



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Central District
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803

RICK SCOTT
GOVERNOR

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SECRETARY

Electronically Sent- Received Receipt Requested

FINAL PERMIT

PERMITTEE

Liberty Tire Recycling, LLC
1251 Waterfront Place, Suite 400
Pittsburgh, PA 15222

Authorized Representative:
Mr. Jeffrey D. Kendall, CEO
(kendall@libertytire.com)

Air Permit No. 0090236-002-AO
Permit Expires: 03/31/2018
Site Name: Rockledge Mulch Plant
Minor Source Air Operation Permit
Project Name: Tire Mulch Processing Plant

This is the final air operation permit for a used tire mulch processing plant. The processing is conducted at the Liberty Tire Recycling, LLC, Rockledge Mulch Plant (Standard Industrial Classification No. 3069). The facility is located in Brevard County at 270 Barnes Boulevard in Rockledge, Florida. The UTM coordinates are Zone 17, 528.24 km East and 3129.77 km North.

This final permit is organized by the following sections:

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Facility-wide and Emissions Unit Specific Conditions
- Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, 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 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

SECTION 1. GENERAL INFORMATION (FINAL)

FACILITY AND PROJECT DESCRIPTION

Rockledge Mulch Plant

Liberty Tire Recycling, LLC operates a rubber tire mulch manufacturing facility. The facility receives shredded rubber derived from recycled tires and further processes it into landscaping mulch of various colors. Without controls, the facility could emit uncontrolled emissions of particulate matter (PM) that are above permitting thresholds. The facility also emits volatile organic compounds (VOCs) and hazardous air pollutants (HAP), specifically methylene diphenyl diisocyanate (MDI), from the mulch coating operation. The VOC/HAP emissions from the coating operation are well below permitting thresholds.

Project Description and Proposed Emission Unit

This project is the initial air operation permit for this facility. This facility consists of the following emissions units.

Facility ID No. 0090236	
ID No.	Emission Unit Description
001	Mulch Processing Plant with Baghouse

NOTE: Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

Exempt Emission Units/Activities

- Coating Operation: VOC/HAP (methylene diphenyl diisocyanate (MDI)) emissions of 0.008 tons/yr are well below permitting threshold, Rule 62-210.300(3), F.A.C.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a minor source.

PERMIT HISTORY/AFFECTED PERMITS

This is the initial Air Operation permit for this facility. It replaces Final Construction Permit 0090236-001-AC, issued on September 19, 2012.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District, Waste & Air Resource Programs. The Central District's mailing address and phone number is:

Florida Department of Environmental Protection
Central District Office
Waste and Air Resource Programs
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803-3767
Telephone: 407-897-4100

All documents related to applications for permits shall be submitted to the above address or electronically to the following address: **DEP_CD@dep.state.fl.us**. In any electronic submittal, clearly identify the Air Permit No. 0090236-002-AO.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Compliance Assurance Program. (Use the above mailing or e-mail address.)
3. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions; and
 - d. Appendix D. Common Testing Requirements.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]
6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

7. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:
- a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
 - b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
 - c. copies of the most recent compliance test reports required by Specific Condition No. **A.6.**, if not previously submitted; and
 - d. copies of the most recent two months of records/logs specified in Specific Condition No. **A.11.**

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), 62-210.900, and 62-297.620(4) F.A.C.]

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Mulch Processing Plant with Baghouse

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	<p data-bbox="277 323 781 359">Mulch Processing Plant with Baghouse</p> <p data-bbox="277 401 1419 653">Shredded tire rubber feedstock is delivered to the facility via truck. The facility’s processing storage building has enlarged plastic warehouse curtains over the west side door to accommodate truck entry. The building has an interior bunker to contain stored feedstock and windscreens over the open areas on the north side of the building. If space permits within the building, the trucks are off-loaded and feedstock is stored inside the building. If the storage building is full, the feedstock is off-loaded and stored outside in bunkered piles that are wetted with sprinklers to control fugitive PM emissions.</p> <p data-bbox="277 695 1419 911">Front-end loaders are used to transfer the rubber feedstock from storage to the two (2) enclosed in-feed hoppers that are vented to the baghouse (Dustex Model 3600-54). From the in-feed hoppers, feedstock moves inside the Processing and Shipping Building for granulation. The facility has two (2) granulators (shredders) that are both vented to the baghouse. Reject wire recovered from the granulation process is conveyed outside the building to a receiving bin.</p> <p data-bbox="277 953 1430 1100">From the granulation process, shredded rubber of the proper size (undersized rubber material is conveyed inside the processing building for bagging and storage in 1-ton super sacks prior to sale as fuel) is conveyed within the Processing and Shipping Building to the coating process.</p> <p data-bbox="277 1142 1435 1320">The coating process consists of seven (7) mixing vessels, each with a 6,000-pound capacity. Polyurethane coatings of the desired color are poured directly into the vessels. These coatings contain up to 10 percent of mixed isomers of MDI that through polymerization become part of the coating and only a negligible amount is emitted into the atmosphere. The facility also uses coating additives.</p> <p data-bbox="277 1362 1386 1472">The coatings applied in the mixing vessels cure in approximately 30 minutes and once cured, the coated mulch is then transferred by conveyor and front-end loader inside the Processing and Shipping Building to the bagging operation.</p>

PERFORMANCE RESTRICTIONS

- A.1. Restricted Operation:** The hours of operation for the granulators are limited to 6,000 hours per any consecutive 12-month period
[Permit Application received 02/20/2013; Rules 62-4.070(3) and 62-210.200(247), “Potential to Emit,” F.A.C.]
- A.2. Permitted Capacity:** The total process rate shall not exceed 122,640 tons per any consecutive 12-month period.

