
2. Projected or Actual Date of Commencement of Construction (DD-MON-YYYY):

Upon FDEP Approval of Proposed Project

3. Projected Date of Completion of Construction (DD-MON-YYYY):

01-OCT-1996

Professional Engineer Certification

1. Professional Engineer Name: John B. Koogler, Ph.D., P.E. Registration Number: 12925
2. Professional Engineer Mailing Address: Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th Street City: Gainesville State: Florida Zip Code: 32609
3. Professional Engineer Telephone Numbers: Telephone: (904) 377-5822 Fax: (904) 377-7158
4. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance (a) that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; or (b) for any application for a Title V source air operation permit, that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application;</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application; and</i> <i>(3) For any application for an air construction permit for one or more proposed new or modified emissions units, the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> Signature _____ Date <u>12/12/95</u> 

* Attach any exception to certification statement.

Application Contact

1. Name and Title of Application Contact: Mark Hagmann- Project Engineer
2. Application Contact Mailing Address: Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th Street City: Gainesville State: Florida Zip Code: 32609
3. Application Contact Telephone Numbers: Telephone: (904) 377-5822 Fax: (904) 377-7158

Application Comment

<p>NA</p>

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Name, Location, and Type

1. Facility Owner or Operator: Trevor Cook, Vice President			
2. Facility Name: Kleen Soil International, Incorporated			
3. Facility Identification Number:			[X] Unknown
4. Facility Location Information: NA Facility Street Address: City: County: Zip Code:			
5. Facility UTM Coordinates: NA Zone: East (km): North (km):			
6. Facility Latitude/Longitude: NA Latitude (DD/MM/SS): Longitude (DD/MM/SS):			
7. Governmental Facility Code: 0	8. Facility Status Code: C	9. Relocatable Facility? [X] Yes [] No	10. Facility Major Group SIC Code: 16
11. Facility Comment: Kleen Soil International, Incorporated plans on using this unit state wide as a mobile soil thermal treatment unit. Upon approval of this application Kleen Soil International, Incorporated will notify the Department where they plan on locating the mobile unit.			

Facility Contact

1. Name and Title of Facility Contact: Trevor Cook, Vice President		
2. Facility Contact Mailing Address: Organization/Firm: Kleen Soil International, Incorporated Street Address: 13838 Harlee Road City: Palmetto State: Florida Zip Code: 34221		
3. Facility Contact Telephone Numbers: Telephone: (813) 723-1600 Fax: (813) 772-7743		

Facility Regulatory Classifications

1. Small Business Stationary Source? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown
2. Title V Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
3. Synthetic Non-Title V Source? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
4. Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Synthetic Minor Source of Pollutants Other than HAPs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6. Major Source of Hazardous Air Pollutants (HAPs)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Possible
7. Synthetic Minor Source of HAPs? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
8. One or More Emissions Units Subject to NSPS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9. One or More Emission Units Subject to NESHAP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
10. Title V Source by EPA Designation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
11. Facility Regulatory Classifications Comment: The central baghouse and afterburner system represents a federally-enforceable condition on the physical and operational design of the plant.

B. FACILITY REGULATIONS

Depending on the application category, this subsection of the Application for Air Permit form provides either a brief analysis or detailed listing of federal, state, and local regulations applicable to the facility as a whole. (Regulations applicable to individual emissions units within the facility are addressed in Subsection III-B of the form.)

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

The mobile thermal soil remediation unit is subject to the following:

Chapter 62-4, F.A.C.: Permits

Chapter 62-103, F.A.C.: Rules of Administrative Procedure

Chapter 62-210, F.A.C.: Stationary Sources-General Requirements

Chapter 62-275, F.A.C.: Air Quality Areas

Chapter 62-775, F.A.C.: Soil Thermal Treatment Facilities

Chapter 62-296, F.A.C.: Stationary Sources- Emission Standards

Chapter 63-297, F.A.C.: Stationary Sources-Emissions Monitoring

C. FACILITY POLLUTANT INFORMATION

This subsection of the Application for Air Permit form allows for the reporting of potential and estimated emissions of selected pollutants on a facility-wide basis. It must be completed for each pollutant for which the applicant proposes to establish a facility-wide emissions cap and for each pollutant for which emissions are not reported at the emissions-unit level.

Facility Pollutant Information: Pollutant _____ of _____

1. Pollutant Emitted: N/A		
2. Estimated Emissions: N/A		(tons/year)
3. Requested Emissions Cap: N/A	(lb/hour)	(tons/year)
4. Basis for Emissions Cap Code: N/A		
5. Facility Pollutant Comment:		
<p>All pollutants are reported in the Emissions Unit Information Section.</p>		

Facility Pollutant Information: Pollutant _____ of _____

1. Pollutant Emitted: N/A		
2. Estimated Emissions: N/A		(tons/year)
3. Requested Emissions Cap: N/A	(lb/hour)	(tons/year)
4. Basis for Emissions Cap Code: N/A		
5. Facility Pollutant Comment: N/A		

D. FACILITY SUPPLEMENTAL INFORMATION

This subsection of the Application for Air Permit form provides supplemental information related to the facility as a whole. (Supplemental information related to individual emissions units within the facility is provided in Subsection III-I of the form.) Supplemental information must be submitted as an attachment to each copy of the form, in hard-copy or computer-readable form.

Supplemental Requirements for All Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
2. Facility Plot Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Process Flow Diagram(s): <input checked="" type="checkbox"/> Attached, Document ID: <u>001</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input checked="" type="checkbox"/> Attached, Document ID: <u>003</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Fugitive Emissions Identification: <input checked="" type="checkbox"/> Attached, Document ID: <u>003</u> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
6. Supplemental Information for Construction Permit Application: <input checked="" type="checkbox"/> Attached, Document ID: <u>002-Estimated Emissions</u> <input type="checkbox"/> Not Applicable

Additional Supplemental Requirements for Category I Applications Only [N/A]

7. List of Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities Onsite but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable

<p>9. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>10. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>11. Enhanced Monitoring Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>12. Risk Management Plan Verification:</p> <p><input type="checkbox"/> Plan Submitted to Implementing Agency - Verification Attached, Document ID: _____</p> <p><input type="checkbox"/> Plan to be Submitted to Implementing Agency by Required Date</p> <p><input checked="" type="checkbox"/> Not Applicable</p>
<p>13. Compliance Report and Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>14. Compliance Statement (Hard-copy Required) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION

This subsection of the Application for Air Permit form provides general information on the emissions unit addressed in this Emissions Unit Information Section, including information on the type, control equipment, operating capacity, and operating schedule of the emissions unit.

