M E M O R A N D U M

DATE: February 2, 2011

TO: Richard D. Garrity, Ph.D.

FROM: Jeff Sims **THRU:** Diana M. Lee, P.E.
Sterlin K. Woodard, P.E.

SUBJECT: REVISED DRAFT Construction/Title V Operating Permits
EnviroFocus Technologies, LLC
Permit Nos.: 0570057-024-AC
0570057-022-AV

Attached are REVISED DRAFT Permit Nos. 0570057-022-AV and 0570057-024-AC for the revision of the Title V operating permit to incorporate Permit No. 0570057-021-AC, and for the reduction of particulate matter (PM) and lead (Pb) emission limits for the blast furnace enclosure (EU015) at the secondary lead (battery recycling) smelting facility. These permits are being issued concurrently since the changes for the blast furnace enclosure authorized by Permit No. 0570057-024-AC involve no new construction and the permittee demonstrated compliance with the new emission limits through compliance testing performed in March 2010. Permit No. 0570057-022-AV incorporates Permit Nos. 0570057-021-AC and 0570057-024-AC.

Permit No. 0570057-018-AC authorized construction of an enclosure for the existing blast furnace area and an increase in the lead production limit from the blast furnace. Permit No. 0570057-021-AC revised Permit No. 0570057-018-AC to include the addition of a sodium bicarbonate (baking soda) dry injection scrubber system to control SO_2 emissions from the blast furnace. The enclosure was added in order to capture and control fugitive particulate matter (PM) and lead (Pb) emissions from the blast furnace area. The construction permits required reductions in many of the pollutant emission limits in order to avoid the applicability of Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD). The sodium bicarbonate scrubber system was added in order to assure compliance with the new SO_2 emission limit. Stack testing has been performed and demonstrated compliance with all the revised emission limits.

Since the new sodium bicarbonate scrubber system acts as part of a distinct control system for SO_2 emissions, the *Compliance Assurance and Monitoring (CAM) Plan* required revision to address its

operation and monitoring requirements. In addition, the following plans were revised to reflect changes authorized by the construction permits: *Startup, Shutdown and Malfunction Plan, Baghouses Standard Operation and Maintenance Procedures Manual,* and *SOP for the Control of Fugitive Emissions*. Most changes are simple updates adding the operation and description of the furnace enclosure system to the plans; however, one requirement in the *SOP for the Control of Fugitive Emissions* was changed to allow for weekly inspection of the sprinkler system rather than daily, so that plan has been attached to the construction permit to formally document the change. All the amended plans have been attached to the Revision permit. The Revision permit also corrects the stack dimensions identified in the previous applications for the Torit baghouse exhaust to more accurately identify a height of 130' and a uniform diameter of 8'. In addition, an inconsistency in the burner ratings for the blast furnace afterburner was noted between the current permit and the revision application. After detailed research of the burners, it was explained that the burners are comprised of two base burners and a single, larger modulating burner with a total heat input of approximately 8.3 MMBtu/hr combined as currently operated. However, the facility also noted that the total heat input value could vary up to as much as 10 MMBtu/hr without any substantial modifications to the system (i.e. adjusting the delivery pressure, excess air %, etc.). Therefore, the afterburner rating will remain 10 MMBtu/hr as stated in the current Title V permit. Based on updates to the State rules since the last Title V permit issuance, the Revision permit was also updated to include a revised Renewal Permit Application due date based on 225 days prior to expiration rather than 180 days, and the AOR due date has been restated as April 1st of each year rather than March 1st.

Construction Permit 0570057-024-AC is being issued concurrently with the Revision permit to address an airflow discrepancy revealed during the initial Revision permit application review. Permit No. 0570057-021-AC identified an anticipated airflow of 65,000 acfm for the blast furnace enclosure (EU015) exhaust, with corresponding emission limits of 0.004 gr/dscf and 9.8 tons/yr for particulate matter (PM) and 0.000085 gr/dscf and 0.21 tons/yr for lead (Pb). However, although the rating on the fan was verified as 65,000 acfm, stack tests performed on the Torit exhaust revealed airflows ranging from approximately 76,000 dscfm to 94,000 dscfm. The primary explanation was that the manufacturer's rating is based on an assumed static pressure of 12" w.c. Since the Torit collection system utilizes large ducts with relatively few bends, and the baghouse cartridges offered less airflow resistance than anticipated, the less than expected overall pressure drop results in a lower than expected static pressure and the airflow is elevated accordingly. Therefore, based on the results of the tests and the potential for fluctuations based on particulate load, damper settings, and age of cartridge filters, the airflow specified in the construction and Revision permits will be specified at the highest recorded value of 95,000 acfm.

Since Permit No. 0570057-021-AC contained PM and Pb limits specifically to avoid PSD, the applicant requested lower PM and Pb grain loading limits in order to maintain the annual emission limits to below the PSD threshold from the original construction permit. Based on the stack tests results, PM and Pb emissions are being based on 94,000 dscfm. Therefore, the revised emission limits are 0.003 gr/dscf and 10.6 tons/yr for particulate matter (PM) and 0.00006 gr/dscf and 0.21 tons/yr for lead (Pb). Since initial testing has already been performed, only annual testing is being required hereafter. The new enclosure and blast furnace (including tapping and charging) are

subject to PM and Pb RACT, NSPS requirements of 40 CFR 60 – Subpart L, and the MACT requirements of Subpart X of the NESHAP for Pb and VOC (blast furnace only). The limits requested by the applicant are typically stricter than the limits specified by the applicable regulations.

The DRAFT permits were issued on September 13, 2010. Comments were received from Frank Burbach (ENVIRON International Corporation) on behalf of the permittee via e-mail on September 29, 2010. A response to the comments was provided via e-mail on November 8, 2010. Additional comments were provided by Mr. Burbach on November 9, 2010 and November 19, 2010. A comment was also received from Angela Fogarty (EnviroFocus Technologies) on December 22, 2010. Edits were made to the DRAFT permits based on the comments provided which resulted in significant changes that required issuance of a REVISED DRAFT permit. The comments and any resulting changes are noted in the Technical Evaluation for the REVISED DRAFT permits.

Based on our review, we recommend the issuance of these permits as drafted.

JDS: 0570057-024-AC/0570057-022-AV

February 2, 2011

Mr. John Tapper
Chief Operating Officer
EnviroFocus Technologies, LLC
1901 N. 66th Street
Tampa, FL 33619

Re: REVISED DRAFT Air Construction Permit No.: 0570057-024-AC
REVISED DRAFT Title V Air Operation Permit Revision Project No.: 0570057-022-AV
Revision to Title V Air Operation Permit No.: 0570057-016-AV
EnviroFocus Technologies, LLC

Dear Mr. Tapper:

One copy of the Technical Evaluation and Preliminary Determination, the combined Public Notice, the REVISED DRAFT Air Construction Permit, and the REVISED DRAFT Title V Air Operation Permit Revision for EnviroFocus Technologies, LLC located at 1901 N. 66th Street, Tampa, Hillsborough County, is enclosed. The permitting authority's "INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION" and the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION" are also included.

