

Exhibit No. 4

**AIR POLLUTION
PREVENTION PLAN**

**Auto Shred Recycling, L.L.C.
Pensacola, Florida**

10/2/03

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I. Introduction

This Air Pollution Prevention Plan (APPP) is for the operation of an automobile shredder mill and plant-wide fugitive emissions from Auto Shred Recycling, L.L.C. located at 1000 South Myrick Street, Escambia County; UTM Coordinates: Zone 16,475.80 km East and 3363.40 km North; Latitude: 30° 24' 15" and Longitude: 87° 155' 05" West. Auto Shred Recycling, L.L.C. operates under Standard Industrial Classification (SIC) 5093 Scrap and Waste Recycling.

The APPP describes this facility and its operations; identifies potential sources of air pollution; recommends appropriate best management practices (BMP's) and pollution control measures to reduce emissions of air pollutants; provides guidelines for employee training and annual compliance evaluation inspections. The APPP must be retained on site and made available to U.S. EPA, state or local officials upon request.

II. Pollution Prevention Team

Marc Jaffe is responsible for development and implementation of this APPP.

Marc Jaffe can be reached at:

Auto Shred Recycling, L.L.C.
1000 South Myrick St.
Pensacola, Florida 32505
Telephone: (850) 432-0977
Fax: (850) 433-4814

Other individuals who are responsible for implementing the APPP include:

Name	Responsibility
<u>Mill Operator</u>	<u>Monitor facility for fugitive emissions</u>
<u>James Heal</u>	<u>Operations Manager</u>
<u>George Jorge</u>	<u>Shredder Supervisor</u>
<u>Tony Schultz/ Paul Martin</u>	<u>Environmental/ Safety Director</u>

Designated Pollution Prevention Team members will conduct annual compliance evaluation inspections; determine the effectiveness of this plan; assess the need for additional pollution control measures and ensure that the terms and conditions of the Air Operation Permit are complied with. Team members will schedule the Visible Emissions Test before the end of June to allow for any unforeseen mechanical problems that may prevent the test from being completed by the deadline. Team members will also be responsible for keeping APPP records available for Department inspection.

Visible Emissions Test can be arranged with Barbara Sviglin at Pensacola P.O.C., Inc. (850) 456-4406.

III. General facility Information

Name of Facility: Auto Shred Recycling, L.L.C.

Facility Address: 1000 South Myrick St.
Pensacola, Florida 32505

Facility Contact: Marc Jaffe
General Manager
(850) 432-0977

Regulatory Agency: State of Florida
Department of Environmental Protection

Air Operation Permit: 03330011121-002~~X~~-AO

Emissions Unit ID No: 001- Auto Shredder Mill Solid Waste System
Wet Scrubber and Cyclones No. 1 and No. 2

