Permittee:
Commercial Metals Company d/b/a
CMC Recycling
2038 North Lane Ave.
Jacksonville, FL 32254

Permit No.: 0310252-009-AO
Facility ID No.: 0310252
SIC No (s).: 50
Project: Automobile and Scrap Shredder

This permit is for the purpose of renewing Permit No. 0310252-008-AO for the operation of Commercial Metals Company d/b/a CMC Recycling. CMC Recycling is located at 2038 North Lane Avenue, Jacksonville, Duval County, FL 32254; UTM Coordinates: Zone 17, 427.64 km East and 3357.30 km North; Latitude: 30° 20' 44" North and Longitude: 81° 45' 11" West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (FS) and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, Florida Administrative Code (FAC). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Neighborhoods Department, Environmental Quality Division (Permitting Authority) in accordance with the terms and conditions of this permit.

Operation Permit Application Due Date: **August 1, 2018**
Expiration Date: **September 30, 2018**

Neighborhoods Department
Environmental Quality Division

Robert Steven Pace, P.E., Manager
Air Quality Branch

RSP/HDS

Section I. Facility Information

Subsection A. Facility/Project Description

CMC Recycling is an Automobile and Scrap Shredder.

Scrap metal and automobiles are loaded onto an in-feed conveyor. The feedstock is conveyed to the shredder hammer mill (EU No. 004) where hammers shred the scrap metal into fragments. The material is then discharged through grate openings. Fugitive particulate matter (PM) air emissions are controlled utilizing a foam suppression or water spray system. The foam suppression system is the primary control device. The foam suppression system was installed as a safety measure to reduce the impacts of potential explosions that might result from the shredding of material such as automobile gas tanks or compressed gas cylinders. The water spray system is the secondary control device.

The shredded material falls onto a discharge conveyor and is transported to a magnetic cleaning separator system where an electromagnetic drum is underfed and picks up ferrous material. The material is then carried to a vibrator which is positioned between magnets. The magnets can trap non-ferrous material and waste when the ferrous material is passed over the magnets. The ferrous product is cleaned up when discharged through a Z-box separator. The material free falls against an air-flow that will pick up any light material and carries it over the top of the box. The ferrous material hits impact plates during its fall, increasing the possibilities of detaching any non-ferrous or waste material that it is carrying. The metal is then discharged from the Z-box as clean ferrous product. PM air emissions at the Z-box (EU No. 003) are controlled using a fabric filter baghouse.

The non-ferrous product and waste material picked up by the air flow at the Z-box are discharged through a high efficiency cyclone. The Z-box cyclone baghouse, controls PM air emissions from approximately 25% of the air flow from the Z-box cyclone. The remaining 75% of the air flow is recirculated back to the Z-box. The heavier particles are thrown towards the cyclone walls and are removed through the bottom due to the cyclonic effect at the entrance to the cyclone.

The non-ferrous material from the cyclone is discharged to a transfer conveyor which transports it to the non-ferrous material conveyor. The non-ferrous material is conveyed to an Eddy Current separator system where the shredder waste or shredder fluff (i.e., foam, fabrics, plastics, rubber, and glass) is separated from the non-ferrous product. The non-ferrous product is separated by commodity (e.g., aluminum and copper). The shredder fluff is transported to a storage area where it is stored until it is taken off-site for disposal.

The facility is a minor source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year pursuant to Chapter 62-210, FAC, and JEPB Rule 2.301.

Subsection B. Summary of Emission Unit (EU) ID Nos. and Brief Descriptions

EU No.	EU Description	Control Device
003	Automobile and Scrap Shredder (Z-box cyclone)	Z-box Baghouse, Mac Environmental Model Number (MN) 96-120 MCF 255
004	Shredder Hammer Mill	Foam Suppression System (primary control device), Midwest Industrial Supply, Inc., Dust Buster Simplex MN 1-A Water Spray System (secondary control device), Texas Shredder, Inc., MN 98/104 Heavy SE

Subsection C. Relevant Documents

Air Operation Permit Renewal Application received September, 27, 2013
Air Operation Permit No. 0310252-008-AO

Section II. Facility Wide Conditions

Subsection A. General Conditions

All permits issued by the Permitting Authority shall include the following general conditions in accordance with 62-4.160, FAC, and Rule 2.1401, JEPB.