An electronic version of the REVISED DRAFT Permits will be posted on the Division of Air Resource Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

"http://www.dep.state.fl.us/air/eproducts/ards/default.asp"

The "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION" must be published as soon as possible. Proof of publication, i.e., newspaper affidavit, must be provided to the permitting authority's office within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permits pursuant to Rule 62-110.106(11), F.A.C.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Diana M. Lee, P.E., at the above letterhead address. If you have any other questions, please contact Jeff Sims, at 813/627-2600.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

EnviroFocus Technologies, LLC

Hillsborough County

REVISED Construction Permit and Title V Operating Permit

Application Number

0570057-024-AC and 0570057-022-AV

Environmental Protection Commission of

Hillsborough County

Tampa, FL

February 2, 2011

I. Project Description

A. Applicant: Mr. John Tapper
Chief Operating Officer
EnviroFocus Technologies, LLC
1901 N. 66th Street
Tampa, FL 33619

B. Engineer: Russell S. Kemp, P.E.
ENVIRON International Corp.
1600 Parkwood Circle, Suite 310
Atlanta, GA 30339

P.E. No.: 56355

C. Project and Location:

Attached are REVISED DRAFT Permit Nos. 0570057-022-AV and 0570057-024-AC for the revision of the Title V operating permit to incorporate Permit No. 0570057-021-AC, and for the reduction of particulate matter (PM) and lead (Pb) emission limits for the blast furnace enclosure (EU015) at the secondary lead (battery recycling) smelting facility. These permits are being issued concurrently since the changes for the blast furnace enclosure authorized by Permit No. 0570057-024-AC involve no new construction and the permittee demonstrated compliance with the new emission limits through compliance testing performed in March 2010. Permit No. 0570057-022-AV incorporates Permit Nos. 0570057-021-AC and 0570057-024-AC.

The DRAFT permits were issued on September 13, 2010. Comments were received from Frank Burbach (ENVIRON International Corporation) on behalf of the permittee via e-mail on September 29, 2010. A response to the comments was provided via e-mail on November 8, 2010. Additional comments were provided by Mr. Burbach on November 9, 2010 and November 19, 2010. A comment was also received from Angela Fogarty (EnviroFocus Technologies) on December 22, 2010. Edits were made to the DRAFT permits based on the comments provided which resulted in significant changes that required issuance of a REVISED DRAFT permit. The comments and any resulting changes are noted as follows:

A. Letter (via e-mail) from Frank Burbach of ENVIRON International Corporation dated September 29, 2010 and received on September 29, 2010.

1. **COMMENT:** (1) Part D) of Facility-Wide Condition No. 7 and the Fugitive Dust SOP specify vacuuming of traffic areas 3 times daily, but Specific Condition No. B.17 only requires vacuuming twice daily. (2) Parts I) and K) of Facility-Wide Condition No. 7 require wet suppression of lead-bearing materials; however, the permittee requests removal because the addition of water can be hazardous to operation of the blast furnace.

RESPONSE: (1) All traffic areas/paths throughout the facility are required to be vacuumed three times daily as specified in Facility-Wide Condition No. 7 and the Fugitive Dust SOP. Specific Condition No. B.17 refers only to "pavement cleaning" operations within the Refining and Casting Area. Through reference to the Fugitive Dust SOP, "pavement cleaning" requires that the refining and casting area be washed/hosed down at least two times each day. That condition is not referring to vacuuming requirements. (2) The addition of water to the lead-bearing materials in the feed storage area is intended as an additional control mechanism to minimize fugitive dust emissions. The requirement is consistent with language from the existing Fugitive Dust SOP which states: "… *The materials stored in this area are washed/wetted prior to storage and will remain moist even after long-term storage. Additional wetting of the stored material will be provided, if necessary, to prevent the generation of dust; however, it is not anticipated that additional wetting will be necessary…"*. It should be noted that the addition of water is <u>not</u> intended to be <u>required</u> on the lead-bearing materials as part of normal operation within the feed storage area, but rather to be used as a supplement to other control techniques to minimize emissions, including the maintenance of an enclosure around the storage area. EPC recognizes the safety concerns expressed with charging excessively moist material into the blast furnace and agrees that careful oversight is necessary. However, given that the facility has previously specified that the normal stored feed materials contain 3-10% moisture, the addition of water would only be expected when handling especially dry materials below or at the lower end of those values. The phrase "as needed" has been added to both Parts I) and K) of Facility-Wide Condition No. 7 to help clarify the intent.

2. **COMMENT:** The facility requested that the reference to "instantaneous" afterburner temperature in Specific Condition No A.34 be changed to "3-hour average" temperature as stated in Specific Condition No A.32.

RESPONSE: Specific Condition No A.34 refers to the "best operational practices" believed to be necessary to minimize occurrences of excess emissions. The intent is also to establish requirements that will trigger operational changes in response to conditions that could likely result in non-compliance with emission limits and/or minimum operating temperatures. Therefore, as already stated in the current Title V permit, instantaneous temperature is specified rather than a 3-hour average so that a response to a low afterburner operating temperature can be more readily addressed before a 3-hour average temperature exceedance occurs. The use of instantaneous temperature also allows more flexibility for the facility to make immediate adjustments and to maintain continual operations rather than use of an average temperature. In addition, in order to clarify when the facility can start reloading of the furnace in the instances when loading of lead bearing materials is stopped due to low afterburner operating temperature, the following additional language has been added to Specific Condition No. A.34.

FROM:

A.34. … For hydrocarbon and carbon monoxide control, best operational practice shall

require that if the instantaneous afterburner temperature falls below the minimum afterburner operating temperature (as specified in Specific Condition No. A.32) for more than one hour, the furnace operation shall accept no more lead bearing material.

TO:

A.34. … For hydrocarbon and carbon monoxide control, best operational practice shall require that if the instantaneous afterburner temperature falls below the minimum afterburner operating temperature (as specified in Specific Condition No. A.32) for more than one hour, the furnace operation shall accept no more lead bearing material. <u>If loading of lead bearing material is discontinued due to the instantaneous afterburner operating temperature being below the minimum afterburner operating temperature (as specified in Specific Condition No. A.32), then lead bearing material shall not be charged until the instantaneous afterburner operating temperature is above the minimum afterburner operating temperature.</u>

3. **COMMENT:** The facility requested that language be added to Specific Condition No. A.38 to clarify that the furnace can continue operation during SO2 CEM failure.

RESPONSE: The SO2 CEM is an indicator of compliance, but not the formal method of demonstrating compliance as performed through stack testing. However, operation of the CEM is believed to be an important feedback indicator to help determine the SO2 emission rate and to ensure proper operation of the sodium bicarbonate scrubber system. EPC recognizes that the CEM can experience periodic operational problems, and agrees that the blast furnace could continue operation for limited durations without the CEM functioning; however, the CEM is expected to be returned to proper operation as soon as possible following a malfunction. The use of the CEM is considered a best operational practice and therefore expected to meet the minimum CEM maintenance downtime criteria from EPA guidance of ≤ 5% of emission unit operation time. In order to best estimate overall emissions, any gaps in SO2 emissions records caused from CEM downtime should be filled with the best estimation of emissions based on stack test records or CEM historical records. Finally, since operation of the SO2 scrubbing system is directly tied to the SO2 CEM during normal operation, the facility must ensure that during CEM failure the scrubbing system continues to operate in an alternate mode that provides for an adequate sodium bicarbonate injection rate to provide reasonable assurance of compliance with the SO2 emission rate. The following changes were made to Specific Condition No. A.38:

FROM:

A.38. The permittee shall calibrate and maintain a continuous emission monitor (CEM) for the pollutant sulfur dioxide on the blast furnace exhaust line in accordance with the manufacturer's operation and maintenance plan, and shall calibrate and maintain a device to continuously measure the sodium bicarbonate injection rate. The CEM shall be in continuous operation during any blast furnace operation. The permittee shall provide notification to EPC as soon as possible (within 24 hours) when unexpected failure of the SO_2 CEM occurs. If

failure occurs during non-working hours or on the weekend, notification shall occur by fax or phone message to the Compliance Section of EPC on the same date as the event or on the next business day. Following the initial certification of the SO_2 continuous emissions monitor, the permittee may request that the continuous emission monitor become the referenced compliance method by requesting an alternate sampling procedure pursuant to Rule 62-297.620, F.A.C.

