

## MEMORANDUM

**DATE:** September 6, 2012

**TO:** Richard D. Garrity, Ph.D.

**FROM:** Stephen Hathaway, P.E.                      **THRU:** Diana M. Lee, P.E.  
Sterlin K. Woodard, P.E.

**SUBJECT:**    **Air Construction Permit – Trademark Metals Recycling, LLC**  
                  **DRAFT Permit No. 0570119-016-AC**

Attached is DRAFT Permit No. 0570119-016-AC which authorizes Trademark Metals Recycling, LLC to install a charging well which will feed into the existing aluminum holding furnace at the facility. Also, the charging rate to the holding furnace will be increased from 2,500 lbs/hr to 7,000 lbs/hr of molten aluminum.

This project will help facilitate the transfer of molten aluminum into the holding furnace. The molten aluminum from the two rotary furnaces will be poured into a transfer ladle (approximately 3,000 lb capacity vessel) and then transferred into the charging well, which will then feed directly into the existing aluminum holding furnace. The charging well will be located on the south side of the holding furnace. The charging well will not use any external heating equipment to keep the aluminum in a molten state, as it will use the holding furnace as its heat source. In addition, the well will be lined with refractory brick to help keep the aluminum hot during transfer operations.

The holding furnace is a *Group 2* furnace, therefore, it is only authorized to process clean charge as defined in 40 CFR 63 Subpart RRR. The holding furnace is not subject to PM RACT, due to the low levels of PM emissions from the combustion of natural gas. No increase in potential emissions or annual production was requested with this project. It is expected that by not having to re-melt the aluminum from the molds (sows) that the holding furnace will use less natural gas to maintain the aluminum in a molten state. However, since the holding furnace will be processing more molten aluminum, actual emissions from the combustion of natural gas may increase as a result of this project.

This project is subject to 40 CFR 63 Subpart RRR National Emissions Standards for Hazardous Air Pollutants for Secondary Aluminum Smelters.

Based on our review, we recommend the issuance of the DRAFT AC permit.

SRH: 0570119-016-AC

TECHNICAL EVALUATION  
AND  
PRELIMINARY DETERMINATION  
FOR

Trademark Metals Recycling, LLC

Hillsborough County

Air Construction Permit

Application Number

0570119-016-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

September 6, 2012

## I. Project Description

A. Applicant: Brenda Anderson  
Environmental Manager  
Trademark Metals Recycling, LLC  
5220 Dover Street  
Tampa, FL 33619

B. Engineer: Veronica N. Sgro, P.E.  
Koogler and Associates, Inc.  
4014 NW 13<sup>th</sup> Street  
Gainesville, FL 32609

P.E. No.: 69227

### C. Project and Location:

The applicant proposes to install a charging well which will feed into the existing aluminum holding furnace at the facility. The charging well will be located on the south side of the holding furnace, which will allow the direct transfer of molten aluminum from the two rotary furnaces. The holding furnace is a Group 2 furnace, therefore, it is only authorized to process clean charge as defined in 40 CFR 63 Subpart RRR. Also, the maximum charging rate to the holding furnace will be increased from 2,500 lbs/hr to 7,000 lbs/hr of molten aluminum.

The project has been assigned the NEDS Source Classification Code Nos. 3-04-001-60 and 3-90-006-99. The Standard Industrial Code for the project is No. 3341, Primary Metal Industries, Secondary Smelting and Refining of Nonferrous Metals. The project is located at 6912 E 9<sup>th</sup> Avenue, Tampa, FL 33619. UTM Coordinates of the location are 17-364.7 E and 3093.6 N.

### D. Process and Controls:

Trademark Metals Recycling, LLC operates a secondary aluminum smelting facility which turns contaminated aluminum scrap into reusable metal by smelting in two rotary furnaces. The molten aluminum from the rotary furnaces is poured into molds (sows) and sent to the holding furnace for re-melting prior to casting. The emissions from the two rotary furnaces are controlled by a 50,000 ACFM lime-injected Control Design & Integration Model SMF-50-3.0 Baghouse. All of the furnaces are fired on natural gas, and the emissions from the holding furnace vent directly to the atmosphere.

