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Auto Shred Recycling, L.L.C.
Auto Shredder Mill
Facility ID No.: 0330121
Escambia County

Air Operation Permit
Permit No.: 0330121-002-AO

Permitting Authority
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8364
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[electronic file name: 0330121o.doc]

Air Operation Permit
Permit No.: 0330121-002-AO

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Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

Permittee:
Auto Shred Recycling, L.L.C.

Permit No.: 0330121-002-AO
Facility ID No.: 0330121
SIC Nos.: 50, 5093
Project: Auto Shredder Mill

This permit is for the operation of the Auto Shredder Mill located at 1000 South Myrick Street, Escambia County; UTM Coordinates: Zone 16, 475.80 km East and 3363.40 km North; Latitude: 30° 24' 15" North and Longitude: 87° 15' 05" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. 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 permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix G-1, General Conditions
Appendix SS-1, Stack Sampling Facilities

Effective Date: January 5, 1999

Renewal Application Due Date: November 7, 2004 ~~2003~~

Expiration Date: January 5, 2004

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Ed K. Middleswart, P.E.
Air Program Administrator

EKM/as

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of a scrap yard where automobiles and other large ferrous-metal objects are run through a shredder mill for size reduction and sorting. The Auto Shredder Mill is powered by two new electric motors which replaced old diesel engines in 1995. The mill is designed to shred scrap autos and other similar metal scrap at the rate of 44.1 tons per hour. Shredded scrap discharged from the mill is initially separated with a light fraction pneumatically conveyed to No. 1 cyclone. The heavy fraction is conveyed to a zigzag where the heavy metal pieces fall by gravity to a conveyor belt while the lighter non-metal pieces are pneumatically conveyed to No. 2 cyclone. Particulate emissions from both cyclone conveying air streams are controlled by a wet scrubber manufactured by Newell, Serial No. 75. Solids discharged from the bottom of the two cyclones are routed to the new trommel and eddy current systems. Spray systems and metal covers installed over the conveyors protect the contents, especially the lighter "fluff", from wind action. The trommel system is essentially a rotary drum screen. The eddy current system uses induced magnetic fields to separate non-ferrous metals, such as stainless steel, zinc, aluminum and copper from the fluff, plastic and dirt. Process waste is transported off the site for disposal at a Class I or II permitted landfill.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the permit application received, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
001	Auto Shredder Mill Solid Waste System - Wet Scrubber and Cyclones #1 & #2
002	Plant-Wide Fugitive Emissions

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:

AO17-159156 Permit Application received January 10, 1989
AO17-242194 Permit Application received December 2, 1993
AO17-242194 Permit Application (additional) received January 25, 1994
Letter from J. Arledge dated February 3, 1994
Letter from J. Consolletti dated July 19, 1995
Letter from J. Consolletti dated August 7, 1995
Letter from T. Snow dated April 3, 1996
AO Permit Renewal Application received November 20, 1998

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. 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), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, 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 that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: Water mist sprayer systems will be used on conveyor systems and shear to help control fugitive dust. Roads and parking areas will be monitored and cleaned, and cranes will minimize materials' drop height to help control fugitive dust.
[Rule 62-296.320(4)(c),2.,F.A.C., Permit AO17-242194]
5. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]
6. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in FAC Rule 62-4.050(4) to the Northwest District office of the Department.
[Rule 62-4.090, F.A.C.]
7. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8597
8. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, day or night, and for emergencies involving a significant threat to human health or the environment is (800) 320-0519. For routine business, telephone (850) 595-8364 during normal working hours.
[Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U.

ID No. Brief Description

001 Auto Shredder Mill Solid Waste System - Wet Scrubber and Cyclones #1 & #2

INDUSTRIAL
TONS

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

39,375 Gross Tons

Production
is measured/
recorded in
Gross Tons =
22,407
Gross Tons
(LONG)

A.1. Capacity. The shredder mill operation rate shall not exceed 44.1 tons of scrap shredded per hour. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., AO17-242194 application]

A.2. Hours of Operation. The hours of operation for this emissions unit shall not exceed 4,200 hrs/yr. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., AO17-242194 application]

Emission Limitations and Standards

A.3. The maximum allowable emission rate for the wet scrubber shall be 31.73 lb PM/hr, 66.63 T PM/yr. [Rule 62-296.320(4)(a)2., F.A.C.]

A.4. Visible emissions shall not exceed 10% opacity under normal operating conditions. Permittee accepts this more stringent VE limit with a waiver of annual particulate testing requirements. [Permittee request, Permit AO17-242194]

Test Methods and Procedures

5.a. Annual Visible Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with DEP Method 9 for 30 minutes. Such tests shall be scheduled annually before the end of October. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. [Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

5.b. EPA Method 5 shall be used to test for compliance with Specific Condition A.3. if the source exceeds the VE limits of Specific Condition A.4.. Permittee may be required to test annually for PM if VE limits are exceeded frequently. [Rule 62-296.320(4)(a)3.a.ii., F.A.C.]

