**MEMORANDUM**

TO : Ed K. Middleswart, P.E. Ed m 11/8
FROM : Andy Allen, Owen Mancarella OM
DATE : 10/22/99
SUBJECT : Evaluation Summary for Wise Recycling, LLC, 0330066-002-AO, Escambia County

We recommend issuing an operating permit to Wise Recycling, LLC to operate their Pensacola facility.

Process Description. This facility consists of an aluminum recycling plant. Aluminum beverage containers are processed through a collection hopper to a belt conveyer with a magnetic head pulley to separate steel cans. The remaining cans are weighed in a scale hopper, then fed by conveyer to a hammermill and shredded to approximately one inch squares, and then pneumatically conveyed to a truck trailer loading station.

Pollution Control Equipment. The transportation air is cleaned by a TORIT Model 30-15 High Efficiency Cyclone Dust Collector with approximately 95% efficiency.

Environmental Impact.

| Airborne Contaminant Emitted | FAC Rule | Estimated Emissions lbs/hr | Estimated Emissions T/yr | Allowable Emissions lb/hr | Allowable Emissions T/yr |
|---|---|---|---|---|---|
| PM | | 0.48 | 1.2 | | |
| Objectionable Odors | 62-296.320(2) | | | None allowed off plant property. | |
| VE | 62-297.620 | | | Not more than 20% opacity | |

Applicable Rules & Regulations. There are no unit specific air rules applicable to this activity. Prior to 11/2/93 (AC17-239580) this facility was equipped with two baghouses and the 5% opacity standard was applied per Rule 62-297.620(4). However, when AC17-239580 was issued (eliminating the baghouses due to blinding problems in favor of a single high efficiency cyclone), the 5% requirement was retained instead of switching over to the 20% standard per the General Visible Emissions Standard of Rule 62-296.320(4)(b)1. Since a notice of this construction permit was not published, this requirement is not federally enforceable and I have corrected the opacity standard to 20%.

Compliance Monitoring. A VE test (30 mins) is due in the 5th year of the permit just prior to renewal. This frequency was carried forward from the previous operating permit. Next, the permittee is required to mainain a log of operating hours. And also, the permittee is required to conduct an inspection twice a day and record the results.

Compliance History. Initially constructed in 1976 under permit AC17-2149. Generally good compliance history except for two instances of fugitive problems. The first was in Oct 1990 which included a WN, the next time was in 8/94. Both times the problem was discovered during an inspection and both times the facility took corrective actions immediately. Subsequent to the second instance, the facility proposed a twice per day inspection list and this has been included in the permit by reference. All other inspections were in compliance (file contains annual inspections from 7/88).

Fee Summary. This is an AO2B ($1,000 fee) minor source with no stack test. The original construction permit fee was $250 for an AC1F facility (source less than 5 TPY).

om:omc

Memo for File

Subject: Site Visit to Wise Recycling LLC on 10/22/99

From: Owen Mancarella OM

Date: 10/22/99

This visit was part of my evaluation for the operating permit renewal (application received 9/29/99). Mr. Harold Stone gave me a tour of the facility including starting up the processing line to allow me to get familiar with the process.

The truck-trailer loads of aluminum cans are unloaded by a small front end loader and are dumped into a weigh hopper. When the weigh hopper senses a full load, it drops the cans onto a conveyer belt which takes them to a second larger hopper which acts as a reserve to assure a sufficient supply of stock to continuously feed the hammermill. During the conveyer ride to this second hopper, iron/steel/etc. objects are trapped by a magnetized roller and dropped into a separate bin which is taken periodically to Perdido Landfill. The stock is then fed to the hammermill and pneumatically blown into a truck-trailer. The rear of the trailer is backed up against a seal to prevent fugitive PM from escaping during the pneumatic loading. The air stream is run through a high efficiency cyclone and the filtered PM is dropped into a 55 gallon drum. The drum fills slowly and is routinely checked and emptied (a full day or processing does not fill the drum).

While the process was running I checked for fugitives along the entire pathway of the carrier air including the seal around the rear of the loading trailer. I did not see any evidence of leakage. Everything was very tightly sealed and in good working order. I also checked the exhaust from the cyclone. I watched three separate times for about one minute each. The background was clear blue and the sun was to my back. There was no detectable breeze. Small segments of the stack exhaust were just barely discernable, intermittently, from the sky. At no time did I see a complete plume profile.

Harold was very knowledgeable about the activity and was eager to share his 13 years of experience and knowledge. He showed me the logbook to verify that they were doing the twice-a-day inspections. Additionally, he explained that they control the process rate by doing one trailer load of recycled cans at a time before starting up for the next trailer. They know the weight of each trailer load, and they record the start and finish times, which allows them to manage the throughput and avoid exceeding the maximum allowable permitted rate of 8,000 pounds/hr.