This project is to install a charging well which will feed the existing aluminum holding furnace at the facility. Also, the maximum charging rate to the holding furnace will be increased from 2,500 lbs/hr to 7,000 lbs/hr of molten aluminum.

This project will help facilitate the transfer of molten aluminum into the holding furnace. The molten aluminum from the two rotary furnaces will be poured into a transfer ladle (approximately 3,000 lb capacity vessel) and then transferred into the charging well, which will then feed directly into the existing aluminum holding furnace. The charging well will be

located on the south side of the holding furnace. The proposed dimensions of the charging well are approximately 5'x4'x5'. The charging well will not use any external heating equipment to keep the aluminum in a molten state, as it will use the holding furnace as its heat source. In addition, the well will be lined with refractory brick to help keep the aluminum hot during transfer operations.

The holding furnace is a *Group 2* furnace, therefore, it is only authorized to process clean charge as defined in 40 CFR 63 Subpart RRR. The holding furnace is not subject to PM RACT, due to the low levels of PM emissions from the combustion of natural gas. No increase in potential emissions or annual production was requested with this project. It is expected that by not having to re-melt the aluminum from the molds (sows) that the holding furnace will use less natural gas to maintain the aluminum in a molten state. However, since the holding furnace will be processing more molten aluminum, actual emissions from the combustion of natural gas may increase as a result of this project.

E. Application Information:

Received on: July 24, 2012

Information Requested: n/a

Application Complete: July 24, 2012

## II. Rule Applicability

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

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Non-attainment Areas, F.A.C., since the facility is minor by state definition with respect to Rules 62-212.400 and 500, F.A.C.

This project is subject to the requirements of Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Non-attainment Requirements, F.A.C., since a permit is required for this project.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the facility is a source of particulate matter and opacity, and a potential source of odor.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.417, Specific Emission Limiting and Performance Standards, F.A.C., since there is not an applicable source category.

This project is not subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology for VOC's, F.A.C., since there is not an applicable category for this source.

This project is not subject to the requirements of Rule 62-296.600, F.A.C., Reasonably Available Control Technology for Lead, since there is not an applicable category for this source.

This project is not subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology for Particulate Matter, F.A.C., since the potential PM emissions from the affected emission unit are less than 1 tons per year.

This project is subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since the affected emission unit is subject to 40 CFR 63 Subpart RRR - National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Smelters.

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

III. Summary of Emissions

<b>Emission Unit(s)</b>	<b>Regulated Pollutants</b>	<b>Current Actual Emissions (TPY)*</b>	<b>Potential Emissions (TPY)**</b>	<b>Emissions Increase (TPY)</b>
EU 004 – Aluminum Holding Furnace	CO	1.0	2.1	1.1
	NO <sub>x</sub>	1.1	2.5	1.4
	Pb	0.000006	0.000013	0.000007
	PM	0.1	0.2	0.1
	SO <sub>2</sub>	0.01	0.02	0.01
	VOC	0.06	0.14	0.08

\*Based on average of 2010 and 2011 AOR's for EU 004 Aluminum Holding Furnace.

\*\*Based on natural gas combustion @ 6 MMBtu/hr, 1,050 MMBtu/MMCF, and 8,760 hours per year.

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

IV. Conclusions:

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

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

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

CERTIFIED MAIL

In the Matter of an  
Application for Permit by:

File No.: 0570119-016-AC  
County: Hillsborough

Brenda Anderson  
Environmental Manager  
Trademark Metals Recycling, LLC  
5220 Dover Street  
Tampa, FL 33619 /

INTENT TO ISSUE

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, Trademark Metals Recycling, LLC, applied on July 24, 2012 to the EPC for an air construction permit to install a charging well on the south side of the aluminum holding furnace at the secondary aluminum smelting facility located at 6912 E 9<sup>th</sup> Avenue, Tampa, FL 33619. Also, the charging rate to the holding furnace will be increased from 2,500 lbs/hr to 7,000 lbs/hr.

