EnviroFocus Technologies, LLC

Facility ID No. 0570057
Hillsborough County

Title V Air Operation Permit Renewal

Permit No. 0570057-025-AV
(Renewal of Title V Air Operation Permit No. 0570057-022-AV)

Permitting and Compliance Authority:

Environmental Protection Commission
of Hillsborough County
Air Management Division

3629 Queen Palm Drive
Tampa, Florida 33619
Telephone: (813) 627-2600
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Permit No. 0570057-025-AV

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PERMITTEE:
EnviroFocus Technologies, LLC
6505 Jewel Avenue
Tampa, Florida 33619

Permit No. 0570057-025-AV
EnviroFocus Technologies
Facility ID No. 0570057
Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V air operation permit for the above referenced facility. The existing facility is located in Hillsborough County at 1901 N 66th Street, Tampa, Florida. UTM Coordinates are: Zone 17, 364.00 East and 3093.50 North. Latitude is: 27° 57' 43.0'' North; and, Longitude is: 82° 22' 49.0'' West.

The Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: [TBD]
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. DATE + 5 years, 20xx

(Draft/Proposed)

_____

Richard D. Garrity, Ph.D.
Executive Director

RDG/SRH/srh

Subsection A. Facility Description.

EnviroFocus Technologies recycles spent automotive and industrial lead-acid batteries as well as lead scrap to produce lead ingots. Batteries arrive at the facility by truck and are off-loaded directly to the battery process area. The batteries first go through a shredder where most of the acid is drained. They then pass through a hammer mill that serves as the primary crusher. The crushed material then passes through counter current flotation and separation equipment that separates the metallic lead, plastic, rubber, and lead salts (or muds). The metallic lead and small amounts of plastic and rubber are all conveyed to the material charging storage area. The muds are slurried with soda ash to form lead carbonate and sodium sulfate that are separated in a filter process. The press cake is also sent to the material charging storage area. The M.A. 41DS Battery Recycling System is designed to reduce the sulfur content of the blast furnace feed stock and resulting sulfur dioxide (SO_2) emissions from the furnace.

Lead-bearing materials from the processed batteries are stored in piles in a partially enclosed structure. Lead-bearing materials for the blast furnace charge are taken from the older piles, and a single 36" x 72" oval Blast Furnace is used for producing molten lead from the various materials charged into the blast furnace. The blast furnace charge is approximately composed of 85% lead-bearing materials, 8-12% coke, 2.5% limerock, and 2.5% cast iron. Lead-bearing materials may include, but are not limited to, CRTs, re-run slag, and indigenous materials such as respirators, baghouse dust, and treatment plant sludge. Material is charged via a mechanical skip hoist with automatically opened charge doors at the top of the furnace. Blast furnace operations are limited by the amount of blast lead produced annually.

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. Refined lead includes soft lead, hard lead, and calcium lead. Refining is accomplished in four 78 ton Refining Kettles, all indirectly fired with natural gas. Sodium nitrate and other chemicals are added to the refining process to aid in the removal of antimony, tin, and zinc from the lead. After the lead refining process is completed, the refined lead is cast into ingots by a pigging machine. The dross removed during the refining process is either returned to the blast furnace or sold. Facility personnel may purchase blast lead from other facilities to be processed in the refining operation and the blast lead produced on site may be sold without further processing.

Carbon monoxide (CO) and volatile organic compounds (VOC) emissions from the blast furnace are controlled by the use of a 10 MMBtu/hr afterburner. SO_2 emissions from the blast furnace are controlled by a sodium bicarbonate ($NaHCO_3$) dry scrubber system. The scrubber injection system utilizes a 25 HP 300 ACFM Tutill Model 4009-46L3-A1066 blower to pneumatically convey the dry sodium bicarbonate from a hopper system into the cooling loops upstream of the baghouse based upon readings from the SO_2 CEM. The dry sodium bicarbonate is delivered in supersacks, and manually fed into the hopper inside the Blast Furnace Building. Particulate Matter emissions from the hopper loading are controlled by the Torit dust collector, which controls the Blast Furnace Building Enclosure (see below).

Particulate matter (PM) and lead (Pb) emissions directly from the blast furnace are controlled by enclosures and a 34,000 acfm ten compartment baghouse fabricated by Gulf Coast Recycling, Inc., which was modeled after a Wheelabrator-Frye Dustube Model 126, Series 55 baghouse. PM and Pb emissions from the blast furnace charging, tapping, and skiphoist loading are captured by hoods or enclosures and vented to an approximately 20,000 ACFM, three compartment baghouse (aka "hygiene" baghouse) similar in design to the previously mentioned baghouse.

A blast furnace enclosure is also present around the blast furnace area to help control unconfined PM and Pb emissions from the blast furnace. The blast furnace enclosure covers approximately 10,000 ft^2 and surrounds the blast furnace area with permanent walls and a roof. Several automated and manual doors are present around the enclosure to provide access to the refining area or outdoors, or to be used for maintenance activities. These doors 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 into which air is drawn to create a null air flow within the opening in order 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 air drawn to the Torit dust collector comes from one duct drawing from the previously mentioned horseshoe vent, and a second duct located at the top of an 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 to the duct. 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 based on stack test results.

Particulate matter and lead emissions from the refining kettles are controlled by enclosures and a three-compartment 28,000 acfm baghouse equipped with a bag leak detection system along with continuous monitoring and recording of the pressure drop across each baghouse compartment. Fugitive emissions of particulate matter and lead from process and grounds are controlled through the use of water spray, reasonable precautions, and specific work practices. Note that all flow rates listed herein are estimates. The flow rates, along with the affected allowable emissions, were amended for the blast furnace and refining kettle baghouses as part of the last permit renewal following a review of the history of flow rates recorded during the annual compliance tests.

The facility is 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. EPC staff has determined that the monitoring and recordkeeping requirements of these regulations meet the requirements of periodic monitoring. The blast furnace is also subject to SO_2 and CO limits and the permittee is required to perform annual testing, maintain a SO_2 CEM, and maintain recordkeeping. Additionally, annual opacity testing, as well as daily Method 22 observations, are required to meet the requirements of periodic monitoring. The blast furnace is subject to CAM for CO and SO_2. The monitoring requirements from the MACT (Pb, VOC) and Pb RACT already satisfy the requirements of CAM for these pollutants. The facility shall comply with the requirements of the most recently approved CAM Plan (attached).

The facility also has a Caterpillar 1,500 HP emergency diesel generator manufactured in 2010 which supplies power to the facility in the event of a power outage. This generator is subject to 40 CFR 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. However, the facility must comply with 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart IIII. This engine is being included in Appendix ICE as a regulated emission unit (EU 027) and has been certified to meet the emissions standards for non-road diesel engines.

Subsection B. Summary of Emissions Units.