TO:

A.38. The permittee shall calibrate and maintain a continuous emission monitor (CEM) for the pollutant sulfur dioxide on the blast furnace exhaust line in accordance with the manufacturer's operation and maintenance plan, and shall calibrate and maintain a device to continuously measure the sodium bicarbonate injection rate. The CEM shall be in continuous operation during any blast furnace operation, except during any unforeseen failure of the CEM system. In the event of CEM failure, all operation of the blast furnace shall be documented and SO2 emissions shall be estimated for the missing data based on stack test records or CEM historical records. The CEM shall be returned to proper operation as soon as possible following malfunction, and, as a best operational practice, should not have total downtime in excess of 5% overall blast furnace operational time during each 6-month period. During failure of the SO2 CEM, the permittee shall also ensure that the sodium bicarbonate scrubbing system continues to operate in an alternate mode that provides for an adequate sodium bicarbonate injection rate to provide reasonable assurance of compliance with the SO2 emission rate. The permittee shall provide notification to EPC as soon as possible (within 24 hours) when unexpected failure of the SO_2 CEM occurs. If failure occurs during non-working hours or on the weekend, notification shall occur by fax or phone message to the Compliance Section of EPC on the same date as the event or on the next business day. Following the initial certification of the SO_2 continuous emissions monitor, the permittee may request that the continuous emission monitor become the referenced compliance method by requesting an alternate sampling procedure pursuant to Rule 62-297.620, F.A.C.

4. **COMMENT:** The facility requested removal of the requirement from Specific Condition No. A.39 to convert SO2 CEM data from ppm to lb/hr.

RESPONSE: The condition is not requesting a conversion to lb/hr, but rather to lb/ton of lead produced. The condition is intended to provide data on the emission rate of SO2 compared to lead produced to evaluate against the limit from Specific Condition No. A.14. Since data collection at the facility was formerly less automated than it is presently, this condition had previously been established in order to develop a better reference value for ppm values observed from the CEM. Given the improved automation and data collection capabilities at the facility, this value should be available in the requested format from currently recorded data in the data collection systems. The condition has been updated as follows:

FROM:

A.39. The permittee shall establish a conversion factor for the purpose of converting SO2 CEM monitoring data from ppm into units of lbs of SO2 per ton of lead produced each hour as specified in Specific Condition No. A.14, using information from the most recent compliance test.

TO:

A.39. The permittee shall ~~establish a conversion factor for the purpose of~~ convert~~ing~~ SO2 CEM monitoring data from ppm into units of lbs of SO2 per ton of lead produced each hour as specified in Specific Condition No. A.14. ~~using information from the most recent compliance test.~~

5. **COMMENT:** The facility requested clarification on the recordkeeping requirement of Specific Condition No. A.42 regarding material input to the furnace.

RESPONSE: The condition requires that a ton/hr charge rate be documented during each hour of operation. Since data collection at the facility was formerly less automated than it is presently, this condition had previously stressed the use of manual operator logs in developing the charge rate. Given the improved automation and data collection capabilities at the facility, this value should be available in the requested format from currently recorded data in the data collection systems. The condition has been updated as follows:

FROM:

A.42. The permittee shall keep a record of the material input to the blast furnace for each and every hour and back calculate a ton per hour input figure based on actual hours of operation as recorded on the operator log sheets.

TO:

A.42. The permittee shall keep a record of the material input to the blast furnace for each ~~and every~~ hour and ~~back calculate~~document ~~a~~the tons of charge per hour based on a daily average. ~~input figure based on actual hours of operation as recorded on the operator log sheets.~~

6. **COMMENT:** The facility requested removal of the requirement to perform an annual "Response Test" on the baghouse leak detection systems as stated in the *Baghouse SOP* since the manufacturer does not require them for those units. The permittee proposes to install an optional automatic hourly self checking system offered by the manufacturer which checks the control unit hardware, control unit calibration, sensor cable and particular sensor/probe. If installed, the self checking system should address concerns relating to the proper operational status of the detection monitor and eliminate the need for an annual response test.

RESPONSE: A response test is meant to be a check on the operational status of the bag leak detection monitor to ensure repeatable and reliable response. A requirement to perform an

annual response test on the monitors is included in the current Title V permit (*Baghouse SOP*) and was also part of the updated *Baghouse SOPs* submitted with the application and received as a response to the Request for Additional Information on April 29, 2010. The response tests are intended to provide confidence of proper operation through the simulation of a broken bag and observance of the reaction of the monitoring system. The baghouses are controlling particulate matter and lead emissions that have stringent emission limitations from the stacks along with low ambient air quantity standards, so it is significant that the baghouses retain a high level of efficiency in emission control and that malfunctions are minimized. In addition, EPA guidance from the *Office of Air Quality Planning and Standards (OAQPS) Fabric Filter Bag Leak Detection Guidance* (EPA-454/R-98-015) indicates that as part of normal quality assurance procedures that a response test should be performed monthly on the monitoring system.

However, based on the data provided by the manufacturer, the addition of an automatic self checking system should provide assurance of proper operation of the system on a regular basis and therefore reduce the need to perform an annual response test to validate its operation. Therefore, if the optional self checking system is installed on the leak detection systems, then an annual response test will not be required. If the self checking system is not present on the leak detection systems, then the requirement for an annual response test is believed to be a minimally acceptable practice to ensure proper operation, and will therefore remain in the *Baghouse SOP*. The frequency of response tests on units without the self checking systems may be re-evaluated and increased with the addition of new baghouses as part of the facility expansion or as a result of non-compliance issues. In addition, if the EPC has good reason to believe that a leak detection system is not performing properly even though it has a self checking system, it may require a response test to be performed to verify proper operation of the unit. The first bullet on page 10 of the *Baghouse SOP* was edited as follows:

FROM:

- Response Test: A response check will be performed at least annually in accordance with the manufacturer's procedure.

TO:

- Response Test: <u>If the detection system is not fitted with the automatic hourly self checking system as noted above, then</u> a response check will be performed at least annually in accordance with the manufacturer's procedure.

7. **COMMENT:** The facility requested that the excursion values stated in the SO2 CAM Plan be changed to 330 lb/hr on a daily average rather than 202 lb/hr on a 3-hour average. The facility stated that a review of the historical data shows that EFT frequently exceeds 202 lb/hr while still meeting the annual emission limit. The facility also noted that the averaging period for Indicator 2 in Table 1 of the CAM Plan was misstated as a 6-hour average rather than continuously updated.

