Florida Department of

Memorandum

Environmental Protection

TO: Rick Bradburn
THROUGH: Armando Sarasua
FROM: John Fleck
DATE: November 23, 2009
SUBJECT: Evaluation Summary for Wise Recycling, LLC, Pensacola 0330066-004-AO, Escambia County

We recommend issuing a permit to Wise Recycling, LLC to operate their Pensacola Recycling Plant. This is a renewal of air operating permit 0330066-003-AO, effective October 21, 2004.

Process 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. This facility is limited to the processing of 8,000 lb/hour (excluding non-aluminum contaminants) and a maximum of 4,992 hours/year of operation. Recordkeeping is required to verify compliance.

Pollution Control Equipment. The transportation air is cleaned by a TORIT Model 30-15 High Efficiency Cyclone Dust Collector with approximately 95% efficiency.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	62-296.320(4)(a)	0.48[1] (2)[2]	1.2[1] (4.99)[2]	N/A	N/A
SO2	N/A	N/A	N/A	N/A	N/A
VOC	N/A	N/A	N/A	N/A	N/A
NOx	N/A	N/A	N/A	N/A	N/A
CO	N/A	N/A	N/A	N/A	N/A
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	62-296.320(4)(b)1	N/A	N/A	Not more than 20% opacity	

[1]Estimate is based on October 30, 1990 testing at Roanoke, Virginia which had a maximum of 0.48 pounds per hour (one of three one hour tests) on a similar system (emissions controlled by cyclone only) running at 8040 pounds per hour (8000 pounds aluminum and assumed 40 pounds of dirt contaminant).
[2]Estimate is based on a maximum assumed dirt contaminant of 0.5% which is emitted as PM. At 4 tons/hr of aluminum with 0.02 tons contaminant, 40 pounds/hr of PM would be liberated and then reduced by 95% with the cyclone.

Applicable Rules & Regulations. Prior to 11/2/1993 (AC17-239580) this facility was equipped with two baghouses and the 5% opacity standard was applied per Rule 62-297.620(4), F.A.C. However, when AC17-239580 was issued (eliminating the baghouses due to blinding problems in favor of a single high efficiency cyclone), the 5% requirement was retained instead of switching over to the 20% standard per the General Visible Emissions Standard of Rule 62-296.320(4)(b)1. Since a notice of this construction

permit was not published, this requirement is not federally enforceable. It was corrected to the opacity standard of 20% in operating permit 0330066-002-AO.

Compliance Monitoring. A VE test (30 minutes) is due in the 5th year of the permit just prior to renewal. This frequency was carried forward from the previous operating permits. The permittee is also required to maintain a log of operating hours, conduct inspections twice a day and record the results, and maintain a production log to include aluminum cans processed in pounds per hour, based on a daily average.

Compliance History. 2009 - the facility violated the 15 day notice for VE testing but other wise was in compliance. 2005 to 2008 - Facility noted to be in compliance. 2004 - Facility noted to be "In-Compliance". Inspector recommended that facility continue in its efforts to reduce any potential fugitive emissions by good housekeeping practices.

Fee Summary. This is an AO2B ($1,000 fee) minor source with no stack test. The original construction permit fee was $250 for an AC1F facility (source less than 5TPY).

JF/c