EU No.	Brief Description
Regulated Emissions Units	
001	Blast Furnace Exhaust
004	Furnace Tapping and Charging
008	Soda Ash Silo
009	Facility Grounds and Miscellaneous Operations
011	Four Refining Kettles
013	Refining Kettle Exhaust Stacks
015	Blast Furnace Enclosure
027	1500 HP Emergency Generator RICE

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received August 4, 2011, this facility is not a major source of hazardous air pollutants (HAP). Because this facility operates stationary reciprocating internal combustion engines, it is subject to regulation under 40 CFR 63, Subpart ZZZZ - National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. The existing facility is a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
40 CFR 60, Subpart A, NSPS General Provisions	001, 004, 015, 027
40 CFR 60, Subpart L	001, 004, 015
40 CFR 60, Subpart IIII	027
40 CFR 63, Subpart X	001, 004, 009, 011, 013, 015
40 CFR 63, Subpart ZZZZ	027
Rule 62-296.600, 601, and 603, F.A.C. – Pb RACT	001, 004, 009, 011, 013, 015
Rule 62-296.700 and 712, F.A.C. – PM RACT	001, 004, 009, 011, 015
Rule 62-296.320(2), F.A.C. – Objectionable Odor	Facility-wide

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally Enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter, including emissions of lead, from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, charging, melting, tapping, casting, storing or handling; without taking reasonable available control technology (RACT) and maximum achievable control technology (MACT) to prevent such emissions. RACT and MACT measures shall include, but not be limited to, the following::

a. Maintain enclosed screw conveyor below the furnace baghouse hoppers to prevent re-entrained dust.
b. Minimize vehicular traffic on unpaved areas.
c. Maintain vegetation coverage on all of the unpaved plant grounds.
d. Three times daily, regardless of plant operation, vacuum paved traffic areas using a HEPA filter equipped vacuum, except when natural precipitation makes it impractical. For all other paved areas such as the furnace area, the refining area, and the battery breaking area, use a directed water wash three times daily regardless of plant operation. The directed water wash will be to clean pavement and to collect settled dust. Simply wetting the area will not constitute a directed water wash.
e. Maintain a tire wash, or utilize pressure washing techniques, for the front-end loaders and forklifts used in the battery pile storage building to prevent tracking of lead bearing materials outside the roofed areas of the plant.
f. Minimize slag transfer with front-end loader through the plant. Store, handle, and process slag in enclosed structures.
g. Use only trained personnel for furnace operations.
h. Maintain the sprinkler system and operate it in accordance with the sprinkler plan as detailed in the SOP for the Control of Fugitive Emissions (attached).
i. Water the lead-bearing materials in the group battery storage pile building as needed with sufficient frequency and quantity to prevent the formation of dust.
j. Maintain the partial enclosure in the refining and furnace areas and the battery breaking area.
k. Maintain the partial enclosure in the furnace area, apply wet suppression for the storage of any lead bearing materials (excluding lead buttons) as needed, and maintain a vehicle wash at the exit of the area.

l. Maintain records of all wet suppression, pavement cleaning and vehicle washing activities as per the SOP for the Control of Fugitive Emissions.
m. Using hoods, fans, filters, and similar equipment as detailed in the permitting applications to capture, contain, and control lead and particulate matter emissions.
n. Apply water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
o. Ensure proper operation of the blast furnace tapping and charging collection system.
p. Ensure proper operation of the blast furnace enclosure collection system.

[Rule 62-296.320(4)(c), F.A.C. and Rule 62-296.601(2), F.A.C., 40 CFR 63 Subpart X, Consent Order of September 4, 1996, Construction Permit Nos. 0570057-002, 008, 009, 010, 021-AC; and Title V Permit Application Received on August 4, 2011]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW7. 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.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. 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, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

FW10. 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 S*tartup, 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]

FW11. When appropriate, any recording, monitoring or reporting requirements that are time-specific shall be in accordance with the effective date of this permit, which defines day one. [Rule 62-213.440(1), F.A.C.]

FW12. Any reports, data, notifications, certifications and requests required to be sent to the United States Environmental Protection Agency Region 4 should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides and Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: (404)562-9155; Fax: (404)562-9163

FW13. Notwithstanding any of the other Specific Conditions of this permit, the following Subparts of 40 CFR 63 Subpart A shall apply to this facility: 63.1; 63.2; 63.3; 63.4; 63.5; 63.6(a), (b), (c), (e), (f), (g), (i), and (j); 63.7; 63.8; 63.9(a), (b), (c), (d), (e), (g), (h)(1-3), h(5-6), and (j); 63.10; and 63.12-15.

FW14. 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 emission standard contained in Rules 62-204, 62-210, 62-212, 62-62-297, F.A.C., or in a permit issued pursuant to those rules 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.
[Rule 62-297.310(7)(b), F.A.C.]

FW15. 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.
c. Processing or charging any new materials into the blast furnace or the refining kettles.

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

FW16. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

FW17. 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.]

FW18. 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.]

FW19. 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.]

FW20. Federal Stationary RICE Requirements – In addition to the Specific Conditions listed in this permit, the emergency stationary internal combustion engine, EU ID No. 027, is required to comply with the applicable requirements of NSPS 40 CFR 60 Subpart IIII (Standards of Performance for Stationary Reciprocating Internal Combustion Engines) and NESHAP 40 CFR 63 Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines), which are attached to this permit. [40 CFR 60 Subpart IIII, 40 CFR 63 Subpart ZZZZ, Rule 62-204.800, F.A.C., and Rule 62-4.070(3), F.A.C.]

Subsection A. Emissions Units 001, 004, 008, 009, and 015

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
-001	Blast Furnace Exhaust
-004	Furnace Tapping and Charging
-008	Soda Ash Silo
-009	Facility Grounds and Miscellaneous Operations
-015	Blast Furnace Enclosure

The blast furnace is charged with lead scrap and press cake received from the battery breaking operation, drosses from refining, press cake from the waste water treatment facility, purchased scrap lead, and other indigenous materials from battery manufacturing. The process heat needed to melt the lead is produced by the reaction of coke with blast air blown into the furnace. The lead scrap is fed into the furnace in alternating layers with the coke to maintain appropriate levels and proper temperature conditions. The furnace is then tapped to remove melted lead and collect slag that has been separated from the charge. PM and Pb emissions from the furnace charging and tapping are controlled by a dedicated baghouse (a.k.a. the "hygiene" baghouse). The VOC and CO emissions from the blast furnace are controlled by a 10 MMBtu/hr afterburner. The exhaust from the afterburner then passes through several chillers and PM and Pb emissions are then controlled by a 10 compartment baghouse. The SO_2 emissions are controlled by an up-front desulfurization process that removes a portion of the sulfur from the furnace feed material, and by a sodium bicarbonate dry scrubber injection system prior to the baghouse. Unconfined PM and Pb emissions from the blast furnace are controlled by a blast furnace enclosure surrounding the blast furnace area that vents to the Torit dust collector.

{Permitting notes: The facility is regulated under: NESHAP 40 CFR 63 Subpart X, NSPS 40 CFR 60 Subpart L, and Rules 62-296.320(2), 62-296.600 (RACT Lead), and 62-296.700, F.A.C. (RACT PM) Emissions Unit No. 008 from Permit Nos. 0570057-002, 008, 009-AC has previously been changed to EU009.}

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum allowable process rates are as follows:

EU No(s).	Maximum Process Rate	Maximum Hours of Operation	Maximum Coke Usage	Maximum Afterburner Heat Input Rate
001, 004, 015	7.9 tons/hr of charge[1,2] 32,000 tons/12-months of lead produced	8,760 hrs/12-months	7,300 tons/12-months	10 MMBtu/hr and 85.5 MMCF/12-months
008	20 tons/hr	1,000 hrs/12-months	n/a	n/a

[1] Raw material charging rates on a daily basis shall be consistent with the following approximate percentages: 85% lead-bearing materials, 8-12% coke, 2.5% limerock, and 2.5% cast iron. Lead-bearing materials may include, but are not limited to, CRTs, re-run slag, and indigenous materials such as respirators, baghouse dust, and treatment plant sludge. The following rates represent the approximate hourly material input into the blast furnace.

[2] The blast furnace enclosure and tapping and charging ventilation systems shall be in operation at all times during any blast furnace operation.

[Rules 62-4.070(3), 62-4.160(2), 62-204.800, 62-210.200(PTE) and Air Construction Permit Nos. 0570057-002, 008, 009, 010, and 021-AC]

A.2. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Unless otherwise specified, the averaging times for Specific Conditions **A.4.-A.9.** are based on the specified averaging time of the applicable test method.

