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Wise Recycling, LLC
Pensacola
Facility ID No.: 0330066
Escambia County

Air Operation Permit
Permit No.: 0330066-004-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 Governmental Center, Suite 308
Pensacola, FL 32502-5794
Telephone: 850/595-8300
Fax: 850/595-8096

[electronic file name: 0330066-004-AO.doc]

Air Operation Permit
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Florida Department of Environmental Protection

Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Permittee:
Wise Recycling, LLC

Permit No.: 0330066-004-AO
Facility ID No.: 0330066
SIC No(s).: 5093
Project: Air Operation Permit

This permit is for the operation of the Pensacola Wise Recycling Plant located at 605 West Hope Drive, Escambia County; UTM Coordinates: Zone 16, 474.20 km East and 3374.80 km North; Latitude: 30° 30' 45" North and Longitude: 87° 15' 47" 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.

Referenced attachments made a part of this permit:
Appendix G-1, General Conditions
Appendix EP-1, Daily Equipment Inspection report

Effective Date: November 23, 2009
Renewal Application Due Date: September 24, 2014
Expiration Date: November 23, 2014

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Rick Bradburn

Rick Bradburn
Air Program Administrator

RB/jf/c

Section I. Facility Information.
This permit is for the renewal of Air Operation Permit 0330066-003-AO, effective October 21, 2004.

Subsection A. Facility Description.
This facility consists of an aluminum recycling plant. Aluminum beverage containers are processed through a collection hopper to a belt conveyer with a magnetic head pulley to separate steel cans. The remaining cans are weighed in a scale hopper, then fed by conveyer to a hammer mill and shredded to approximately one-inch squares, and then pneumatically conveyed to a truck trailer loading station. The transportation air is collected from the truck trailer and cleaned by a TORIT Model 30-15 High Efficiency Cyclone Dust Collector with approximately 95% efficiency. The loading dock's trailer backstops are fitted with dock seals to prevent fugitive emissions.

Based on the permit application received August 19, 2009, 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	Aluminum Recycling Plant

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 August 19, 2009
Additional Information Request dated September 16, 2009
Additional Information Response received September 22, 2009

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a 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 that designated as Number 1 on the Ringelmann Chart (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. [Rule 62-297.310(7)(b), F.A.C.]

5. Unconfined Emissions of 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 at this facility include the following:

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.]

6. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications 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. [Rule 62-4.090, F.A.C.]

7. 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 Office
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794
Telephone: 850/595-8300; Fax: 850/595-8096

Notification of compliance testing may be submitted by electronic mail to nwdair@dep.state.fl.us.

8. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850/595-8300, extension 1220, 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, then press 7, during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
001	Aluminum Recycling Plant

This emissions unit consists of an aluminum recycling plant. Aluminum beverage containers are processed through a collection hopper to a belt conveyer with a magnetic head pulley to separate steel cans. The remaining cans are weighed in a scale hopper, then fed by conveyor to a hammer mill and shredded to approximately one-inch squares, and then pneumatically conveyed to a truck trailer loading station. The transportation air is cleaned by a TORIT Model 30-15 High Efficiency Cyclone Dust Collector, with approximately 95% efficiency. Potential Emissions are estimated based on an assumed maximum 0.5% particulate matter liberation from the amount processed, which is controlled by the cyclone with approximately 95% efficiency. Emissions are subject to the General Visible Emissions Standard of Rule 62-296.320(4)(b)1., F.A.C.

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

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum allowable operating rate is 8,000 pounds of aluminum cans processed per hour, based on a daily average. [Rules 62-4.070, 62-4.160(2) and 62-210.200(PTE), F.A.C.]
{Permit Note: This weight excludes non-aluminum contaminants.}

A.2. Hours of Operation. The maximum hours of operation for this emissions unit shall not exceed 4,992 hours/year (calendar). [Rules 62-4.070, 62-4.160(2) and 62-210.200(PTE), F.A.C.

Emission Limitations and Standards

A.3. Visible Emissions. Visible emissions shall be less than 20% opacity.
[Rule 62-4.070 and 62-296.320(4)(b)1., F.A.C.]

Test Methods and Procedures

A.4.a. Visible Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with DEP Method 9 for 30 minutes. Such test shall be scheduled between **June 1, 2014 and July 31, 2014**. 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, 62-297.310(4) &(7), and 62-297.401(9), F.A.C.]
{Permitting Note: The June-July dates provide a target window to run the VE test and have time to submit the test within 45 days of testing and yet be able to submit the test with the renewal application 60 days before the permit expiration date.}

A.4.b. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7), F.A.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(7) and 62-297.620(1), F.A.C.]

A.4.c. Testing of emissions shall be conducted with the source operating at capacity . Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, sources 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, operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070, F.A.C.]

Monitoring of Operations

A.5. Daily Environmental Equipment Inspection Plan. This plan outlines inspection and recordkeeping procedures that provide assurance the facility will operate in continuous compliance. The permittee shall follow all procedures outlined in the most recently approved Plan (Appendix EP-1).
[Rule 62-210.300(2)(a)2, F.A.C.]

{Permit Note: This document (Appendix EP-1) should be kept up-to-date with the facility's current activities and will not require any permit action; however, such modifications shall be submitted to the Department for approval. 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.}

A.6. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually, and a production log to include aluminum cans processed in pounds per hour, based on a daily average . [Rule 62-4.070, 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.

WISE RECYCLING, LLC – PENSACOLA
DAILY ENVIRONMENTAL EQUIPMENT INSPECTION
OCTOBER 12, 2004

During days of shredding operations, one of the plant operatives will inspect the shred transfer environmental equipment twice per day and log this activity in the environmental inspection book. The first inspection will take place in the first half of the production day and the second inspection will take place in the second half of the production day. If any problems are discovered during these inspections, the process will be shut down and required repairs made. Problems and repairs will be noted in the environmental inspection notebook.

Equipment will be inspected with the process running. Inspect the following items:

1. Check the shred pipe delivery system. Look for any holes in which shreds or dust escape. If shreds or dust are escaping, make repairs.

2. Check the trailer loading backstop. Look for leaking door seals, holes in backstop, or floating pressure relief device. If leaks are discovered, make repairs.

3. Inspect the dust collection equipment. Look for leaking dust pipe, any holes in the collector, and view the exhaust stack. If dust is escaping, make repairs.

If any problems are noted during the above inspections, shut down and repair.

In addition to the above activity, check the dust barrels at the end of every shift. Empty the barrels when they are one third full.

Dennis F. Church
Area Business Manager

WISE - PENSACOLA

ENVIRONMENTAL EQUIPMENT INSPECTION LOG

MONTH_____ YEAR_____

Day of Month	First Half Inspection (initials)	2nd Half Inspection (initials)	Recordable Findings
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
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21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			

Indicate "No processing" for days not shredding.