Type of Emissions Unit Addressed in This Section

Check one:

- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, an individually-regulated emission point (stack or vent) serving a single process or production unit, or activity, which also has other individually-regulated emission points.
- This Emissions Unit Information Section addresses, as a single emissions unit, a collectively-regulated group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

Emissions Unit Information Section 1 of 1

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section: Emissions unit will consist of a 65 TPH mobile soil thermal treatment unit with air pollution controlled by a baghouse and an afterburner. Major components of the emissions unit will be a contaminated soil feed bin, bin to dryer belt conveyor, dryer, baghouse, and an afterburner.		
2. ARMS Identification Number: [] No Corresponding ID [X] Unknown		
3. Emissions Unit Status Code: C	4. Acid Rain Unit? [] Yes [X] No	5. Emissions Unit Major Group SIC Code: 16
6. Initial Startup Date (DD-MON-YYYY): N/A .		
7. Long-term Reserve Shutdown Date (DD-MON-YYYY): N/A		
8. Package Unit: Mobile Thermal Treatment Unit Manufacturer: Industrial Waste, Inc. Model Number:		
9. Generator Nameplate Rating: N/A MW		
10. Incinerator Information: Dwell Temperature: 1600 °F Dwell Time: 0.5 second Incinerator Afterburner Temperature : 1600 °F		
11. Emissions Unit Comment: Construction of the mobile unit will start upon Department approval.		

Emissions Unit Information Section 1 of 1

Emissions Unit Control Equipment

A.

1. Description: Fabric Filters - High Temperature (T > 250°F) Baghouse efficiency = 99%
2. Control Device or Method Code: 016

B.

1. Description: Direct-Flame Afterburner Afterburner efficiency ≥ 95%
2. Control Device or Method Code: 019

C.

1. Description: N/A
2. Control Device or Method Code: N/A

Emissions Unit Information Section 1 of 1

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate: 41 mmBtu/hr to kiln / 42 mmBtu/hr to afterburner
2. Maximum Incineration Rate: N/A lb/hr tons/day
3. Maximum Process or Throughput Rate: 65.0 tons per hour contaminated soil 357,000 tons per year contaminated soil
4. Maximum Production Rate: NA
5. Operating Capacity Comment: This emissions unit will be synthetically limited based on limiting the annual process rate of contaminated soil and the annual fuel usage rate. The heat input to the kiln is 41 MMBtu/hr and to the afterburner is 42 MMBtu/hr.

Emissions Unit Operating Schedule

Requested Maximum Operating Schedule:		
	24 hours/day	7 days/week
	52 weeks/year	8760 hours/year

B. EMISSIONS UNIT REGULATIONS

Depending on the application category, this subsection of the Application for Air Permit form provides either a brief analysis or detailed listing of all federal, state, and local regulations applicable to the emissions unit addressed in this Emissions Unit Information Section.

Rule Applicability Analysis (Required for Category II applications and Category III applications involving non Title-V sources. See Instructions.)

See Page 11.

C. EMISSION POINT (STACK/VENT) INFORMATION

This subsection of the Application for Air Permit form provides information about the emission point associated with the emissions unit addressed in this Emissions Unit Information Section. An emission point is typically a stack or vent but can be any identifiable location at which air pollutants, including fugitive emissions, are discharged into the atmosphere.

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: Document 001-Final Exhaust
2. Emission Point Type Code: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4
3. Descriptions of Emissions Points Comprising this Emissions Unit: Stack from afterburner
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: NA
5. Discharge Type Code: <input type="checkbox"/> D <input type="checkbox"/> F <input type="checkbox"/> H <input type="checkbox"/> P <input type="checkbox"/> R <input checked="" type="checkbox"/> V <input type="checkbox"/> W
6. Stack Height: 23 feet
7. Exit Diameter: 4.8 feet
8. Exit Temperature: 1600 °F
9. Actual Volumetric Flow Rate: 79,741 acfm

Emissions Unit Information Section 1 of 1

10. Percent Water Vapor : 25%		
11. Maximum Dry Standard Flow Rate: 15,329 dscfm		
12. Nonstack Emission Point Height: NA feet		
13. Emission Point UTM Coordinates:		
Zone:	East (km):	North (km):
14. Emission Point Comment: NA		

Emissions Unit Information Section 1 of 1

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment (1 of 4)

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode): Solid Waste Disposal/Industrial/Incineration/Single Chamber (Petroleum Contaminated Soil)	
2. Source Classification Code (SCC): 5-03-001-02	
3. SCC Units: Tons Burned	
4. Maximum Hourly Rate: 65.0 tons burned per hour	5. Maximum Annual Rate: 357,000 tons burned per year
6. Estimated Annual Activity Factor: N/A	
7. Maximum Percent Sulfur: N/A	8. Maximum Percent Ash: N/A
9. Million Btu per SCC Unit: N/A	
10. Segment Comment:	

Emissions Unit Information Section 1 of 1

Segment Description and Rate: (2 of 4)

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode): In-Process Fuel: Liquefied Petroleum (Propane)	
2. Source Classification Code (SCC): 3-90-010-89	
3. SCC Units: 1000 Gallons Burned	
4. Maximum Hourly Rate: 0.92 Thousand Gallons Burned	5. Maximum Annual Rate: 5,044.2 Thousand Gallons Burned
6. Estimated Annual Activity Factor: NA	
7. Maximum Percent Sulfur: NA	8. Maximum Percent Ash: NA
9. Million Btu per SCC Unit: 90.5	
10. Segment Comment: NA	

Emissions Unit Information Section 1 of 1

Segment Description and Rate: (3 of 4)

