

RECEIVED

SECONDARY ALUMINUM SWEAT FURNACE APR 23 2003  
AIR GENERAL PERMIT REGISTRATION FORM

Bureau of Air Monitoring  
& Mobile Sources

Registration Type

Check one:

- NEW: Initial registration for general permit for proposed *new* secondary aluminum sweat furnace(s).
- EXISTING: Initial registration for general permit for *existing* secondary aluminum sweat furnace(s).
- RE-REGISTRATION: Re-registration for general permit for secondary aluminum sweat furnace(s) upon expiration of current general permit.

Facility Registration

Facility Owner/Company Name (Name of corporation, agency, or individual owner):

SCRAP-ALL INC.

Site Name (For example, plant name or number):

Main Yard

Facility Location...

2801 4th ave

Street Address or Other Locator:

City: Tampa

County: Hillsborough

Zip Code: 33605

Facility Identification Number (DEP use only; do not fill in):

0570054-005

Responsible Official

Responsible Official Name:

Mark Goldman

Responsible Official Qualification (Check one or more of the following options, as applicable):

For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.

For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.

Responsible Official Mailing Address...

Organization/Firm: SCRAP-ALL INC

Street Address: PO Box 5567

City: TAMPA

County: Hillsborough

Zip Code: 33675

Responsible Official Telephone Numbers...

Business: (813) 247-3619

Fax: (813) 248-1843

Mobile: (813) 267-1468

Responsible Official Email Address (optional):

Mgoldman @ SCRAPALL.COM

**Facility Description and Comments**

Number of secondary aluminum sweat furnace units on site: 1

Is each secondary aluminum sweat furnace equipped with an afterburner that has a design residence time of at least 0.8 seconds and a design operating temperature of at least 1600 degrees Fahrenheit, and is the manufacturer's documentation of these design specifications maintained on-site?  N (circle one)

If 'No,' explain \_\_\_\_\_

Does each secondary aluminum sweat furnace have an afterburner temperature monitoring device and temperature data recorder?  N (circle one)

If 'No,' explain \_\_\_\_\_

Does each secondary aluminum sweat furnace have a written operation, maintenance, and monitoring (OM&M) plan, and is this plan maintained on-site?  N (circle one)

If 'No,' explain \_\_\_\_\_

Does each secondary aluminum sweat furnace have a written startup, shutdown and malfunction plan, and is this plan maintained on-site?  N (circle one)

If 'No,' explain \_\_\_\_\_

List and briefly describe all other process operations at the site that may emit air pollutants (for example, scrap shredders, degreasers, paint shops, boilers, emergency generators, etc.). Add any comments about the facility that would be helpful to the Department in understanding the nature of your operation (for example, describe the products made, amount of materials used, air pollution control equipment employed, and hours of operation).

① *Diminimus particulate from TRAFFIC and TRUCK Loading OPERATION.*

② *Diminimus particulate from Loading DROSS OR ASH INTO BOXES FOR SHIPPING.*

*We Keep all affected AREAS WATERED DOWN.*

**Facility Contact (If different from Responsible Official)**

Facility Contact Name: <u>Same</u>			
Facility Contact Address...			
Street Address:	<u>Same</u>	County:	Zip Code:
City:			
Facility Contact Telephone Numbers...			
Business:	( ) - <u>Same</u>	Fax:	( ) -
Mobile:	( ) -		
Facility Contact Email Address (optional):			

**Surrender of Existing DEP Air Permit(s)**

Rule 62-213.300(2)(a)2., F.A.C., makes the surrender of all existing DEP air permits, other than the air general permit, a condition precedent for the entitlement to a general permit. Indicate with an "X" whether the responsible official surrenders such permit(s), listing the permit number(s), or whether no such permit(s) exist. Complete this portion of the form **ONLY** if this is an initial registration for general permit:

- I hereby surrender all existing DEP air permits (other than the air general permit for which this registration form is submitted). The permit number(s) are:  
0570054 003 AD
- No DEP air permits currently exist for the operation of the facility indicated in this registration form.

**Responsible Official Certification**

*I, the undersigned, am the responsible official of the facility addressed in this registration form. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this registration form are true, accurate and complete, and that the facility addressed in this registration form is entitled to use the Title V air general permit for secondary aluminum sweat furnaces. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described in this registration form so as to comply with all terms and conditions of the Title V air general permit for secondary aluminum sweat furnaces as set forth at Rule 62-213.300(1)(f), F.A.C.*

*I will promptly notify the Department of any changes to the information contained in this registration form.*

Mark Goldman VP  
Print name of responsible official

Mary Goldman  
Signature

4/17/04  
Date



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

May 21, 2003

Mr. Mark Goldman  
Scrap-All, Inc.  
2801 Fourth Avenue  
Tampa, Florida 33605

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

## NOTICE OF INELIGIBILITY TO USE TITLE V AIR GENERAL PERMIT

Dear Mr. Goldman:

This is to notify you that the Department, pursuant to your submittal received on April 23, 2003, has determined that your facility does not qualify to use the Title V Air General Permit for Secondary Aluminum Sweat Furnace.

The requirements that a facility must meet in order to qualify for use of the Title V Air General Permit are set forth in Rule 62-213.300, Florida Administrative Code (F.A.C.). Your submittal indicates your facility is not eligible for the reason(s) listed below:

- facility information provided is insufficient
- equipment information provided is insufficient
- equipment control information is insufficient
- source category not applicable or incorrect
- emissions indicate facility is not eligible
- certification statement is blank or not signed by Responsible Official (Owner)
- other:

If you have any questions regarding the Department's determination, please contact Rick Butler or Sandy Bowman at the Bureau of Air Monitoring and Mobile Sources at 850/488-0114. However, if you believe you meet the requirements for a Title V Air General Permit, you may complete the enclosed blank notification form, making the corrections indicated above, and resubmit it to the Department. Any facility which does not qualify for a Title V air

*"More Protection, Less Process"*

*Printed on recycled paper.*

general permit may require a standard air pollution control permit from the Department. A notice of your legal rights begins on the following page.

