

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

Ms. Brenda Anderson, Environmental Manager
Trademark Metals Recycling, LLC
TMR – Port Sutton Shredder
5220 Dover Street
Tampa, Florida 33619

File No.: 0571400-006-AO
County: Hillsborough

Enclosed is Permit No. 0571400-006-AO to incorporate Permit No. 0571400-005-AC into the current operating permit for the operation of a scrap metal processing facility, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of receipt of this permit. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen)

days of receipt of that notice.

A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number if known;
- (b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
- (c) A statement of how and when the petitioner received notice of the EPC action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;
- (f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr, Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/KRZ/krz

cc: Pradeep Raval - Koogler and Associates, Inc.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on _____ to the listed persons.

Clerk Stamp

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

Clerk

Date

PERMITTEE:

Trademark Metals Recycling, LLC
TMR – Port Sutton Shredder
4943 Port Sutton Road
Tampa, Florida 33619

PERMIT/CERTIFICATION

Permit No.: 0571400-006-AO
Expiration Date: June 29, 2015
County: Hillsborough
Project: Scrap Metal Processing Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. 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 EPC and made a part hereof and specifically described as follows:

This operating permit is issued concurrently with Permit No. 0571400-005-AC, which revised the design capacity of the existing Shredder (EU 002) to 250 tph, and also increased the Shredder visible emissions limit from 5% to 10%.

TMR – Port Sutton Shredder is a scrap metal processing facility that includes a material shredder/hammer mill and material handling process streams to separate ferrous and non-ferrous metals for export, and waste residuals for landfill disposal. Post-consumer, scrap metal products brought to the facility are unloaded from open-bed trailer trucks and either dumped directly onto the in-feed scrap piles or emptied by magnet or grapple cranes and transferred onto the feed conveyor for the shredder. The facility operates a 6,000 horsepower 98/104 G3 METSO Texas Shredder. The shredder is electrically-powered and has a design capacity of 250 tons per hour (tph). It utilizes an automated water injection system (WIS) to cool the hammer mill and control dust emissions. The amount of water injected ranges up to 60 gpm, and is determined by the electric load on the system. The flow is regulated to maintain maximum efficiency in steam generation. This shredding activity with associated WIS produces particulates trapped by the condensed water vapor which escapes the shredder through the material entrance chute and exit conveyor.

After running through the scrap metal shredder, the shredded material exits the hammer mill onto a shaker table and is transferred via conveyor to two (2) parallel process streams with dual magnet drum separators followed by picker conveyors. The ferrous metal from the separators drops onto the associated ferrous conveyors and then to the related picker conveyors where non-ferrous material that was trapped along with the ferrous metal is removed from the product stream. Ferrous metal from the two picker stations is combined onto a single conveyor and ultimately directed to a radial stacker conveyor to the finished product storage piles.

The non-ferrous material drops below the magnetic drum separators onto a covered conveyor. The non-ferrous material is transferred across a reclaim magnet to collect any additional ferrous material

that passed through the initial separators. Any collected ferrous material is directed through chutes back into the picker stations. The remaining non-ferrous material is transferred via conveyors into the size separating trammel (screen). The non-ferrous materials are separated into four material streams based on size and moved from the trommel into the non-ferrous material separation building by four associated covered conveyors. Each conveyor feeds an individual separation unit that utilizes magnetic eddy currents and controlled air streams to separate the non-ferrous materials into various categories including fluff (i.e. plastics, foam, etc.) and recoverable non-ferrous metals (i.e. aluminum, brass, etc.). The non-ferrous metals are dropped down a chute to the non-ferrous metals conveyors under the building. From there, they are conveyed to the product bays on the side of the non-ferrous separation building. The fluff material is directed to the covered storage bay via covered conveyor where it is dropped onto a pile. The final loading of processed metals and waste fluff material is from the storage piles and bays into open-bed trucks and cargo containers.