A.3. In order to exempt the facility from a PSD review as requested by the permittee, the total emissions from the blast furnace operations detailed in this subsection shall not exceed 29.2 tons of particulate matter, 911 tons of carbon monoxide, 99 tons of volatile organic compounds, 886 tons of sulfur dioxide, 1.4 tons of lead, and 81 tons of nitrogen oxides for any consecutive twelve month period. [Rules 62-212.300 and 400, F.A.C.; and Construction Permit Nos. 0570057-021-AC and 024-AC]

A.4. Lead Emissions. 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, the furnace charging and tapping, and the blast furnace enclosure must meet the following limits. Each vent must meet the standards by itself (no averaging). The maximum emission rates shall not exceed the following: [Rules 62-4.070(3) and 62-212.400, F.A.C.; and Construction Permit Nos. 0570057-021-AC and 024-AC]

	Emission Limit (gr/dscf)	Tons per 12-months
Blast Furnace Stack	0.00072	0.78
Tapping and Charging Stack	0.00062	0.42
Blast Furnace Enclosure Stack	0.00006	0.21

b. 2.0 mg/dscm (0.00087 gr/dscf) for the blast furnace, the process fugitive sources consisting of the charging and the tapping, and the discharge from the blast furnace enclosure. Each vent must meet the standards by itself (no averaging). [40 CFR 63 Subpart X; and Rule 62-204.800 F.A.C.]

c. 0.010 gr/dscf for the blast furnace [Rule 62-296.603, F.A.C.]

d. 0.002 gr/dscf for the process fugitive sources consisted of the charging and tapping vented to control equipment [Rule 62-296.603, F.A.C.]

e. 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 above limitations. [40 CFR 63.544]

A.5. PM Emissions. 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, the furnace charging and tapping, and the blast furnace enclosure must meet the following limits. Each vent must meet the standards by itself (no averaging). The maximum emission rates shall not exceed the following: [Rules 62-4.070(3) and 62-212.400, F.A.C.; and Construction Permit Nos. 0570057-002,008,009,018,021, and 024-AC]

	Emission Limit (gr/dscf)	Tons per 12-months
Blast Furnace Stack	0.011	12.0
Tapping and Charging Stack	0.011	7.4
Blast Furnace Enclosure Stack	0.0027	9.8

b. 50 mg/dscm (0.022 gr/dscf) for the discharge from the blast furnace, the tapping and charging sources, and 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, the tapping and charging sources, and the blast furnace enclosure. [Rule 62-296.700, F.A.C.]
d. Particulate matter emissions from the soda ash silo shall be less than one ton per year in order to exempt the silo from PM RACT. [Rule 62-296.700(2)(c), F.A.C.]

A.6. Visible Emissions. The permittee shall not discharge visible emissions in excess of the following:

a. 3% from any opening of the blast furnace enclosure or the exit from the blast furnace enclosure baghouse.
b. 3% at the exit of the control equipment controlling the blast furnace and the tapping and charging sources.
c. 3% opacity from the battery cracking operations.
d. 5% opacity from the soda ash silo.

[Rules 62-296.603 and 62-296.712, F.A.C.; 40 CFR 60.122(a)(2); Chapter 1-3.52, Rules of the EPC, and Construction Permit No. 0570057-021-AC]

A.7. VOC Emissions. The permittee shall not discharge VOC emissions in excess of the following:
a. In order to exempt the facility from PSD, the maximum total hydrocarbons (VOC) potential to emit from the blast furnace exhaust shall not exceed 89 tons per any 12 consecutive month period, and the blast furnace shall not discharge total hydrocarbons (VOC) in excess of 102 ppm by volume, expressed as propane corrected to 4 percent CO_2, to the atmosphere. [Rule 62-212.400, F.A.C.; 40 CFR 63.543(c); and Construction Permit No. 0570057-021-AC]
b. In order to exempt the facility from PSD, the maximum total hydrocarbons (VOC) potential to emit from the blast furnace tapping and charging exhaust shall not exceed 10 tons per any consecutive 12-month period, and the blast furnace tapping and charging operation shall not discharge total hydrocarbons (VOC) in excess of 18 ppm by volume, expressed as propane, to the atmosphere. [Rule 62-212.400, F.A.C.; 40 CFR 63.543(g); and Construction Permit No. 0570057-021-AC]

A.8. CO Emissions. In order to exempt the facility from PSD, the maximum carbon monoxide potential to emit from the blast furnace exhaust shall not exceed more than 208 pounds per hour or 911 tons per consecutive 12-month period emitted to the atmosphere. [Rule 62-212.400, F.A.C.; and Construction Permit No. 0570057-021-AC]

A.9. SO_2 Emissions. In order to exempt the facility from PSD, the maximum sulfur dioxide potential to emit from the blast furnace exhaust shall not exceed 886 tons per consecutive 12-month period, and the blast furnace shall not discharge more than 55.4 pounds of sulfur dioxide per ton of lead produced as an annual average, based on a 12-consecutive month average updated at the beginning of each month. Compliance with this emission limitation will be demonstrated by the stack testing requirements of Specific Condition No. A.22. and recordkeeping requirements of Specific Condition No. A.34.
[Rule 62-212.400, F.A.C.; and Construction Permit No. 0570057-021-AC]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

A.10. Excess Emissions Allowed. 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

hour period unless specifically authorized by the Department for longer duration. For sulfur dioxide control, best operational practice shall mean that no battery processing will be done unless the desulfurization equipment is operational and the sodium bicarbonate dry scrubber is functioning. 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.13. for more than one hour, the furnace operation shall accept no more lead bearing material. 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.13., then lead bearing material shall not be charged until the instantaneous afterburner operating temperature is above the minimum afterburner operating temperature.

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. Under normal operations, the baghouse for the blast furnace exhaust shall be operated with at least 9 of the 10 baghouse chambers in operation. If the baghouse is operated with less than 9 chambers in operation, then a compliance test under equivalent conditions shall be conducted within 15 days. The EPC may also request a compliance demonstration on the charging/tapping baghouse if a compartment is sealed off while the emission unit is operated for any period of time.
[40 CFR 63.548(f)(1), Rules 62-210.700, and 62-4.070(3), F.A.C.; Permit No. 0570057-022-AV]

A.11. Excess Emissions Prohibited. 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.]

Monitoring of Operations

A.12. CAM Plan. Emission Unit 001 is subject to the Compliance Assurance Monitoring (CAM) requirements for carbon monoxide (CO) and sulfur dioxide (SO_2) as contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [Rules 62-204.800 and 62-213.440(4)(b)4., F.A.C.; and 40 CFR 64]

A.13. In order to ensure compliance with the emission limiting standards of Specific Condition Nos. A.7. and A.8., the permittee shall maintain and operate a natural gas-fired afterburner with a minimum temperature and residence time established during the compliance demonstrations required under this permit. [Rule 62-212.300 and 62-4.070(3), F.A.C.; 40 CFR 63.548(j); and Construction Permit 0570057-002,008,009-AC]

a. The permittee shall calibrate and maintain a device to monitor and to record the temperature in the afterburner chamber on a continuous basis. If the 3-hour average temperature falls more than 50 ^{o}F below the 3-hour average temperature during the previous annual carbon monoxide (CO) compliance demonstration, it shall constitute an excursion of temperature thresholds as specified in Appendix CAM - CO of the Title V operating permit.
b. The permittee shall calibrate and maintain a device to monitor and to record the temperature in the afterburner chamber on a continuous basis. If the 3-hour average temperature falls more than 50 ^{o}F below the 3-hour average temperature during the previous annual hydrocarbon (VOC) compliance demonstration, it shall constitute a violation of the applicable emission standard for VOC listed in this permit.
c. The baseline temperature for normal operation of the afterburner shall be determined from the 3-hour average temperatures from the annual CO and VOC compliance tests, whichever is higher. The minimum operating temperature of the afterburner shall be 50 ^{o}F below the higher of the compliance tests 3-hour average

temperatures. The 3-hour average temperature of the afterburner must remain above this minimum operating temperature.

