M E M O R A N D U M

DATE: November 5, 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
FINAL Permit No. 0570119-016-AC

Attached is FINAL 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.

The DRAFT AC permit package was mailed to the applicant on September 6, 2012. The applicant's consulting company, Koogler and Associates, requested an extension of time to file petition and was granted said extension on September 19, 2012. Koogler and Associates then submitted comments via e-mail on September 26, 2012 with regard to the DRAFT AC permit. The REVISED DRAFT Permit incorporated the comments received and was issued on October 11, 2012. Trademark Metals Recycling published the "PUBLIC NOTICE OF INTENT TO ISSUE PERMIT" on October 19, 2012 in La Gaceta. No further comments were received from the facility or the general public since the issuance of the REVISED DRAFT Permit.

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 FINAL AC permit as drafted.

SRH: 0570119-016-AC

FINAL DETERMINATION

FOR

Trademark Metals Recycling, LLC

Hillsborough County

Air Construction Permit No.

0570119-016-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

November 5, 2012

The Environmental Protection Commission of Hillsborough County mailed a public notice package on September 6, 2012 that included the Intent to Issue AC Permit No. 0570119-016-AC to Trademark Metals Recycling, LLC's Tampa smelting facility, located at 6912 E 9th Avenue, Tampa, FL 33619. The applicant's consulting company, Koogler and Associates, requested an extension of time to file petition and was granted said extension on September 19, 2012. Koogler and Associates then submitted comments via e-mail on September 26, 2012 with regard to the DRAFT AC permit. The REVISED DRAFT AC Permit incorporated the comments received and was issued on October 11, 2012. The AC Permit is for the modification of the aluminum holding furnace, to allow for the direct transfer of molten aluminum for operational flexibility.

The Public Notice of Intent to Issue was published on October 19, 2012 in La Gaceta.

No further comments were received from the facility or the public since the Intent was published.

The final action of the Environmental Protection Commission of Hillsborough County is to issue the final permit.

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 FINAL Permit Number 0570119-016-AC to modify the aluminum holding furnace at the facility located at 6912 E 9th Avenue, Tampa, FL 33619. This air construction permit authorizes the installation of a charging well and associated natural gas burner on the south side of the aluminum holding furnace at the secondary aluminum smelting facility. In addition, the permitted charging rate to the holding furnace will be increased from 2,500 lbs/hr to 7,000 lbs/hr.

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 9th Avenue
Tampa, FL 33619

PERMIT/CERTIFICATION:
FINAL 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 heated 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. Alloying metals, such as magnesium, are added to the holding furnace as needed to produce the desired aluminum alloy. 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.

The charging well will be located on the south side of the holding furnace, and will allow the direct transfer of molten aluminum from the two rotary furnaces via transfer ladle (up to 14,000 lbs capacity, which is also the capacity of each rotary furnace). The well will be equipped with a natural gas burner with a heat input rate of up to 3 MMBtu/hr. The burner will be located on the lid of the well and used as needed to keep the aluminum in a molten state. The proposed dimensions of the charging well are approximately 5'x4'x5'. In addition, the well will be lined with refractory brick to help keep the aluminum hot during transfer operations. The facility will also maintain the ability to melt sows in the holding furnace, as needed, for operational flexibility.

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 9th 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

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)[2]	Charging Rate (tpy)
004	9 [(1)]	7,000	30,660

[(1)]Based on 6 MMBtu/hr for the holding furnace burners and 3 MMBtu/hr for the charging well burner.

[(2)]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., Permit Application Received July 24, 2012, and Additional Information Received September 26, 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 charging well and 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, Permit Application Received July 24, 2012, and Additional Information Received September 26, 2012]

SPECIFIC CONDITIONS:

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]

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]

SPECIFIC CONDITIONS:

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:

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,

SPECIFIC CONDITIONS:

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 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 provisions 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.]

SPECIFIC CONDITIONS:

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 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