RAI RESPONSE

Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR NON-TITLE V AIR PERMIT RENEWAL

See Instructions for Form No. 62-210.900(4)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: Wise Recycling, LLC	
2. Site Name: Aluminum Recycling Plant	
3. Facility Identification Number: 0330066	4. Facility Status Code: A

Application Contact

1. Name and Title of Application Contact: Eric Jones Environmental Engineer
2. Application Contact Mailing Address: Organization/Firm: Sanders Engineering and Analytical Services, Inc. Street Address: 2255 Schillinger Rd N City: Semmes State: AL Zip Code: 36575
3. Application Contact Telephone Numbers: Telephone: (251) 633-4120 Fax: (251) 633-2285

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	

RECEIVED

SEP 22 2009

NORTHWEST FLORIDA DEP

Owner/Authorized Representative

1. Name and Title of Owner/Authorized Representative:
   Dennis F. Church
   Area Business Manager

2. Owner/Authorized Representative Mailing Address:

   Organization/Firm: Wise Recycling, LLC
   Street Address: 605 West Hope Drive
   City: Pensacola State: FL Zip Code: 32534

3. Owner/Authorized Representative Telephone Numbers:
   Telephone: (850) 477-5336 Fax: (850) 477-0324

4. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this Application for Air Permit. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described in this application so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

   Signature 9-22-09 Date

* Attach letter of authorization if not currently on file.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Aluminum Recycling Plant	AO2B	$1,000

Application Processing Fee

Check one: [X] Attached - Amount: $ 1000.00 [ ] Not Applicable

Application Comment

II. FACILITY INFORMATION

Facility Contact

1. Name and Title of Facility Contact:	Dennis F. Church Area Business Manager
2. Facility Contact Mailing Address: Organization/Firm: Wise Recycling, LLC Street Address: 605 West Hope Drive City: Pensacola State: FL Zip Code: 32534	
3. Facility Contact Telephone Numbers: Telephone: (850) 477-5336	Fax: (850) 477-0324

Facility Supplemental Requirements

1. Area Map Showing Facility Location:	[ ] Attached, Document ID:_____	[X] Not Applicable	[ ] Waiver Requested
2. Facility Plot Plan:	[ ] Attached, Document ID:_____	[X] Not Applicable	[ ] Waiver Requested
3. Process Flow Diagram(s):	[ ] Attached, Document ID:_____	[X] Not Applicable	[ ] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter:	[ ] Attached, Document ID:_____	[X] Not Applicable	[ ] Waiver Requested

Facility Comment

All documents pertaining to the supplemental requirements listed above were submitted in the 2004 initial permit application, and there have been no significant changes during the previous five years. Therefore, the original documents should still be valid.

Emissions Unit ID 001

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section must be completed for each emissions unit addressed in this Application for Non-Title V Air Permit Renewal. If submitting the form in hard copy, indicate, in the space provided at the top of each page, the Emissions Unit ID of the emissions unit addressed on the page, as given in the unit's most current air operation permit.

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Unit shreds aluminum cans into approximately one inch squares.	
2. Emissions Unit Status Code: A	3. Long-Term Reserve Shutdown Date:
4. Control Equipment Method/Description (limit to 200 characters per device or method): TORIT Model 30-15 High Efficiency Cyclone Dust Collector, with approximately 95% efficiency	

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: Not Applicable		mmBtu/hr
2. Maximum Incineration Rate: Not Applicable	lb/hr	tons/day
3. Maximum Process or Throughput Rate: 8,000 pounds of aluminum cans processed per hour, based on a daily average		
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:	hours/day	days/week
	weeks/year	4,992 hours/year

Emissions Unit ID 001

Emissions Unit Supplemental Requirements

1. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
2. Compliance Test Report [X] Attached, Document ID:___1_____ [ ] Not Applicable [ ] Previously submitted, Date:_____
3. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
4. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
5. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [X] Not Applicable

Emissions Unit Comment

Document 1

Compliance Test Report

SANDERS ENGINEERING & ANALYTICAL SERVICES, INC.

An Environmental Engineering Firm Specializing in Air Emissions Measurement and Permitting

www.sandersengineering.com EMAIL: sanders@sandersengineering.com

Phone: 251-633-4120 2255 Schillinger Road N.