The DEP will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, Florida Statutes, (F.S.).

A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) by the Agency Clerk in the DEP Office of General Counsel, MS #35, 3900 Commonwealth Boulevard, Tallahassee, FL, 32399-3000 (Telephone: 850/488-9314, Fax: 850/487-4938). 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. Petitions filed by any other person must be filed within 14 (fourteen) days of receipt of notice of this proposed action. A petitioner must 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 permitting authority'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; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when each petitioner received notice of the agency action or proposed 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, as well as the rules and statutes which entitle the petitioner to relief;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority'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 permitting authority's final action may be different from the position

taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation will not be available in this proceeding.

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 note.

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, Florida 32399-3000. The petition must specify the following information:.

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and,
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or wavier 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 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 the 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 party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the permitting authority in the Legal Office; 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 (thirty) days from the date this Notice is filed with the Clerk of the permitting authority.

Executed in Tallahassee, Florida, this \_\_\_\_ day of \_\_\_\_\_, 2003.

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

\_\_\_\_\_  
Howard L. Rhodes, Director  
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order and all copies were sent by certified mail before the close of business on \_\_\_\_\_ to the person(s) listed:


FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to section 120.52(7), Florida Statutes, with the designated agency Clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)

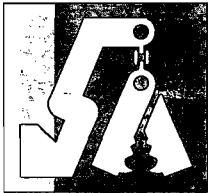
To The File:

Subsequent to the 30-day review period, a letter was not mailed to Scrap-All per Pat Comer.

  
Sandy Bowman

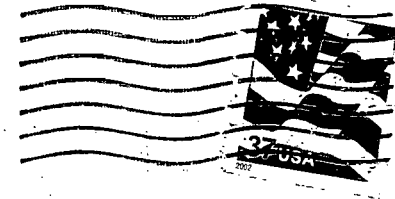
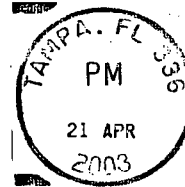


ROB KAUCH  
813 272 5605



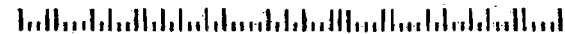
**SCRAP ALL, INC.**

2801 4th Avenue • P.O. Box 5567 • Tampa, Florida 33675



GENERAL PERMITS SECTION  
BUREAU OF AIR MONITORING & MOBILE SOURCES, MS5510  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
2600 BLAIR STONE ROAD  
TALLAHASSEE FL 32399-2400

32399+2400



**Lee, Chi-Sun**

---

**From:** Lee, Chi-Sun  
**Sent:** Thursday, May 15, 2003 11:19 AM  
**To:** Vielhauer, Trina  
**Cc:** Pennington, Jim  
**Subject:** Compliance Assistance Inspection

On May 5 & 6, 2003, I traveled to Tampa ( Hillsborough County ) for compliance assistance inspection for Alcoa Extrusion, Inc., Gulf Coast Recycling, Inc. and Scrap-All, Inc. Primary purpose of these inspection was to verify the current status of the furnace operation and determine applicability of the 40 CFR 63 Subpart RRR.

Scrap-All, Inc.

**Contact:** Mark Goldman President  
**Address:** 2801 4<sup>th</sup> Ave., Tampa, Fl 33675  
**Business:** Industrial scrap metal recycling  
 55 employees, established 1973

*file*  
 #0570054

Diana Lee, Hillsborough County and I arrived at 1; 15 pm on Monday, May 5 and were escorted around the plant by Mr. Goldman. Prior to plant tour, he informed us that the furnace was shut down 10 days ago due to dispute over the subject furnace's permit status.

The local program authority insists the company require Title V Permit but the company said this source is not qualified for Title V Permit. Mr. Goldman stated that if local authority insists for Title V Permit, then company is force to make decision whether continue melting operation of the furnace is economically feasible or shut down the furnace. The company is discussing this matter with consultant to workout with local authority.

This facility is authorized to operate one natural gas fired aluminum smelter furnace. The furnace is identified as a United Corporation Model AS-900 with serial number 84975.

This furnace consists of a primary chamber and a holding chamber for the molten aluminum. The furnace /afterburner is fired on natural gas at a maximum heat input of 3.2 MMBtu/hr and maximum permitted aluminum scrap charging rate of 1200 pounds per hour. Particulate emissions are controlled by a direct flame afterburner. The afterburner chamber temperature is maintaining maximum 1500 degree F, resident time 0.9 second and 5% VE limitation.

The shell of the afterburner appeared to be in good condition. No corrosion or hot spots were found. I informed Mr. Goldman of the operating record keeping requirement and he said he has been following the requirement.

Gulf Coast Metals, Inc.

**Contact:** Lee Levant, President  
**Address:** 6912 East Ninth Ave., Tampa, Fl 33619  
**Business:** Industrial scrap metal recycling  
 25 employees, established 1980

Diana and I arrived at 2:00 pm and Mr. Levant were escorted us around the plant.

**Lee, Chi-Sun**

---

**From:** Lee, Chi-Sun  
**Sent:** Thursday, June 19, 2003 12:21 PM  
**To:** 'leed@epchc.org'  
**Cc:** Vielhauer, Trina; Pennington, Jim  
**Subject:** Compliance Tests

Dear Diana,

Your cooperation during the compliance inspections of Secondary Aluminum Production Facilities in May is greatly appreciated.

The compliance deadline of March 23, 2003 for the subject industries passed. All active furnace(s) should conduct emission tests to verify compliance with the requirement of Subpart RRR prior to end of the federal fiscal year 2003. Also any facility without an emission control system must recognize the urgency of this matter and install the appropriate control system as soon as possible.