{Permitting Note: The EPC staff has determined that the monitoring and recordkeeping requirements required by MACT (Pb, VOC) and RACT (Pb), along with the CAM Plan for CO and SO_2 and the requirement to maintain an SO_2 CEM, meet the requirements of periodic monitoring.}

A.14. In order to help ensure compliance with the emission limiting standard of Specific Condition Nos. A.3. and A.9., the permittee shall maintain and operate a M.A. Industries Model 41 Desulfurization System to process all incoming batteries prior to charging to the furnace. [Rule 62-4.070(3), F.A.C.; and Construction Permit Nos. 0570057-002,008,009, and 021-AC]

A.15. The permittee shall maintain and calibrate a device which continuously measures and records the pressure drop across each baghouse compartment controlling the emission units covered under this permit. [Rule 62-4.070(3), F.A.C.]

A.16. In order to demonstrate compliance with Specific Condition No. A.6., the permittee shall conduct a daily instantaneous visible emissions check on each emissions unit, and maintain records for at least 5 years. [Rules 62-4.070(3) and 62-213.440(1)(b), F.A.C.]

A.17. The permittee shall maintain continuous operation of bag leak detection systems on the blast furnace exhaust baghouse, the blast furnace tapping and charging baghouse, and 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]

Continuous Monitoring Requirements

A.18. SO_2 CEMS. 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 SO_2 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 SO_2 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 SO_2 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. [Rules 62-4.070(3), and 62-4.130 F.A.C.; 40 CFR 70.6(a)(3)(iii)(B); and Application Received on August 4, 2011]

A.19. The permittee shall convert SO_2 CEM monitoring data from ppm into units of lbs of SO_2 per ton of lead produced each hour in accordance with the procedures specified in Specific Condition No. A.9. [Rule 62-4.070(3), F.A.C.; and Application Received on August 4, 2011]

Test Methods and Procedures

{Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.20. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Method for Determining Particulate Matter Emissions from Stationary Sources
6	Determination of Sulfur Dioxide Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
10	Determination of Carbon Monoxide Emissions from Stationary Sources {Note: The method shall be based on a continuous sampling train.}
12	Determination of Inorganic Lead Emissions from Stationary Sources
25A	Method for Determining Gaseous Organic Concentrations (Flame Ionization)

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. In the case of the EPA Method 9 test on the blast furnace, all readings shall be at least 30 minutes in duration and concurrent with one of the Method 12 (lead) runs. [62-297.401, F.A.C., 40 CFR 60.123, and 40 CFR 63.547]

A.21. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.22. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), the following emission units shall be tested as specified below to demonstrate compliance with the emissions standards for Pb, PM, CO, SO_2, VOC, opacity, and face velocity, as applicable. 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.]

Blast Furnace Exhaust

(X) Pb
(X) PM
(X) Carbon Monoxide
(X) Hydrocarbons
(X) Opacity
(X) Sulfur Dioxide

Tapping and Charging Baghouse Exhaust

(X) Pb
(X) PM
(X) Opacity
(X) Hydrocarbons

Blast Furnace Enclosure

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

Battery Breaking Enclosure

(X) Opacity

Soda Ash Silo
(X) Opacity

A.23. Compliance with the doorway in-draft requirement (face velocity) 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 mmHg.
   (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 mmHg when all doors are in the position they are in during normal operation.

A.24. 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.

A.25. Testing of emissions shall be conducted with the sources operating at capacity with conditions representative of normal operations. Capacity is defined as 90-100% of the approximate rated capacity as specified in Specific Condition No. A.1. 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. If it is impracticable to test at capacity, then the source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. For the blast furnace, the type and amounts of materials charged during the test must also be included. Failure to submit the input rates, output rates, control equipment parameters such as pressure drops, afterburner temperatures, sodium bicarbonate injection rates and actual operating conditions may invalidate the tests.

During compliance testing of the blast furnace for PM and Pb, testing of the blast furnace exhaust must be performed with a minimum of 9 of the 10 baghouse chambers in operation. As indicated in Specific Condition No. A.10., a minimum of 9 baghouse chambers must be in operation at all times during normal operation. Special PM and Pb testing to demonstrate compliance with less than 9 chambers in operation will be required within 15 days, if the blast furnace is operated with less than 9 baghouse chambers in operation. [Rules 62-297 and 62-4.070, F.A.C]

A.26. 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 site-specific test plan to include a test program summary, the schedule, data quality objectives, and both the internal and the external quality assurance program. Visible emission testing for emission units subject to 40 CFR 60 (Subpart X) requires at least 30 days advanced notification. Emission units not subject to Subpart X (i.e. soda ash silo, battery breaking) require at least 15 days advanced notification. [40 CFR 63.7 and 63.9; and Rule 62-297.310(7)(a), F.A.C.]

A.27. The permittee shall analyze SO_2 Performance Audit (PA) samples during each EPA Method 6 performance test of the blast furnace. The audit samples shall be requested by the permittee at least 30 days prior to the test date. Audit materials may be obtained by contacting the appropriate EPA Regional Office or the EPC. If the Administrator fails to provide required PA materials to an owner or operator of an affected source in time to analyze the PA samples during a performance test, the requirement to conduct a PA under this paragraph shall be waived for such source for that performance test. [40 CFR 63.7]

A.28. 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. [Rule 62-213.440(1)(b), F.A.C.; and 40 CFR 63.7]

A.29. 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 test on the blast furnace shall be conducted concurrent with one of the EPA Method 12 runs while the furnace is operating at capacity.
b. The visible emission test on the blast furnace tapping and charging operation shall be on the charging/tapping baghouse exhaust.
c. The visible emission tests on the Blast Furnace Enclosure shall be performed consistent with the testing requirements of Specific Condition No. A.21. 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.

A.30. The attached Operation and Maintenance Plan (Baghouses Standard Operation and Maintenance Procedures Manual) to meet the particulate RACT requirements of Rule 62-296.700, F.A.C., the lead RACT requirements of Rule 62-296.600, F.A.C., and the MACT requirements of 40 CFR 63.548; the attached Compliance Assurance and Monitoring (CAM) Plans, the attached Startup, Shutdown and Malfunction Plan, and the attached SOP for the Control of Fugitive Emissions are enforceable parts of this permit. The facility shall operate the affected emission units in accordance with the latest versions of the plans. [Rules 62-4.070(3), 296.600, and 296.700, F.A.C.; and 40 CFR 63.548]

Recordkeeping and Reporting Requirements

A.31. Reporting Schedule. The following report(s) and notification(s) shall be submitted to the Compliance Authority, in addition to the reports required to be submitted under Appendix RR:

Report	Reporting Deadline	Related Condition(s)
NESHAP Excess Emissions Report	Within 30 days of the end of each semiannual period.	A.33.

[Rule 62-213.440, F.A.C.]

A.32. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

A.33. 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)]

A.34. The permittee shall keep the following records to ensure compliance with Specific Condition Nos. A.1, A.3. and A.9: [Rule 62-4.070(3), F.A.C.]

a. Monthly hours of operation for the blast furnace and the soda ash silo.

b. Monthly and rolling twelve month totals of the amount of lead produced in tons from the blast furnace.

c. Monthly and rolling twelve month totals of sulfur dioxide emissions, in tons per year, to be calculated by multiplying the most recent stack test or CEM results in pounds of SO_2 per ton of lead produced times the monthly lead production from the furnace operation.

d. Rolling twelve month average of the pounds of sulfur dioxide per ton of lead produced from the blast furnace, updated each month and based off the most recent SO_2 stack test or CEM results multiplied by the most recent twelve month's production of lead.