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The project is not exempt from permitting procedures. The EPC has determined that an air pollution construction permit is required to commence or continue operations at the described facility.

The EPC intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 and 62-4.

Pursuant to Section 403.815 and 403.0872, F.S. and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper

meets these requirements, please contact the EPC at the address or telephone number listed below. **The applicant shall provide proof of publication to the EPC, Air Permitting Section, at 3629 Queen Palm Dr., Tampa, Florida 33619 (Phone 813-627-2600 - FAX 813-627-2660) within 7 (seven) days of publication.** Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S.; or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

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

- (a) The name and address of each agency affected and each agency's file or identification number if known;
- (b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
- (c) A statement of how and when the petitioner received notice of the EPC action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;
- (f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as

required by Rule 28-106.301, F.A.C.

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

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

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

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

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

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

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

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

the procedures of the federal program.

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

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.  
Executive Director

cc: Florida Department of Environmental Protection, Southwest District (via e-mail)  
Veronica N. Sgro, P.E. – Koogler and Associates, Inc.

**CERTIFICATE OF SERVICE**

The undersigned duly designated clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed before the close of business on \_\_\_\_\_ to the listed persons.

**FILING AND ACKNOWLEDGEMENT**

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

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY  
NOTICE OF INTENT TO ISSUE PERMIT

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue air construction Permit No. 0570119-016-AC to Trademark Metals Recycling, LLC to install a charging well on the south side of the aluminum holding furnace at the secondary aluminum smelting facility. In addition, the charging rate to the holding furnace will be increased from 2,500 lbs/hr to 7,000 lbs/hr. The facility is located at 6912 E 9<sup>th</sup> Avenue, Tampa, FL 33619.

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

The EPC will issue the Final permit with the conditions of the DRAFT permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr., Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

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

- (a) The name and address of each agency affected and each agency's file or identification number if known;
- (b) The name, address, and telephone number of the petitioner, and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when petitioner received notice of the EPC action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC proposed action;
- (f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification

of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and

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

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

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

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

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

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Dr., Tampa, FL 33619. The complete project file includes the proposed Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E., at the above address, or call 813-627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the proposed permit and require, if applicable, another Public Notice.

ENVIRONMENTAL PROTECTION COMMISSION OF  
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Brenda Anderson  
Environmental Manager  
Trademark Metals Recycling, LLC  
5220 Dover Street  
Tampa, FL 33619

Dear Ms. Anderson:

Re: Hillsborough County - AP

Enclosed is Permit Number 0570119-016-AC to modify the aluminum holding furnace at the facility located at 6912 E 9<sup>th</sup> Avenue, Tampa, FL 33619. This air construction permit authorizes the installation of a charging well on the south side of the aluminum holding furnace at the secondary aluminum smelting facility.

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

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.  
Executive Director

RDG/SRH/srh

cc: Florida Department of Environmental Protection (e-mail)  
Veronica N. Sgro, P.E. – Koogler and Associates, Inc.

CERTIFICATE OF SERVICE

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

FILING AND ACKNOWLEDGEMENT

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

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date

PERMITTEE:  
Trademark Metals Recycling, LLC  
6912 E 9<sup>th</sup> Avenue  
Tampa, FL 33619

PERMIT/CERTIFICATION  
DRAFT Permit No.: 0570119-016-AC  
County: Hillsborough  
Expiration Date: March 6, 2014  
Project: Modify Holding Furnace

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the EPC and made a part hereof and specifically described as follows:

For the modification of the aluminum holding furnace at Trademark Metals Recycling, LLC's secondary aluminum smelting facility. This permit authorizes the installation of a charging well which will feed the existing aluminum holding furnace at the facility. Also, the maximum charging rate to the holding furnace will be increased from 2,500 lbs/hr to 7,000 lbs/hr of molten aluminum.