002- Plant-wide Fugitive Emissions

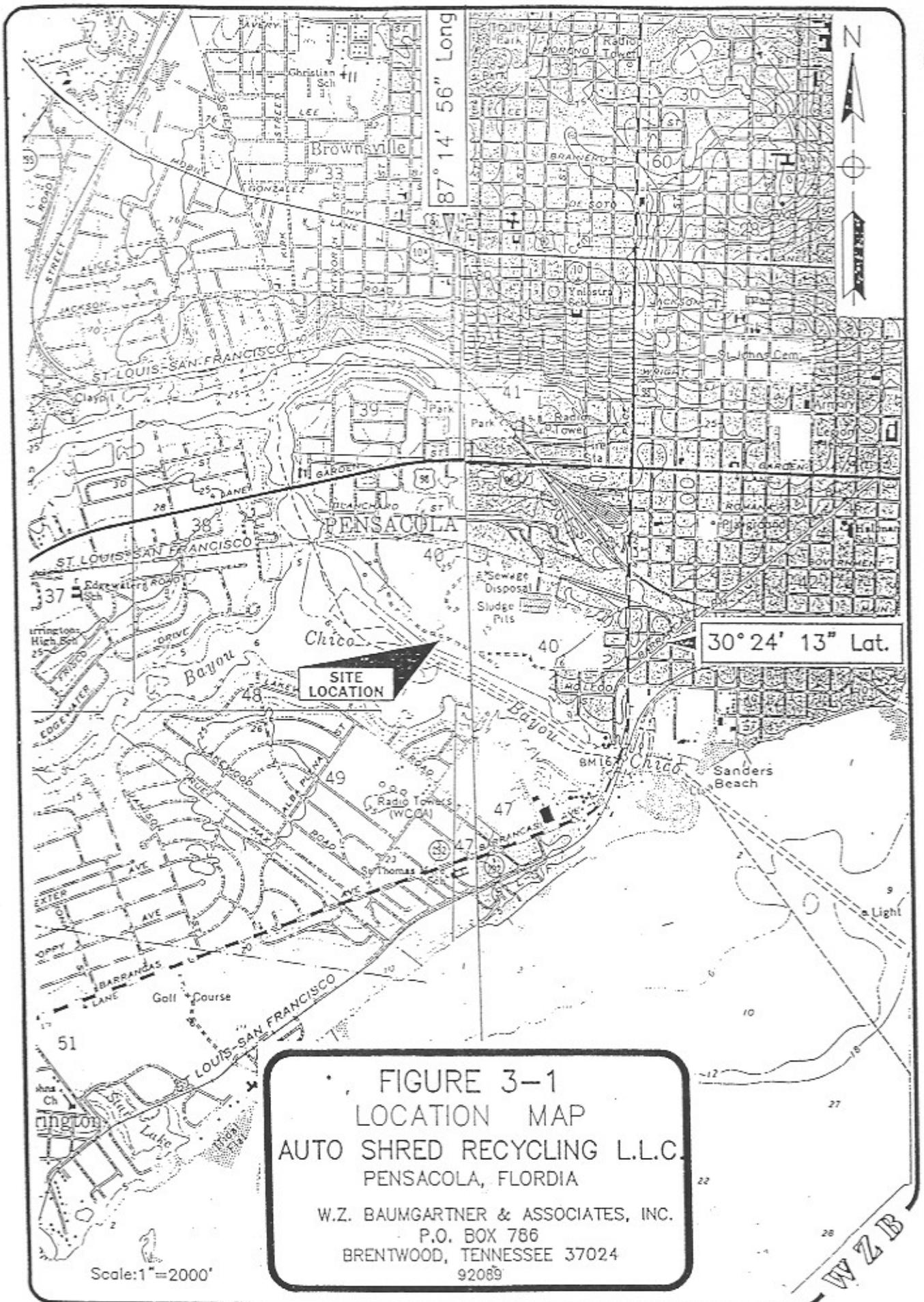
Facility Description

This facility consists of a scrap yard where automobiles and other large ferrous-metal objects are run through a shredder mill for size reduction and sorting. The auto shredder mill is powered by two new electric motors, which replaced the older diesel engines in 1995. The mill is designed to shred scrap autos and other similar scrap at the rate of 44.1 gross tons of shredded steel per scheduled operating hour. Shredded scrap discharged from the mill is initially separated with a light fraction pneumatically conveyed to No. 1 cyclone. The heavy fraction is conveyed to a zigzag where the heavy metal pieces fall by gravity to a conveyer belt while the lighter non-metallic pieces are pneumatically conveyed to No. 2 cyclone. Particulate emissions from both cyclone conveying air streams are controlled by a wet scrubber manufactured by Newell, serial No. 75. Solids discharged from the bottom of the two cyclones are routed to the trommel and eddy current systems. In addition to the wet scrubber and cyclones, a damp shredding system has been installed at the mill to further reduce potential particulate emissions. The damp shredding system injects finely atomized water into the shredder mill. Most of the injected water is turned into steam, which captures nearly all of the dust knocked loose by the shredding action. The dust and light material as well as the shredded material exits the mill through the bottom in a damp state. Spray systems and metal covers are installed over some of the conveyers to protect the contents, especially the lighter fluff, from wind action. The trommel system is essentially a rotary drum screen. The eddy current system uses induced magnetic fields to separate non-ferrous metals, such as stainless steel, zinc, aluminum and copper from the fluff, plastic and dirt. Residual matter is transported off site for disposal at a Class I or II permitted landfill.

Site Map

The site map for Auto Shred Recycling, L.L.C., is shown on the following page. The site map shows the following information (where applicable):

1. Facility boundaries
2. Permitted emission sources
3. Potential fugitive emissions sources
4. Shredder mill
5. Conveyor system
6. Buildings and equipment
7. Loading/unloading areas
8. Scrap processing areas
9. Scrap storage areas
10. Barge loading areas
11. Roads and parking
12. Surface water bodies
13. Sprinklers
14. Restricted areas
15. Green areas
16. Paved and Asphalt areas
17. Unpaved areas



IV. Assessment of Potential Pollution Sources

A summary of the potential sources of air pollution and the BMP's used to control them are presented in Table 1.