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Mulch Processing Plant with Baghouse

[Permit Application received 02/20/2013; Rules 62-4.070(3) and 62-210.200(247), "Potential to Emit," F.A.C.]

EMISSIONS STANDARDS

A.3. Visible Emissions (VE): Visible emissions from each particulate emissions source are limited to less than 5 percent (5%) opacity.

[Permit Application received 02/20/2013; Rule 62-296.320(4)(b), and Rule 62-297.620(4) F.A.C.]

{Permitting Note: This lower visible emission standard is accepted by the applicant in lieu of annual compliance testing requirements for particulate emissions}

A.4. Particulate Matter (PM) Emissions: Particulate emissions shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

[Permit Application received 02/20/2013; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.5. Unconfined Particulate Matter (PM) Emissions: No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions shall include, but are not limited to, the following:

- a. Vacuum street sweeping.
- b. Enclosure of the primary shredded rubber delivery using the existing building fitted with wind screens and unloading bunker.
- c. Enclosure of both rubber receiving bins with enclosures vented to the dust collector.
- d. Fence screening and vegetation.
- e. Limiting the speed of vehicles on facility property.
- f. Moving undersized rubber collection system to inside the Processing and Shipping Building, where applicable.
- g. Use of water sprinklers on outside storage piles and wire reject bin.

[Permit Application received 02/20/2013; Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

A.6. Annual Compliance Tests: During each federal fiscal year (October 1st to September 30th), the emissions unit shall be tested to demonstrate compliance with the emissions standards for Visible Emissions specified in Specific Condition No. **A.3.**

[Rule 62-297.310, F.A.C.]

A.7. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

A. EU No. 001 Mulch Processing Plant with Baghouse

[Rule 62-297.310, F.A.C.]

A.8. Test Method: Required tests shall be performed in accordance with the following reference method.

EPA Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.401, F.A.C.]

When the Department, 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 a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

NOTIFICATION REQUIREMENTS

A.9. Test Notification: The permittee shall notify the Compliance Authority, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the permittee. [Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

RECORDS AND REPORTS

A.10. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(8), F.A.C.]

A.11. Monthly Recordkeeping Requirements: In order to demonstrate compliance with Specific Condition Nos. **A.1. and A.2.**, the permittee shall maintain a monthly log at the facility for a period of at least five (5) years from the date the data is recorded. The log, at a minimum, shall contain the following:

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

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Monthly

- a. Facility Name, Facility ID No. (i.e., Liberty Tire, Recycling LLC, Rockledge Plant, Facility # 0090236);
- b. Designation of the month and year of operation for which the records are being tabulated; and,
- c. Daily record for the following information:
 - i. Daily hours of operation (Condition A.1)
 - ii. Daily amount processed in tons (Condition A.2)
 - iii. Results of daily inspections of all process equipment and the emissions control systems (baghouse, conveyor and equipment covers, etc.) (Condition A.12.a)
 - iv. Description of any repairs / corrective actions accomplished. (Condition A.12.b)
 - v. Daily pressure drop reading for the baghouse and time when reading taken. (Condition A.12.c)
 - vi. Results of daily visible emissions test and time when test conducted. (Condition A.12.d)
- d. Monthly and consecutive 12-month total of operational hours and tire mulch processed (tons)

The monthly logs shall be completed by the end of the following month.

Note: A consecutive 12-month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12-months should retain 12-month totals using whatever number of months of data are available until such a time as a consecutive 12-month total can be maintained each month.

[Rule 62-4.070(3), F.A.C.]

A.12. Operation and Maintenance (O & M) Plan for Particulate Control: The facility shall develop and implement an operation and maintenance (O&M) plan to minimize the PM emissions from the regulated emission points and the facility wide fugitive PM emissions. The dates and actions of the following procedures shall be documented. These include:

- a. Daily inspections of all process equipment and the emissions control systems (baghouse, conveyor and equipment covers, etc.) to identify any equipment leaks or malfunctions during the days when operating.
- b. Conduct repair/corrective action as soon as possible once the leaks or malfunctions are identified.
- c. Daily monitoring of the pressure drop for the baghouse during the days when operating. The baghouse pressure shall be operated in the range of the manufacturer's recommendation. **The pressure drop shall be recorded on a daily basis on the days when operating.**
- d. Daily inspection of the visible emissions from the baghouse during the day when operating. If any visible emission is observed, the facility shall evaluate the process

SECTION 3. FACILITY-WIDE AND EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

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equipment and the baghouse and accomplish corrective action to eliminate the visible emissions.

[Rule 62-4.070(3), F.A.C.]