Fax: 251-633-2285 Semmes, AL 36575

September 22, 2009

Mr. Harold Stone
Wise Recycling
605 W. Hope Drive
Pensacola, FL 32534

Dear Mr. Stone:

Sanders Engineering & Analytical Services, Inc. (SEAS) performed Method 9 visible emissions testing for Wise Recycling on the Dust Collector (EU 001, Permit No. 0330066-003-AO) located at the Pensacola, Florida facility. The testing was conducted July 30, 2009. The Florida Department of Environmental Protection was notified so that a representative could be present to observe the testing.

The production rate during the testing was 7,344 pounds per hour. The highest six minute average opacity observed during the 30 minute visible emissions test was 0.2 percent. The applicable rules and regulations of the Florida Department of Environmental Protection require a visible emission rate of no greater than or equal to 20 percent opacity. The results of the testing indicate the unit is in compliance with the visible emission condition of the permit to operate issued by the Florida Department of Environmental Protection. The summary of results, field data sheet, plant production documentation and observer certification are attached.

If you have any questions, or if we may be of further assistance, please do not hesitate to contact us.

Sincerely,

Eric Jones
Environmental Engineer

EJ/gm

Enclosure

RECEIVED

SEP 22 2009

NORTHWEST FLORIDA
DEP

TABLE I. VISIBLE EMISSIONS TEST RESULTS
WISE RECYCLING
DUST COLLECTOR - EU ID 001
Thursday, July 30, 2009

TIME	OPACITY PERCENT	6 MIN. AVG.	TIME	OPACITY PERCENT	6 MIN. AVG.
8:22:00	0		8:37:00	0	0.0
8:22:15	0		8:37:15	0	0.0
8:22:30	0		8:37:30	0	0.0
8:22:45	0		8:37:45	0	0.0
8:23:00	0		8:38:00	0	0.0
8:23:15	0		8:38:15	0	0.0
8:23:30	0		8:38:30	0	0.0
8:23:45	0		8:38:45	0	0.0
8:24:00	0		8:39:00	0	0.0
8:24:15	0		8:39:15	0	0.0
8:24:30	5		8:39:30	0	0.0
8:24:45	0		8:39:45	0	0.0
8:25:00	0		8:40:00	0	0.0
8:25:15	0		8:40:15	0	0.0
8:25:30	0		8:40:30	0	0.0
8:25:45	0		8:40:45	0	0.0
8:26:00	0		8:41:00	0	0.0
8:26:15	0		8:41:15	0	0.0
8:26:30	0		8:41:30	0	0.0
8:26:45	0		8:41:45	0	0.0
8:27:00	0		8:42:00	0	0.0
8:27:15	0		8:42:15	0	0.0
8:27:30	0		8:42:30	0	0.0
8:27:45	0	0.2	8:42:45	0	0.0
8:28:00	0	0.2	8:43:00	0	0.0
8:28:15	0	0.2	8:43:15	0	0.0
8:28:30	0	0.2	8:43:30	0	0.0
8:28:45	0	0.2	8:43:45	0	0.0
8:29:00	0	0.2	8:44:00	0	0.0
8:29:15	0	0.2	8:44:15	0	0.0
8:29:30	0	0.2	8:44:30	0	0.0
8:29:45	0	0.2	8:44:45	0	0.0
8:30:00	0	0.2	8:45:00	0	0.0
8:30:15	0	0.2	8:45:15	0	0.0
8:30:30	0	0.0	8:45:30	0	0.0
8:30:45	0	0.0	8:45:45	0	0.0
8:31:00	0	0.0	8:46:00	0	0.0
8:31:15	0	0.0	8:46:15	0	0.0
8:31:30	0	0.0	8:46:30	0	0.0
8:31:45	0	0.0	8:46:45	0	0.0
8:32:00	0	0.0	8:47:00	0	0.0
8:32:15	0	0.0	8:47:15	0	0.0
8:32:30	0	0.0	8:47:30	0	0.0
8:32:45	0	0.0	8:47:45	0	0.0
8:33:00	0	0.0	8:48:00	0	0.0
8:33:15	0	0.0	8:48:15	0	0.0
8:33:30	0	0.0	8:48:30	0	0.0
8:33:45	0	0.0	8:48:45	0	0.0
8:34:00	0	0.0	8:49:00	0	0.0
8:34:15	0	0.0	8:49:15	0	0.0
8:34:30	0	0.0	8:49:30	0	0.0
8:34:45	0	0.0	8:49:45	0	0.0
8:35:00	0	0.0	8:50:00	0	0.0
8:35:15	0	0.0	8:50:15	0	0.0
8:35:30	0	0.0	8:50:30	0	0.0
8:35:45	0	0.0	8:50:45	0	0.0
8:36:00	0	0.0	8:51:00	0	0.0
8:36:15	0	0.0	8:51:15	0	0.0
8:36:30	0	0.0	8:51:30	0	0.0
8:36:45	0	0.0	8:51:45	0	0.0