Trademark Metals Recycling, LLC (TMR) operates a secondary aluminum smelting facility which turns contaminated aluminum scrap into reusable metal by smelting in two rotary furnaces. The molten aluminum from the rotary furnaces is poured into molds (sows) and sent to the holding furnace for re-melting prior to casting. The emissions from the two rotary furnaces are controlled by a 50,000 ACFM lime-injected Control Design & Integration Model SMF-50-3.0 Baghouse. All of the furnaces are fired on natural gas, and the emissions from the holding furnace vent directly to the atmosphere.

This project will help facilitate the transfer of molten aluminum into the holding furnace. The molten aluminum from the two rotary furnaces will be poured into a transfer ladle (an approximately 3,000 lb capacity vessel) and then transferred into the charging well, which will then feed directly into the existing aluminum holding furnace. The charging well will be located on the south side of the holding furnace. The proposed dimensions of the charging well are approximately 5'x4'x5'. The charging well will not use any external heating equipment to keep the aluminum in a molten state, as it will use the holding furnace as its heat source. In addition, the well will be lined with refractory brick to help keep the aluminum hot during transfer operations.

The holding furnace is a *Group 2* furnace, therefore, it is only authorized to process clean charge as defined in 40 CFR 63 Subpart RRR. The holding furnace is not subject to PM RACT, due to the low levels of PM emissions from the combustion of natural gas.

This project is subject to 40 CFR 63 Subpart RRR - National Emissions Standards for Hazardous Air Pollutants for Secondary Aluminum Smelters.

Location: 6912 E 9<sup>th</sup> Avenue, Tampa, Hillsborough County, FL 33619

Emission Unit No.:

004	Aluminum Holding Furnace
Emission Point #1	Charging Well
Emission Point #2	Holding Furnace Combustion Exhaust

References Permit No.: 0570119-014-AV

PERMITTEE:  
Trademark Metals Recycling, LLC

Permit/Certification No.: 0570119-016-AC  
Project: Modify Holding Furnace

SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]
5. Permitted Capacity. As requested by the permittee, in order to limit the potential to emit for this project and exempt the aluminum holding furnace from PM RACT, the maximum permitted capacities are as follows:

EU No.	MMBtu/hr Heat Input	Charging Rate (lb/hr) <sup>1</sup>	Charging Rate (tpy)
004	6	7,000	30,660

<sup>1</sup>Based on a daily average.

[Rules 62-4.070(3), 62-210.200 (Potential-to-Emit), and 62-296.700(2)(c), F.A.C., Title V Permit No. 0570119-014-AV, and Permit Application Received July 24, 2012]

6. Methods of Operation. In order to comply with Specific Condition No. 5, the following restrictions and limitations apply:
  - a. *Fuel.* The only fuel that is allowed to be burned in the holding furnace is natural gas.
  - b. Only clean charge shall be processed in the holding furnace.
  - c. No reactive HAP-containing or HAP-generating fluxes may be used in the holding furnace.

[40 CFR 63.1506(o), Rule 62-4.070(3), Title V Permit No. 0570119-014-AV, and Permit Application Received July 24, 2012]

7. Hours of Operation. This emission unit may operate continuously (8,760 hours/year).  
[Rule 62-210.200 (Potential-to-Emit), F.A.C. and Title V Permit No. 0570119-014-AV]

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8. Visible Emissions. Visible emissions from the aluminum holding furnace shall not exceed 20% opacity. [Rules 62-296.320(4)(b)1. and 62-4.070(3), F.A.C.]

**Test Methods and Procedures**

9. Test the charging well and the aluminum holding furnace for visible emissions at the point of highest opacity within 30 days of commencing operation after installation of the charging well, and annually thereafter, and submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. Commencing operation is defined as setting into operation any emission unit for any purpose. [Rules 62-4.070(3), 62-210.200(91), and 62-297.310(7)(a), F.A.C.]

10. Compliance with the emission limitations of Specific Condition No. 8 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The visible emissions tests shall be a minimum of 30 minutes in duration. The minimum requirements for stack sampling facilities, source sampling, and reporting, shall be in accordance with Rule 62-297, F.A.C. [Rules 62-4.070(3) and 62-297.310(7)(a), F.A.C.]