Particulate Matter, Volatile Organic Compounds, and Hazardous Air Pollutants are emitted from the scrap metal shredder. The shredder generates heat which volatilizes the organic matter and heavy metal compounds contained in the material. The automated water injection system is used to cool the hammer mill and control particulate emissions.

Particulate Matter is also emitted from the material handling and separation activities. The unconfined particulate matter emissions are controlled by watering sprinklers and misting nozzles. The watering sprinklers are positioned to maintain material piles sufficiently damp, and all material conveyor transfer points are controlled by water misting nozzles.

The facility also receives pre-separated metals (i.e. aluminum, brass, etc.) that are assembled in various piles near the front of the site. When a sufficient quantity of a type of metal is collected, the facility may process the metal through an electrically-powered baler (Harris Press & Shear, Inc. – Model HRB 10A). Material is fed onto the receiving conveyor at ground level and then transported up and into the feed chamber. Two sets of rams are then used to then compress the metal into a rectangular cuboid shape for easier handling during the export process. The baler has been determined to be exempt from permitting pursuant to Rule 62-210.300(3)(b), F.A.C.

The facility is a true minor source of PM and VOC emissions. The material handling operations are subject to the 5% opacity standard from PM-RACT (Rule 62-296.711, F.A.C.) and Chapter 1-3.52, Paragraph 2, Rules of the EPC. The scrap metal shredder has a 10% opacity limit based on the EPC/FDEP Alternative RACT Determination dated June 23, 1993.

TMR – Port Sutton Shredder
Tampa, Florida

Permit No.: 0571400-006-AO
Project: Scrap Metal Processing Facility

Location: 4943 Port Sutton Road, Tampa, Hillsborough County

UTM Coordinates: 17- 361.43 E, 3087.45 N

Latitude: 27° 54' 17" N

Longitude: 82° 24' 09" W

Facility ID No.: 0571400

Emission Unit ID Nos.:

- 001 – Feed Scrap Processing (Truck Unloading & Feed Conveyor)
- 002 – Scrap Metal Shredder
- 003 – Ferrous Metal Processing (Conveyor Transfer Points & Separation Equipment)
- 004 – Non Ferrous Material Processing (Conveyor Transfer Points & Separation Equipment)
- 005 – Shredded Metal and Fluff Loadout

SPECIFIC CONDITIONS:

- 1.** A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
- 2.** Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
- 3.** All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
- 4.** The use of property, facilities, equipment, processes, products, or compounds, or any other act that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.
- 5.** Hazardous Air Pollutants (HAP) emissions shall be less than 10 tons in any 12 consecutive month periods for any individual HAP, and less than 25 tons in any 12 consecutive month periods for the total of all HAPs combined. [Rules 62-210.200 – “Potential to Emit”, F.A.C.; and Permit Nos. 0571400-001/002-AC]
- 6.** The maximum allowable visible emissions from the Scrap Metal Shredder (EU 002) shall not exceed 10% opacity. [Rule 62-4.070(3), F.A.C., Air Construction Permit Application submitted April 23, 2014, and Alternative RACT Determination dated June 23, 1993]
- 7.** The maximum allowable visible emissions from the feed scrap unloading from trucks, feed scrap loading onto feed conveyor, all conveyor transfer points, and processed metal and residual fluff loading to storage pile, truck or container shall not exceed 5% opacity. [Rule 62-4.070(3), F.A.C. and 62-296.711(2)(a), F.A.C., Chapter 1-3.52, Rules of the EPC, and Permit Nos. 0571400-001/002-AC]
- 8.** The permittee shall maintain a truck scale to determine the amount of scrap metal received with an error of equal to or less than 10 percent. [Rule 62-4.070(3), F.A.C.]
- 9.** In order to minimize mercury emissions, the permittee shall participate in the US EPA’s National Voluntary Mercury Switch Removal Program (NVMSRP). The Attachment - Mercury Switch BMP is a part of this permit to be used as a reference guideline for employing best management practices. The permittee should continue to pursue and implement best management practices in conjunction with this guideline. Mercury switches recovered for recycling shall be processed in accordance with the universal waste handling requirements specified in 40 CFR 273. [Rule 62-4.070(3), F.A.C.; and Chapter 1-1.07, Rules of the EPC]
- 10.** All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related

