

July 3, 2013

NOTICE OF AIR POLLUTION PERMIT

CERTIFIED MAIL: 7006 0810 0000 7059 9222
RETURN RECEIPT REQUESTED

ISSUED TO:

Mr. Richard Rubin
Owner
Republic Metals Corporation
12900 NW 38 Avenue
Opa Locka, FL. 33054

Air Permit Number: 0250637-008-AO
Issue Date: July 3, 2013
Expiration Date: July 2, 2018

Project: State of Florida Non-Title V Air Operation Permit Renewal.
Facility Description: Precious Metals Recovery, Refining & Recycling
[Major SIC Code 3341 – Secondary Smelting and Refining of Non-Ferrous Metals.
NAICS 331492 – Secondary Smelting, Refining, and Alloying of Nonferrous Metal
(except Copper and Aluminum)]
Location: 12900 NW 38 Avenue, Opa Locka, FL 33054
Lat./Long: 25° 53' 25" N / 80° 15' 46" W
UTM Coordinates: Zone 17 East (km) 573.85 North (km) 2863.57

This is Permit Number 0250637-008-AO for the operation of an air pollution source issued by the the **Miami-Dade County Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management pursuant to Chapter 24, Code of Miami- Dade County and Chapter 403.087, Florida Statutes (F.S.)**. This is a State Air Operation Permit authorizing the operation of the emissions unit described in the permit.

The Florida Department of Environmental Protection (FDEP) has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the FDEP recognizes the RER as the approved local air pollution control program of Miami-Dade County. Through a Specific Operating Agreement, the FDEP delegated to the RER the authority to issue or deny permits for this type of air pollution source located in Miami-Dade County.

STATEMENT OF BASIS:

This permit is issued under the provisions of **Chapter 24, Code of Miami-Dade County, Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297**, and in conformance with all existing regulations of the FDEP and the RER rules. The above named owner or operator is hereby authorized to perform the work or construct the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the RER and made a part hereof and specifically described in this permit.

PERMIT CONTENTS:

- Part I -- Summary Information
- Part II -- Facility-Wide Specific Conditions
- Part III -- Emission Unit Specific Conditions
- Appendix A – General Conditions

PART I -- SUMMARY INFORMATION

This permit addresses the following air pollution emission unit(s):

Emissions Unit Number	Emissions Unit Description
001	<u>Incinerators with afterburner and natural gas fired :</u> Simonds 2151 B Incinerator, 180 lb/hr capacity, 1.2 MMBTU/hr, 7.5 ft stack; Simonds 750 B Incinerator, 100 lb/hr capacity, 1.2 MMBTU/hr, 21 ft stack; Riello F1/08 Incinerator, 4.41 lb/hr capacity, 0.8 MMBTU/hr, 7 ft stack; Simonds Model AF-3 Incinerator, 770 lb/hr. (9.24 tons per day) capacity, continuous feed, 6.0 MMBTU/hr, gas flow 2,086 SCFM, secondary chamber 1,800 ⁰ F preheat temperature, stack height 11 ft.
002	
004	
005	
006	

SIGNIFICANT DATES:

Air Operation Permit Renewal Application Received June 4, 2013.

REGULATORY CLASSIFICATION:

This facility is classified as a synthetic minor, non-Title V, source of air pollution.

PERMIT HISTORY:

Permit No	Project Type Description	Issue Date	Expiration Date
AC 13-255858	Simonds Incinerators (Nos. 1 & 2)	01/12/1995	06/30/1995
AC 13-261613	Rotary Incinerator (No. 3)	04/15/1995	04/14/1996
0250637-001-AO	Initial Operation Permit	02/27/1996	02/26/2001
0250637-002-AC	Riello Incinerator (No. 4)	05/08/1996	05/07/1997
0250637-003-AO	AO Revision	06/23/1997	06/22/2002
0250637-004-AC	Replacement Incinerator (No. 5)	01/17/2003	01/16/2004
0250637-005-AO	AO Renewal	07/03/2003	07/02/2008
0250637-006-AO	AO Renewal	07/10/2008	07/09/2013
0250637-007-AC	AC for New Precious Metals Recovery Line	08/17/2012	08/16/2014