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode): In-Process Fuel: Distillate Oil (# 2 Diesel)	
2. Source Classification Code (SCC): 3-90-005-89	
3. SCC Units: 1000 Gallons Burned	
4. Maximum Hourly Rate: 0.59 Thousand Gallons Burned	5. Maximum Annual Rate: 3,245 Thousand Gallons Burned
6. Estimated Annual Activity Factor: NA	
7. Maximum Percent Sulfur: 0.75	8. Maximum Percent Ash: NA
9. Million Btu per SCC Unit: 141.0	
10. Segment Comment: See Segment Comment on Page 28	

Emissions Unit Information Section 1 of 1

Segment Description and Rate: (4 of 4)

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode): In-Process Fuel: On-Spec Used Oil	
2. Source Classification Code (SCC): 3-90-999-99	
3. SCC Units: 1000 Gallons Burned	
4. Maximum Hourly Rate: 0.92 Thousand Gallons Burned	5. Maximum Annual Rate: 5,044.2 Thousand Gallons Burned
6. Estimated Annual Activity Factor: NA	
7. Maximum Percent Sulfur: 0.75 ***See Segment Comment***	8. Maximum Percent Ash: NA
9. Million Btu per SCC Unit: 125.0	

10. Segment Comment:

During a 30-day rolling average the sulfur content will not exceed 0.35 percent. The maximum sulfur content requested is 0.75 percent.

To provide the Department with assurance that the sulfur content of neither the on-specification used oil nor the virgin No. 2 fuel oil will exceed 0.75% maximum and 0.35% on a 30-day average, Kleen Soil International, Incorporated will require oil suppliers to provide certification of the sulfur content of each shipment of fuel and the quantity of fuel contained in each shipment, Kleen Soil International, Incorporated can maintain a running average of the sulfur content of the fuels used during each month, Kleen Soil International, Incorporated can assure itself and the Department that the 30-day average sulfur content of the fuel will not exceed 0.35%. The records of fuel deliveries and the running 30-day average fuel sulfur levels will be maintained and available for the Department's review, as required by applicable state regulations.

The record keeping will include records of individual shipments of fuel and cumulative quantities of fuel received during each calendar year and records of the monthly average sulfur contents of the used oil fuel and the virgin No. 2 diesel fuel. Additionally, Kleen Soil International, Incorporated will maintain records of fuel use during each day of plant operation and of the number of hours that the plant operates each day. These records will include the amount and type of fuel consumed.

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 1 of 7

1. Pollutant Emitted: PM		
2. Total Percent Efficiency of Control: 99.+ %		
3. Primary Control Device Code: 016		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	5.26 lb/hour	23.0 tons/year
6. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 0.04 grains/dscf Reference: Process Knowledge		
9. Emissions Method Code: <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: 15,329 dscfm x 0.04 gdscf x 1lb/7,000 grains x 60 min/hr = 5.26 lbs/hr 5.26 lbs/hr x 8760 hrs/yr x ton/2000 lbs = 23.0 tons/yr		
11. Pollutant Potential/Estimated Emissions Comment: The Central Baghouse System is a federally-enforceable limitation on potential-to-emit.		

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: RULE, F.A.C. 62-296.415(2)(a)		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions:	5.26 lb/hour	23.0 tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

B.

1. Basis for Allowable Emissions Code: N/A		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions: N/A	lb/hr	tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 2 of 7

1. Pollutant Emitted: PM10		
2. Total Percent Efficiency of Control: N/A		%
3. Primary Control Device Code: 016		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	5.26 lb/hour	23.0 tons/year
6. Synthetically Limited? <input type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 0.04 grains/dscf Reference: Process Knowledge		
9. Emissions Method Code: <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: 15,329 dscfm x 0.04 gdscf x 1lb/7,000 grains x 60 min/hr = 5.26 lbs/hr 5.26 lbs/hr x 8760 hrs/yr x ton/2000 lbs = 23.0 tons/yr		
11. Pollutant Potential/Estimated Emissions Comment: The Central Baghouse System is a federally-enforceable limitation on potential-to-emit. PM10 emissions assumed the same as PM emissions.		

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page) [N/A]

A.

1. Basis for Allowable Emissions Code: N/A
2. Future Effective Date of Allowable Emissions: N/A
3. Requested Allowable Emissions and Units: N/A
4. Equivalent Allowable Emissions: N/A lb/hour tons/year
5. Method of Compliance: N/A
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A

B.

1. Basis for Allowable Emissions Code: N/A
2. Future Effective Date of Allowable Emissions: N/A
3. Requested Allowable Emissions and Units: N/A
4. Equivalent Allowable Emissions: N/A lb/hr tons/year
5. Method of Compliance: N/A
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 3 of 8

1. Pollutant Emitted: CO		
2. Total Percent Efficiency of Control: NA		%
3. Primary Control Device Code: NA		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	6.69 lb/hour	23.0 tons/year
6. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 100 ppm CO/ft³ gas x (28/385)lb CO/ft³ Reference: 62-296.415(1)(b)		
9. Emissions Method Code: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: $\text{CO} = 15,329 \text{ dscfm} \times 60 \text{ min/hr} \times (100 \times 10^{-6}) \text{ ft}^3 \text{ CO/ft}^3 \text{ gas} \times (28/385) \text{ lb CO/ft}^3 = \mathbf{6.69 \text{ lbs/hr}}$ $6.69 \text{ lbs CO/hr} \times 8760 \text{ hrs/2000 lbs} = \mathbf{23.0 \text{ tons/yr}}$		
11. Pollutant Potential/Estimated Emissions Comment: NA		

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: RULE, F.A.C. 62-296.415(1)(b)		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions:	5.26 lb/hour	23.0 tons/year
5. Method of Compliance: F.A.C. 62-297.500		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

B.

1. Basis for Allowable Emissions Code: N/A		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions: N/A	lb/hr	tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 4 of 7

1. Pollutant Emitted: NOX		
2. Total Percent Efficiency of Control: NA %		
3. Primary Control Device Code: NA		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	13.28 lb/hour	36.5 tons/year
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 0.02 lbs NOX/gal fuel Reference: AP-42		
9. Emissions Method Code: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: From Fuel: (#2 Diesel) NOX = 0.02 lbs/gal x 664 gal/hr = 13.28 lbs/hr 0.02 lbs/gal x 3,652,000 gal/yr / 1 ton/2,000 lbs = 36.5 tons/yr		
11. Pollutant Potential/Estimated Emissions Comment: <p style="text-align: center;">This pollutant is synthetically limited by limiting the annual fuel usage rate.</p> <p style="text-align: center;">Emission rates for other fuel types are located in Document 002.</p>		

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page) [N/A]

A.