SPECIFIC CONDITIONS:

activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not be limited to, the following:

- A) Crane & loader operators shall minimize the material drop heights, as much as possible;
- B) Post speed limit signs to control the speed of vehicles to 10 mph in unpaved areas and 15 mph in paved areas of the facility.
- C) Wet roadways and unpaved areas as necessary to prevent excessive fugitive emissions. Paved areas shall be kept free of dirt and or debris by sweeping or vacuuming (no blowers permitted). If paved areas are not kept free of dirt and debris, they shall be maintained wet to the extent necessary to prevent excessive fugitive emissions.
- D) Control equipment (spray nozzles, fire extinguishers, shovels, rakes, etc.) shall be properly maintained to perform its designed function.
- E) Maintain piles wet to the extent necessary to operate in compliance with the applicable visible emission standard.
- F) Operator of the crane, loader, or forklift used to deliver scrap to and/or from the torch cutting area must have a clear, unobstructed view of the area of hazardous operations at all times.

[Rules 62-4.070(3) and 62-296.320, F.A.C.]

11. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter and incidental fires from torch cutting operations. Reasonable precautions shall include, but not be limited to, the following recommendations: [Rules 62-296.320 and 62-4.070(3), F.A.C., Air Construction Permit Application submitted April 23, 2014]

- A) Maintain a fire extinguisher, water hose with nozzle, rakes and shovels to spread dirt, or other fire suppression equipment in a location immediately adjacent to all torch cutting activities.
- B) The permittee shall be responsible for assuring material to be torch cut is free of grease, oil, debris, or other flammable material(s) prior to commencing torch cutting. Only exempt solvents shall be used to clean metal surfaces.
- C) Immediately extinguish any incidental fires created from the torch cutting operations. If necessary, a spotter shall be used to spot and extinguish incidental fires caused by the torch cutting activity.
- D) The permittee is responsible for assuring there is a safe method to immediately extinguish incidental fires.
- E) Flammable materials or debris shall be kept at least 100 feet from all torch cutting activities.
- F) The permittee shall follow the safety and best practices recommended by Institute of Scrap Recycling Industries, Inc. (ISRI) for any torch cutting operations performed at this site.

SPECIFIC CONDITIONS:

12. The facility is permitted to operate continuously; 8,760 hours per consecutive 12 month period. [Rule 62-210.200 (Potential to Emit), F.A.C, and Permit Nos. 0571400-001/002-AC]

13. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62 210.200 (Definitions) and 62-296.320(2), F.A.C.]

14. In order to demonstrate compliance with Specific Condition Nos. 6 and 7, the permittee shall perform visible emission (VE) tests for each emission unit: Feed Scrap Processing (EU 001), Scrap Metal Shredder (EU 002), Ferrous Metal Processing (EU 003), Non Ferrous Material Processing (EU 004), and Shredded Metal and Fluff Loadout (EU 005). The VE tests shall be performed annually during each federal fiscal year (October 1 - September 30), with a target date of December 8th. [Rule 62-297.310(7)(a), F.A.C.]

15. EPA Method 9 shall be used to determine compliance for visible emissions (VE). The visible emissions test shall be conducted by a certified observer and be a minimum of thirty (30) minutes in duration. The test observation period shall include the period during which the highest opacity can reasonably be expected to occur. Opacity observations shall be made at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. The minimum requirements for stationary point source emissions test procedures and reporting shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [40 CFR 60 Appendix A, Method 9, Rules 62-296.711(3)(a) and 62-297.310(4), F.A.C., and Chapter 1-3.52, Rules of the EPC]