Please notify the relevant facility on this matter. If you have any questions, please feel free to call me at 850-414-7268

Active facilities in your program: Scrap-All Inc.  
Gulf Coast Metals Inc.

Best Regards,

Chi-Sun Lee

COMMISSION  
Kathy Castor  
Pat Frank  
Ken Hagan  
Jim Norman  
Jan K. Platt  
Thomas Scott  
Ronda Storms



Administrative Offices,  
Legal & Water Management Division  
The Roger P. Stewart Environmental Center  
1900 - 9th Ave. • Tampa, FL 33605  
Ph. (813) 272-5960 • Fax (813) 272-5157

Air Management Fax 272-5605  
Waste Management Fax 276-2256  
Wetlands Management Fax 272-7144  
1410 N. 21st Street • Tampa, FL 33605

Executive Director  
Richard D. Garrity, Ph.D.

May 19, 2003

RECEIVED  
MAY 23 2003  
Bureau of Air Monitoring  
& Mobile Sources

Mr. Bruce Thomas, P.E.  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400, MS 5510

Re: Hillsborough County - AP  
DEP File No. 0570054-005-AG

Dear Mr. Thomas:

Thank you for notifying EPC staff of the air general permit notification submittal by Scrap All, Inc., representatives on April 23, 2003 for a Title V Air General Permit for Secondary Aluminum Sweat Furnaces. Please note, EPC staff currently has an application for a Title V Air Operation Permit under review for Scrap All, Inc., and have requested additional information. A partial response was received April 17, 2003, however the application is still incomplete.


Scrap All, Inc., operates a secondary aluminum sweat furnace at a scrap handling facility that is open to the public. Persons wishing to sell scrap metals, transport the scrap to the facility by truck or trailer. The material is weighed and unloaded. The large pieces of scrap are sorted and placed in various piles within the yard. The scrap may be loaded into a compactor, sorted further, cut to size, or loaded into trucks and railcars for transport offsite. Aluminum scrap is segregated from other metals and sorted according to type. The aluminum is stored and later charged into the furnace.

After inspecting the facility, EPC staff has determined the particulate matter emissions from the scrap handling activities exceed the five ton per year threshold established for insignificant emissions units in accordance with Rule 62-213.300(2)(a)(1)(b), F.A.C. Rules 62-213.300(1)(f)(1) and 62-213.300(2)(a)(1), F.A.C., prohibit any facility with significant emissions units other than a secondary aluminum sweat furnace to operate under a air general permit as defined by Rule 62-213.300(1)(f), F.A.C.

Based on handling 36,000 tons of scrap per year, the number of times the material is handled/dropped (approximately 5), an emissions factor of 0.20 lbs/ton/drop (AP-42, Table 12.10-7), and an control efficiency of 50% for water sprays, the potential particulate matter emissions from the scrap handling operations alone have been estimated by EPC staff to equal 9.0 tpy. Additionally, in

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E-Mail: [epcinfo@epchc.org](mailto:epcinfo@epchc.org)

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Bruce Thomas  
May 19, 2003

Page 2

the Title V Air Operation Permit submitted January 17, 2003, the applicant states the particulate matter emissions from the material handling were estimated to be 8.64 tpy based on a different emissions factor.

Therefore, it is the opinion of EPC staff that the facility is not eligible to operate under the Title V Air General Permit for Secondary Aluminum Sweat Furnaces due to the magnitude of the potential particulate matter emissions from the scrap handling activities.

EPC staff wishes to thank you again for the opportunity to comment on this project. We reserve the right to file any legal challenge against the agency action. Furthermore, we request to be formally notified in writing of agency action in this matter. If you have any questions, please feel free to contact Rob Kalch at (813) 272-5530.

Sincerely,

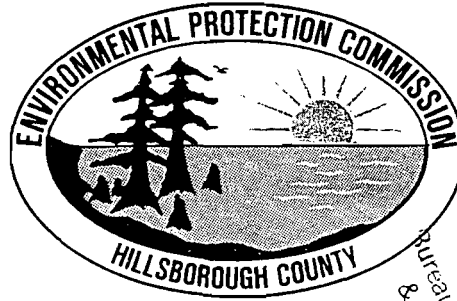


Alain G. Watson  
Air Toxics Section

cc: Sandy Bowman, BAMMS  
Rick Murrati, EPC  
Robert Wallace, P.E., Environmental Engineering Consultants, Inc.  
Mark Goldman, Scrap All, Inc.

rsk

COMMISSION  
Kathy Castor  
Pat Frank  
Ken Hagan  
Jim Norman  
Jan K. Platt  
Thomas Scott  
Ronda Storms



Executive Director  
Richard D. Garrity, Ph.D.

May 23, 2003

Bureau of Air Monitoring  
& Mobile Sources

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MAY 27 2003

Administrative Offices,  
Legal & Water Management Division  
The Roger P. Stewart Environmental Center  
1900 - 9th Ave. • Tampa, FL 33605  
Ph. (813) 272-5960 • Fax (813) 272-5157

Air Management Fax 272-5605  
Waste Management Fax 276-2256  
Wetlands Management Fax 272-7144  
1410 N. 21st Street • Tampa, FL 33605

Agency Clerk  
Office of General Counsel  
Department of Environmental Protection  
3900 Commonwealth Blvd., MS 35  
Tallahassee, FL 32399

Subject: Request for Extension of Time to File a Chp. 120 Petition  
Scrap-All, Inc. – Air General Permit No. 0570054-005-AG

To Whom It May Concern:

The Environmental Protection Commission of Hillsborough County (EPC) respectfully requests a 30-day extension of time to file a Chapter 120 petition for formal hearing pursuant to Chapter 62-110, F.A.C. and Chapter 120, F.S. regarding an Air General Permit that Scrap-All, Inc. intends to operate under (Permit No. 0570054-005-AG). In short, EPC asserts Scrap-All should operate under a Title V operation permit, not a general permit.