RESPONSE: The use of 202 lb/hr was specified as an excursion value because it represents the average hourly emission rate of SO2 equivalent to the limit of 886 tons/yr assuming that the system was in operation for 8,760 hours/yr. Extended operation above this value, specifically at a value 63% higher (330 lb/hr), would appear to be an indicator of potential non-compliance with the annual limit. However, when evaluating against the annual limit, the hourly emission rates are short-term indicators that aren't able to account for offsets below the average hourly value due to extended furnace outage or changes in feed composition with lower SO2 emissions. Therefore, the reference to a lb/hr excursion value is being removed from the SO2 CAM plan. The excursion value for SO2 emissions will now be established as 55.4 lb/ton of lead produced <u>based on a 30-day average</u>. Evaluation of this parameter on a 30-day average should identify potential non-compliance with the annual SO2 emission limit and allow for adjustments in operation prior to exceedance of the annual limit. The averaging period for Indicator 2 was changed as requested to "continuously updated".

B. Letter (via e-mail) from Frank Burbach of ENVIRON International Corporation dated November 9, 2010 and received on November 9, 2010.

1. **COMMENT:** As a follow-up to Comment A.5 above, the material input to the furnace required in Specific Condition No. A.42 does not specify an averaging time period. Since the process for charging material into the blast furnace is a batch process, and Specific Condition No. A.5.B) references an "approximate" hourly material input rate, the records should indicate that the tons of charge per hours should be based on a daily average.

RESPONSE: Since the condition still requires documentation of charging each hour, and the maximum charge rate is identified as an approximate value, Specific Condition No. A.42 was changed as requested (as indicated in the response to Comment A.5 above).

C. Letter (via e-mail) from Angela Fogarty (EnviroFocus Technologies) dated December 22, 2010 and received on December 22, 2010.

1. **COMMENT:** The comment related to the proposed addition of an optional automatic hourly self checking system on the bag leak detection systems. The COMMENT and RESPONSE have already been addressed in Comment A.6 above.

Permit No. 0570057-018-AC authorized construction of an enclosure for the existing blast furnace area and an increase in the lead production limit from the blast furnace. Permit No. 0570057-021-AC revised Permit No. 0570057-018-AC to include the addition of a sodium bicarbonate (baking soda) dry injection scrubber system to control sulfur dioxide (SO_2) emissions from the blast furnace. The Revision permit incorporates the following plans which were revised to reflect changes authorized by the construction permits: *CAM Plan, Startup, Shutdown and Malfunction Plan, Baghouses Standard Operation and Maintenance Procedures*

Manual, and *SOP for the Control of Fugitive Emissions*. Most changes are simple updates adding the operation and description of the furnace enclosure system to the plans; however, one requirement in the *SOP for the Control of Fugitive Emissions* was changed to allow for weekly inspection of the sprinkler system rather than daily, so that plan has been attached to the construction permit to formally document the change. The construction permit also corrects the stack parameters for the Torit baghouse exhaust stack and amended. Based on updates to the State rules since the last Title V permit issuance, the Revision permit was also updated to include a revised Renewal Permit Application due date based on 225 days prior to expiration rather than 180 days, and the AOR due date has been restated as April 1st of each year rather than March 1st.

The new construction permit is to address an airflow discrepancy revealed during the initial Revision permit application review. Although Permit No. 0570057-021-AC identified an anticipated airflow of 65,000 acfm for the blast furnace enclosure (EU015) exhaust, higher airflows were recorded during stack testing. Therefore, since Permit No. 0570057-021-AC contained PM and Pb limits specifically to avoid PSD, lower PM and Pb grain loading limits have been established in order to maintain the annual emission limits to below the PSD threshold values from Permit No. 0570057-021-AC.

The project has been assigned NEDS Source Classification Code Nos. 3-04-004-03 (secondary metal lead – blast furnace) and 3-04-004-99 (secondary metal lead – miscellaneous). The Standard Industrial Code for the project is No. 3341. The project is located at 1901 N. 66th Street, Tampa. UTM Coordinates of the location are 17-364.0 East and 3093.5 North, Hillsborough County.

D. Process and Controls:

The facility recycles spent automotive and industrial lead-acid batteries to produce lead ingots. The batteries are shredded and then pass through a hammer mill. The crushed material is separated and the metallic lead and small amounts of plastic and rubber are all conveyed to the material charging storage area. The lead salts (muds) are slurried with soda ash, filtered, and then sent to the material charging storage area. This M.A. 41DS Battery Recycling System is designed to reduce the sulfur content of the furnace feedstock and resulting sulfur dioxide emissions from the furnace.

The lead-bearing materials are charged into a blast furnace via a mechanical skiphoist. Lead and slag are both tapped and collected at the base of the furnace. Lead is tapped to form buttons, which are sold or transported to the refining area. Carbon monoxide (CO) and volatile organic compounds (VOC) emissions from the blast furnace are controlled by the use of a 10 MMBtu/hr afterburner. Sulfur dioxide (SO_2) emissions from the blast furnace are controlled by a sodium bicarbonate dry injection scrubber system. Particulate matter (PM) and lead (Pb) emissions from the blast furnace are controlled by a ten compartment baghouse. PM and Pb emissions from the blast furnace charging, tapping, and skiphoist loading are captured by hoods or enclosures and vented to a three compartment “hygiene” baghouse.

The blast furnace enclosure covers approximately 10,000 ft^2 and surrounds the blast furnace area with permanent walls and a roof. An overhead "speed door" is used between the blast furnace area and the refining area to allow for easier movement of equipment back and forth. A series of manual doors are also present for equipment movement and employee access into and out of the blast furnace area, along with a hinged door for occasional access to the blast furnace for crucible removal and other maintenance activities. These doors will typically remain closed. There is also a permanent opening between the blast furnace area and the material charging storage room to allow for frequent traffic between the rooms. A "horseshoe" type hood is located around the perimeter of the opening and approximately 32,500 acfm is drawn to create a null air flow within the opening. This was done to prevent migration of fugitive emissions back and forth between the enclosures.

The blast furnace enclosure is maintained under a negative pressure and vented through a Torit Downflo Oval Cartridge dust collector (Model #DFO 4-96). The dust collector has 96 filter cartridges, total filter media area of 18,420 ft^2, and an air:cloth ratio of 3.5:1, and is cleaned using pulsed-jet. The final exhaust is out a 130' stack. The rating on the Torit fan is 65,000 acfm; however, due to a lower than anticipated static pressure in the blast furnace enclosure control system, the actual maximum airflow through the Torit exhaust stack is estimated at 95,000 acfm. The enclosure includes the operation of the "hygiene" baghouse, so additional airflow is being drawn from the enclosure and vented to the hygiene baghouse.

The air drawn to the new Torit dust collector comes from two distinct ducts. One 40" duct transports air collected from the previously mentioned horseshoe vent. The second extraction point is from the top of a new inner shroud, similar to a chimney, that extends down from the roof to a height of approximately 15' above the floor and immediately around the blast furnace. Air is drawn from the building interior into the bottom of the shroud and pulled upward toward a 40" duct. This design aids in removal of the majority of heat released from the blast furnace. The two 40" ducts combine into a single 56" duct before entering the Torit dust collector.