A.35. The permittee shall keep a record of the material input to the blast furnace for each hour and document the tons of charge per hour based on a daily average. [Rule 62-4.070(3), F.A.C.; and Application Received on August 4, 2011]

A.36. 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. [Rule 62-213.440(1)(b); and 40 CFR 63 Subpart X]

Other Requirements

A.37. Federal Rule Requirements. In addition to the specific conditions listed above, these emission units are also subject to the applicable requirements contained in 40 CFR 60, Subpart A – NSPS General Provisions, 40 CFR 60 Subpart L – Standards of Performance for Secondary Lead Smelters, 40 CFR 63 Subpart A – NESHAP General Provisions, and 40 CFR 63 Subpart X - National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting. [Rule 62-204.800 and 62-213.440, F.A.C.]

The specific conditions in this section apply to the following emissions units:

EU No.	Brief Description
-011	Four Refining Kettles
-013	Refining Kettle Exhaust Stacks

Lead is tapped from the blast furnace to form buttons, which are sold or transported to the refining area. Refined lead includes soft lead, hard lead, and calcium lead. Refining is accomplished in four 78 ton Refining Kettles, all indirectly fired with natural gas. Sodium nitrate and other chemicals are added to the refining process to aid in the removal of antimony, tin, and zinc from the lead. After the lead refining process is completed, the refined lead is cast into ingots by a pigging machine with the use of star ladles on a conveyor line. The dross removed during the refining process is returned to the blast furnace. Facility personnel may purchase blast lead from other facilities to be processed in the refining operation and the blast lead produced on site may be sold without further processing.

Particulate matter and lead emissions from the refining kettles and star ladles are controlled by enclosures and hoods, respectively, and ducted to an approximately 28,000 ACFM three-compartment baghouse equipped with a bag leak detection system along with continuous monitoring and recording of the pressure drop across each baghouse compartment.

Emission Unit 013 constitutes the emissions from natural gas combustion combined for all 4 refining kettles. Since the kettles are indirectly fired, natural gas emissions are separate from the lead processing area inside the kettles. Each kettle is exhausted through its own individual stack without any additional pollution controls.

NOTE: Emissions Unit No. 002 was changed to Emissions Unit Nos. 011 and 013 as part of issuance of Construction Permit No. 0570057-010-AC.

{Permitting note(s): (The facility is regulated under: NESHAP 40 CFR 63 Subpart X, NSPS 40 CFR 60 Subpart L, and Rules 62-296.320(2), 62-296.600 (RACT Lead), and 62-296.700 (RACT PM), F.A.C.}

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum allowable process rates are as follows:

EU No.	Maximum Process Rate	Maximum Hours of Operation	Maximum Natural Gas Usage
011	86 tons of charge materials per kettle per batch[1,3]	8,760 hrs/12-months	n/a
	360,000 lbs sodium nitrate/12-months		
	32,000 tons/12-months of lead produced		
013	4.2 MMBtu/hr/kettle[2]	8,760 hrs/12-months	98.6 MMCF/12-months

[1] The charge per kettle is greater than the kettle capacity due to the removal of impurities and the addition of various materials (fluxes and additives) required to produce the finished lead product.
[2] No gases shall be vented to the kettle burner exhaust stacks for the refining kettles except those exhaust gases generated from firing of the refining kettles.
[3] No more than two star ladles shall be operated at a time.
[Rule 62-210.200(PTE) and Air Construction Permit No. 0570057-010-AC]

B.2. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

B.3. Notwithstanding any of the other Specific Conditions of this permit, the following Subparts of 40 CFR 63, Subpart A, shall apply to the permittee: 63.1, 63.2, 63.3, 63.4, 63.5, 63.6(a), (b), (c), (e), (f), (g), (i), and (j); 63.7, 63.8, 63.9 (a), (b), (c), (d), (e), (g), (h)(1-3), (h)(5-6), and (j); 63.10; and 63.12-15. [40 CFR 63 and Rule 62-4.070(3), F.A.C.]

Emission Limitations and Standards

{Permitting Note: The attached Table 1, Summary of Air Pollutant Standards, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Unless otherwise specified, the averaging times for Specific Conditions **B.5.-B.7.** are based on the specified averaging time of the applicable test method.

B.4. In order to exempt the facility from a PSD review as requested by the permittee, the total emissions from the refining kettle operations detailed in this subsection shall not exceed 4.7 tons of particulate matter and 0.19 tons of lead for any consecutive twelve month period. [Rules 62-212.300 and 400, F.A.C.; and Construction Permit Nos. 0570057-002,008,009, and 010-AC]

B.5. Lead Emissions. In order to demonstrate compliance with Specific Condition No. B.4., the permittee shall not discharge lead emissions from the refining area baghouse, which controls the refining area process fugitive emissions sources (refining kettles and star ladles), in excess of:

a. 0.0002 gr/dscf up to the limitations below: [Construction Permit No. 0570057-010-AC and Rule 62-296.603(1)(d), F.A.C.]

	lbs/hr	Tons per 12 months
Refining Kettles Stack	0.043	0.19

b. 2.0 mg/dscm (0.00087 gr/dscf) [40 CFR 63.544]

B.6. PM Emissions. In order to demonstrate compliance with Specific Condition No. B.4., the permittee shall not discharge particulate matter emissions from the refining area baghouse, which controls the refining area process fugitive emissions sources (refining kettles and star ladles), in excess of 0.005 gr/dscf and not to exceed 1.1 lbs/hr and 4.7 tons for any 12 consecutive month period. [Permit No. 0570057-010-AC; Rule 62-4.070(3), F.A.C.; and Renewal Application received August 4, 2011]

B.7. Visible Emissions. Visible emissions from the refining area (kettle hoods and star ladles), the refining area baghouse, and the indirect firing of the refining kettles shall not exceed 3% opacity. [Rules 62-296.603 and 62-4.070(3), F.A.C.; and Permit No. 0570057-010-AC]

B.8. Face Velocity. The refining kettles and the associated star ladle(s) shall be ventilated to maintain a face velocity of 75 meters per minute (250 feet per minute) with the enclosure hood doors in the normal operating position. Ventilation air from all enclosure hoods and capture hoods shall be directed to a control device that shall not discharge lead compounds in excess of the limitations in Specific Condition No. B.5. [40 CFR 63.544(a) and (b), Rule 62-204.800, F.A.C., and Permit No. 0570057-010-AC]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

B.9. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered

to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. For particulate matter and lead, best operational practices shall mean the emission unit can continue to operate for up to two hours following the alarm being sounded for a broken bag. After two hours, the compartment where the broken bag occurred shall be sealed off, or the broken bag replaced, to continue operation of that emissions unit. If a compartment is sealed off, and the emissions unit is operated for any period of time, the EPC may require a compliance demonstration under equivalent conditions. [Rule 62-210.700(1), F.A.C., Rule 62-4.070(3), F.A.C., and Permits 0570057-002, 008, 009, and 010-AC]

B.10. Excess Emissions Prohibited. 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.]