Submerged - Dept as empty
Measure depth once loaded

5.c. The test reports shall comply with applicable portions of F.A.C. Rule 62-297.310, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.
[Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

5.c. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% 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 fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.
[Rules 62-297.310(2) and 62-4.070, F.A.C.]

Source Commitments

6. The approved Air Pollution Prevention Plan shall be implemented. All records of inspections, site compliance evaluation records and preventive maintenance records shall be retained on site for a period of at least two years and made available for Department inspection.
[FAC Rule 62-4.070 and AO17-242194 application]

7. Solid waste (fluff from cyclones, trommel, eddy current separator and dredge from scrubber settling/holding pond) are to be disposed of at a Class I or II permitted landfill.
[FAC Rule 62-4.070 and AO17-242194 application]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 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. Nor 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 does not constitute 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 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 and used by the permittee to achieve compliance with the conditions of this permit, are 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, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of this permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,
 - c. Sampling or monitoring 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 noncompliance; and

b. The period of noncompliance, including exact 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 Department for penalties or for 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 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 proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with 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 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

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 measurement;
- the person responsible for performing the sampling or measurement;
- the date(s) 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 the 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.

APPENDIX SS-1, STACK SAMPLING FACILITIES

Stack Sampling Facilities Provided by the Owner of an Emissions Unit. This section describes the minimum requirements for stack sampling facilities that are necessary to sample point emissions units. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. Emissions units must provide these facilities at their expense. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

(a) Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.

(b) Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.

(c) Sampling Ports.

1. All sampling ports shall have a minimum inside diameter of 3 inches.
2. The ports shall be capable of being sealed when not in use.
3. The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.

5. On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.

(d) Work Platforms.

1. Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.
2. On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.
3. On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.
4. All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.

(e) Access to Work Platform.

APPENDIX SS-1, ACK SAMPLING FACILITIES (version dated 10/07/96)
(continued)

1. Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.

2. Walkways over free-fall areas shall be equipped with safety rails and toeboards.

(f) Electrical Power.

1. A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

2. If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

(g) Sampling Equipment Support.

1. A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

a. The bracket shall be a standard 3 inch x 3 inch x one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.

b. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.

c. The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.

2. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

3. When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

**AUTO SHRED INDUSTRIES
Air Pollution Prevention Plan**

1.1. INTRODUCTION

This Air Pollution Prevention Plan covers the operation of Auto Shred Industries, located in Pensacola, Florida 32505. It describes this facility and its operations, identifies potential sources of air pollution at the facility, recommends appropriate best management practices (BMPs) or pollution control measures to reduce the discharge of pollutants in the air, and provides for periodic review of this Plan.

General Facility Information

Name of Facility:	SSF, Inc. d/b/a Auto Shred Industries
Facility Address:	1000 South Myrick St., Pensacola, Florida 32505
Facility Contact:	Dennis Arruebarrena Yard Manager (904) 432-0977 1000 South Myrick St., Pensacola, Florida 32505
Owner:	SSF, Inc. d/b/a/ Auto Shred Industries
Air Discharge Permit:	
Authorized Regulatory Agency	Department of Environmental Protection
Permit Type:	Specific
Permit No.:	AO17-159156

Plan Objectives

The objective of this plan is threefold: (1) to identify potential sources of pollution at the Auto Shred facility which may affect the quality of air discharges, (2) to describe best management practices (BMPs) that are consistent with sound business practices in the scrap processing and recycling industries, and (3) to provide other elements such as a facility inspection program, a site compliance evaluation program, a recordkeeping and reporting program that will help the facility comply with the terms and conditions of the Permit.

POLLUTION PREVENTION TEAM

The Air Pollution Prevention Team is responsible for developing, implementing, maintaining and revising the plan. The members of the team are familiar with the management and operations of the facility. The members and their primary responsibilities are as follows:

Corporate Safety Director

Conducting annual inspections, annual site compliance evaluations, training employees.

Yard Manager

Conducting annual inspections, annual site compliance evaluations, training employees.
Implementing and maintaining BMPs, keeping and submitting records and reports.

Operations Manager

Conducting annual inspections, annual site compliance evaluations, training employees.
Overseeing maintenance of equipment and environmental controls.

Shredder Supervisor

Attending annual inspections and compliance evaluations, training employees. Instituting and enforcing rules and regulations on a day to day basis to insure compliance with this plan.
Assigning competent personnel to positions of inspection, operation, and maintenance of all environmental controls. Determining when specific conditions warrant additional controls or suspension to avoid potential upsets.

POTENTIAL SOURCES OF AIR POLLUTANTS

Site Map

Presents a map of the facility showing the following features:

- Locations of permitted air pollution sources
- Locations of buildings and equipment
- Locations of potential sources of air pollution
- Surface water bodies
- Locations where the following activities occur:
 - Fixed fueling operations
 - Vehicle and equipment maintenance areas
 - Loading/unloading areas
 - Scrap processing areas
 - Roads and parking

Potential Sources

Permitted

Cyclone Separator

This unit is designed to separate light and heavy materials through the use of air and a closed loop water system.