This construction permit (Permit No. 0570057-024-AC) is being issued concurrently with the Revision permit to address an airflow discrepancy revealed during the initial Revision permit application review. Permit No. 0570057-021-AC identified an anticipated airflow of 65,000 acfm for the blast furnace enclosure (EU015) exhaust, with corresponding emission limits of 0.004 gr/dscf and 9.8 tons/yr for particulate matter (PM) and 0.000085 gr/dscf and 0.21 tons/yr for lead (Pb). However, as stated previously, stack tests performed on the Torit exhaust revealed higher than expected airflows, presumably due to lower than expected static pressure from the Torit control system. Therefore, based on the results of the testing, the airflow is now specified at the highest recorded value of 95,000 acfm.

Since Permit No. 0570057-021-AC contained PM and Pb limits specifically to avoid PSD, the applicant requested lower PM and Pb grain loading limits in order to maintain the annual emission limits to below the PSD threshold from the original construction permit. Based on the stack tests results, PM and Pb emissions are being based on 94,000 dscfm. Therefore, the revised emission limits specified in this construction permit are 0.003 gr/dscf and 10.6 tons/yr

for particulate matter (PM) and 0.00006 gr/dscf and 0.21 tons/yr for lead (Pb). Since initial testing has already been performed, only annual testing is being required hereafter.

The new enclosure and blast furnace (including tapping and charging) are subject to PM and Pb RACT, NSPS requirements of 40 CFR 60 – Subpart L, and the MACT requirements of Subpart X of the NESHAP for Pb and VOC (blast furnace only). The limits requested by the applicant are typically stricter than the limits specified by the applicable regulations.

E. Application Information:

Received on: June 15, 2010
Information Requested: n/a
Application Complete: June 15, 2010

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., since the project is below the significant emission increase levels for PM/PM10 and Pb.

This project is subject to the requirements of Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C., since it is a source of air pollution requiring a permit under this rule.

This project is subject to the requirements of Rule 62-213, Operation Permits for Major Sources of Air Pollution, F.A.C., since the facility is a Title V Source by state definition.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the project is a potential source of PM, Pb, visible emissions and odors.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.417, Specific Emission Limiting and Performance Standards, F.A.C., since there is no applicable source specific category in this rule.

This project is not subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology for VOC and NOX Emitting Facilities, F.A.C., since there is no applicable source specific category in this rule.

This project is subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology - Lead, F.A.C., since the source falls under Secondary Lead Smelting Operations (Rule 62-296.603, F.A.C.).

This project is subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology Particulate Matter, F.A.C., since the source falls under Miscellaneous Manufacturing Process Operations (Rule 62-296.712, F.A.C.).

This project is subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since the facility is subject to the requirements in 40 CFR 60, Subpart L (Standards of Performance for Secondary Lead Smelters) and 40 CFR 63, Subpart X (National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting).

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

III. Summary of Emissions

EU015 – Blast Furnace Enclosure
(including previously unconfined emissions from blast furnace)

Regulated Pollutants	Current Actual Emissions ton/yr	Future Actual Emissions (PTE) ton/yr	Allowable Emissions
PM	2.5	10.6	0.003 gr/dscf
Pb	0.01	0.21	0.00006 gr/dscf
Opacity	N/A	N/A	3%

The emission unit is subject to PM-RACT, Pb-RACT, 40 CFR 60 – Subpart L, and 40 CFR 63 – Subpart X. Since Permit No. 0570057-018-AC contained PM and Pb limits specifically to avoid PSD, lower PM and Pb grain loading limits have been established in order to maintain the annual emission limits to below the PSD threshold values from Permit No. 0570057-018-AC. The current actual emissions were estimated based on the average of emissions from 2008 & 2009 AOR data.

In order to limit their PTE and avoid PSD from the original project (Permit No. 0570057-018-AC), the facility elected to accept more stringent emission limits than required by the applicable regulations for all of the pollutants listed. These PSD-avoidance allowable emissions will be specified in the permit. PM and Pb emissions were based on air flow ratings of 94,000 dscfm for the new enclosure dust collector.

Inventory of Title III pollutants is estimated to be less than 10 TPY individually and less than 25 TPY collectively.

IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit to operate the aforementioned air pollution source in

accordance with the REVISED draft permits and its conditions as stipulated (see attached).

In the Matter of an
Application for Permits by:

File No.: 0570057-024-AC/0570057-022-AV
County: Hillsborough

Mr. John Tapper
Chief Operating Officer
EnviroFocus Technologies, LLC
1901 N. 66th Street
Tampa, FL 33619
_____/

INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue an Air Construction Permit and a Title V Air Operation Permit Revision (copy of REVISED DRAFT Permits attached) for the Title V source detailed in the application specified above, for the reasons stated below.

The applicant, EnviroFocus Technologies, LLC, applied on September 25, 2009 to the permitting authority for a Title V Air Operation Permit Revision for their secondary lead (battery recycling) smelting facility located at 1901 N. 66th Street, Tampa, Hillsborough County. The applicant also applied on June 15, 2010 to the permitting authority for an Air Construction Permit at the same location.

The construction permit is for the reduction of particulate matter (PM) and lead (Pb) emission limits for the blast furnace enclosure (EU015). PM and Pb emissions from the blast furnace enclosure are controlled by a Torit Downflo Oval Cartridge dust collector. Following construction of the enclosure, stack testing revealed higher than expected airflows from the Torit exhaust; therefore, lower PM and Pb grain loading limits have been established based on 94,000 dscfm in order to avoid the applicability of Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration. These permits are being issued concurrently since the changes for the blast furnace enclosure authorized by Permit No. 0570057-024-AC involve no new construction and the permittee demonstrated compliance the new emission limits through compliance testing. Permit No. 0570057-022-AV incorporates Permit Nos. 0570057-024-AC and 0570057-021-AC, which authorized construction of the enclosure and an increase in the lead production limit from the blast furnace.

The permitting authority has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-

213. This source is not exempt from Title V permitting procedures. The permitting authority has determined that an Air Construction Permit and a Title V Air Operation Permit Revision is required to commence or continue operations at the described facility.

The permitting authority intends to issue the Air Construction Permit and the Title V Air Operation Permit Revision based on the belief that reasonable assurances have been provided to indicate that operation of the source will not adversely impact air quality, and the source will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, and 62-297, F.A.C.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION." The notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the permitting authority at the address or telephone number listed below. **The applicant shall provide proof of publication to the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Drive, Tampa, FL 33619 (Telephone: 813/627-2600; Fax: 813/627-2660), within 7 (seven) days of publication pursuant to Rule 62-110.106(5), F.A.C.** Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

The permitting authority will issue the Air Construction Permit and the PROPOSED Operating Permit, and subsequent FINAL Operating Permit, in accordance with the conditions of the attached REVISED DRAFT Title V Air Operation Permit Revision unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this REVISED DRAFT Air Construction Permit, the permitting authority shall issue another REVISED DRAFT Construction Permit and require, if applicable, another Public Notice.

