Florida Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T.
Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

Kellen Environmental Corp.
3535 State Road 60 East
Mulberry, FL 33860-7927

Authorized Representative:
Mr. Alexander McKenzie, President

Air Permit No. 1050446-001-AC
Permit Expires: 05/13 2015
Site Name: Kellen Environmental Corp.
Minor Air Construction
Project Name: Initial Construction Permit

This is the final after-the-fact air construction permit for a newly constructed used oil filter recycling plant. The work is conducted at Kellen Environmental Corp. (Standard Industrial Classification No. 5093). The facility is located in Polk County at 3535 State Road 60 East in Mulberry, Florida. The UTM coordinates are Zone 17, 408.91 km East, and 3085.70 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 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 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida

_____ _____

Kelley M. Boatwright Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

Alexander McKenzie, President
Kellen Environmental Corp.
alex@kellencorp.com

Prakash S. Lodha, P.E.
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Rhonda Hughes,
SWD Air Compliance
Rhonda.hughes@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

_____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Project Description and Proposed Emission Unit

This is the final after-the-fact air construction permit for a newly constructed used oil filter recycling facility. Used oil filters are brought to the facility in drums from various locations. They are placed into a collection pit where residual oil begins to drain from the filters. After 0.5 hours they are conveyed to a baler and crushed into 50-70 pound ingots using a hydraulic ram. The process of compacting the used oil filters squeezes out approximately 88% of the oil trapped in the filter. The blocks are loaded onto pallets designed to collect used oil. The process pallets are loaded into a heat cleaning oven. During cleaning the oil drains from the filters into a collection tank. A complete cycle (from loading into the oven to removal from the oven) takes approximately 23 hours. The thermally cleaned blocks of filters are then sold to foundries for steel recycling. The recovered waste oil is sold to a recycling facility (not burned as fuel for the oven). The newly constructed facility consists of the following emissions unit.

Facility ID No. 1050446

EU ID No.	Emission Unit Description
001	Heat Cleaning Oven M100B

This project will also add a second heat cleaning oven to the facility *(see Section 3.A. for a complete description of the second oven)*. This will add the following emissions unit.

EU ID No.	Emission Unit Description
002	Heat Cleaning Oven M200B

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a natural minor source of air pollution.

PERMIT HISTORY/AFFECTED PERMITS

No previous air permits have been issued for this new facility.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Resource Management Section. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Resource Management Section
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance and Enforcement Section - Attention: AIR. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance and Enforcement Section – Attention: AIR
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

3. Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;
b. Appendix B. General Conditions;
c. Appendix C. Common Conditions; and
d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Application for Non-Title V Air Operation Permit - This permit authorizes construction of the permitted emissions unit and initial operation to determine compliance with Department rules. A Non-Title V air operation permit is required for continued operation of the permitted emissions unit(s). The permittee shall apply for a Non-Title V air operation permit at least 90 days prior to expiration of this permit. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Non-Title V air operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

c. a copy of the initial compliance test report required by Specific Condition No. A.13., if not previously submitted; and

d. copies of the most recent month of records/logs specified in Specific Condition No. A.15.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.030, 62-4.050, and 62-4.220, F.A.C.]

A. EU Nos. 001 and 002 – Heat Cleaning Ovens M100B and M200B

This section of the permit addresses the following emissions units (EUs).

EU ID No.	Emission Unit Description
001	Heat Cleaning Oven M100B – This heat cleaning oven is a McRae Combustion Systems, Inc., M100B thermal processor. It is a two chambered system that uses heat in a sealed environment to separate the oil from the steel and reduces the paper and other volatiles to clean inert ash. Programmable Logic Controller (PLC) controlled burners regulate the temperature inside the process chambers. The oven uses natural gas, propane or on-spec used oil to fire the burners at a rate of 0. 3 MMBtu/hour in the primary chamber and at 2.8 MMBtu in the secondary chamber. The temperature in the primary chamber is kept at 1400 °F and the temperature in the secondary chamber is kept above 1600 °F. The secondary chamber acts as an afterburner. The oven can process a maximum of 10,000 pounds of ingots per day. The total oven run time is 17 hours. A complete cycle (from loading into the collection pit to removal from the oven) is approximately 23 hours.
002	Heat Cleaning Oven M200B – This heat cleaning oven is a McRae Combustion Systems, Inc., M200B thermal processor. It is a two chambered system that uses heat in a sealed environment to separate the oil from the steel and reduces the paper and other volatiles to clean inert ash. PLC controlled burners regulate the temperature inside the process chambers. The oven uses natural gas or propane to fire the burners at a rate of 0.3 MMBtu/hour in the primary chamber and at 3.0 MMBtu/hour in the secondary chamber. The temperature in the primary chamber is kept at 1400 °F and the temperature in the secondary chamber is kept above 1600 °F. The secondary chamber acts as an afterburner. The oven can process a maximum of 20,000 pounds of ingots per day. The total oven run time is 17 hours. A complete cycle (from loading into the collection pit to removal from the oven) is approximately 23 hours.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity – The charging rate for the heat cleaning ovens shall not exceed:

a. Heat Cleaning Oven M100B (EU No. 001) – 5.0 tons per day of used oil filters;

b. Heat Cleaning Oven M200B (EU No. 002) – 10.0 tons per day of used oil filters.

[Rule 62-210.200 (" Potential to Emit"), F.A.C.]

A.2. Authorized Fuel – Only the following fuels shall be burned:

a. Heat Cleaning Oven M100B (EU No. 001) – natural gas, propane, on-specification reclaimed fuel oil;

b. Heat Cleaning Oven M200B (EU No. 002) – natural gas.

[Rule 62-210.200 ("Potential to Emit"), F.A.C.; as requested in construction permit application received 01/01/2013]

A.3. Fuel Oil Sulfur Content Limitation - The sulfur content of the on-specification reclaimed fuel oil burned in Heat Clean Oven M100B (EU No. 001) shall not exceed 0.5% by weight.

(*Permitting Note - See Specific Condition No. A.14. for associated recordkeeping requirements.)*

[Rules 62-210.200 ("Potential to Emit") and 62-210.300(c)2.c., F.A.C.]

A.4. Reclaimed Fuel Oil Specifications – The permittee shall only burn on-specification reclaimed fuel oil. On-specification reclaimed fuel oil is defined below.

Constituent/Property	Maximum Allowable Level
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash Point	100 degrees F minimum
PCB's	shall be less than 2 ppm

(*Permitting Note - See Specific Condition No. A.14. for associated recordkeeping requirements.)*

[40 CFR 761.20(e)(2) and (3) and 40 CFR 279.11; Rule 62-710.210, F.A.C.]

A.5. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (Potential to Emit"), F.A.C.]

EMISSIONS STANDARDS

A.6. Visible Emissions Limitation - Visible emissions (VE) from each heat cleaning oven shall not exceed five percent (5%) opacity except that visible emissions not exceeding fifteen (15%) percent opacity are allowed for up to six (6) minutes in any one (1) hour period.
[Rule 62-296.401(1)(a) F.A.C.]

COMPLIANCE TESTING REQUIREMENTS

A.7. Initial Visible Emissions Compliance Tests - Emission Unit No. 001, Heat Cleaning Oven M100B and Emission Unit No. 002 Heat Cleaning Oven M200B shall be tested to demonstrate initial compliance with the emissions standards for visible emissions. Each initial test shall be conducted no later than 90 days after initial operation of each unit.
[Rules 62-4.070(3) and 62-297.310(7)(a)1., F.A.C.]

A.8. Visible Emissions Compliance Tests After Initial Testing - During each federal fiscal year (October 1st to September 30th), the emissions unit shall be tested to demonstrate compliance with the emissions standards for visible emissions.
[Rule 62-297.310, F.A.C.]

A.9. Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.10. Compliance Test Methods - Required visible emissions compliance tests shall be performed in accordance with the following reference method.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in Appendix A of 40 CFR 60 and is adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.

[Rule 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

A.11. Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(*Permitting Note - The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

A.12. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of Heat Cleaning Oven M100B (EU No.

001) and Heat Cleaning Oven M200B (EU No. 002), no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070 and 62-210.200, ("Commence Operation") F.A.C.]

RECORDS AND REPORTS

A.13. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

A.14. Fuel Analysis Requirements - For each delivery of on-specification reclaimed fuel oil, the vendor shall provide an analysis documenting the on-specification fuel oil meets the requirements of Specific Condition Nos. A.3. and A.4. The analyses shall be kept at the facility for a minimum of the most recent three (3) year period and made available to the Department upon request.
[Rule 62-4.070(3), F.A.C.]

A.15. Daily Records – In order to document compliance with Specific Condition No. A.1., the permittee shall record the following daily:

a. facility name, facility ID No., emission unit ID No., and description (e.g., Kellen Environmental, 1050446, EU 001, Heat Cleaning Oven M100B);

b. month/day/year; and

c. total quantity of used oil filters processed in each oven (tons/day).

The daily records shall be completed by the 3rd business day. These records shall be maintained at the facility for at least 3 years and made available to the Department upon request.

[Rule 62-4.070(3), F.A.C.]