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### MEMORANDUM

**DATE:** May 22, 2013

**TO:** Richard D. Garrity, Ph.D.

**FROM:** Stephen Hathaway, P.E.                      **THRU:** Diana M. Lee, P.E.

**SUBJECT:** **Administratively Corrected Air Construction Permit No. 0570119-017-AC**  
**Trademark Metals Recycling, LLC**  
**Project No. 0570119-019-AC**

Attached is Administratively Corrected Air Construction Permit No. 0570119-017-AC for Trademark Metals Recycling, LLC, which authorized the facility to modify the two aluminum rotary furnaces at the facility by installing larger capacity natural gas burners. The maximum burner capacity is being increased from 6 MMBtu/hr to 7.5 MMBtu/hr. However, additional compliance testing is being required within 75 days of exceeding 6.0 MMBtu/hr heat input, based on the the daily recordkeeping of the natural gas usage for each furnace.

On May 2, 2013, TMR requested that the requirement for measuring/recording/adjusting the pressure drop across the rotary furnace burner orifices, as required by Specific Condition A.34. of the AC Permit, be changed from daily to annually for the following reasons:

1. Reasonable assurance of compliance with the permitted heat input rates will be provided by the requirement to monitor and record the daily natural gas usage for both rotary furnaces.
2. Based on information from the burner manufacturer, the burner equipment components are not designed for daily adjustment. The screws that adjust the settings are meant to screw down and stay in place until a re-setting is desired or required. A calibration check of the settings, as intended by EPCHC, can be done annually but to do it more frequently could result in premature stripping of the threads of the custom screws.
3. Due to the location of the equipment, access to the screws, hooking up a manometer, and going through the required evaluation process, is cumbersome, and daily checks could adversely affect worker health and safety given the proximity to the heat from the furnaces.
4. The emissions from minor variations (due to meteorological conditions and gas pressure fluctuations) in the natural gas burned in such a small capacity burner are insignificant and so

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daily checks are not necessary.

Based on our review of the above reasons and Rule 62-210.360(1)(g), F.A.C., we recommend the issuance of the Administratively Corrected AC permit as drafted.

SRH: 0570119-019-AC