The permitting authority will accept written comments concerning the proposed Title V Air Operation Permit Revision issuance action for a period of 30 (thirty) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this REVISED DRAFT Permit, the permitting authority shall issue another REVISED DRAFT Permit and require, if applicable, another Public Notice.

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, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2660. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the 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, F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(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 and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
(c) A statement of how and when the petitioner received notice of the EPC action;
(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 EPC's proposed action;
(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules and statutes; and
(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the

proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000. The petition must specify the following information:

(a) The name, address, and telephone number of the petitioner,
(b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any,
(c) Each rule or portion of a rule from which a variance or waiver is requested,
(d) The citation to the statute underlying (implemented by) the rule identified in (c) above,
(e) The type of action requested,
(f) The specific facts that would justify a variance or waiver for the petitioner,
(g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule), and
(h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of the those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statues, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, 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.

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

_____

Richard D. Garrity, Ph.D.
Executive Director

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION (including the combined PUBLIC NOTICE and the REVISED DRAFT Permit package) and all copies were hand-delivered or sent by certified mail or electronically (with Read Receipt) before the close of business on _____ to the person(s) listed:

Mr. John Tapper / EnviroFocus Technologies, LLC

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION (including the combined PUBLIC NOTICE and the REVISED DRAFT Permit package) were sent by U.S. mail or electronically (with Read Receipt) on the same date to the person(s) listed or as otherwise noted:

Russell S. Kemp, P.E., ENVIRON International Corp.

In addition, the undersigned duly designated deputy agency clerk hereby certifies that copies of this INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION (including the REVISED DRAFT Permit package) were sent by U.S. mail or electronically (with Read Receipt) on the same date to the person(s) listed:

Barbara Friday, BAR [barbara.friday@dep.state.fl.us] (for posting with Region 4 , U.S. EPA)
Katy Forney, U.S. EPA, Region 4 (e-mail)
Ana Oquendo, U.S. EPA, Region 4 (e-mail)

Clerk Stamp

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION

Environmental Protection Commission of Hillsborough County

REVISED DRAFT Air Construction Permit No.: 0570057-024-AC
REVISED DRAFT Permit Revision Project No.: 0570057-022-AV
EnviroFocus Technologies, LLC
Hillsborough County

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue an Air Construction Permit and a Title V Air Operation Permit Revision to EnviroFocus Technologies, LLC for a modification of the Tampa Plant located at 1901 N. 66th Street, Tampa, Hillsborough County, 33619. The construction permit is for the reduction of particulate matter and lead emission limits for the blast furnace enclosure (EU015). Emissions from the blast furnace enclosure are controlled by a Torit Downflo Oval Cartridge dust collector. Permit No. 0570057-022-AV incorporates Permit Nos. 0570057-024-AC and 0570057-021-AC, which authorized construction of the enclosure and an increase in the lead production limit from the blast furnace.

A Best Available Control Technology (BACT) determination was not required.

The permitting authority will issue the Final Air Construction Permit and the PROPOSED Title V Air Operation Permit Revision and subsequent FINAL Title V Air Operation Permit Revision, in accordance with the conditions of the REVISED DRAFT Permits unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The permitting authority will accept written comments concerning the proposed Air Construction Permit issuance action for a period of 14 (fourteen) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION." Written comments should be provided to the permitting authority office. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this REVISED DRAFT Air Construction Permit, the permitting authority shall issue another REVISED DRAFT Construction Permit and require, if applicable, another Public Notice.

The Permitting Authority will accept written comments concerning the REVISED DRAFT Permit for a period of thirty (30) days from the date of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT AND A TITLE V AIR OPERATION PERMIT REVISION." Written comments must be post-marked and all facsimile comments must be received by the close of business (5:00 pm), on or before the end of this 30-day period, by the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Drive, Tampa, FL 33619 (Telephone: 813/627-2600; Fax: 813/627-2660). As part of his

or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location on the Department's official web site for notices at http://tlhora6.dep.state.fl.us/onw and in a newspaper of general circulation in the area affected by the permitting action. For additional information, contact the Permitting Authority at the above address or phone number. If written comments or comments received at a public meeting result in a significant change to the REVISED DRAFT Permit, the Permitting Authority shall issue another REVISED DRAFT Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

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, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the 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 F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

(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, and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
(c) A statement of how and when petitioner received notice of the EPC action;
(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 EPC proposed action;
(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged

facts relate to the specific rules and statutes; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any Title V permit. Any petition shall be based only on objections to the Title V permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any Title V permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

<u>Permitting Authority:</u>
Environmental Protection Commission of Hillsborough County
3629 Queen Palm Drive
Tampa, Florida 33619
Telephone: 813/627-2600
Fax: 813/627-2660

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Dr., Tampa, Florida 33619. The complete project file includes the Draft Air Construction Permit, the application for revision,

and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E., at the above address, or call 813-627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the proposed permits and require, if applicable, another Public Notice.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Mr. John Tapper
Chief Operating Officer
EnviroFocus Technologies, LLC
1901 N. 66th Street
Tampa, FL 33619

Dear Mr. Tapper: Re: Hillsborough County - AP

Enclosed is Permit Number No. 0570057-024-AC for the reduction of particulate matter and lead emission limits for the blast furnace enclosure (EU015) at the secondary lead (battery recycling) smelting facility, issued pursuant to Section 403.087, Florida Statutes. This permit is being issued concurrently with Title V Revision Permit No. 0570057-022-AV.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, FL 33619; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

cc: FDEP, Southwest District (e-mail)
Russell S. Kemp, P.E., ENVIRON International Corp.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

Clerk Stamp
FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

PERMITTEE:	PERMIT/CERTIFICATION
EnviroFocus Technologies, LLC	Permit No.: 0570057-024-AC
1901 N. 66th Street	County: Hillsborough
Tampa, FL 33619	Expiration Date: September 13, 2011
	Project: Furnace Enclosure Emissions Revision

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. 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 EPC and made a part hereof and specifically described as follows:

This construction permit is for the reduction of particulate matter (PM) and lead (Pb) emission limits for the blast furnace enclosure (EU015), and to more accurately reflect the airflow rate from the enclosure exhaust system.

The facility recycles spent automotive and industrial lead-acid batteries to produce lead ingots. The batteries are shredded and then pass through a hammer mill. The crushed material is separated and the metallic lead and small amounts of plastic and rubber are all conveyed to the material charging storage area. The lead salts (muds) are slurried with soda ash, filtered, and then sent to the material charging storage area. This M.A. 41DS Battery Recycling System is designed to reduce the sulfur content of the furnace feedstock and resulting sulfur dioxide emissions from the furnace.

The lead-bearing materials are charged into a blast furnace via a mechanical skiphoist. Lead and slag are both tapped and collected at the base of the furnace. Lead is tapped to form buttons, which are sold or transported to the refining area. Carbon monoxide (CO) and volatile organic compounds (VOC) emissions from the blast furnace are controlled by the use of a 10 MMBtu/hr afterburner. Sulfur dioxide (SO_2) emissions from the blast furnace are controlled by a sodium bicarbonate dry injection scrubber system. Particulate matter (PM) and lead (Pb) emissions from the blast furnace are controlled by a ten compartment baghouse. PM and Pb emissions from the blast furnace charging, tapping, and skiphoist loading are captured by hoods or enclosures and vented to a three compartment “hygiene” baghouse.