On May 19, 2003, EPC staff filed comments and objections which included a request to be copied on any final agency action. A review of ARMS permit tracking system shows that the entitlement to the General Permit was done on May 21, 2003 by the Bureau of Air Monitoring and Mobile Sources in Tallahassee (processed by Bruce Thomas). Please feel free to contact Alain Watson at (813) 272-5955 x1298 to discuss this matter.

Sincerely,

Jerry Campbell  
Division Director, Air Management

cc: Alain Watson, EPC Air  
Richard Tschantz, EPC Legal  
Bruce Thomas, DEP Air  
Mark Goldman, Scrap-All, Inc.  
Robert Wallace, P.E., Environmental Engineering Consultants, Inc.

www.epchc.org

E-Mail: [epcinfo@epchc.org](mailto:epcinfo@epchc.org)

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# TELEFAX TRANSMISSION



RECEIVED  
MAY 28 2003  
Bureau of Air Monitoring  
& Mobile Sources

*Environmental Engineering Consultants, Inc.*  
5119 North Florida Avenue  
Tampa, Florida 33603  
(813) 237-3781 (800) 229-3781  
Fax: (813) 238-0036

TO: Bruce Thomas

FROM: Rob Wallace

FAX: 850-922-6979

TOTAL # PAGES (INCLUDING COVER): \_\_\_\_\_

DATE: 5-28-03

MESSAGE: The are the attachments to the "Application For  
Air Permit - Title V Source that was e-mailed  
to you this date.



**RECEIVED**  
**MAY 28 2003**  
Bureau of Air Monitoring  
& Mobile Sources

**ATTACHMENT A**

**COMPLIANCE REPORT AND CERTIFICATION**



**SCRAP ALL, INC.**

2801 4th Avenue • P.O. Box 5567 • Tampa, Florida 33675 • Phone: (813) 247-3619 • FAX: (813) 248-1843

January 08, 2003

I Mark Goldman, Vice President of Scrap-All, Inc. hereby certify that the attached test results are true and accurate to the best of my knowledge.

*Mark Goldman VP*  
*01/08/03*



Institute of Scrap Recycling Industries, Inc.

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.

VISIBLE EMISSION OBSERVATION FORM

**SOURCE NAME** Scrap-All, Inc. **PROJECT NUMBER** **OBSERVATION DATE** 01-08-03

**LOCATION** 2801 4th St. Tampa, FL 33675 **PERMIT #** 0570054-003-A0 **OBSERVER'S NAME (PRINT)** Jason Lichtenstein

**ADDRESS** Aluminum Scrap Furnace **CENTRAL EQUIPMENT** Asterburner **CERTIFIED BY** ETA/FOEP **DATE** 2-20-03

**START TIME** 9:37 **STOP TIME** 10:37

1	0	0	0	0	0	0	0	0	0
2	0	0	0	0	0	0	0	0	0
3	0	0	0	0	0	0	0	0	0
4	0	0	0	0	0	0	0	0	0
5	0	0	0	0	0	0	0	0	0
6	0	0	0	0	0	0	0	0	0
7	0	0	0	0	0	0	0	0	0
8	0	0	0	0	0	0	0	0	0
9	0	0	0	0	0	0	0	0	0
10	0	0	0	0	0	0	0	0	0
11	0	0	0	0	0	0	0	0	0
12	0	0	0	0	0	0	0	0	0
13	0	0	0	0	0	0	0	0	0
14	0	0	0	0	0	0	0	0	0
15	0	0	0	0	0	0	0	0	0
16	0	0	0	0	0	0	0	0	0
17	0	0	0	0	0	0	0	0	0
18	0	0	0	0	0	0	0	0	0
19	0	0	0	0	0	0	0	0	0
20	0	0	0	0	0	0	0	0	0
21	0	0	0	0	0	0	0	0	0
22	0	0	0	0	0	0	0	0	0
23	0	0	0	0	0	0	0	0	0
24	0	0	0	0	0	0	0	0	0
25	0	0	0	0	0	0	0	0	0
26	0	0	0	0	0	0	0	0	0
27	0	0	0	0	0	0	0	0	0
28	0	0	0	0	0	0	0	0	0
29	0	0	0	0	0	0	0	0	0
30	0	0	0	0	0	0	0	0	0