Monitoring of Operations

B.11. The Operation and Maintenance Plan required to meet the particulate matter and lead RACT requirements of Rule 62-296.600, F.A.C. and the MACT requirements of 40 CFR 63, Subpart X, the Startup, Shutdown and Malfunction Plan required for the refining operation, and the SOP for the Control of Fugitive Emissions are an enforceable part of this permit. [40 CFR 63, Permit No. 0570057-010-AC, and Rule 62-4.070(3), F.A.C. and Renewal Application received August 4, 2011]

B.12. The bag leak detection system shall be in operation at all times during baghouse operation in accordance with 40 CFR 63.548. [40 CFR 63.548(c)(9), Rule 62-4.070(3), F.A.C., and Permit No. 0570057-010-AC]

B.13. Any time a refining kettle is being fired, the refining kettle enclosure hood(s) shall be vented to the refining area baghouse, which shall be in operation. [Rule 62-4.070(3), F.A.C. and Permit No. 0570057-010-AC]

B.14. Any time a star ladle is in operation, the ventilation air from the star ladle capture hood(s) shall be vented to the refining area baghouse, which shall be in operation. [Rule 62-4.070(3), F.A.C. and Permit No. 0570057-010-AC]

B.15. The permittee shall operate according to the standard operating procedures manual (Baghouses SOP Manual) that describes, in detail, procedures for inspection, maintenance, and bag leak detection and corrective action plans for the baghouse controlling the lead and particulate matter emissions from the refining kettles and star ladles. The procedures specified in the standard operating procedures manual for inspections and routine maintenance for the refining area baghouses include the following requirements: [40 CFR 63.548(b) and (c), 40 CFR 63.549(b), Rule 62-296.600, F.A.C., and Permit No. 0570057-010-AC]

a. Daily monitoring of pressure drop across each baghouse cell.
b. Weekly confirmation that dust is being removed from hoppers through visual inspection, or equivalent means of ensuring the proper functioning of removal mechanisms.
c. An appropriate methodology for monitoring cleaning cycles to ensure proper operation.
d. Monthly check of bag cleaning mechanisms for proper functioning through visual inspection or equivalent means.
e. Monthly check of bag tension on reverse air and shaker-type baghouses. Such checks are not required for shaker-type baghouses using self-tensioning (spring loaded) devices.
f. Quarterly confirmation of the physical integrity of the baghouse through visual inspection of the baghouse interior for air leaks.
g. Quarterly inspection of fans for wear, material buildup, and corrosion through visual inspection, vibration detectors, or equivalent means.

h. Continuous operation of a bag leak detection system.
i. Preventative maintenance schedule, which is consistent with routine long-term maintenance.

B.16. The permittee shall operate according to the standard operating procedures manual (SOP for the Control of Fugitive Emissions) that describes, in detail, the measures that are to be taken to control fugitive dust emission sources within the refining and casting area. The controls specified in the standard operating procedures manual include partial enclosure and pavement cleaning two times per day; or total enclosure and ventilation of the enclosure to a control device. Records are to be kept of all wet suppression, pavement cleaning, and vehicle washing activities to control fugitive dust emissions in accordance with the SOP for the Control of Fugitive Emissions. [40 CFR 63.545(a), 40 CFR 63.549(b), and Permits Nos. 0570057-002, 008, 009, and 010-AC]

B.17. The permittee shall operate in accordance with the written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. The permittee shall keep the necessary parts for routine repairs or otherwise predictable bag leak detection system malfunctions of the bag leak detection system readily available. [40 CFR 63.6(e)(3)(i), Rule 62-4.070(3), F.A.C., and Permit No. 0570057-010-AC]

B.18. The bag leak detection system shall meet the following specifications and requirements:
[40 CFR 63.548(e) and Permit No. 0570057-010-AC]

a. The bag leak detection system shall be certified by the manufacturer to be capable of detecting particulate matter emissions at concentrations of 10 milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.
b. The bag leak detection system sensor shall provide output of relative particulate matter loadings.
c. The bag leak detection system shall be equipped with an alarm system that will alarm when an increase in relative particulate loadings is detected over a preset level.
d. The bag leak detection system shall be operated in a manner consistent with available written guidance from the U.S. Environmental Protection Agency or, in the absence of such written guidance, the manufacturer's written specifications and recommendations for installation, operation, and adjustment of the system.
e. The initial adjustment of the system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time.
f. Following initial adjustment, the permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time, except as detailed in an approved SOP. In no event shall the sensitivity be increased by more than 100 percent or decreased more than 50 percent over a 365 day period unless such adjustment follows a complete baghouse inspection which demonstrates the baghouse is in good operating condition.
g. For negative pressure, induced air baghouses, and positive pressure baghouses that are discharged to the atmosphere through a stack, the bag leak detector shall be downstream of the baghouse and upstream of any wet acid gas scrubber.
h. Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

B.19. The permittee shall operate in accordance with the “Baghouse SOP” which includes a corrective action plan that specifies the procedures to be followed in the case of a bag leak detection system alarm. The permittee shall act in accordance with the corrective action plan and the procedures used to determine and record the time, duration, and cause of the alarm as well as documenting the corrective actions taken to

correct the control device malfunction or minimize emissions as specified below: [40 CFR 63.548(f), Rule 62-4.070(3), F.A.C., and Permit No. 0570057-010-AC]

a. The procedures used to determine the cause of the alarm must be initiated within 30 minutes of the alarm.

b. The cause of the alarm must be alleviated by taking the necessary corrective action(s) which may include, but are not limited to the following steps:

1. Inspecting the baghouse for air leaks, torn or broken filter elements, or any other malfunction that may cause an increase in emissions.
2. Sealing off defective bags or filter media.
3. Replacing defective bags or filter media, or otherwise repairing the control device.
4. Sealing off a defective baghouse compartment.
5. Cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system.
6. Shutting down the process producing the particulate emissions.

B.20. In order to demonstrate compliance with Specific Condition No. B.1., the permittee shall maintain a measuring device (gas meter) on the natural gas supply to the kettles. [Rule 62-4.070(3), F.A.C. and Permit No. 0570057-010-AC]

B.21. In order to demonstrate compliance with the "Baghouse SOP", the permittee shall maintain a measuring device(s) to determine the air pressure differential across each baghouse compartment within 10 percent accuracy. The permittee shall maintain a continuous recorder to document the pressure differential across each baghouse compartment. [Rule 62-4.070(3), F.A.C. and Permit No. 0570057-010-AC]

B.22. During periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the refining operations (including associated air pollution control equipment) in accordance with the procedures specified in the startup, shutdown, and malfunction plan required for the refining operation. [40 CFR 63.6(e)(3)(ii) and Permit No. 0570057-010-AC]

a. When actions taken by the owner or operator during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, the owner or operator shall keep records for that event that demonstrate that the procedures specified in the plan were followed. These records may take the form of a "checklist," or other effective form of recordkeeping, that confirms conformance with the startup, shutdown, and malfunction plan for that event. In addition, the owner or operator shall keep records of these events as specified in 40 CFR 63.10(b) (and elsewhere in this part), including records of the occurrence and duration of each startup, shutdown, or malfunction of operation and each malfunction of the air pollution control equipment. Furthermore, the owner or operator shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the affected source's startup, shutdown and malfunction plan in the semiannual (or more frequent) startup, shutdown, and malfunction report required in 40 CFR 63.10(d)(5). [40 CFR 63.6(e)(3)(iii)]

b. If an action taken by the owner or operator during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the affected source's startup, shutdown, and malfunction plan, the owner or operator shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan, followed by a letter within 7 working days after the end of the event, in accordance with 40 CFR

63.10(d)(5) (unless the owner or operator makes alternative reporting arrangements, in advance, with the Administrator (see 40 CFR 63.10(d)(5)(ii))). [40 CFR 62.6(e)(3)(iv)]

Test Methods and Procedures

{Permitting Note: The attached Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.23. Test Methods. Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Method for Determining Particulate Matter Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources
12	Determination of Inorganic Lead Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department [62-297.401, F.A.C., 40 CFR 60.123, and 40 CFR 63.547]

