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

Progress Rail Services Corporation
PO Box 1037
Albertville, Alabama 35950

Authorized Representative:
Mr. Stephen Tew, Global Director, Environmental Services

Air Permit No. 1190009-010-AO
Permit Expires: 01/16/2018
Site Name : Wildwood Facility
Minor Air Operation Permit
Project Name: Operation Permit Renewal

This is the final permit to renew Air Operation Permit No. 1190009-010-AO for a power cable reclamation system with a cyclone separator operation at the Progress Rail Services/Wildwood Facility (Standard Industrial Classification No. 3999). The facility is located in Sumter County at 4198 East County Road 462 in Wildwood, Florida. The UTM coordinates are Zone 17, 398.98 km East, and 3195.46 km North.

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.

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 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of final permit. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of final permit, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition 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 Florida Administrative Code.

All petitions filed under these rules shall contain:

(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; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of when and how the petitioner received notice of the agency decision;
(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 agency's proposed action;
(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency'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 agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department'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 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department'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 Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

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, 3900 Commonwealth Boulevard, Mail Station #35, 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 Hillsborough County, Florida

Kelley M. Boatwright 1/25/2013

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 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.

Mr. Stephen Tew, Global Director, Environmental Services
Progress Rail Services Corporation
Stew@progressrail.com

Mr. Robert Patterson
Progress Rail Services Corporation
RPatterson@progressrail.com

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.

Rhonda Hughes 1/16/2013
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The facility processes power cable to recover ferrous (iron), aluminum, and copper. A portion of the power cable processed is recovered, with the remainder consisting of plastic insulation material. The facility consists of the following emissions unit (EU).

Facility ID No. 1190009	
EU ID No.	**Emission Unit Description**
002	Power Cable Reclamation System with a Cyclone Separator.

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

This permit replaces Operation Permit No. 1190009-009-AO.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section prior to January 1, 2013; and the Florida Department of Environmental Protection, Central District's Air Resource Management Section on and after January 1, 2013.

   The Southwest District's 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

   The Central District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Central District Office
   Air Resource Management Section
   3319 Maguire Blvd., Ste 232
   Orlando, Florida 32803-3767
   Telephone: 407-897-4100

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

2. Compliance Authority - Prior to January 1, 2013, all documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section. On and after January 1, 2013, all documents related to compliance activities shall be submitted to the Central District Office's Air Resource Management Section. See above mailing addresses and phone numbers.

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. Operation Permit Renewal Application - A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an 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 most recent test report for visible emissions (VE) required by Specific Condition Nos. A.5. and A.9., if not previously submitted.

   [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

B. EU No. 002 - Cable Reclamation System with a Cyclone Separator

This section of the permit addresses the following emissions unit (EU).

EU ID No.	Emission Unit Description
002	Power Cable Reclamation System with a Cyclone Separator This emissions unit consists of a Triple/S Dynamic Cable Reclamation System. There is a cable pre-chopper unit set up separately, outside the facility. Cable and wire are processed through this unit and cut to approximately one-inch (1") size. The material that is processed through this wire chopper is stacked outside the existing facility and most of the pre-chopped material is transported into the existing power cable reclamation facility by a front-end loader. The power cable is pre-chopped and placed in a material feed bin. Feed rollers insert the pre-chopped cable into the Model T-15 Primary Granulator. The granulator dissects the cable and a minimum of 90% of the metal is liberated from the insulating plastic. After removing the ferrous metal by magnet, the granulated cable pieces are fed through a surge bin into a screening system and then a Model T-15 Fluidized Bed Separator. The separator, by use of air, gravity, and vibrating screens, separates the plastic from the metal pieces. The metal is further segregated into aluminum and copper in the Model S-22 Stoner, which also uses fluidized air. The plastic, after being separated, is blown by the booster fan to the Triple/S Dynamic Model SV-72 Cyclone, where it is separated from the air stream which is then exhausted through a stack or vent. Unseparated metal and plastic are recycled back to the granulator.

PERFORMANCE RESTRICTIONS

A.1. Hours of Operation - The hours of operation of this emission unit are not limited (i.e., permitted for 8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(definition of Potential to Emit), F.A.C.]