PART II -- FACILITY-WIDE SPECIFIC CONDITIONS

1.0 Administrative Requirements

- 1.1 Regulating Agencies: All applications, tests, reports, notifications, or other submittals required by this permit shall be submitted to the Miami-Dade County Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management located at 701 NW 1 Ct, Suite 400, Miami, Florida 33136.
- 1.2 Citation Format: In this permit, references to **F.A.C. Rule 62-xxx refer to rules promulgated under Title 62 of the Florida Administrative Code; references (if any) to 40 CFR 60.xx (or 61.xx or 63.xx) refer to regulations codified under Part 60 (or 61 or 63) of Title 40 of the Code of Federal Regulations.**
- 1.3 Specific and General Conditions: The owner or operator shall be subject to the specific conditions of this permit and the owner or operator shall be aware of, and operate under, the attached General Conditions, attached as Appendix A of this permit. General Conditions are binding and enforceable pursuant to Chapter 403, F.S.
[Rule 62-4.160 F.A.C.]
- 1.4 Applicable Regulations: This facility is subject to regulation of Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any other applicable federal, state, or local permitting requirements or other regulations.
- 1.5 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid and hazardous wastes in accordance with all applicable Federal, State and Local regulations.
- 1.6 Other Permits: This air pollution permit does not preclude the owner or operator from obtaining any other types of required permits, licenses or certifications from the RER or other departments or agencies.
- 1.7 Renewal of This State Permit Required: An application for renewal of this air operating permit must be submitted to the RER, Air Quality Management **at least 60 days prior** to the expiration date of this permit. To apply for renewal of an operating permit, the applicant shall submit the appropriate application form in triplicate, the appropriate application fee, all required compliance test results, and such additional information as the RER may require by law.
[Rule 62-4.030, 62-4.050, and 62-4.220 F.A.C.]

Note that public notice may be required again at the time of renewal or revision of this permit if the facility or permit is materially changed from that described by this permit.
[Rule 62-210.350(4)(a) F.A.C.]

- 1.8 County Permit Renewal: A request for renewal of the Miami-Dade County annual air operating permit must be submitted annually to the RER Air Quality Management on the appropriate form, **by May 31st of each calendar year**, along with the appropriate Miami-Dade County permit fee.
[Chapter 24-18, Code of Miami-Dade County]

2.0 General Pollutant Emission Limiting Standards

- 2.1 Objectionable Odor Prohibited: No person shall cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor.
[Rule 62-296.320(2) F.A.C.]

2.2 General Visible Emissions Standard: Unless otherwise specified by permit or rule, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than 20 percent opacity at any time.
[Rule 62-296.320(4)(b) F.A.C.]

2.3 Volatile Organic Compounds/Organic Solvents Emissions:

No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the RER.

Such controls include the following:

- Tightly cover or close all VOC containers when they are not in use.
- Tightly cover all open tanks, which contain VOCs when they are not in use.
- Maintain all pipes, valves, fittings, etc., which handle VOCs in good operating condition.
- Confine rags used with VOCs to tightly closed, fireproof containers when not in use.
- Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.

[Rule 62-296.320(1) F.A.C.]

2.4 Unconfined Emissions of Particulate Matter:

No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.

Reasonable precautions include the following:

- Paving and maintenance of roads, parking areas and yards.
- Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- Application of asphalt, water, chemicals, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities.
- Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- Landscaping or planting of vegetation.
- Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.
- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.
- Substitution of powdery materials with granular or pelletized materials, where possible.

[Rule 62-296.320(4)(c) F.A.C.]

3.0 Operation Requirements

3.1 Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650 F.A.C.]

3.2 Excess Emissions: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing best operational practices to minimize emissions are adhered to, and the duration of excess emissions shall be minimized but in no case exceeds two hours in any 24 hour period unless specifically authorized by the RER for longer duration. Excess emissions which are caused entirely

or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.

[Rule 62-210.700 F.A.C.]

4.0 Compliance Testing Requirements

4.1 Test Notification: Unless otherwise specified in this permit, the RER Air Facilities Section shall be notified in writing of expected compliance test dates (when required) at least fifteen (15) days prior to compliance testing. The notification shall include the following information: the date, time, and location of each test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner.

[Rule 62-297.310(7)(a) 9 F.A.C.]

4.2 Testing at Capacity: Compliance testing (when required) shall be conducted with the emission units operating at the permitted capacity (90 to 100% of the maximum permitted operation rate of the emission units). If an emission unit is not tested at permitted capacity, the emission unit shall not be operated above 110% of the test load until a new test showing compliance is conducted. Operation of the emissions unit above 110% of the test load is allowed for no more than 15 days for the purpose of conducting additional compliance testing to regain the authority to operate at the permitted capacity.