Stationary Shredder Engines

Unit is equipped with two 1700 horsepower diesel engines

Fugitive Emissions

Roads and parking lots

Shear Stacking Conveyor

Shredder Transfer/Loading Conveyor

Cranes used to load finished product into barges/trucks

BEST MANAGEMENT PRACTICES

Air quality management controls, or best management practices (BMPs), will be implemented to reduce the amount of pollutants in air discharges from Auto Shred Industries. The following categories of BMPs will be considered, and selected where applicable:

Operational Controls

Good Housekeeping Practices

Preventive Maintenance Measures

Facility Inspection Procedures

Employee Training Programs

The following BMP's are selected for Auto Shred Industries:

Operational Controls

Maintain a written corporate environmental policy statement that clearly states the commitment of Auto Shred Industries to comply with all relevant environmental laws and regulations.

Develop an inbound material inspection program to minimize the likelihood of receiving materials that may pose a significant threat to air quality.

Install a wind direction monitor.

Good Housekeeping Practices

Sweep accessible paved areas, as needed, on a regular basis.

Confine and remove waste materials on a timely basis.

Properly label all drums containing chemicals and all hazardous material containers.

Preventive Maintenance Measures

Shredder

Cyclone Separator

Air motors

- Monitored from operators station
- Closed loop water system
 - Checked daily for proper operation
 - Cleaned as required
- Diesel Engines
 - Intake air filters
 - Checked daily and cleaned as required
 - Blower motor
 - Monitored from operators station
 - Cylinder head temperature
 - Individual cylinders are monitored from operators station.
 - Water, oil, stack air temperature
 - Each engine is equipped with monitors that alarm when unit is out of tolerance
 - Engine oil
 - Engine oil is sampled monthly and monitored for contamination of the following:
 - Metals -- indication of excessive wear.
 - Fuel -- indication of fuel leaking into crankcase.
 - Water -- indication of breach of cooling system.
 - Fuel - Low Sulphur
- Conveyor System
 - Equipped with a low volume water mist sprayer to control dust.
- Shear
 - Equipped with a low volume water mist sprayer to control dust.
- Loading Equipment
 - Operator training
- Facility
 - Roads and Parking Areas will be monitored and cleaned as necessary to control dust.

EMPLOYEE TRAINING PROGRAM

A training and education program will be developed for employees. The employee training program will address those conditions that cause pollution, effective use of the BMP's, proper scrap inspection, handling and storage procedures as well as reporting and response actions.

Appropriate training will be provided for:

- Crane Operators
- Shredder Personnel
- Shear Personnel
- Supervisors
- Maintenance Personnel

FACILITY INSPECTIONS

Employee

All Auto Shred Industries' employees will be made aware that a part of his/her job description is to report any potential pollution problem immediately.

Department

Each Supervisor will develop a routine inspection program for his/her department to address environmental concerns.

Management

An Air Pollution Prevention Team will conduct an annual inspection of the physical plant, training programs, department inspections, response procedures, upset cause and effect, and the Air Pollution Prevention Plan.

RECORDKEEPING

This plan, all inspections, site compliance evaluation records, and preventive maintenance records shall be retained at Auto Shred Industries for at least one year after date of occurrence.

These records must be made available, upon request, to representatives of the Florida Department of Environmental Protection.

*Consider requiring
2 yrs for records in
sp. cl.*

COMPREHENSIVE SITE COMPLIANCE EVALUATION

In addition to the facility inspection described above, the plan requires that a comprehensive site compliance evaluation be conducted annually. The objective of the evaluation is to assess the overall effectiveness of this plan and to modify or improve as appropriate.

The annual compliance evaluation of the facility will include the following elements:

Modify or update the site map to reflect current conditions.

Visually inspect the potential pollution sources at the facility.

Evaluate the BMP's to determine whether they are adequate and have been properly implemented.

Inspect structural air quality control measures, to ensure they are operating correctly.

The annual site compliance evaluation will be performed by the designated members of the Air Quality Pollutions Prevention Team. The Plan must be revised, as necessary, within two weeks of the evaluation, and all changes to the plan must be implemented within 12 weeks of the evaluation unless due to unforeseen circumstances.

A report summarizing the scope of the evaluation, the person(s) conducting the evaluation, the date of the evaluation, major observations and findings, and actions taken in accordance with the plan must be prepared and retained as part of the plan.

The report must identify any incidents of non-compliance. Where a report does not identify any incidents of non-compliance, the report must contain a certification that the facility is in compliance with the plan. The report must be signed by an authorized representative of this facility.

CERTIFICATION OF PLAN

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

_____ Name _____ Date

_____ Title

_____ Company