16. Testing of emissions for the scrap metal shredder and material handling operations shall be conducted with the sources operating at capacity. The capacity of the shredder is 250 tons per hour. Compliance testing shall also be conducted under conditions that are representative of the typical mixtures of auto-bodies and post-consumer scrap, engines removed, fluids drained, transmissions removed, gas tanks, batteries, mercury-containing products, etc. The permittee shall use the records required in Specific Condition No. 21 in order to determine the representativeness of a typical mixture for compliance testing. If it is impracticable to test at capacity, then the source 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 15 fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. The permittee shall include in the test report the water injection rate range in gallons per minute for the shredder. [Rules 62-4.070(3) and 62-297.310, F.A.C]

17. The permittee shall notify the Air Compliance Section of the EPC at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)(9), F.A.C.]

SPECIFIC CONDITIONS:

18. The permittee shall submit two (2) copies of the compliance test report required by this permit to the Air Compliance Section of the EPC within forty-five (45) days after the test is complete. The test report shall contain sufficient detail on the source tested and the test procedures used to allow the EPC to determine if the test was properly conducted and the test results properly computed. [Rule 62-297.310(8), F.A.C.]

19. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions, or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

20. The permittee shall not circumvent any air pollution control device, or allow the emissions of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

21. In order to demonstrate continuous compliance with Specific Condition Nos. 5 and 6, the permittee shall maintain records of the scrap metal shredder operation and material handling activities. The emission factors used to estimate the PM and total HAP emission limits are based on stack test data from similar sources. They are listed here for reference only: 0.095 lb PM/ton of scrap through the shredder, 0.00257 lb PM/ton of scrap for each material transfer point, and 0.0044 lb HAP/ton of scrap processed through the shredder. The facility records shall include the following:

- A) Day, Month, and Year of the data recorded;
- B) The total weight of feed scrap loaded to the shredder, in short tons or metric tons (specified), on a monthly basis and the rolling total for the previous consecutive 12 month period;
- C) The total hours of operation of the shredder and the average shredder feed rate in tons per hour, on a monthly basis.

[Rules 62-4.070(3), F.A.C., and Permit Nos. 0571400-001/002-AC]

22. In order to provide reasonable assurance of compliance with Specific Condition Nos. 14, 15, and 16, the permittee shall maintain records of the typical mixtures of auto-bodies and post-consumer scrap, engines removed, fluids drained, transmissions removed, gas tanks, batteries, mercury-containing products, etc. [Rules 62-4.070(3), F.A.C.]

23. The permittee shall comply with the following Operation and Maintenance Plan for Particulate Control: [Rule 62-296.700, F.A.C.]

SPECIFIC CONDITIONS:

Smart Water Injection System

A) Process Parameters:

1. Source Designators: Water Injection System
2. Manufacturer: Best
3. Number of Spray Nozzles: Six (6)
4. Design Flow Rate: 20 – 60 gallons per minute

B) The following observations, checks and operations apply to this source and shall be conducted on the schedule specified:

Daily

1. During mill operation the smart water injection system is continuously monitored by the operator from a mill computer display which generates a visual bar graph and an alarm should an error occur.
2. Daily inspections are performed for build-up and clogging of nozzles at which time nozzles are drilled and/or rodded if determined to be clogged.

24. These records shall be maintained onsite and made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request and kept on file for at least three years from the date of measurement. [Rules 62-4.070(3), and 62-4.160(14)(b), F.A.C.]

25. [Reserved.]

26. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

27. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation:

- A) Alteration or replacement of any equipment or major component of such equipment;
- B) Installation or addition of any equipment which is a source of air pollution;

Note: Items A and B are not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit. [Rules 62-210.300 and 62-4.070(3), F.A.C.]

TMR – Port Sutton Shredder
Tampa, Florida

Permit No.: 0571400-006-AO
Project: Scrap Metal Processing Facility

SPECIFIC CONDITIONS:

28. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rules 62-4.090 and 62-210.900, F.A.C.]

**ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY**

Richard D. Garrity, Ph.D.
Executive Director