Scrap, Inc.
Facility ID No.: 0330284
Escambia County

Air Operation Permit
Permit No.: 0330284-003-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850/595-8300
Fax: 850/595-8393

Air Operation Permit
Permit No.: 0330284-003-AO

Table of Contents

Section	Page Number
Placard Page	1
I. Facility Information A. Facility Description. B. Summary of Emissions Unit ID No(s). and Brief Description(s). C. Relevant Documents.	2
II. Facility-wide Conditions	3
III. Emissions Unit(s) and Conditions A. Electric Shredder System	6
Appendices: Appendix G-1, General Conditions Appendix OMP, Operation and Maintenance Plan dated June 2010	
Referenced Attachments Time Sensitive Action Chart	At End

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
NORTHWEST
160 W. GOVERNMENT STREET
PENSACOLA, FLORIDA 32502-5794

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

Permittee:
Scrap, Inc.

Permit No.: 0330284-003-AO
Facility ID No.: 0330284
SIC No(s).: 5093
Project: Air Operation Permit

This permit is for the operation of Scrap, Inc. located at 1751 North Green Street Pensacola, Escambia County; UTM Coordinates: Zone 16, 474.8 km East and 3366.4 km North; Latitude: 30° 25' 53" North and Longitude: 87° 15' 42" 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, 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.

Effective Date: September 29, 2015
Renewal Application Due Date: July 31**,** 2020
Expiration Date: September 29, 2020

_____

Elizabeth Mullins Orr
Permitting Program Administrator
Northwest District

EMO/dm/m

Section I. Facility Information.

This is a renewal of air operating permit 0330284-002-AO, effective September 29, 2010 for this facility. There were no changes noted at the facility, but this permit renewal reduces the frequency of visible emissions testing from annually to once every five years prior to permit renewal. This permit also includes updated testing language from Rule 62-297.310, effective March 9, 2015.

Subsection A. Facility Description.

This facility consists of an electric shredder metal recycling system. Metal scrap is conveyed into the shredder where a water suppression/injection system is used to decrease fugitive emissions and reduce heat generation. Moist shredded material is then conveyed to a magnetic separator. Separated ferrous material, which comprises about 75 percent of the feed from the shredder, is transferred by another conveyor to an air classifier system that includes a "zero-bleed" cyclone system, manufactured by Osborn Engineering, Inc. The zero-bleed system has a secondary closed loop which balances the system and eliminates exhaust to the atmosphere, leaving only the fugitive particulate emissions from the shredder. After the classifier, miscellaneous trash and selected metallics are retrieved at a picking station. The remaining ferrous material is transferred to a storage area by a radial stacking conveyor. The stored material is a commercial product for off-site transport and recycle. The nonferrous fraction from the magnetic separator, plus fluff from the cyclone, is conveyed past an overband magnetic separator, through a trommel for size separation and then to Eddy Current Separators to segregate metal and non-metal fractions.

The facility has an operations and maintenance plan (OMP) that includes control settings and procedures for startup, shutdown, inspections, maintenance and troubleshooting of the cascade system and the water injection system. The OMP shall be updated as necessary.

Based on the permit application received March 5, 2015, this facility is not a major source of hazardous air pollutants (HAP).

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

E.U. ID No.	Brief Description
001	Electric Shredder System

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:
Permit Application received March 5, 2015

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. All listed appendices are 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 that 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 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. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standards contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests that 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 Department. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rule 62-297.310(8)(c), F.A.C.]

5. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and Chapter 62-257, F.A.C.]

6. Annual Operating Report. An Annual Operating Report for Air Pollutant Emitting Facility, DEP Form 62-210.900(5), shall be submitted for each year by April 1 of the following year. A copy of the form and instructions may be obtained from the Department's Northwest District office or electronically at http://www.dep.state.fl.us/air/rules/forms/aor.htm. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office. [Rule 62-210.370(3)(c), F.A.C.]

7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. No emission control devices or systems are ordered at this time. [Rule 62-296.320(1), F.A.C.]

8. Unconfined 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 to prevent emissions of unconfined particulate matter at this facility include:

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), F.A.C.; Permit 0330284-001-AC]

9. Permit Renewal Application. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit a permit renewal application using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department. You can obtain a permit application form or apply for permit renewal electronically at the following web address: http://www.dep.state.fl.us/air/rules/forms/application.htm. [Rule 62-4.090, F.A.C.]

9. Notifications and Reports. 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 Compliance Assurance Program
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850/595-8300; Fax: 850/595-8097

Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us and copied to the permitting authority at epost_nwdwasteair@dep.state.fl.us.

10. Contact Info. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850.595.8300, day or night, and for emergencies involving a significant threat to human health or the environment is 800.320.0519. For routine business, telephone 850.595.8300, during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

11. Operation and Maintenance Plan (OMP). This plan includes the startup, shutdown and operation procedures for the pollution control equipment. This plan provides reasonable assurance that the facility will operate in compliance. The permittee shall follow all procedures outlined in the most recently submitted OMP. Proposed changes to the OMP shall be submitted to the Department for review and approval prior to implementation. All records of inspections and maintenance shall be retained on site for a period of at least two years and made available for Department inspection. [Rule 62-4.070(3), F.A.C.]

Permit Note: An OMP should be a living document that provides procedures to help in maintaining the subject facility in compliance with applicable air regulations. Keeping this document up to date with the facility's current activities will not require any permit action. This does not alleviate the facility from the air construction permitting requirements for facility modifications per Rule 62-210.300(1)(a), 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	Electric Shredder System

Steel scrap is conveyed into the electric shredder system where a water suppression/injection system is used to decrease fugitive particulate emissions from the shredder. The 4000 hp shredder system was manufactured by Newell Industries (formerly Riverside Engineering) Model 80x104 Mill #199. The shredder system includes a unique patented "zero-bleed" cyclone system, manufactured by Osborn Engineering. The zero bleed system is a closed loop cyclone system without a defined emissions stack.