1. Basis for Allowable Emissions Code: N/A
2. Future Effective Date of Allowable Emissions: N/A
3. Requested Allowable Emissions and Units: N/A
4. Equivalent Allowable Emissions: N/A lb/hour tons/year
5. Method of Compliance: N/A
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A

B.

1. Basis for Allowable Emissions Code: N/A
2. Future Effective Date of Allowable Emissions: N/A
3. Requested Allowable Emissions and Units: N/A
4. Equivalent Allowable Emissions: N/A lb/hr tons/year
5. Method of Compliance: N/A
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 5 of 8

1. Pollutant Emitted: VOC		
2. Total Percent Efficiency of Control: 99.0 %		
3. Primary Control Device Code: 019		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	35.56 lb/hour	97.8 tons/year
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 27,000 PPM VOC x Soil x Efficiency Reference: Based on material balance analysis		
9. Emissions Method Code: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: (Afterburner destruction efficiency of 95% min.) From Soil: VOC = 65 tons/hr soil x 2,000 lbs/ton x 27,000 ppm VOC/1,000,000 x (1-.99) = 35.10 lbs/hr 357,500 tons/yr soil x 27,000 ppm VOC/1,000,000 x (1-0.99) x 1 ton/2,000 lbs = 96.5 tons/yr From Fuel: (Propane) VOC = 917.13 gal/hr x 0.5 lb/1000 gal = 0.46 lb/hr 5,044,199 gal/yr x x 0.5 lb/1000 gal x 1 ton/2,000 lbs = 1.26 tons/yr		
11. Pollutant Potential/Estimated Emissions Comment: This pollutant is synthetically limited based on limiting annual fuel usage rate, soil processing rate and contaminant level in soil, VOC limit in soil of 27,000 ppm (2.7%) is proposed as daily average. Emission rates for other fuel types are located in Document 002.		

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: ESCTV		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions:	35.56 lb/hour	97.8 tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

B.

1. Basis for Allowable Emissions Code: N/A		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions: N/A	lb/hr	tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 6 of 8

1. Pollutant Emitted: SO2		
2. Total Percent Efficiency of Control: NA		
3. Primary Control Device Code: NA		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	34.86 lb/hour	95.9 tons/year
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: (0.0035 x 2) lb/SO₂/lb fuel Reference: Stoichiometry		
9. Emissions Method Code: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: $SO_2 = 664 \text{ gph} \times 7.5 \text{ lb/gal} \times (0.0035 \times 2) \text{ lb } SO_2/\text{lb fuel} = \mathbf{34.86 \text{ lb/hr}}$ $SO_2 = 3,652,000 \text{ gpy} \times 7.5 \text{ lb/gal} \times (0.0035 \times 2) \text{ lb } SO_2/\text{lb fuel} / 2,000 \text{ lb} = \mathbf{95.9 \text{ tons per year}}$		
11. Pollutant Potential/Estimated Emissions Comment: <p style="text-align: center;">This pollutant is synthetically limited by limiting the annual fuel usage rate.</p> <p style="text-align: center;">Emission rates for other fuel types are located in Document 002.</p>		

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: ESCTV		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions:	34.86 lb/hour	95.9 tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

B.

1. Basis for Allowable Emissions Code: N/A		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions: N/A	lb/hr	tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page)

A.

1. Basis for Allowable Emissions Code: ESCTV		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions:	34.86 lb/hour	95.9 tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

B.

1. Basis for Allowable Emissions Code: N/A		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions: N/A	lb/hr	tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 7 of 8

1. Pollutant Emitted: H104, Hexane		
2. Total Percent Efficiency of Control: 99.0 %		
3. Primary Control Device Code: 019		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	1.56 lb/hour	4.3 tons/year
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 ____ to ____ tons/year		
8. Emission Factor: 4.4 (Hexane to VOC ratio by weight) Reference: FDEP MEMO; Dated August 3, 1995, from C. H. Fancy Subject: Methods of Determining/Quantifying HAPs		
9. Emissions Method Code: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5		
10. Calculation of Emissions: (Afterburner destruction efficiency of 95% min.) 0.044 x 35.56 lbs/hr VOC = 1.56 lb/hr 0.044 x 97.8 tons/yr VOC = 4.3 tons/yr		
11. Pollutant Potential/Estimated Emissions Comment: This pollutant is synthetically limited based on limiting annual contaminated soil process rate. Hexane is below the 10 tons per year for a single hazardous air pollutant threshold and not subject to Title V reporting requirements.		

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page) [N/A]

A.

1. Basis for Allowable Emissions-Code: ESCTV		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions:	1.56 lb/hour	4.3 tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

B.

1. Basis for Allowable Emissions Code: N/A		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions: N/A	lb/hr	tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 8 of 8

1. Pollutant Emitted: HAPS		
2. Total Percent Efficiency of Control: 99.0 %		
3. Primary Control Device Code: 019		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	3.91 lb/hour	10.8 tons/year
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 11.0 (HAPS to VOC ratio by weight) Reference: FDEP MEMO; Dated August 3, 1995, from C. H. Fancy Subject: Methods of Determining/Quantifying HAPs		
9. Emissions Method Code: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5		
10. Calculation of Emissions: (Afterburner destruction efficiency of 95% min.) 0.11 x 35.56 lbs/hr VOC = 3.91 lb/hr 0.11 x 97.8 tons/yr VOC = 10.8 tons/yr		
11. Pollutant Potential/Estimated Emissions Comment: This pollutant is synthetically limited based on limiting annual contaminated soil process rate. The total hazardous air pollutants are below the 25 tons per year threshold and not subject to Title V reporting requirements.		

Emissions Unit Information Section 1 of 1

Allowable Emissions (Pollutant identified on front of page) [N/A]

A.