**DESCRIBE EMISSION POINT** Circular stack ~ 36" DIA

**EMISSION POINT HEIGHT ABOVE GROUND LEVEL** ~ 30' **EMISSION POINT HEIGHT RELATIVE TO OBSERVER** ~ 30'

**STANCE TO EMISSION POINT** ~ 50' **DIRECTION TO EMISSION POINT** NNW

**DESCRIBE EMISSIONS** No emissions observed

**COLOR OF EMISSIONS** NA **CONTINUOUS** **INTERMITTENT** NA **FUGITIVE** **IF YES, IS PLUME ATTACHED** NA **DETACHED**

**WATER VAPOR PRESENT** YES **WHAT POINT WAS OPACITY DETERMINED** No emissions observed

**DESCRIBE BACKGROUND** Sky **COLOR OF BACKGROUND** Blue **SMT CONDITIONS** Clear

**WIND SPEED** 0-3 mph **WIND DIRECTION** WEST

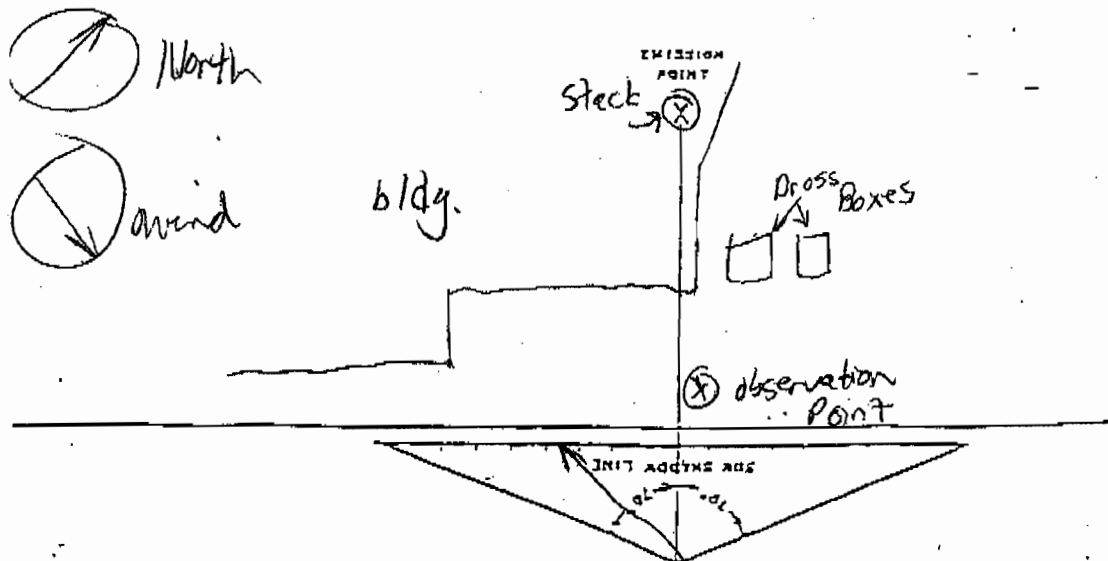
**AIR TEMPERATURE** 57.4 °F **RELATIVE HUMIDITY** 53%

**MARKS** Asterburner Temp = 1660 °F

**AVERAGE OPACITY** 0% **RANGE OF OPACITY READINGS** FROM 0 TO 0

**OBSERVER'S SIGNATURE** Jason Lichtenstein **DATE** 01-08-03

**EU# 002**



2/20/2003  
 FIELD EXPIRATION DATE  
 298128  
 CERTIFICATION NUMBER  
 Jason Lichtenstein  
 BEARER'S SIGNATURE  
 TMEPDS  
 LECTURE EXPIRATION DATE

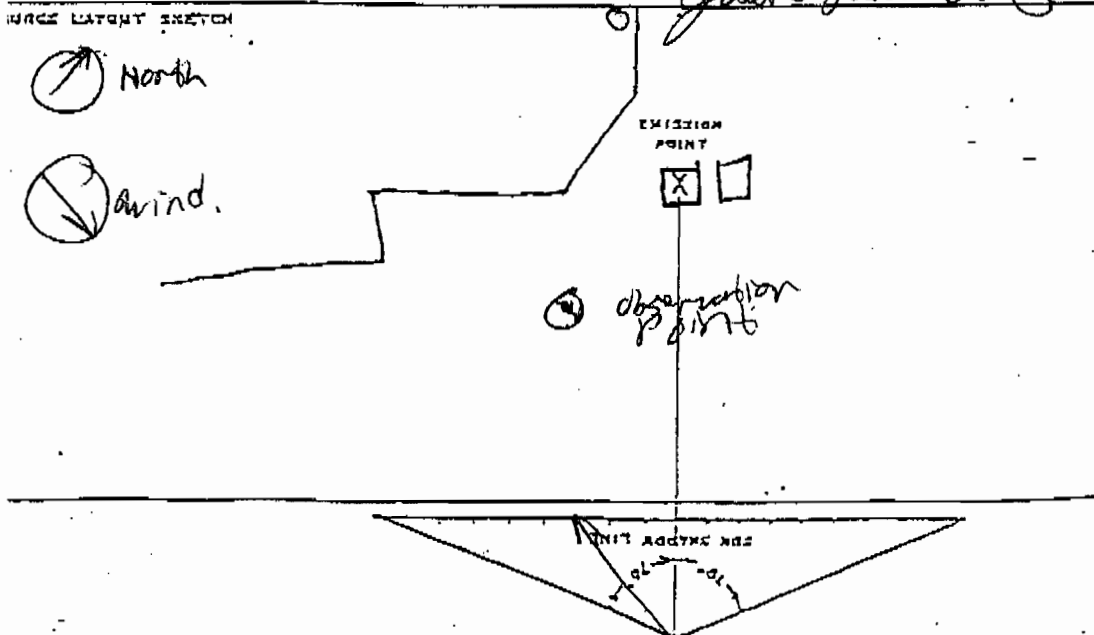
has completed the STATE OF FLORIDA visible emissions evaluation training and is qualified observer of visible emissions as specified by EPA Reference Method 9.

JASON LICHTENSTEIN

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.

VISIBLE EMISSION OBSERVATION FORM

FACILITY NAME <b>Scrap-All Inc.</b>		PROJECT NUMBER		OBSERVATION DATE <b>01-08-03</b>	
LOCATION <b>2801 4th St. Ramp, FL 33675</b>		PERMIT # <b>0570054-003-A0</b>		OBSERVER'S NAME (PRINT) <b>Jason Lichtenstein</b>	
PROCESS <b>Dross/Ash Handling</b>		CONTROL EQUIPMENT <b>NA</b>		CERTIFIED BY <b>ETA/FDEP</b>	
ISSUE EMISSION POINT <b>Opening of box + dross pile</b>		START TIME <b>9:37</b>		DATE EXPIRES <b>2-20-03</b>	
EMISSION POINT HEIGHT AWE GROUND LEVEL <b>~3'</b>		EMISSION POINT HEIGHT RELATIVE TO OBSERVER <b>~2'</b>		STEP TIME <b>10:07</b>	
DISTANCE TO EMISSION POINT <b>~15'</b>		DIRECTION TO EMISSION POINT <b>North</b>			
DESCRIBE EMISSIONS <b>No emissions observed</b>		LOG OF EMISSIONS <b>NA</b>		CONTINUOUS (INTERMITTENT) <b>NA</b>	
WIND VELOCITY PRESENT <b>YES</b>		IF YES, IS PLUME ATTACHED <b>NA</b>		FUGITIVE (INTERMITTENT) <b>NA</b>	
WHAT POINT WAS OPACITY DETERMINED <b>within 6" of opening</b>		LOG OF BACKGROUND <b>Brown/Gray</b>		EXT CONDITIONS <b>Clear</b>	
WIND SPEED <b>0-3 mph</b>		WIND DIRECTION <b>West</b>		RELATIVE HUMIDITY <b>53%</b>	
AIR TEMPERATURE <b>57.4°F</b>		MARKS		AVERAGE OPACITY <b>0%</b>	
				RANGE OF OPACITY READINGS FROM <b>0</b> TO <b>0</b>	
				OBSERVER'S SIGNATURE <i>Jason Lichtenstein</i>	
				DATE <b>01-08-03</b>	