Highest 6 Minute Average Opacity was 0.2 Percent from 8:22:00 to 8:27:45

EPA
VISIBLE EMISSION OBSERVATION FORM 1

Form Number		Page	Of
Continued on VEO Form Number			

Method Used (Circle One): Method 9 | 203A | 203B | Other: _____

Company Name	Wise Recycling
Facility Name	
Street Address	605 W. Hope Dr.
City	Pensacola
State	FL
Zip	32534

Process	Aluminum shredding	Unit #	EU001
Operating Mode			
Control Equipment	Dust collector	Operating Mode	

Describe Emission Point: ~1' round stack on ~~north~~ east side of shredder building

Height of Emiss. Pt.	Start ~25' End Same	Height of Emiss. Pt. Rel. to Observer	Start ~25' End Same
Distance to Emiss. Pt.	Start ~175' End Same	Direction to Emiss. Pt. (Degrees)	Start ~260° End Same

Vertical Angle to Obs. Pt.	Start ~8° End Same	Direction to Obs. Pt. (Degrees)	Start ~260° End Same

Distance and Direction to Observation Point from Emission Point: Start Same Point End Same

Describe Emissions	Start NA	End Same	
Emission Color	Start NA End Same	Water Droplet Plume	Attached ☐ Detached ☐ None ☒

Describe Plume Background	Start Sky	End Same	
Background Color	Start White End Same	Sky Conditions	Start Broken End Same
Wind Speed	Start 0-5mph End Same	Wind Direction	Start SW End Same
Ambient Temp.	Start 86°F End 86°F	Wet Bulb Temp.	RH Percent 85

Source Layout Sketch

Draw North Arrow: ☐ TN ☒ MN

Longitude	Latitude	Declination

Additional Information: Permit No. 0330066-003-AO

Observation Date	Time Zone	Start Time	End Time
7-30-09	Central	8:22	8:52

Min \ Sec	0	15	30	45	Min \ Sec	0	15	30	45
1	0	0	0	0	1				
2	0	0	0	0	2				
3	0	0	5	0	3				
4	0	0	0	0	4				
5	0	0	0	0	5				
6	0	0	0	0	6				
7	0	0	0	0	7				
8	0	0	0	0	8				
9	0	0	0	0	9				
10	0	0	0	0	10				
11	0	0	0	0	11				
12	0	0	0	0	12				
13	0	0	0	0	13				
14	0	0	0	0	14				
15	0	0	0	0	15				
16	0	0	0	0	16				
17	0	0	0	0	17				
18	0	0	0	0	18				
19	0	0	0	0	19				
20	0	0	0	0	20				
21	0	0	0	0	21				
22	0	0	0	0	22				
23	0	0	0	0	23				
24	0	0	0	0	24				
25	0	0	0	0	25				
26	0	0	0	0	26				
27	0	0	0	0	27				
28	0	0	0	0	28				
29	0	0	0	0	29				
30	0	0	0	0	30				

Observer's Name (Print)	Eric Jones
Observer's Signature	Eric Jones
Date	7-30-09
Organization	Sanders Engineering & Analytical Services
Certified By	Whitlow Enterprises
Date	

VEOF1.1

Whitlow Enterprises, LLC
www.smokeschool.net
Certifies that
Eric Jones of Sanders Engineering
Has passed the certification test required by 40 CFR 60 Appendix A
and is qualified as a visible emissions evaluator
Certification Date: 4/21/2009 Location: Mobile/Saraland/Pritchard, AL