1. Basis for Allowable Emissions Code: ESCTV		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions:	3.91 lb/hour	10.8 tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

B.

1. Basis for Allowable Emissions Code: N/A		
2. Future Effective Date of Allowable Emissions: N/A		
3. Requested Allowable Emissions and Units: N/A		
4. Equivalent Allowable Emissions: N/A	lb/hr	tons/year
5. Method of Compliance: N/A		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode): N/A		

Emissions Unit Information Section 1 of 1

F. VISIBLE EMISSIONS INFORMATION

This subsection of the Application for Air Permit form must be completed for only those emissions units which are subject to a visible emissions limitation. The intent of this subsection of the form is to identify each activity associated with the emissions unit addressed in this section for which a separate opacity limitation would be applicable. Visible emission subtype codes for each such activity are listed in the instructions for Field 1. Most emissions units will be subject to a "subtype VE" limit only.

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE			
2. Basis for Allowable Opacity:		<input checked="" type="checkbox"/> Rule	<input type="checkbox"/> Other
62-296.415(2)(a), F.A.C.			
3. Requested Allowable Opacity:			
Normal Conditions:	5 %	Exceptional Conditions:	5 %
Maximum Period of Excess Opacity Allowed:			0 min/hour
4. Method of Compliance: Method 9 (30-minute, @ exhaust of central baghouse)			
5. Visible Emissions Comment:			
This opacity limitation applies to the final exhaust stack.			

G. CONTINUOUS MONITOR INFORMATION [N/A]

This subsection of the Application for Air Permit form must be completed for only those emissions units which are required by rule or permit to install and operate one or more continuous emission, opacity, flow, or other type monitors. A separate set of continuous monitor information (Fields 1-6) must be completed for each monitoring system required.

Continuous Monitoring System:

1. Parameter Code: CO	
2. CMS Requirement:	<input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Monitor Information: Manufacturer: Southern Technologies Model Number: 48H (Thermo Electron) Serial Number: 40218-262	
4. Installation Date (DD-MON-YYYY): N/A	
5. Performance Specification Test Date (DD-MON-YYYY): N/A	
6. Continuous Monitor Comment:	

H. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION

This subsection of the Application for Air Permit form must be completed for all applications, not just those undergoing prevention-of-significant-deterioration (PSD) review pursuant to Rule 62-212.400, F.A.C. The intent of this subsection is to make a preliminary determination as to whether the emissions unit addressed in this Emissions Unit Information Section consumes PSD increment. PSD increment is consumed (or expanded) as a result of emission increases (decreases) occurring after pollutant-specific baseline dates. Pollutants for which baseline dates have been established are sulfur dioxide, particulate matter, and nitrogen dioxide.

PSD Increment Consumption Determination

1. Increment Consuming for **Particulate Matter** or Sulfur Dioxide?

If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements.

-] The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.

-] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and emissions unit consumes increment.

-] The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

-] For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.

-] None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

Emissions Unit Information Section 1 of 1

2. Increment Consuming for Nitrogen Dioxide?

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

- The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.
- The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- The facility addressed in this application is classified as an EPA major source, and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and emissions unit consumes increment.
- None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3. Increment Consuming/Expanding Code:			
PM	<input checked="" type="checkbox"/> C	<input type="checkbox"/> E	<input type="checkbox"/> Unknown
SO2	<input checked="" type="checkbox"/> C	<input type="checkbox"/> E	<input type="checkbox"/> Unknown
NO2	<input checked="" type="checkbox"/> C	<input type="checkbox"/> E	<input type="checkbox"/> Unknown
4. Baseline Emissions:			
PM		0 lb/hour	0 tons/year
SO2		0 lb/hour	0 tons/year
NO2			0 tons/year
5. PSD Comment: N/A			

Emissions Unit Information Section 1 of 1

I. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

This subsection of the Application for Air Permit form provides supplemental information related to the emissions unit addressed in this Emissions Unit Information Section. Supplemental information must be submitted as an attachment to each copy of the form, in hard-copy or computer-readable form.

Supplemental Requirements for All Applications

1. Process Flow Diagram <input checked="" type="checkbox"/> Attached, Document ID: <u>001</u> [] Not Applicable [] Waiver Requested
2. Fuel Analysis or Specification <input checked="" type="checkbox"/> Attached, Document ID: <u>004</u> [] Not Applicable [] Waiver Requested
3. Detailed Description of Control Equipment <input checked="" type="checkbox"/> Attached, Document ID: <u>005</u> [] Not Applicable [] Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ [] Not Applicable <input checked="" type="checkbox"/> Waiver Requested
5. Compliance Test Report <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input checked="" type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Supplemental Information for Construction Permit Application <input checked="" type="checkbox"/> Attached, Document ID: <u>Document 006-DEP MEMO</u> [] Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Emissions Unit Information Section 1 of 1

Additional Supplemental Requirements for Category I Applications Only [N/A]