has completed the STATE OF FLORIDA visible emissions evaluation training and is qualified observer of visible emissions as specified by EPA Reference Method 9.

JASON LICHTENSTEIN

2/20/2003  
FIELD EXPIRATION DATE

298128  
CERTIFICATION NUMBER

Jason Lichtenstein  
OBSERVER'S SIGNATURE

TEMPUS  
LECTURE EXPIRATION DATE

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.

VISIBLE EMISSION OBSERVATION FORM

**SOURCE NAME** Scrap-Ali Inc

**PROJECT NUMBER** 0570054-003-40

**OBSERVATION DATE** 01-08-03

**LOCATION** 2501 4th St, Tampa, FL 33675

**OBSERVER'S NAME (PRINT)** Jason Lichtenstein

**CERTIFIED BY** ETA/FDEP

**DATE EXP.** 2-20-03

**DEPT TIME** 11:50

**STOP TIME** 12:01

**EMISION POINT** Top of truck

1	0	0	0	0	31
2	0	0	0	0	32
3	0	0	0	0	33
4	0	0	0	0	34
5	0	0	0	0	35
6	0	0	0	0	36
7	0	0	0	0	37
8	0	0	0	0	38
9	0	0	0	0	39
10	0	0	0	0	40
11	0	0	0	0	41
12	0	0	0	0	42
13					43
14					44
15					45
16					46
17					47
18					48
19					49
20					50
21					51
22					52
23					53
24					54
25					55
26					56
27					57
28					58
29					59
30					60

**EMISION POINT HEIGHT RELATIVE TO OBSERVER** ~10'

**EMISION POINT HEIGHT RELATIVE TO OBSERVER** ~10'

**WIND DIRECTION TO EMISION POINT** ~20'

**DIRECTION TO EMISION POINT** NNW

**TYPE OF EMISSIONS** No emissions observed

**TYPE OF EMISSIONS** CONTINUOUS INTERMITTENT NA FUGITIVE NA

**IF YES, IS PLUME ATTACHED** NA

**WHAT POINT WAS OPACITY DETERMINED** within 6" of opening of truck

**TYPE OF BACKGROUND** Fence/Sky

**TYPE OF BACKGROUND** Clear

**WIND SPEED** 0-10mph

**WIND DIRECTION** South

**AIR TEMPERATURE** 59.8

**RELATIVE HUMIDITY** 52%

**MARKS** EU# 100

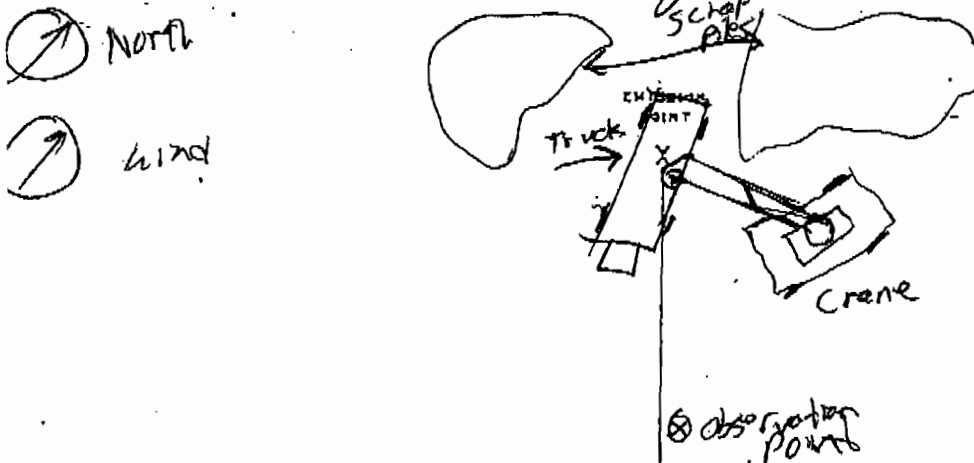
**AVERAGE OPACITY** 0%

**RANGE OF OPACITY READINGS** FROM 0 TO 0

**OBSERVER'S SIGNATURE** Jason Lichtenstein

**DATE** 01-08-03

FIELD LAYOUT SKETCH



JASON LICHTENSTEIN

has completed the STATE OF FLORIDA visible emissions evaluation training and is qualified observer of visible emissions as specified by EPA Reference Method 9.