The blast furnace enclosure covers approximately 10,000 ft^2 and surrounds the blast furnace area with permanent walls and a roof. An overhead “speed door” is used between the blast furnace area and the refining area to allow for easier movement of equipment back and forth. A series of

manual doors are also present for equipment movement and employee access into and out of the blast furnace area, along with a hinged door for occasional access to the blast furnace for crucible removal and other maintenance activities. These doors will typically remain closed. There is also a permanent opening between the blast furnace area and the material charging storage room to allow for frequent traffic between the rooms. A "horseshoe" type hood is located around the perimeter of the opening and approximately 32,500 acfm is drawn to create a null air flow within the opening. This was done to prevent migration of fugitive emissions back and forth between the enclosures.

The blast furnace enclosure is maintained under a negative pressure and vented through a Torit Downflo Oval Cartridge dust collector (Model #DFO 4-96). The dust collector has an air:cloth ratio of 3.5:1 and is cleaned using pulsed-jet. The final exhaust is out an 130' stack. The rating on the Torit fan is 65,000 acfm; however, due to a lower than anticipated static pressure in the blast furnace enclosure control system, the actual maximum airflow through the Torit exhaust stack is estimated at 95,000 acfm based on stack test results. The enclosure includes the operation of the "hygiene" baghouse, so additional airflow is being drawn from the enclosure and vented to the hygiene baghouse.

The air drawn to the new Torit dust collector comes from two distinct ducts. One 40" duct transports air collected from the previously mentioned horseshoe vent. The second extraction point is from the top of a new inner shroud, similar to a chimney, that extends down from the roof to a height of approximately 15' above the floor and immediately around the blast furnace. Air is drawn from the building interior into the bottom of the shroud and pulled upward toward a 40" duct. This design aids in removal of the majority of heat released from the blast furnace. The two 40" ducts combine into a single 56" duct before entering the Torit dust collector.

More stringent emission limits for PM and Pb were requested to compensate for higher than expected airflows from the enclosure exhaust system that were recorded during compliance testing, and therefore to avoid PSD applicability as evaluated from the initial construction permit for the blast furnace enclosure (Permit No. 0570057-018-AC). Based on the stack tests results, PM and Pb emissions are being based on 94,000 dscfm. Therefore, in order to maintain the annual emission limits to below the PSD threshold from the original construction permit, the revised emission limits specified in this construction permit are 0.003 gr/dscf and 10.6 tons/yr for PM and 0.00006 gr/dscf and 0.21 tons/yr for Pb.

The new enclosure and blast furnace (including tapping and charging) are subject to PM and Pb RACT, NSPS requirements of 40 CFR 60 – Subpart L, and the MACT requirements of Subpart X of the NESHAP for Pb and VOC (blast furnace only). The limits requested by the applicant are typically stricter than the limits specified by the applicable regulations. Since initial testing has already been performed, only annual testing is being referenced in this permit.

Location: 1901 N. 66th Street, Tampa

UTM: 17-364.0E 3093.5N FACILITY ID NO: 0570057

EU ID No.: 015 – Blast Furnace Enclosure

Replaces Permit Nos.: N/A

References Permit Nos.: 0570057-016-AV
0570057-018-AC
0570057-021-AC

Facility-wide Conditions:

Subsection A

A.1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

A.2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

A.3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

A.4. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

A.5. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable requirement or permit condition is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. For the purpose of confirming compliance with the emission limitations in this permit, the EPC may require the use of EPA Method 9, EPA Method 24, or other approved methods, as deemed necessary.
[Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

A.6. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment* or major component of such equipment.
B) Installation or addition of any equipment* which is a source of air pollution.

*Not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit.

A.7. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

A.8. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited.
[Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.]

A.9. No owner or operator of a lead processing operation shall cause, allow, or permit the emissions of lead or particulate matter (PM), including emissions of lead or PM from vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, charging, melting, tapping, casting, storing or handling, unless reasonably available control technology and maximum available control technology are employed to control such lead emissions.
[Rules 62-296.601(2), 62-296.320(4)(c)2. and 62-4.070(3), F.A.C.]

A.10. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the EPC which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan. [40 CFR 63.6(e)(1)(i) and (ii), 40 CFR 60.11(d), and Rule 62-4.070(3), F.A.C]

A.11. Submit to the Environmental Protection Commission of Hillsborough County completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. The annual operating report, shall be submitted each year by April 1. [Rule 62-210.370(3)(c)., F.A.C.]

A.12. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

A.13. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

A.14. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

Specific Conditions:

Subsection B

EU No. 015 – Blast Furnace Enclosure

B.1. [Reserved.]

B.2. The blast furnace enclosure ventilation system shall be in operation at all times during any blast furnace operation, and its hours of operation operations are unlimited (i.e. 8760 hrs/yr). [Rule 62-4.070(3), F.A.C.]

B.3. The permittee shall not discharge lead emissions to exceed the following:

A) In order to exempt the facility from PSD, the discharge from the blast furnace enclosure must not exceed the following limits: [Construction Permit Application received June 15, 2010; and Rules 62-4.070(3) and 62-212.400, F.A.C.]

	Emission Limit (gr/dscf)	Tons per 12 months
Blast Furnace Enclosure Stack	0.00006	0.21

B) 2.0 mg/dscm (0.00087 gr/dscf) for the discharge from the blast furnace enclosure. [40 CFR 63.543(a); and Rule 62-204.800 F.A.C.]

B.4. The permittee shall not discharge particulate matter emissions to exceed the following:

A) In order to exempt the facility from PSD, the discharge from the blast furnace enclosure must not exceed the following limits: [Construction Permit Application received June 15, 2010; and Rules 62-4.070(3) and 62-212.400, F.A.C.]

	Emission Limit (gr/dscf)	Tons per 12 months
Blast Furnace Enclosure Stack	0.003	10.6

B) 50 mg/dscm (0.022 gr/dscf) for the discharge from the blast furnace enclosure. [40 CFR 60.122(a) and Rule 62-296.800 F.A.C.]
C) 0.03 gr/dscf for the discharge from the blast furnace enclosure. [Rule 62-296.700, F.A.C.]

B.5. The permittee shall not discharge visible emissions in excess of the following:
[Rules 62-296.603 and 62-296.712, F.A.C.; and 40 CFR 60.122(a)(2)]

A) 3% from any opening of the blast furnace enclosure or the exit from the blast furnace enclosure baghouse.

B.6. The blast furnace, including the tapping and charging operations, shall be located in a total enclosure subject to general ventilation that maintains the building at a lower than ambient pressure to ensure in-draft through any doorway opening, excluding the passageway between the enclosure and containment room. All such exhaust shall be directed to control equipment that shall not discharge lead in excess of the limitations in Specific Condition No. B.3.A).
[40 CFR 63.544]

Testing Methods and Procedures

B.7. The permittee shall test the emissions from the blast furnace enclosure (EU015) for the following pollutants/parameters annually during each federal fiscal year (October 1 – September 30). The permittee shall submit 2 copies to the Air Compliance Section of the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. Testing procedures shall be consistent with the requirements of the 40 CFR 63 and Rule 62-297, F.A.C. The permittee shall also submit a complete notification of the compliance status along with the test report in accordance with 40 CFR 63.9(h).[Rule 62-297.310(7)(a)4. and 62-4.070(3), F.A.C.]