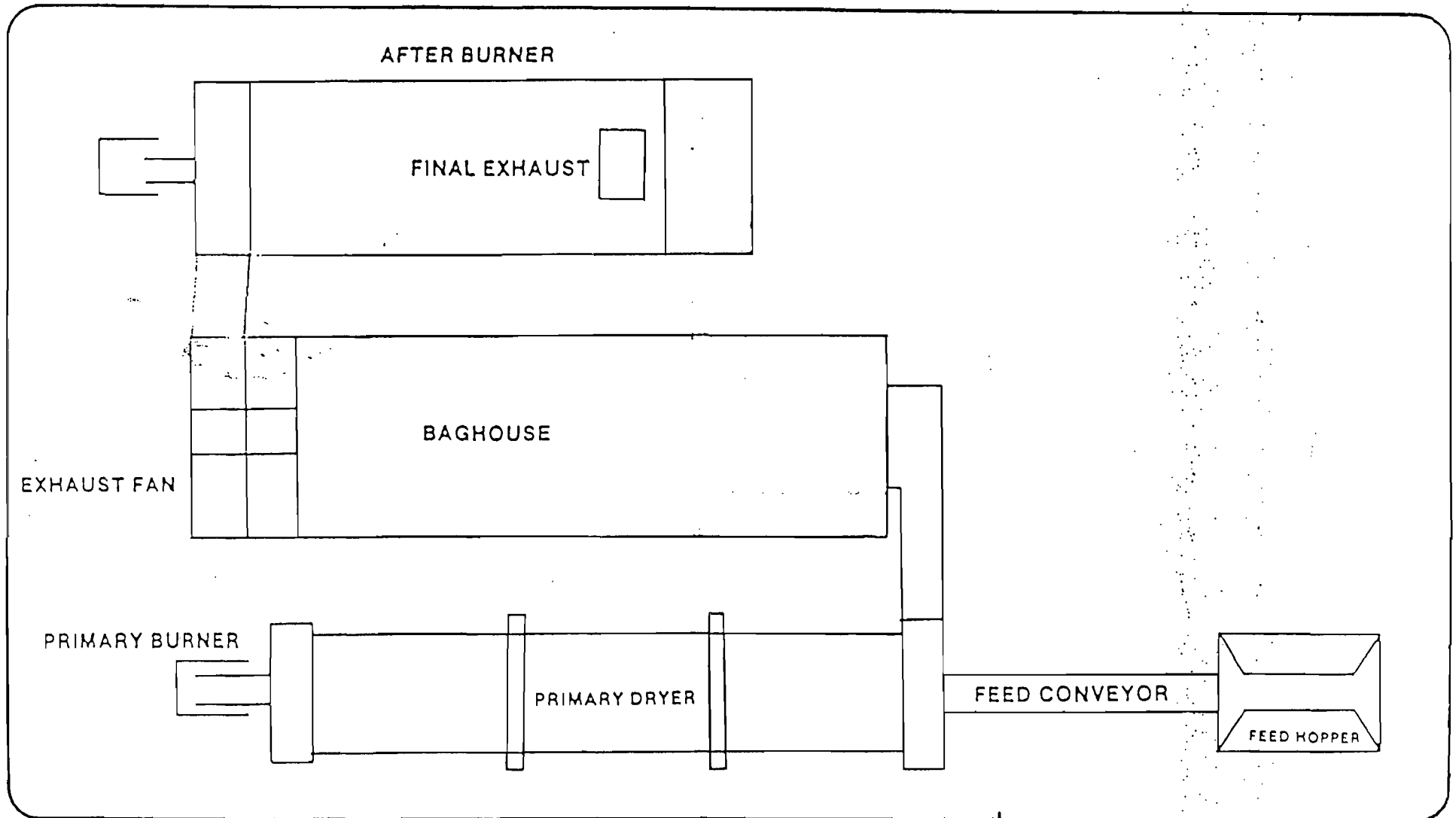
10. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Enhanced Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Acid Rain Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

ATTACHMENTS



Industrial Waste, Inc.

MOBILE THERMAL TREATMENT UNIT



DOCUMENT 2A
Mobile Soil Thermal Treatment Unit
Estimated Emissions
for On-Spec Used Oil Fuel

	Emission	Emissions				Emissions
Pollutant	Factor (lb/1000gal)	(lb/hr)				(tons/yr)
Pollutant	Factor (lb/1000gal)					
VOC	2.52E-01	0.17				0.46
NOX	2.00E+01	13.28				36.52
	lb/gal					
SO2	0.0035	34.86				95.87
	ppm					
Lead	100.00		assume 50% control in baghouse			< 1 ton/yr
Arsenic	5.00		assume 50% control in baghouse			< 1 ton/yr
Cadmium	2.00		assume 50% control in baghouse			< 1 ton/yr
Chromium	10.00		assume 50% control in baghouse			< 1 ton/yr
flow =	15329.03	dscfm	temp2 =	775.00	R	
gal =	664.00	gal/hr	flow =	30000.00	acfm	
ann_gal =	3652000.00	gal/yr	stk_moist =	0.25	%	
soil =	65.00	tph	Drum/Afterburner =	83	mmBtu/hr	
ann_soil =	357500.00	tpy	sulfur =	0.35	% Sulfur	
af_eff	0.05	emitted				

DOCUMENT 2 B
Mobile Soil Thermal Treatment Unit
Estimated Emissions
for #2 Fuel Oil

	Emission	Emissions					Emissions
Pollutant	Factor (lb/1000gal)	(lb/hr)					(tons/yr)
Pollutant	Factor (lb/1000gal)						
VOC	2.52E-01	0.15					0.41
NOX	2.00E+01	11.77					32.38
SO2	0.0035	30.87					84.89
flow =	15329.03	dscfm	temp2 =	775.00	R		
gal =	588.65	gal/hr	flow =	30000.00	acfm		
ann_gal =	3237588.65	gal/yr	stk_moist =	0.25	%		
soil =	65.00	tph	Drum/Afterburner =	83	mmBtu/hr		
ann_soil =	357500.00	tpy	sulfur =	0.35	% Sulfur		
af_eff	0.05	emitted					

DOCUMENT 2C
Mobile Soil Thermal Treatment Unit
Estimated Emissions
for Propane

	Emission	Emissions					Emissions
Pollutant	Factor (lb/1000gal)	(lb/hr)					(tons/yr)
Pollutant	Factor (lb/1000gal)						
VOC	5.00E-01	0.46					1.26
NOX	1.90E+01	17.43					47.92
flow =	15329.03	dscfm	temp2 =	775.00	R		
gal =	917.13	gal/hr	flow =	30000.00	acfm		
ann_gal =	5044198.90	gal/yr	stk_moist =	0.25	%		
soil =	65.00	tph	Drum/Afterburner =	83	mmBtu/hr		
ann_soil =	357500.00	tpy					
af_eff	0.05	emitted					

DOCUMENT 3
SECTION II: FACILITY INFORMATION
PART D: FACILITY SUPPLEMENTAL INFORMATION

QUESTION 4: Precautions to Prevent Emissions of Unconfined Particulate Matter

The handling of the processed soil and vehicle traffic will likely be the most significant sources of unconfined particulate matter emissions.

- The control of unconfined particulate matter emissions from processed soil will be controlled by water spray as necessary.
- The control of emissions resulting from vehicle movement will be controlled, as necessary, by the application of a chemical dust suppressant or water.