2/20/2003  
FIELD EXPIRATION DATE

298128  
CERTIFICATION NUMBER

Jason Lichtenstein  
OBSERVER'S SIGNATURE

TEMPFDS  
LECTURE EXPIRATION DATE

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## PROCESS RATE STATEMENT

PLANT: Scrap All Inc.  
 SOURCE: Aluminum Scrap Furnace, Cross Ash Handling, Scrap Material Handling  
 DESCRIPTION: \_\_\_\_\_  
 LOCATION: 2801 4th Avenue, Tampa, FL  
 PERMIT NO. 0570054-003-A0  
 POINT ID: 002-006 100  
 TEST DATE: 01-08-03  
 TEST INTERVAL: 9:37-10:37 9:37-10:07

### PROCESS RATE

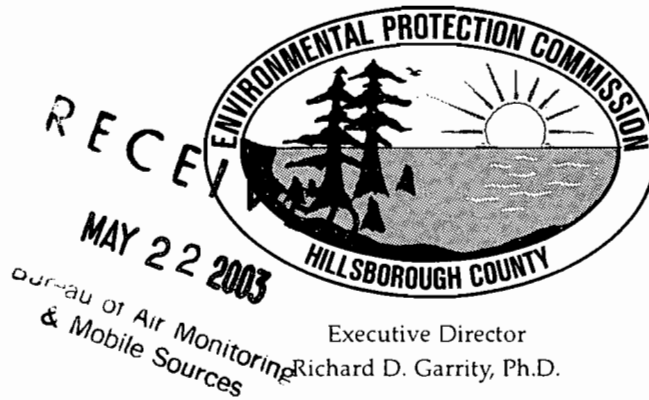
PARAMETER	UNITS	TEST DATA	PERMIT SPECIFICATION
Aluminum Scrap Furnace	lbs/hr <del>1200</del>	1200	≤ 1200 lbs/hr
Cross/Ash Handling			
Scrap Material Handling			

#### COMMENTS:

I hereby certify that the above stated process rate and compliance test data are true and correct to the best of my knowledge.

Signed Mary Goldman  
 Name MARY GOLDMAN  
 Title VP

COMMISSION  
Kathy Castor  
Pat Frank  
Ken Hagan  
Jim Norman  
Jan K. Platt  
Thomas Scott  
Ronda Storms



Executive Director  
Richard D. Garrity, Ph.D.

Administrative Offices,  
Legal & Water Management Division  
The Roger P. Stewart Environmental Center  
1900 - 9th Ave. • Tampa, FL 33605  
Ph. (813) 272-5960 • Fax (813) 272-5157  
Air Management Fax 272-5605  
Waste Management Fax 276-2256  
Wetlands Management Fax 272-7144  
1410 N. 21st Street • Tampa, FL 33605

May 19, 2003

Mr. Bruce Thomas, P.E.  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400, MS 5510

Re: Hillsborough County - AP  
DEP File No. 0570054-005-AG

Dear Mr. Thomas:

Thank you for notifying EPC staff of the air general permit notification submittal by Scrap All, Inc., representatives on April 23, 2003 for a Title V Air General Permit for Secondary Aluminum Sweat Furnaces. Please note, EPC staff currently has an application for a Title V Air Operation Permit under review for Scrap All, Inc., and have requested additional information. A partial response was received April 17, 2003, however the application is still incomplete.

Scrap All, Inc., operates a secondary aluminum sweat furnace at a scrap handling facility that is open to the public. Persons wishing to sell scrap metals, transport the scrap to the facility by truck or trailer. The material is weighed and unloaded. The large pieces of scrap are sorted and placed in various piles within the yard. The scrap may be loaded into a compactor, sorted further, cut to size, or loaded into trucks and railcars for transport offsite. Aluminum scrap is segregated from other metals and sorted according to type. The aluminum is stored and later charged into the furnace.

After inspecting the facility, EPC staff has determined the particulate matter emissions from the scrap handling activities exceed the five ton per year threshold established for insignificant emissions units in accordance with Rule 62-213.300(2)(a)(1)(b), F.A.C. Rules 62-213.300(1)(f)(1) and 62-213.300(2)(a)(1), F.A.C., prohibit any facility with significant emissions units other than a secondary aluminum sweat furnace to operate under a air general permit as defined by Rule 62-213.300(1)(f), F.A.C.

Based on handling 36,000 tons of scrap per year, the number of times the material is handled/dropped (approximately 5), an emissions factor of 0.20 lbs/ton/drop (AP-42, Table 12.10-7), and an control efficiency of 50% for water sprays, the potential particulate matter emissions from the scrap handling operations alone have been estimated by EPC staff to equal 9.0 tpy. Additionally, in

[www.epchc.org](http://www.epchc.org)

E-Mail: [epcinfo@epchc.org](mailto:epcinfo@epchc.org)

AN AFFIRMATIVE ACTION - EQUAL OPPORTUNITY EMPLOYER



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Bruce Thomas  
May 19, 2003

Page 2

the Title V Air Operation Permit submitted January 17, 2003, the applicant states the particulate matter emissions from the material handling were estimated to be 8.64 tpy based on a different emissions factor.

Therefore, it is the opinion of EPC staff that the facility is not eligible to operate under the Title V Air General Permit for Secondary Aluminum Sweat Furnaces due to the magnitude of the potential particulate matter emissions from the scrap handling activities.

EPC staff wishes to thank you again for the opportunity to comment on this project. We reserve the right to file any legal challenge against the agency action. Furthermore, we request to be formally notified in writing of agency action in this matter. If you have any questions, please feel free to contact Rob Kalch at (813) 272-5530.

Sincerely,



Alain G. Watson  
Air Toxics Section

cc: Sandy Bowman, BAMMS  
Rick Murrati, EPC  
Robert Wallace, P.E., Environmental Engineering Consultants, Inc.  
Mark Goldman, Scrap All, Inc.

rsk



## Best Available Copy

COMMISSION  
 Kathy Castor  
 Pat Frank  
 Ken Hagan  
 Jim Norman  
 Jan K. Platt  
 Thomas Scott  
 Ronda Storms



Executive Director  
 Richard D. Garrity, Ph.D.