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

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The electric shredder hourly scrap feed rate shall not exceed 150 tons per hour. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Permit 0330284-001-AC; manufacturer's recommendation].

A.2. Hours of Operation. The hours of operation for the electric shredder shall not exceed 2400 hours/year; however, the hours of operation for the water injection/suppression system are not limited. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Permit 0330284-001-AC]

Emission Limitations and Standards

A.3. Visible emissions. (VE) shall not exceed 20% opacity during normal operation. If excess visible emissions occur due to malfunction, the shredder/air classifier system shall be shut down and inspection/repairs conducted to restore normal operation. [Permit 0330284-001-AC; Rules 62-4.070(3) and 62-296.320(4)(b)1., F.A.C.]

Test Methods and Procedures

A.4. Compliance Tests. Once every five years prior to obtaining a renewed operating permit, the emissions unit shall be tested to demonstrate compliance with the emissions standard for visible emissions. The testing shall be scheduled during the year before the facility's permit renewal application due date so that the results can be submitted with the application. The visible emissions tests shall be conducted in accordance with EPA Method 9 for one hour. 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(3), 62-296.320(4)(b)4.a. and 62-297.310(8)(b)1. & (9) & (10), F.A.C.]

A.5. Test Reports. 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(8)(c). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing. [Rules 62-297.310(10) and 62-297.620(1), F.A.C.]

A.6. Operating Conditions During Emissions Testing. Testing of emissions shall be conducted with the emissions unit operating at testing capacity. Testing capacity is defined as at least 90% of the maximum operation rate specified by the permit. If it is impractical to test at the testing capacity, the emissions unit may be tested at less than testing capacity. If an emissions unit is tested at less than the testing capacity,

another emissions test shall be conducted and completed no later than 60 days after the emissions unit operation exceeds 110% of the capacity at which its most recent emissions test was conducted. [Rules 62-297.310(3) and 62-4.070(3), F.A.C.]

Monitoring of Operations

A.7. Water Suppression/Injection System:

a. The permittee shall minimize emissions of fugitive particulate matter into the atmosphere by incorporating best management practices. The water suppression system shall be engaged prior to commencing shredding operations and will remain in operation throughout the duration of the shredding process. It will not be disengaged until the shredding process has ceased. During shredding, water sprayers shall be used on the shredder feed ramp area, the first shredded product conveyor system and the front shredder wall area to further decrease particulate matter emissions. A trained operator shall observe emissions qualitatively during operation. If visible emissions are detected (e.g., due to feed variation), the water suppression system's flow rate will be increased according to the operation and maintenance manual in order to eliminate the visible emissions.
b. The permittee shall maintain appropriate ranges of water flow rate (gallons per minute and % to be delivered through the proportional valve) and bias operational parameters as required in the most recent OMP in order for the water suppression/injection system sufficient to properly control particulate matter and visible emissions.
c. Inspections and maintenance shall be performed on the water suppression/injection system as outlined in the most recent OMP. This includes but is not limited to daily, weekly, and quarterly inspections, cleaning, and water meter calibration.

[Permit 0330284-001-AC, Rule 62-4.070(3), F.A.C.; RAI response letter dated 7/8/09; OMP dated 2010]

A.8. Zero-bleed Cascade System:

a. The permittee shall maintain optimum control settings for the cascade system including but not limited to bleed-off control, bypass control and indirect control water volume in shredder as required in the most recent OMP in order for the system to properly control particulate matter and visible emissions.
b. Inspections and maintenance shall be performed on the water suppression/injection system as outlined in the most recent OMP. This includes but is not limited to daily, weekly, biweekly and monthly inspections, and cleaning, repair and replacement of flaps, seals, and liners as outlined in the most recent OMP.

[Rule 62-4.070(3), F.A.C.; OMP dated June 2010]

Recordkeeping and Reporting Requirements

A.9. Additional Test Report Requirement. Test reports shall indicate the water flow rate and bias operational parameters for the water suppression/injection system; and the optimum control settings for the cascade system. [Rule 62-4.070(3), F.A.C.]

A.10. Operational Data Records. The permittee shall maintain daily records of the electric shredder's tons of scrap processed in tons per day, operating hours in hours per day, and that day's hourly scrap feed rate in tons per hour. An operating hour is defined to be any hour, whole or fractional, that the mill is shredding scrap for that day. The day's hourly scrap feed rate shall be the result of a day's tons of scrap processed that day, divided by the operating hours for that day. These records shall be maintained and shall be made available for inspection for a minimum of five years. [Rule 62-4.070(3), F.A.C.]

A.11. Inspection and Maintenance. Records of all inspections and maintenance (in the form of a log or checklist) shall be kept and maintained on site for a period of at least two years after the inspection or maintenance was performed and made available for Department inspection. [Rule 62-4.070(3), F.A.C.]

Source Commitments

A.12. Solid Waste. Solid waste (fluff from cyclones, trommel, eddy current separator and dredge from scrubber settling/holding pond) shall be used as an alternate daily landfill cover or disposed of at a Class I or II permitted landfill, or further processed and sold. [Rule 62.4-070(3), F.A.C.]

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. 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 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 and at reasonable times, access to the premises where the permitted activity is located or conducted for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this 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 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 that 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 Department approves the transfer.

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 measurement;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- 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.