QUESTION 5: FUGITIVE EMISSIONS IDENTIFICATION

The generation of fugitive particulate matter emissions during the handling of contaminated soil is expected to be minimal; primarily because of the inherent moisture content of this material. If fugitive emissions do become a problem during the handling of contaminated soil (during the receiving, storage, or transfer to the processing plant), these emissions will be controlled by water sprays.

DOCUMENT 4

Fuel Specifications:

Kleen Soil International, Incorporated requests permission to use on-specification used oil fuel, virgin No. 2 fuel oil or Propane for the kiln and afterburner. The on-specification used oil and the No. 2 fuel oil will be stored in separate storage tanks. The Propane, by necessity, will be stored in a dedicated tank.

The fuels will be fired singularly to the kiln and afterburner. It is possible that one fuel might be fired to the kiln while a different type of fuel is fired to the afterburner. It is not proposed, however, that a mixture of two or more fuels will be fired co-currently to either the kiln or the afterburner. If the blending and co-firing of fuels does appear feasible in the future, an amendment to the permit will be requested.

FUEL ANALYSIS

	On-Spec. Used Oil	No. 2 Fuel Oil	Propane
Percent Sulfur	0.35	0.35	Nil
Percent Ash	Nil	Nil	Nil
Percent Nitrogen	Nil	Nil	Nil
Density (lb/gal)	7.5	7.5	5.0
Heat Capacity (BTU/gal)	125,000	141,000	90,500
Other Contaminants	Trace Metals	None	None

DOCUMENT 005

Detailed Description of Control Equipment:

Baghouse (Manufactured by Industrial Waste, Inc.):

Max No. Bags: 480 Nomex Bags; 5" diameter and 8' long
Media Area: 5,024 sq. ft.
Total Filter CFM: 30,000 acfm
Air to Cloth Ratio: 6 to 1
Control Efficiency: 99.0%

Afterburner (Manufactured by Industrial Waste, Inc.):

Control Efficiency: 99.0%
Dwell Temperature: 1600 °F
Dwell Time: 0.77 second
Incinerator Afterburner Temperature : 1600 °F
Stack Ht: 23.0 ft
Stack Width: 6.0 ft
Stack Depth: 3.0 ft
Stack Area: 18.0 ft²
Equivalent Stack Diameter: 4.8 ft

Florida Department of
Environmental Protection

Memorandum

TO: Bill Thomas, P.E.
District Air Program Administrator

FROM: *John Brown*
C. H. Fancy, Chief
Bureau of Air Regulation

DATE: August 3, 1995

SUBJECT: Methods of Determining/Quantifying HAPs.

This memo is in response to your May 23 memo regarding approved methods of determining/quantifying HAPs.

A source can become a synthetic non-Title V source by obtaining a federally enforceable permit (one that is public noticed and enforceable in a practical manner) pursuant to Guidance Memo DARM PER/V-10, dated 6-15-95.

The practical enforceability is accomplished in any manner that provides the Department reasonable assurance that Hazardous Air Pollutants (HAPs) are not emitted in amounts in excess of 10/25 TPY. The applicant needs to indicate specifically how practical enforceability can be demonstrated. Test methods may not be required if the applicant can show the HAPs constituency of the petroleum products that contaminate the soil.

For example, the attached document extracted from Gasoline Distribution Industry (Stage I), shows that the maximum amount of a single HAP in gasoline is 4.4% for hexane. The total HAPs are approximately 11%. If the soil is contaminated solely from gasoline spills, it may be reasonable to use such a table for calculating maximum levels of HAPs. Therefore, 94.6 TPY of emissions from gasoline spills cannot result in the 10/25 TPY that make the source major for HAPs.

All District Air Program Administrators were provided a draft copy of proposed Guidance on Air Emissions from Petroleum Clean up Sites on June 20. That guidance is being finalized by DWM and DARM. You may be able to use that draft guidance to further answer the questions that you posed in your memo.

CHF/jb/jk
Attachment

TABLE C-4. VAPOR PROFILE OF NORMAL GASOLINE

HAZARDOUS AIR POLLUTANT ^a	HAP TO VOC RATIO (percentage by weight)		
	MINIMUM	ARITHMETIC AVERAGE	MAXIMUM
Hexane	0.3	1.6	4.4
Benzene	0.2	0.9	2.2
Toluene	0.4	1.3	4.0
2,2,4 Trimethylpentane (iso-octane)	0.03	0.8	2.6
Xylenes	0.05	0.5	1.5
Ethylbenzene	0.03	0.1	0.5
TOTAL HAPS^b	2.0	4.8	11.0

^a Cumene and naphthalene were also identified in some of the data points in small quantities. They are not shown as their addition does not significantly change the analysis.

^b The total HAP ratios shown in the table are not simply sums of the individual HAPs. Total HAPs were calculated for each individual sample in the data base and the values represented in the table reflect the maximum, minimum, and arithmetic average total HAPs of these samples.



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

RECEIVED
DEC 19 1995
BUREAU OF
AIR REGULATION

KA 450-95-03
December 18, 1995

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

Subject: Kleen Soil International, Inc.
Mobile Soil Remediation Plant
Air Construction Permit Application-Additional Information

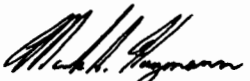
Dear Mr. Hanks:

Enclosed are corrected pages 6, 18, 29, 31, 37, 41, and 43 for the air construction permit application for the subject facility.

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

Sincerely,

KOOGLER & ASSOCIATES


Mark A. Hagmann

Application Processing Fee

Check one:

[**X**] Attached - Amount: \$ 4,500.00 [] Not Applicable.

Construction/Modification Information

1. Description of Proposed Project or Alterations:

The proposed project will be a mobile petroleum contaminated soil thermal treatment unit. It will consist of a rotary thermal processing kiln with an afterburner and a baghouse.

Pollutant emissions will be controlled by a baghouse and an afterburner.

This application shall establish the mobile unit authorization to operate in any county in which Kleen Soil International, Incorporated has published, in a local publication, the Notice of Intent to Issue Permit. A state-wide permit is requested to operate in all counties in the state of Florida except for Hernando and Okaloosa Counties where Kleen Soil International, Incorporated does not plan on operating the portable soil thermal treatment unit.