(X) Pb (Baghouse Exhaust)
(X) PM (Baghouse Exhaust)
(X) Opacity (Baghouse Exhaust and Enclosure Doorway Openings)
(X) Face Velocity (Enclosure Doorway Openings)

B.8. Compliance with the emission limitations of Specific Condition Nos. B.3, B.4, B.5, and B.6. shall be demonstrated using the EPA test methods 1, 2, 3, 3B, 4, 5, 9 and 12 contained in the 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The requirements of 40 CFR 63.547 also must be met. The minimum requirements for stack sampling facilities source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C., 40 CFR 60, Appendix A and 40 CFR 63. In the case of the EPA Method 9 test, all readings shall be at least 30 minutes in duration.
[Rule 62-297, F.A.C.; 40 CFR 60.123; and 40 CFR 63.547]

B.9. Compliance with the doorway in-draft requirement on the *Blast Furnace Enclosure* shall be determined using either of the following two procedures:
[Rule 62-4.070(3), F.A.C., and 40 CFR 63.547]

1. (i) The permittee shall use a propeller anemometer or equivalent device meeting the requirements of 40 CFR 63.547(d)(2)(ii) through (d)(2)(iv).

(ii) Doorway in-draft shall be determined by placing the anemometer in the plane of the doorway opening near its center.

(iii) Doorway in-draft shall be demonstrated for each doorway that is open during normal operation, excluding the passageway between the enclosure and containment room, with all remaining doorways in the position they are in during normal operation.

2. (i) The permittee shall install a differential pressure gage on the leeward wall of the building to measure the pressure difference between the inside and outside of the building.

(ii) The pressure gage shall be certified by the manufacturer to be capable of measuring pressure differential in the range of 0.02 to 0.2 mm Hg.

(iii) Both the inside and outside taps shall be shielded to reduce the effects of wind.

(iv) The permittee shall demonstrate the inside of the building is maintained at a negative pressure as compared to the outside of the building of no less than 0.02 mm Hg when all doors are in the position they are in during normal operation.

B.10. The permittee shall provide at least the minimum requirements for stack sampling facilities as specified in 40 CFR 60.8(e)(1), (2), (3) and (4), 40 CFR 63.7, and Rule 62-297, F.A.C. Sources sampling platforms, platform access, and other associated work areas, whether permanent or temporary, shall be in accordance with Occupational Safety and Health Administration standards per 29 CFR 1910, Subparts D and E.

B.11. Testing of the blast furnace enclosure shall occur with the blast furnace in normal operation along with typical movement of the enclosure openings for plant activities. To help simulate the maximum generation of PM and Pb emissions, including re-entrained fugitives from the blast furnace area floor, movement of plant machinery (i.e. forklifts, etc.) in the blast furnace area shall continue during the tests. Movement of plant equipment, specifically from the containment room into the blast furnace enclosure, shall continue at a frequency reflecting, at a minimum, normal movement around the blast furnace area. Failure to submit the control equipment parameters, such as pressure drops, and actual operating conditions may invalidate the tests.
[Rules 62-297 and 62-4.070, F.A.C.]

B.12. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 60 days prior to the date on which a formal compliance test is to begin of the date, time and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. Along with the notification, the permittee shall submit a <u>site-specific test plan</u> to include a test program summary, the schedule, data quality objectives, and both the internal and the external quality assurance program. [40 CFR 63.7 and 63.9]

B.13. Records of each performance test required by the permit shall be retained by the permittee for a minimum of 5 years and made available upon request. [40 CFR 63.7]

B.14. Visible emission tests shall be performed using EPA Method 9 and shall be thirty (30) minutes in duration pursuant to Rule 62-297.310 F.A.C. The visible emission tests must be conducted in accordance with the following requirements:
[Rules 62-296.600, 62-296.712 and 62-297, F.A.C.; and 40 CFR 60.123]

A) The visible emission tests on the *Blast Furnace Enclosure* shall be performed consistent with the testing requirements of Specific Condition No. B.11. Visible emission tests shall be conducted on the enclosure baghouse exhaust and all enclosure doorway openings typically or routinely open during normal operation. Observations shall be made at the highest point of opacity observed from the enclosure operation.

Monitoring and Record Keeping

B.15. The blast furnace enclosure and its control system shall be operated in accordance with the latest versions of the Operation and Maintenance Plan (*Baghouses Standard Operation and Maintenance Procedures Manual*), the *Startup, Shutdown and Malfunction Plan*, and the *SOP for the Control of Fugitive Emissions*. As documented in the latest version of the *SOP for the Control of Fugitive Emissions*, weekly inspection of the sprinkler system are now required rather than daily. [Rules 62-4.070(3), 296.600, and 296.700, F.A.C.; and 40 CFR 63.548]

B.16. Excess emissions resulting from the start-up, shutdown or malfunction of any emissions unit shall be permitted provided best operational practices to minimize emissions are adhered to, and the duration of the excess emissions shall be minimized but in no case exceed two hours in any 24 hours period unless specifically authorized by the Department for longer duration.
[Rules 62-210.700, and 62-4.070(3), F.A.C.]

B.17. For particulate matter and lead control, best operational practices shall mean the emission unit can continue for up to two hours following the alarm being triggered for a broken bag. After 2 hours, the cell where the broken bag is located shall be sealed off, or the bag must have been replaced in order to continue operation of that particular emission unit. The procedures used to determine the cause of the alarm must be initiated within 30 minutes of the alarm.
[Rule 62-210.700, F.A.C. and 40 CFR 63.548(f)(1)]

B.18. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

B.19. If an excess emission occurs, the permittee shall file a report semiannually covering the periods January to June and July to December within 30 days of the period. The report shall be consistent with the requirements of 40 CFR 63.10(d)(5)(i). If the action taken is not consistent with the permittee's startup, shutdown, and malfunction plan, the more immediate reporting

requirements of 40 CFR 63.10(d)(5)(ii) shall apply (i.e. reporting is required within 2 working days). [40 CFR 63.10(d)(5)]

B.20. The permittee shall maintain and calibrate a device which continuously measures and records the pressure drop across each baghouse compartment controlling the emission unit covered under this permit. [Rule 62-4.070(3), F.A.C.]

B.21. The permittee shall keep the following records to ensure compliance with Specific Condition Nos. B.1 and B.2:
[Rule 62-4.070(3), F.A.C.]

A) Monthly hours of operation for the blast furnace.

B.22. All record keeping required by this permit shall be maintained for at least five years by the permittee and made available to the EPC upon request.
[40 CFR 63 Subpart X]

B.23. In order to demonstrate compliance with Specific Condition Nos. B.5. and B.6., the permittee shall conduct a daily instantaneous visible emissions check on the emissions unit, and maintain records for at least 5 years. [Rule 62-4.070(3), F.A.C.]

B.24. The permittee shall maintain continuous operation of bag leak detection systems on the blast furnace enclosure baghouse in conjunction with 40 CFR 63.548. [Rule 62-4.070(3), F.A.C. and 40 CFR 63.548]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.
Executive Director

-- ATTACH TITLE V PERMIT NO. 0570057-022-AV HERE --