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 1410 N. 21st Street • Tampa, FL 33605

May 19, 2003

Mr. Bruce Thomas, P.E.  
 Department of Environmental Protection  
 2600 Blair Stone Road  
 Tallahassee, FL 32399-2400, MS 5510

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 DEP File No. 0570054-005-AG

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E-Mail: [epcinfo@epchc.org](mailto:epcinfo@epchc.org)

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Bruce Thomas  
May 19, 2003

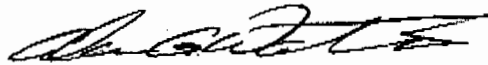
Page 2

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Alain G. Watson  
Air Toxics Section

cc: ~~Sandy Bowman, BAMMS~~  
~~Rick Murrati, EPC~~  
~~Robert Wallace, P.E., Environmental Engineering Consultants, Inc.~~  
~~Mark Goldman, Serap All, Inc.~~

rsk  
Leroy Shelton



Florida  
Department of  
Environmental Protection

Jeb Bush  
Governor

**Twin Towers Office Building**  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David Struhs  
Secretary

F A X T R A N S M I T T A L S H E E T

DATE: 4/29

TO: ROD KALCH

PHONE: \_\_\_\_\_

FAX: \_\_\_\_\_

FROM: BRUCE THOMAS

PHONE: \_\_\_\_\_

Division of Air Resources Management

FAX: 850.922.6979

RE: \_\_\_\_\_

CC: \_\_\_\_\_

Total number of pages including cover sheet: 4

**Message**

SCRAP-ALL, INC. G.P. NOTIFICATION

**If there are any problems with this fax transmittal, please call the above phone number.**

*"Protect, Conserve, and Manage Florida's Environmental and Natural Resources"*

*Printed on recycled paper*

THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

456975 DEC19 2005

Please include your AIRS ID# on your check or money order. This number is located on the mailing label.

**TOTAL AMOUNT DUE: \$50.00**

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570054 40  
SCRAP-ALL, INC.  
2801 4TH AVE  
TAMPA, FL 33605

Bureau of Air Monitoring  
& Mobile Sources

DEC 21 2005

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AIR ACCT. CODE 372020350013755010000  
BENEFITTING OBJECT CODE 002000  
BENEFITTING CATEGORY 000200

FOR GOVERNMENT USE ONLY  
ORG.: 37550101000 EO: A1  
FUND: 20-2-035001  
OBJECT: 002273

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SCRAP-ALL

Bureau of Air Monitoring  
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FUND: 20-2-035001  
OBJECT: 002273

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SCRAP-ALL, INC.

059366

REFERENCE NO.	DESCRIPTION	INVOICE DATE	INVOICE AMOUNT	DISCOUNT TAKEN	AMOUNT PAID
122203		12/22/03	50.00		50.00
CHECK DATE	CHECK NO.	PAYEE	DISCOUNTS TAKEN	CHECK AMOUNT	
12/23/03	59366	DEPT OF ENVIROMENTAL PROTECTION		\$50.00	



THIS PORTION MUST BE ATTACHED TO REMITTANCE FOR PROPER HANDLING

434718 DEC 26 2003

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**TOTAL AMOUNT DUE: \$50.00**

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570054  
 MARK GOLDMAN  
 SCRAP-ALL, INC.  
 P O BOX ~~5151~~ 5567  
 TAMPA FL 33675

Bureau of Air  
& Marine  
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 Org.: 37550101000 EO: A1  
 Fund: 20-2-035001  
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Trademark Metals Recycling LLC

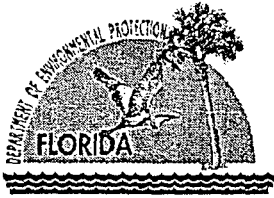
Check No.	277644
Date	03/28/07
Stub	1 of 1

60610 FLORIDA DEPT OF ENVIRONMENTAL PROTECTION

INVOICE	DESCRIPTION	DATE	GROSS AMT.	DISCOUNT	NET AMOUNT
032707	HQ AIRS ID#570054	03/27/07	75.00		75.00
<b>TOTALS</b>			75.00		75.00

ENDORSEMENT OF THE ATTACHED CHECK BY PAYEE IS ACKNOWLEDGEMENT OF PAYMENT IN FULL FOR ALL ITEMS INCLUDED IN THIS STATEMENT.

PLEASE DETACH BEFORE DEPOSITING



# Department of Environmental Protection

Jeb Bush  
Governor

Division of Air Resource Management  
2600 Blair Stone Road, MS 5510  
Tallahassee, Florida 32399-2400

Colleen M. Castille  
Secretary

**TO: Holder of Title V Air General Permit**

Our records indicate that, as the owner or operator of an eligible facility, you have claimed entitlement to the use of a Title V Air General Permit under Rule 62-213.300, Florida Administrative Code (F.A.C.).

For your facility to maintain its eligibility for the Title V Air General Permit, Rule 62-213,300(3)(b), F.A.C. states "...the owner or operator of the facility must, upon written notice from the Department, submit payment of an annual operation fee in the amount of \$50.00. This fee is due and payable between January 15 and March 1 of each year for which the facility is in operation and subject to the requirements of this rule and the general permit." This invoice constitutes the Department's written notice, as required under the general permit rule.

Please make your check or money order payable to the Department of Environmental Protection and staple it to the detachable portion of this invoice below. To maintain your facility's eligibility for the general permit, the fee must be received by the Department not later than March 1. Your check and the detachable portion of this invoice below should be mailed to:

OK TO PA  
M  
3/27/07

Title V Air General Permits  
Receipts  
Post Office Box 3070  
Tallahassee, FL 32315-3070

60610  
\$75.00

4150.7910.03  
M

(CUT HERE)

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471888 MAR30 2007

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SCRAP-ALL, INC.  
2801 4TH AVE  
TAMPA, FLORIDA 33605

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BENEFITTING OBJECT CODE 002000  
BENEFITTING CATEGORY 000200  
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ORG.: 37550101000 EO: A1  
FUND: 20-2-035001  
OBJECT: 002273

1070 U.S. POSTAGE PB 357  
8025 \$00.390 MAR 28 2007  
0307 MAILED FROM ZIP CODE 33602

TITLE V - General Permit  
Receipts  
Post Office Box 3070  
Tallahassee, FL 32315-3070

32315-3070 BO99