Note: The Application Fee is Sub-Type 1C [62-4.050(4)(a)3.b].

Air Construction Permit - Source 50 tpy < 100 tpy = \$4,500.00

2. Projected or Actual Date of Commencement of Construction (DD-MON-YYYY):

Upon FDEP Approval of Proposed Project

3. Projected Date of Completion of Construction (DD-MON-YYYY):

01-OCT-1996

Emissions Unit Information Section 1 of 1

Emissions Unit Control Equipment

A.

1. Description: Fabric Filters - High Temperature (T > 250°F) Baghouse efficiency = 99%
2. Control Device or Method Code: 016

B.

1. Description: Direct-Flame Afterburner Afterburner efficiency ≥ 99%
2. Control Device or Method Code: 019

C.

1. Description: N/A
2. Control Device or Method Code: N/A

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 1 of 8

1. Pollutant Emitted: PM		
2. Total Percent Efficiency of Control: 99%		
3. Primary Control Device Code: 016		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	5.26 lb/hour	23.0 tons/year
6. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 0.04 grains/dscf Reference: Process Knowledge		
9. Emissions Method Code: <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: 15,329 dscfm x 0.04 gdscf x 11b/7,000 grains x 60 min/hr = 5.26 lbs/hr 5.26 lbs/hr x 8760 hrs/yr x ton/2000 lbs = 23.0 tons/yr		
11. Pollutant Potential/Estimated Emissions Comment: NA		

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 2 of 8

1. Pollutant Emitted: PM10		
2. Total Percent Efficiency of Control: N/A		%
3. Primary Control Device Code: 016		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	5.26 lb/hour	23.0 tons/year
6. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 ____ to ____ tons/year		
8. Emission Factor: 0.04 grains/dscf Reference: Process Knowledge		
9. Emissions Method Code: <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: $15,329 \text{ dscfm} \times 0.04 \text{ gdscf} \times 11\text{lb}/7,000 \text{ grains} \times 60 \text{ min/hr} = \mathbf{5.26 \text{ lbs/hr}}$ $5.26 \text{ lbs/hr} \times 8760 \text{ hrs/yr} \times \text{ton}/2000 \text{ lbs} = \mathbf{23.0 \text{ tons/yr}}$		
11. Pollutant Potential/Estimated Emissions Comment: <p style="text-align: center;">PM10 emissions assumed the same as PM emissions.</p>		

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 5 of 8

1. Pollutant Emitted: VOC		
2. Total Percent Efficiency of Control: 99%		
3. Primary Control Device Code: 019		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	35.56 lb/hour	97.8 tons/year
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 ____ to ____ tons/year		
8. Emission Factor: 27,000 PPM VOC x Soil x Efficiency Reference: Based on material balance analysis		
9. Emissions Method Code: <input checked="" type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
10. Calculation of Emissions: (Afterburner destruction efficiency of 99% min.) From Soil: VOC = 65 tons/hr soil x 2,000 lbs/ton x 27,000 ppm VOC/1,000,000 x (1-.99) = 35.10 lbs/hr 357,500 tons/yr soil x 27,000 ppm VOC/1,000,000 x (1-0.99) x 1 ton/2,000 lbs = 96.5 tons/yr From Fuel: (Propane) VOC = 917.13 gal/hr x 0.5 lb/1000 gal = 0.46 lb/hr 5,044,199 gal/yr x x 0.5 lb/1000 gal x 1 ton/2,000 lbs = 1.26 tons/yr		
11. Pollutant Potential/Estimated Emissions Comment: This pollutant is synthetically limited based on limiting annual fuel usage rate, soil processing rate and contaminant level in soil. VOC limit in soil of 27,000 ppm (2.7%) is proposed as daily average. Emission rates for other fuel types are located in Document 002.		

Emissions Unit Information Section 1 of 1

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 7 of 8

1. Pollutant Emitted: H104, Hexane		
2. Total Percent Efficiency of Control: 99%		
3. Primary Control Device Code: 019		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	1.56 lb/hour	4.3 tons/year
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 4.4 (Hexane to VOC ratio by weight) Reference: FDEP MEMO; Dated August 3, 1995, from C. H. Fancy Subject: Methods of Determining/Quantifying HAPs		
9. Emissions Method Code: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5		
10. Calculation of Emissions: (Afterburner destruction efficiency of 99% min.) $0.044 \times 35.56 \text{ lbs/hr VOC} = 1.56 \text{ lb/hr}$ $0.044 \times 97.8 \text{ tons/yr VOC} = 4.3 \text{ tons/yr}$		
11. Pollutant Potential/Estimated Emissions Comment: This pollutant is synthetically limited based on limiting annual contaminated soil process rate. Hexane is below the 10 tons per year for a single hazardous air pollutant threshold and not subject to Title V reporting requirements.		

E. POLLUTANT INFORMATION

For the emissions unit addressed in this Emissions Unit Information Section, a separate set of pollutant information must be completed for each pollutant required to be reported. See instructions for further details on this subsection of the Application for Air Permit.

Pollutant Potential/Estimated Emissions: Pollutant 8 of 8

1. Pollutant Emitted: HAPS		
2. Total Percent Efficiency of Control: 99%		
3. Primary Control Device Code: 019		
4. Secondary Control Device Code: N/A		
5. Potential Emissions:	3.91 lb/hour	10.8 tons/year
6. Synthetically Limited? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
7. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/year		
8. Emission Factor: 11.0 (HAPS to VOC ratio by weight) Reference: FDEP MEMO; Dated August 3, 1995, from C. H. Fancy Subject: Methods of Determining/Quantifying HAPs		
9. Emissions Method Code: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 5		
10. Calculation of Emissions: (Afterburner destruction efficiency of 99% min.) 0.11 x 35.56 lbs/hr VOC = 3.91 lb/hr 0.11 x 97.8 tons/yr VOC = 10.8 tons/yr		
11. Pollutant Potential/Estimated Emissions Comment: This pollutant is synthetically limited based on limiting annual contaminated soil process rate. The total hazardous air pollutants are below the 25 tons per year threshold and not subject to Title V reporting requirements.		