George Whitlow
President

MSPAL042109-02

Sanders

From: Harold Stone [hstone@wiserecycling.com]

Sent: Monday, September 21, 2009 2:30 PM

To: sanders@sandersengineering.com

Subject: Production rate

Good morning Mr. Sanders,
The production rate during the test time period of 8:00am to 9:00am was 7,344 lbs per hour. Please let us know if we can help you in any way.
Thank You, Harold Stone
Plant Manager
Wise Recycling LLC
Pensacola, Fl

FILE COPY

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

September 16, 2009

Sent by Electronic Mail – Received Receipt Requested
dchurch@wiserecycling.com

Mr. Dennis F. Church
Area Business Manager
Wise Recycling, LLC
605 West Hope Drive
Pensacola, Florida 32534

Dear Mr. Church:

This is to acknowledge receipt on August 19, 2009 of your permit application, DEP file number 0330066-004-AO, for renewal of the air operation permit for your Aluminum Recycling Plant in Pensacola, Escambia County. This letter constitutes notice that a permit will be required for your project pursuant to Chapter 403, Florida Statutes.

Your application for permit is incomplete. Please provide the information listed below within 90 days of receipt of this letter. Evaluation of your proposed project will be delayed until all requested information has been received. References made below to "Application" refer to DEP Form No. 62-210.900(4), Effective 2/11/1999 and its instructions.

- Facility Wide Condition No. 6 of permit 0330066-003-AO requires two copies of the application for renewal to be submitted. Only one copy was submitted. Please submit one more copy. [Permit 0330066-003-AO and Rule 62-4.050(2), F.A.C.]

- The compliance test report attached to the application does not have a production rate identified for the testing performed. Specific Condition A.4.c of permit 0330066-003-AO relies on the production testing rate to establish capacity limits. Please supply a test report that includes the production rate for the test. The compliance test should be submitted under separate cover for compliance review as well as attached to the application. [Rules 62-297.310(2) and 62-297.310(8)(c)4 &5, F.A.C.]

When referring to this project, please use the file number indicated above. The Department must receive a response from you within 90 days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-4.055(1), F.A.C.

If you have any questions, please contact John Fleck at 850/595-8300, extension 1232 or john.fleck@dep.state.fl.us.

Sincerely,

Armando I. Sarasua, P.E.
Air Permitting Supervisor

AIS/jf/c

c: Eric Jones, Sanders Engineering sanders@sandersengineering.com

Curle, Mary Beth

From: Dennis Church [dchurch@wiserecycling.com]
Sent: Tuesday, September 29, 2009 10:34 AM
To: Curle, Mary Beth
Subject: RE: DEP Air Program request for additional information; Wise Recycling 0330066-004-AO

From: Curle, Mary Beth [mailto:Mary.Beth.Curle@dep.state.fl.us]
Sent: Tuesday, September 29, 2009 9:57 AM
To: dchurch@wiserecycling.com
Cc: sanders@sandersengineering.com
Subject: FW: DEP Air Program request for additional information; Wise Recycling 0330066-004-AO

Please acknowledge receipt of the attached document. Thank you.

Mary Beth Curle
Administrative Assistant, Northwest District Air Program
850/595-8300 x 1220; fax 850/595-8096

Please Note: Florida has a very broad public records law.
Most written communications to or from state officials regarding state business are public records available to the public and media upon request.
Your e-mail communications may therefore be subject to public disclosure.

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Curle, Mary Beth
Sent: Wednesday, September 16, 2009 12:51 PM
To: 'dchurch@wiserecycling.com'
Cc: 'sanders@sandersengineering.com'; Sarasua, Armando; Fleck, John
Subject: DEP Air Program request for additional information; Wise Recycling 0330066-004-AO

Dear Sir/Madam:

Please send a reply message verifying receipt of the attached document by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document.

The document may require action within a specified time frame. Please open and review as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: http://www.adobe.com/products/acrobat/readstep.html. When printing the attached document

from Adobe Acrobat Reader, select "Document and comments" from the "Print What:" menu item; if this is not done the signature may not appear on the printed document.

Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. Thank you.

Please be advised that if you have anti-virus software, a warning may appear when you attempt to open our document. This is only a warning. We send our documents virus-free.