B.24. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

B.25. Annual Compliance Tests Required. Test the emissions from the process fugitive sources (baghouse exhaust, refining kettles and star ladles) during each federal fiscal year (October 1 – September 30) while operating the four refining kettles and two star ladles for the following pollutant(s), and submit 2 copies of the test data 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 40 CFR 60, 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, F.A.C., 40 CFR 60.123(b), 63.544 and 63.547(a)]

(X) Lead
(X) Particulate Matter
(X) Opacity
( ) Sulfur Oxides
( ) Nitrogen Oxides
( ) Hydrocarbons
( ) Total Reduced Sulfur

B.26. The EPA Method 12 test for determining compliance with the lead emissions limitations in Specific Condition No. B.5. shall be at least sixty minutes per run. One of the Method 12 test runs shall be conducted concurrently with the opacity tests. The Method 9 test for the process fugitive sources shall be at least thirty (30) minutes in duration. The EPA Method 5 test procedures for determining compliance with the particulate matter emissions limit in Specific Condition No. B.6. shall be consistent with the requirements of 40 CFR 60 and Rule 62-297, F.A.C. [Rule 62-297.310, F.A.C. and Permit No. 0570057-010-AC]

B.27. Test the opacity from each stack (4 total) of Emission Unit 013 (indirect firing of the refining kettles) annually (October 1 – September 30) while firing four kettles simultaneously at 4.2 MMBtu/hr each, and submit 2 copies of the test data to the Air Compliance Section of the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. The visible emissions test for the indirect firing of the refining kettles shall be at least thirty minutes in duration for each kettle. Testing procedures

shall be consistent with the requirements of 40 CFR 60 and Rule 62-297, F.A.C. [Permit No. 0570057-010-AC and Rule 62-4.070(3), F.A.C.]

B.28. Test the face velocity at the refining kettle enclosure hoods and star ladles annually (October 1 – September 31) while operating the four refining kettles and two star ladles. The refining kettle enclosure hoods and star ladles shall be tested with the enclosure doors in their normal operating position. Two copies of the test data shall be submitted 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 40 CFR 63.547(d), 40 CFR 60, and Rule 62-297, F.A.C.

B.29. Compliance with the emission limitations of Specific Condition Nos. B.5., B.6., B.7., and B.8. shall be determined using EPA Methods 1, 2, 4, 5, 9, and 12, contained in 40 CFR 60, Appendix A, adopted by reference in Rule 62-297, F.A.C., also the requirements of 40 CFR 63.547 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.

B.30. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity of Specific Condition No. B.1. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the input rates and actual operating conditions may invalidate the test. The refining area tests shall be conducted while firing all four refining kettles and operating two star ladles. The test report shall include the type and amount of materials being charged into the kettles during the test, the number of refining kettles processing lead during the test, the baghouse pressure drop, and the refining kettle firing rates. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C., and Permit No. 0570057-010-AC]

B.31. 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 the 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. If conditions prevent the opacity or visible emissions observations from being conducted concurrently with the performance test(s), the permittee shall deliver or postmark the notification not less than 30 days before the opacity or visible emission observations are scheduled to take place. For the lead and particulate matter tests required for the process fugitive sources, the permittee shall submit a site-specific test plan to include a test program summary, the schedule, data quality objectives, and both the internal and external quality assurance program along with the notification. (Data quality objectives are the pretest expectations of precision, accuracy, and completeness of data.) [40 CFR 60 and 40 CFR 63.7(c)(2)(i) and (iv); and Permit No. 0570057-010-AC]

a. The internal QA program shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of test data precision; an example of internal QA is the sampling and analysis of replicate samples. [40 CFR 63.7(c)(2)(ii)]
b. The external QA program shall include, at a minimum, application of plans for a test method performance audit (PA) during the performance test. The PA's consist of blind audit samples provided by the Administrator and analyzed during the performance test in order to provide a measure of test data bias. The external QA program may also include systems audits that include the opportunity for on-site evaluation by the Administrator of instrument calibration, data validation, sample logging, and documentation of quality control data and field maintenance activities. [40 CFR 63.7(c)(2)(iii)]
c. The Administrator may request additional relevant information after the submittal of a site-specific test plan. [40 CFR 63.7(c)(2)(v)]

B.32. The permittee shall analyze performance audit samples during each performance test. The audit samples shall be requested by the permittee at least 30 days prior to the test date. Audit materials may be obtained by contacting the appropriate EPA Regional Office or the EPC. If the Administrator fails to provide required PA materials to an owner or operator of an affected source in time to analyze the PA samples during a performance test, the requirement to conduct a PA under this paragraph shall be waived for such source for that performance test. [40 CFR 63.7(c)(4)(i) and Permit No. 0570057-010-AC]

Recordkeeping and Reporting Requirements

B.33. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

B.34. In order to demonstrate compliance with the limitations of Specific Condition Nos. B.1. and B.4., the permittee shall maintain the following records of operations for the most recent five year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request. The records shall include, but are not limited to, the following: [Rules 62-4.070(3) and 62-213.440(1)(b), F.A.C.; and Permit No. 0570057-010-AC]

Daily
a. Date (mm/dd/yy)
b. Amount of finished (refined) lead produced. (tons)

Monthly
c. Total amount of finished (refined) lead produced. (tons)
d. Total cubic feet of gas consumed for all four kettles combined. (ft^3)
e. Total lbs of $NaNO_3$ charged into the refining kettles. (lbs)

Rolling Totals
f. Rolling twelve month total of finished lead produced. (tons)
g. Rolling twelve month total of the natural gas consumed for all four kettles. (ft^3)
h. Rolling twelve month total of the $NaNO_3$ charged into the refining kettles. (lbs)

B.35. The permittee shall keep the following records for a minimum of five years, and make them available, upon request, to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency. The records shall include, but are not limited to, the following: [Rules 62-296.600, 62-4.070(3), and 62-213.440(1)(b), F.A.C.; 40 CFR 63; and Permit No. 0570057-010-AC]

a. Records of the occurrence and duration of each startup, shutdown, and malfunction of the refining kettle operation.
b. Records of control equipment operating parameters (pressure drops and bag leak detection system output).
c. Records of all control equipment inspections and checklists which include daily, weekly, monthly, quarterly, and annual inspections.
d. Maintenance records for the air pollution control equipment, which includes, but is not limited to, black-light tests, bag replacements, structural repairs, and motor replacements.
e. Records of air pollution control equipment malfunctions or failures, the occurrence and duration, and the corrective actions taken.
f. An identification of the date, duration, and time of all bag leak detection system alarms, their cause, and an explanation of the corrective actions taken.
g. Records of bag leak detection system malfunctions and periods when inoperative.

h. Records of any adjustments, repairs, calibration checks, and maintenance made to the bag leak detection system.
i. Records of the performance tests, bag leak detection system evaluations, opacity and visible emissions tests, and face velocity tests required by the permit and any information necessary to determine the conditions of performance tests and performance evaluations.
j. The records required as part of the practices described in the "Baghouse SOP" or the "Fugitive Dust Source SOP".
k. The semi-annual and immediate start-up, shutdown, and malfunction reports, and all data required for the reports.
l. All documentation supporting initial notifications and notifications of compliance status.
m. Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan.
n. All information necessary to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a "checklist," or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events).
o. All required measurements needed to demonstrate compliance with a relevant standard (including, but not limited to, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report).