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and are binding and enforceable pursuant to Section 403.141, FS. The permittee is placed on notice that the Permitting Authority 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 Permitting Authority.

3. As provided in subsections 403.987(7), FS, 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 this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Permitting Authority rules, unless specifically authorized by an order from the Permitting Authority.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Permitting Authority 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 Permitting Authority rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Permitting Authority personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, 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 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 Permitting Authority 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 Permitting Authority with the following information:

   a. A description of and cause of noncompliance; and
   b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Permitting Authority for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Permitting Authority may be used by the Permitting Authority as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Permitting Authority rules, except where such use is prescribed by Sections 403.111 and 403.73, FS. 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 Permitting Authority 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 Permitting Authority rules.

11. This permit is transferable only upon Permitting Authority approval in accordance with Rule 62-4.120, FAC, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Permitting Authority.

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

13. This permit also constitutes:

    ( ) Determination of Best Available Control Technology (BACT)
    ( ) Determination of Prevention of Significant Deterioration (PSD)
    ( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
    ( ) Compliance with New Source Performance Standards (NSPS)

14. The permittee shall comply with the following:

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

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 this 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 Permitting Authority rule.

c. Records of monitoring information shall include:

1. The date, exact place, and time of sampling or measurements;
2. The person responsible for performing the sampling or measurements;
3. The date(s) analyses were performed;
4. The person responsible for performing the analyses;
5. The analytical techniques or methods used;
6. The results of such analyses.

15. When requested by the Permitting Authority, 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 the relevant facts were not submitted or were incorrect in the permit application or in any report to the Permitting Authority, such facts or information shall be corrected promptly.

Subsection B. Specific Conditions

1. Any revision to a permit or application shall be submitted to and approved by the Permitting Authority prior to implementation.
[Rule 62-4.080(2), FAC, and Rule 2.1401, JEPB]

2. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit.
[Rule 62-4.090, FAC, and Rule 2.1401, JEPB]

3. Permittee shall notify the Permitting Authority fifteen (15) days prior to the date of each formal compliance test conducted for an emissions unit.
[Rule 62-297.310(7)(a)9., FAC, and Rule 2.1201, JEPB]

4. Testing of emissions shall be conducted with the Emissions Unit 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 Emissions Units may be tested at less capacity; in this case subsequent Emissions Unit operation is limited to 110 percent of the test load until a new test is conducted. Once the Emissions 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(2), FAC, and Rule 2.1201, JEPB]

5. Copies of the test report(s) shall be filed with the Permitting Authority within forty-five (45) days of completion of testing.
[Rule 62-297.310(8)(b), FAC, and Rule 2.1201, JEPB]

6. A satisfactory compliance test shall be performed prior to the renewal of an operation permit. The most recent annual compliance test shall satisfy this requirement if conducted in the past year.
[Rule 62-297.310(7)(a)3, FAC, and Rule 2.1201, JEPB]

7. Excess emissions resulting from startup, shutdown, or malfunction of any emission unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Permitting Authority 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. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Permitting Authority in accordance with Rule 62-4.130, FAC and Rule 2.1401, JEPB. A full written report on the malfunctions shall be submitted to the Permitting Authority in a quarterly report, if requested by the Permitting Authority.
[Rule 62-210.700, FAC, and Rule 2.301, JEPB]

8. Total Particulate Matter (PM) emissions from the facility shall be less than fifteen (15) tons per year and five (5) pounds per hour.
[Rule 62-296.700(2)(a), FAC, and Rule 2.1101, JEPB]

9. Stack sampling facilities and control equipment shall be provided with a method of access that is safe and readily accessible.
[Rule 62-297.310(6), FAC, and Rule 2.1201, JEPB]

10. 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 but are not limited the following:

    a. Paving and maintenance of roads, parking areas and yards.
    b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
    c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
    d. 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.
    e. Landscaping or planting of vegetation.
    f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
    g. Confining abrasive blasting where possible.
    h. Enclosure or covering of conveyor systems.