[Rule 62-297.310(2) F.A.C.]

4.3 Special Compliance Tests: When the RER, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard in Rules 62-204 through 62-297 or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the RER.

[Rule 62-297.310(7)(b) F.A.C.]

5.0 Reporting and Record Keeping Requirements

5.1 Report Excess Emissions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the RER in accordance with Rule 62-4.130, F.A.C. (condition 5.2 below). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the RER.

[Rule 62-210.700(6) F.A.C.]

5.2 Report Plant Operation Problems: If the owner or operator is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the owner or operator shall immediately notify the RER. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the owner or operator from any liability for failure to comply with the FDEP and the RER rules.

[Rule 62-4.130 F.A.C.]

5.3 Retain Records: All records required by this permit shall be kept by the owner or operator and made available for the RER inspection for a minimum of three (3) years from the date of such records.

[Rule 62-4.160(14)(b) F.A.C.]

- 5.4 Compliance Test Reports: Compliance test reports (when required) shall be submitted to the RER Air Facilities Section, as soon as practical, but no later than 45 days after the last sampling run of each test is completed.

Test reports shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the RER to determine if the test was properly conducted and the test results properly computed. Test reports, other than for an EPA Method 9 test, shall include the following information and other information as necessary to make a complete report required pursuant to F.A.C. Rule 297.310(8)(c):

- The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
- The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
- The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
- All measured and calculated data required to be determined by each applicable test procedure for each run.
- The detailed calculations for one run that relate the collected data to the calculated emission rate.
- The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.

[Rule 62-297.310(8)(a) &(b) F.A.C.]

- 5.5 Annual Operating Report Required: Annual Operating Report (DEP Form No. 62-210.900(5)) shall be completed each year and submitted to the Miami-Dade County, RER, Air Quality Management office or submitted electronically to the Florida Department of Environmental Protection by April 1 of the following year.

[Rule 62-210.370(3) F.A.C.]

PART III -- EMISSION UNIT SPECIFIC CONDITIONS

This part of this permit addresses the following emission units:

Emissions Unit Number	Emissions Unit Description
001 002 004 005 006	<p><u>Incinerators:</u> Simonds 2151 B Incinerator, 180 lb/hr capacity Simonds 750 B Incinerator, 100 lb/hr capacity Riello F1/08 Incinerator, 4.41 lb/hr capacity Simonds Model AF-3 Incinerator, continuous feed, natural gas fired 770 lb/hr. (9.24 tons per day) capacity</p> <p><u>Miscellaneous Units:</u></p> <p><u>Furnaces</u> 2 - Lindberg 400 Furnaces 2 - Lindberg 200 Furnaces 1 - Hover & Strong 60 Furnace 1 - Hover & Strong 30 Furnace Furnaces are under hoods connected to roof top discharge stacks (3)</p> <p><u>Gold & Silver Refining</u> 1 - 200, and 2 - 100 gallon reactor kettles for gold digestion 1 - 500 gallon tank for gold precipitation 2 - 170 gallon reactor kettles for silver digestion 1 - 500 gallon tank for silver precipitation Refinery control equipment: - NOxTI-200 CFM (Amby) and TRI-MER scrubbers</p> <p><u>Stone and Miscellaneous Jewelry Processing</u> 1 each - 25 gal, 50 gal, & 100 gallon reactor kettles 1 - 75 gallon precipitation tank</p>

1.0 Emissions Limiting Standards and Operation Restrictions

- 1.1 Incinerator Charge Rate: The charge rate for the emissions units shall be less than 50 tons per day.
 [Rule 62-4.070(3) and 62-296.401(1) F.A.C.; Permit No. 0250637-004-AC]
- 1.2 Visible Emissions: Visible emissions shall not exceed 5% opacity from the incinerators stacks except that visible emissions not exceeding fifteen (15%) percent opacity are allowed for up to six (6) minutes in any one (1) hour period.
 [Rule 62-296.401(1)(a) F.A.C.; Permit No. 0250637-004-AC]
- 1.3 Allowable Fuel: Fuel for the incinerators shall be limited to natural gas.
 [Rule 62-4.070(3) F.A.C.; Permit No. 0250637-004-AC]