A.2. Maximum Process Rate - The maximum permitted process throughput rate for this process (Cable Reclamation System) shall not exceed 8.0 tons/hour (TPH)*.

(Permitting Note: The hourly limit is established to set the permitted capacity for testing purposes only. The permittee is not required to document hourly compliance with this limitation, other than during testing, unless requested by the Department.)

[Rule 62-297.310(2), F.A.C.; Construction Permit No. 1190009-004-AC]

A.3. General Particulate Matter Emission Limiting Standards - Process Weight Table - The maximum total PM emission rates from the emission control device (cyclone) exhaust stack shall not exceed an allowable rate as determined by the applicable Rule 62-296.320(4)(a)2., F.A.C. Process Weight Table formula shown below:

$$E = 3.59P^{0.62}$$

where: E = emissions in pounds per hour (lbs/hr), and
P = process input weight rate in TPH (*and* $\leq$ *30 TPH*)

(continued)

A.3. *(continued)*
For the maximum allowable process input rate of 8.0 tons/hour stated, the maximum allowable PM emission rate from the Process Weight formula would be 13.03 lbs/hour. Compliance with this PM emissions limitation will be based upon compliance with the visible emission limitation of Specific Condition No. A.4. However, should the Department have reason to believe the PM emission standard is not being met, the Department may require that compliance with the PM emission standard be demonstrated by testing in accordance with Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(a)2., and 62-297.310(7)(b), F.A.C.]

EMISSIONS STANDARDS

A.4. Visible Emissions Limitation – In order to provide reasonable assurance that the cyclone emissions control device is operating correctly in accordance with Section 4. Appendix C, Condition 2. (Circumvention of Control Equipment), the Department hereby establishes a visible emission (VE) limitation not to exceed an opacity of five percent (5%) from the cyclone exhaust stack in lieu of a PM stack test.
[Rules 62-4.070(3), and 62-210.650, F.A.C.; Construction Permit No. 1190009-004-AC]

TESTING REQUIREMENTS

A.5. Visible Emissions (VE) Compliance Tests – In order to demonstrate compliance with the visible emissions (VE) standards of Specific Condition No. A.4., the permittee shall conduct a visible emissions (VE) test on the cyclone separator exhaust during the 120- to 365-day period prior to expiration of this permit.
[Rule 62-297.310(7)(a)3, F.A.C.; Construction Permit No. 1190009-004-AC]

A.6. 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.7. Compliance Test Method - Required compliance tests shall be performed in accordance with the following reference method(s).

Method(s)	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources. Compliance with the visible emissions limitation specified in Specific Condition No. A.4 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Chapter 62-297, F.A.C. The Method 9 compliance test shall be conducted by a certified observer and be a minimum of 30 minutes in duration. The test observation period shall include the period during which the highest opacity can reasonably be expected to occur. The minimum requirements for stationary point source emission test procedures and reporting shall be in accordance with Chapter 62-297, F.A.C.

Method(s)	Description of Method and Comments
	and 40 CFR 60 Appendix A.

A.7. *(continued)*
The above method(s) are described in Appendix A of 40 CFR 60 and are 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.8. Compliance Test Notification - The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required compliance 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.]

RECORDS AND REPORTS

A.9. Compliance Test Reports - The permittee shall prepare and submit reports for all required 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.10. Operating Rate During Compliance Testing - Testing of emissions must be accomplished at 90 to 100% of the maximum permitted process throughput rate of 8.0 tons per hour (TPH)*. The actual process rate (in TPH) during the test period for the emission source being tested shall be included in each test report. The type of material being processed shall also be stated in the report along with the process rate. Failure to include the actual process rate in the results may invalidate the test.

(**Permitting Note - The option to test at a rate less than 90% of the maximum process rate has been removed to eliminate the necessity of recordkeeping requirements. Any test performed at an operating rate of less than 7.2 TPH will constitute an invalid test and may not be used to demonstrate compliance with permit conditions.*)

[Rules 62-4.070(3) and 62-297.310(2), F.A.C.]