    [Rule 62-296.320(4)(c), FAC, and Rule 2.1101, JEPB]

11. <u>General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited.</u> The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), FAC, and Rule 2.1101, JEPB]

12. The facility shall be subject to the City of Jacksonville Ordinance Code, Title X, Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 376 [Odor Control], and JEPB Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice].

13. The facility shall be subject to JEPB Rule 2, Parts I through VII, and Parts IX through XIV.

14. The permittee shall submit all compliance related notifications and reports required by this permit to:

Neighborhoods Department
Environmental Quality Division
Ed Ball Building, 214 North Hogan Street, Suite 500
Jacksonville, FL 32202
Telephone: (904) 255-7100
Fax: (904) 255-7130

Section III. Emission Units and Conditions

Emission Unit No. 003 - Automobile and Scrap Shredder (Z-box cyclone)

Emission Unit Description:	Automobile and scrap shredder used to shred whole or flattened cars, loose appliances, No. 2 and light No. 1 scrap. This is the primary mechanism for cleaning waste material from the ferrous and non-ferrous material.
Control Device:	Z-box Baghouse, Mac Environmental Model Number (MN) 96-120 MCF 255

Essential Potential to Emit (PTE) Parameters

1. The nominal volumetric flow rate for this emissions unit is 14,112 cubic feet per minute.
[Rule 62-210.200(247), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. The hours of operation for this emissions unit shall not exceed 4,992 hours per year (hrs/yr).
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

3. The maximum process input rate of recycled automobiles and other miscellaneous metal containing products shall not exceed 200 tons per hour (tons/hr).
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

4. Visible Emissions (VE) shall not exceed five (5) percent opacity.
[Rule 62-4.070(3), F.A.C., and Rule 2.1401, JEPB]

Test Methods and Procedures

5. Testing for demonstration of compliance, every five years (120 days prior to the permit expiration date), shall be performed in accordance with EPA Reference Method (RM) 5 (as described in 40 CFR 60, Appendix A) for particulate matter.
[Rule 62-296.320(4)(a)(3)(b)(ii), FAC, and Rule 2.1101, JEPB]

6. Testing for the demonstration of compliance shall be performed annually from the date of September 1, 2013, in accordance with EPA Reference Method 9 (as described in 40 CFR 60, Appendix A) for the visual determination of opacity. Testing shall be conducted for a minimum period of 30 minutes.
[Rule 62-297.310(4)(a)2, FAC and Rule 2.1201, JEPB]

Emission Unit No. 004 – Shredder Hammer Mill

Emission Unit Description: Hammers shred incoming scrap metal feedstock into smaller pieces.

Control Device : Foam Suppression System (primary control device), Midwest Industrial Supply, Inc., Dust Buster Simplex MN 1-A
Water Spray System (secondary control device), Texas Shredder, Inc., MN 98/104 Heavy SE

Essential Potential to Emit (PTE) Parameters

1. The hours of operation for this emissions unit shall not exceed 4,992 hrs/yr.
[Rule 62-210.200(247), FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. The maximum process input rate of recycled automobiles and other miscellaneous metal containing products shall not exceed 200 tons/hr.
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

3. Visible emissions (VE) shall not exceed 20% opacity.
[Rule 62-296.320(4)(b)1, FAC, and Rule 2.1101, JEPB]

Test Methods and Procedures

4. Testing for the demonstration of compliance shall be performed annually from the date of September 1, 2013, in accordance with EPA Reference Method 9 (as described in 40 CFR 60, Appendix A) for the visual determination of opacity. Testing shall be conducted for a minimum period of 30 minutes.
[Rule 62-297.310(4)(a)2, FAC and Rule 2.1201, JEPB]