B.36. Periodic startup, shutdown, and malfunction reports. If actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan [see 40 CFR 63.6(e)(3)], the owner or operator shall state such information in a startup, shutdown, and malfunction report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report shall consist of a letter, containing the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, that shall be submitted to the Environmental Protection Commission of Hillsborough County semiannually (or on a more frequent basis if specified otherwise in a relevant standard or as established otherwise by the permitting authority in the source's title V permit). The startup, shutdown, and malfunction report shall be delivered or postmarked by the 30th day following the end of each calendar half (or other calendar reporting period, as appropriate). If the owner or operator is required to submit excess emissions and continuous monitoring system performance (or other periodic) reports under this part, the startup, shutdown, and malfunction reports required under this paragraph may be submitted simultaneously with the excess emissions and continuous monitoring system performance (or other) reports. If startup, shutdown, and malfunction reports are submitted with excess emissions and continuous monitoring system performance (or other periodic) reports, and the owner or operator receives approval to reduce the frequency of reporting for the latter, the frequency of reporting for the startup, shutdown, and malfunction reports also may be reduced if the Environmental Protection Commission of Hillsborough County does not object to the intended change. [40 CFR 63.10(d)(5)(i) and Permit No. 0570057-010-AC]

B.37. Immediate startup, shutdown, and malfunction reports. Notwithstanding the allowance to reduce the frequency of reporting for periodic startup, shutdown, and malfunction reports, any time an action taken by an owner or operator during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures specified in the affected source's startup, shutdown, and

malfunction plan, the owner or operator shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan followed by a letter within 7 working days after the end of the event. The immediate report required under this paragraph shall consist of a telephone call (or facsimile (FAX) transmission) to the Environmental Protection Commission of Hillsborough County within 2 working days after commencing actions inconsistent with the plan, and it shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event, that contains the name, title, and signature of the owner or operator or other responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred. Notwithstanding the requirements of the previous sentence, after the effective date of an approved permit program in the State in which an affected source is located, the owner or operator may make alternative reporting arrangements, in advance, with the permitting authority in that State. Procedures governing the arrangement of alternative reporting requirements under this paragraph are specified in 40 CFR 63.9(i). [40 CFR 63.10(d)(5)(ii) and Permit No. 0570057-010-AC]

B.38. The permittee shall submit the reports as required by Specific Condition Nos. B.36. and B.37. The reports shall be submitted at least semi-annually, unless otherwise noted. In addition to the information required under 40 CFR 63.10, General Provisions, once a violation of the standard or excess emissions has occurred the required reports shall include the following information: [40 CFR 63.550(b) and (c), Rule 62-4.070(3), F.A.C., and Permit No. 0570057-010-AC]

a. The reports shall include records of all alarms from the bag leak detection system specified in 40 CFR 63.548(e).
b. The reports shall include a description of the procedures taken following each bag leak detection system alarm pursuant to 40 CFR 63.548(f)(1) and (2).
c. The reports shall contain a summary of the records maintained as part of the practices described in the standard operating procedures manual for baghouses (Baghouse SOP), including an explanation of the periods when the procedures were not followed and the corrective actions taken.
d. The reports shall contain a summary of the fugitive dust control measures performed during the required reporting period, including an explanation of the periods when the procedures outlined in the standard operating procedures manual (Fugitive Dust Source SOP) pursuant to 40 CFR 63.545(a) were not followed and the corrective actions taken. The reports shall not contain copies of the daily records required to demonstrate compliance with the requirements of the standard operating procedures manuals required under 40 CFR 63.545(a) and 40 CFR 63.548(a).

B.39. The permittee shall comply with the following requirements:

a. The permittee shall furnish the EPC written notification as follows: [40 CFR 60.7(a) and 40 CFR 63.6]
1. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The EPC may request additional relevant information subsequent to this notice. [40 CFR 60.7(a)(4)]
2. A notification of the anticipated date for conducting the opacity observations required by this permit. The notification shall be postmarked not less than 30 days prior to such date. [40 CFR 60.7(a)(6) and 40 CFR 63.9(f)]

3. A notification of the anticipated date for conducting the lead and particulate matter tests required by this permit. The notification shall be postmarked not less than 60 days prior to such date. [40 CFR 63.7(c)(2)(iv) and 40 CFR 63.9(e)]

b. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a monitoring device is inoperative. [40 CFR 60.7(b)]

c. The permittee shall maintain a file of all measurements, including performance testing measurements and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports, and records. [40 CFR 60.7(f) and 40 CFR 63.7]

d. Compliance with opacity standards in this part shall be determined by conducting observations in accordance with Reference Method 9 (EPA Method 9) in Appendix A (40 CFR 60). [40 CFR 60.11(b)]

e. The opacity standards set forth in this permit shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. [40 CFR 60.11(c) and 40 CFR 63.6(f)]

f. No owner or operator shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [40 CFR 60.12]

[Rule 62-204.800, F.A.C., 40 CFR 60, and 40 CFR 63]

B.40. The permittee shall keep the written startup, shutdown, and malfunction plan on record to be made available for inspection, upon request, for the life of the affected source or until the affected source is no longer subject to the provisions of this part. In addition, if the startup, shutdown, and malfunction plan is revised, the permittee shall keep previous (i.e., superseded) versions of the startup, shutdown, and malfunction plan on record, to be made available for inspection, upon request, by the Administrator, for a period of 5 years after each revision to the plan. [40 CFR 63.6(e)(3)(v) and Permit No. 0570057-010-AC]

B.41. If the startup, shutdown, and malfunction plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the startup, shutdown, and malfunction plan at the time the permittee developed the plan, the permittee shall revise the startup, shutdown, and malfunction plan within 45 days after the event to include detailed procedures for operating and maintaining the source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment. Additionally, the Administrator may require that a permittee of an affected source make changes to the startup, shutdown, and malfunction plan for that source. The Administrator may require reasonable revisions to a startup, shutdown, and malfunction plan, if the Administrator finds that the plan: [40 CFR 63.6(e)(3)(vii) and (viii) and Permit No. 0570057-010-AC]

a. Does not address a startup, shutdown, or malfunction event that has occurred;

b. Fails to provide for the operation of the source (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or

c. Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.

Other Requirements

B.42. Federal Rule Requirements. In addition to the specific conditions listed above, these emission units are also subject to the applicable requirements contained in 40 CFR 60, Subpart A – NSPS General Provisions, 40 CFR 60 Subpart L – Standards of Performance for Secondary Lead Smelters, 40 CFR 63 Subpart A – NESHAP General Provisions, and 40 CFR 63 Subpart X - National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting. [Rule 62-204.800 and 62-213.440, F.A.C.

B.43. When any revision to a standard(s) applicable to secondary lead smelting operations are promulgated by The United States Environmental Protection Agency, The Florida Department of Environmental Protection, or The Environmental Protection Commission of Hillsborough County, this facility shall comply with all the applicable requirements and apply to revise this permit accordingly. [Rule 62-4.070(3), F.A.C. and Permit No. 0570057-010-AC]

SECTION IV. APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix CAM, Compliance Assurance Monitoring Plan.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix ICE, Requirements for Internal Combustion Engines.
Appendix NESHAP, Subpart A – General Provisions. (Include for all units that are subject to a NESHAP)
Appendix NESHAP, Subpart X and Subpart ZZZZ.
Appendix NSPS, Subpart A – General Provisions. (Include for all units that are subject to an NSPS subpart)
Appendix NSPS, Subpart L.
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix SSM, Startup, Shutdown, and Malfunction Plan
Appendix Baghouse SOP, Baghouse and Torit SOP - Inspection/Maintenance Procedure
Appendix FUG, Standard Operating Procedures for the Control of Fugitive Emissions

REFERENCED ATTACHMENTS.

The Following Attachments Are Included for Applicant Convenience:

Figure 1, Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance (40 CFR 60, July, 1996).
Table H, Permit History.
Table 1, Summary of Air Pollutant Standards and Terms.
Table 2, Compliance Requirements.