11. Testing of emissions shall be conducted at 90-100% of the maximum permitted process rates as stated in Specific Condition No. 5. 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 such as the aluminum feed rate to the charging well may invalidate the test. [Rules 62-297.310(2)(b) and 62-4-070(3), F.A.C.]

12. The permittee shall notify the Environmental Protection Commission of Hillsborough County at least 15 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. [Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

**Recordkeeping and Reporting Requirements**

13. In order to demonstrate compliance with Specific Condition No. 5, the permittee shall maintain daily records of operations for the most recent five years. 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:

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Daily

- a) Month, Day, Year
- b) Total aluminum charged to the holding furnace (lbs)
- c) Total flux charged to the holding furnace (lbs)
- d) Total aluminum alloy produced by the holding furnace (lbs)
- e) Total hours of operation of the holding furnace (hours)
- f) Average charging rate for the holding furnace using b) and e) above (lbs/hr)

Monthly

- g) Total aluminum charged to the holding furnace (tons)
- h) Total flux charged to the holding furnace (tons)
- i) Total aluminum alloy produced by the holding furnace (tons)
- j) Total hours of operation of the holding furnace (hours)
- k) Average charging rate for the holding furnace using g) and j) above (lbs/hr)
- l) Amount of natural gas used in the holding furnace (MMCF)
- m) Running 12-month total of g), i), and l) above

[Rules 62-4.070(3) and 62-296.320, F.A.C., 40 CFR 63.1517(b)(12)]

14. The permittee must provide and maintain easily visible labels posted at the holding furnace that identifies the applicable emission limits and means of compliance, including the applicable operational standard and control method (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (*e.g.*, clean scrap only, all scrap, etc.), flux materials and additional practices, the applicable operating parameter ranges and requirements as incorporated in the OM&M Plan. The labels must be inspected at least once per month to confirm that posted labels are intact and legible.

[Rule 62-4.070(3), F.A.C., 40 CFR 63.1506(b) and 63.1510(c)]

15. The owner or operator must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the reporting period. For the holding furnace, the Title V Responsible Official must submit a certification statement stating that only clean charge materials were processed in the group 2 furnace during the reporting period, and no fluxing was performed or all fluxing performed was conducted using only nonreactive, non-HAP-containing/non-HAP-generating fluxing gases or agents, except for cover fluxes, during the reporting period. The Responsible Official shall also indicate whether or not the holding furnace was operated according to the requirements of 40 CFR 63, Subpart RRR. A detailed report of

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any deviations from the applicable requirements must be submitted for each 6-month reporting period. [40 CFR 63.1516(b)(2)(v)]

16. The aluminum holding furnace is subject to all of the applicable requirements of 40 CFR 63, Subpart A – General Provisions. [40 CFR 63.1518 and Rule 62-204.800, F.A.C.]

**Reasonable Precautions**

17. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing, and handling. [Rules 62-296.320(4)(c)1. and 62-4.070(3), F.A.C.; and Title V Permit No. 0570119-014-AV]

18. 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, 62-296, or 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.]

19. 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.

20. 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(Modification), F.A.C. 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 listed.
- B) Installation or addition of any equipment\* which is a source of air pollution.
- C) Increased production rate(s).

\* Not applicable to routine maintenance, repair, or replacement of component parts.

21. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air

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Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3), F.A.C.]

22. 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.]

23. A minimum of two copies of an application to revise the current Title V Operation Permit shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of the emissions compliance testing required by this permit or at least 90 days prior to the expiration date of this permit, whichever occurs first. The application shall also include a copy of the required compliance tests and a revised OM&M Plan to incorporate the modifications authorized by this permit. [Rules 62-4.050(2), 62-210.300(2), and 62-213.400(2), F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION  
OF HILLSBOROUGH COUNTY

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Richard D. Garrity, Ph.D.  
Executive Director