



Memorandum

Florida Department of Environmental Protection

TO: Sandra F. Veazey 40-1012104
THROUGH: Kevin M. White
FROM: Angelia Jackson
DATE: October 15, 2004
SUBJECT: Evaluation Summary for Wise Recycling, LLC, Pensacola 0330066-003-AO, Escambia County

We recommend issuing a 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 hammer mill and shredded to approximately one-inch squares, and then pneumatically conveyed to a truck trailer loading station. This facility is limited to the processing of 8,000 lb/day (excluding non-aluminum contaminants) and a maximum of 4,992 hours/year of operation. Recordkeeping is required to verify compliance.

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		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	0.48	1.2	N/A	N/A
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	N/A	N/A	N/A	Not more than 20% opacity	

Applicable Rules & Regulations. There are no unit specific air rules applicable to this activity. Prior to 11/2/1993 (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 was corrected to the opacity standard to 20% in operating permit 0330066-002-AO.

Compliance Monitoring. A VE test (30 minutes) is due in the 5th year of the permit just prior to renewal. This frequency was carried forward from the previous operating permits. The permittee is also required to maintain a log of operating hours, conduct inspections twice a day

and record the results, and maintain a production log to include aluminum cans processed in pounds per hour, based on a daily average.

Compliance History.

2004 – Facility noted to be “In-Compliance”. Inspector recommended that facility continue in its efforts to reduce any potential fugitive emissions by good housekeeping practices.

2003 – Facility “In-Compliance” with no recommendations.

2001 – Facility “In-Compliance”. The inspector recommended that the facility adjust current operations log to reflect annual hours (i.e. rolling total of hours of operation for the shredder).

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 5TPY).

SFV:amj