TABLE 1
Potential Sources

Potential Source	Potential Pollutants	Management Practices
1. Newell Mill	Particulate Matter	Operation of a damp shredding system Recyclable materials control program Infeed control and monitoring Employee training and monitoring
2. Emissions Unit ID No. 001 (Wet Scrubber)	Particulate Matter	Operation of wet scrubber and high efficiency cyclones #1 and #2 Preventative maintenance on wet scrubber and cyclones #1 and #2
3. Shredder conveyor system	Particulate Matter	Operation of mist sprayers, covers and wind baffles. Employee training and monitoring
4. Shredded steel stockpile	Particulate Matter	Load shredded material directly into a barge to reduce handling and fugitive emissions* <ul style="list-style-type: none"> • Depends on barge availability and sales Prepared material sprayer Employee training and monitoring
5. Shredded steel barge loading conveyor	Particulate Matter	Portable prepared material sprayer Operation of wind baffles, sprayers and a partial drop chute Employee training and monitoring
6. Automobile Shredder Residue	Particulate Matter	Daily hauling Temporary storage in a box or bin

7. Emissions Unit ID No. 002 Plant-wide fugitive emissions	Particulate Matter	Post APPP Procedures In an appropriate location Employee training and monitoring Operation of material sprayers Sprinkler system Loading conveyer covers and wind baffles Green areas
8. Paved/ Asphalt roads and parking areas	Particulate Matter	Employee training and monitoring Regular sweeping of roads and parking areas
9. Unpaved Roads and storage areas	Particulate Matter	Employee training and monitoring Sprinkler systems Restricted access to unused areas
10. Ferrous Stockpile	Particulate Matter	Spray towers Employee training and monitoring Minimize drop height
11. Ferrous Barge Loading	Particulate Matter	Load material directly into a barge to reduce handling and fugitive emissions (depends on barge availability and sales) Minimize crane drop height Barge loading sprayer
12. Materials Handling Equipment	Particulate Matter	Minimize drop height Prepared material sprayer Drive on paved roads

13. Noise	Noise	<p>Noise baffles around Eddy Current</p> <p>When operationally possible, auto hulks are not shredded before 9:00 AM.</p>
14. General Pollutant Emissions Limiting Standard	Objectionable odor	No operations at this facility will cause or permit the discharge of objectionable odors
15. Explosions	Explosions	<p>Damp shredding system drastically reduces the severity of explosions inside of the mill</p> <p>Notify DEP when explosions occur</p> <p>Record the number of explosions on the monthly shredder report</p> <p>Record downtime caused by explosions on monthly shredder report</p>

V. Recyclable Control Program

Supplier Notification

Materials not accepted at the facility include:

- Lead acid batteries
- Nickel cadmium batteries
- Microwave ovens
- Fluorescent lights
- Hazardous waste
- Radioactive materials
- Fuel tanks
- CFC's

Materials accepted only under certain conditions include:

Material
Closed Vessels

Condition Accepted
When opened and cleaned.

Suppliers are notified of our recyclable control program by: Account Executives and Management.

VI. Operational Improvements

1. Replaced scrubber with higher efficiency model in 1991.
2. Replaced the # 2 cyclone with a higher efficiency model in 1995.
3. Replaced the diesel engines with electric motors in 1996.
4. Changed operating procedures to include the use of an underwater magnet to retrieve lost material.
5. Removed the shear and attached conveyor systems in 1999.
6. Changed operating procedures to apply water to roadways and parking areas with a water spray truck in 1999.
7. Changed operating procedures so that crane operators minimize the drop height of all material.
8. Attached covers and wind baffles to conveyers in 2001.
9. Added water spray nozzles to conveyers in 2001.
10. Installed portable water spray pump to wet prepared scrap material in 2001.
11. Installed stationary spray towers to wet prepared scrap material in 2002.
12. Installed water outlets along the length of the bulkhead so the portable sprayer can be moved to cover both the shredder and ferrous barge loading operations in 2002.
13. Installed a noise baffle on the Eddy Current System in 2002.
14. Added additional wind baffles to conveyor system in 2002.
15. Added a catch pan under the shredder loading conveyor in 2002.
16. Added a wind baffle and partial chute to barge loading conveyor in 2002.
17. Replaced the #1 cyclone with a newer more efficient model in 2002.
18. Changed operational procedures to prohibit the shredding of automobiles before 9:00 AM when operationally possible in 2002.
19. Changed operational procedures to limit the spillage of prepared scrap metal during barge loading operations in 2002.
20. Replaced powered broom with a street sweeper in 2002.
21. Asphalt was used to pave two interior roads, the non ferrous customer unloading area and the equipment storage area in 2002.
22. Access to the unused portions of the facility was restricted by barricades in 2002.
23. Added the damp shredding system in 2002 to reduce particulate going into the air system, control particulate from around the mill and to drastically reduce the possibility of explosions inside of the mill.

VII. Employee Training

APPP training is provided on an initial and annual basis to the following employees:

- Shredder Personnel
- Maintenance Personnel
- Non-Ferrous Personnel
- Administration

The following topics are addressed in the annual training programs:

- Air Operation Permit requirements
- APPP objectives
- Pollution Prevention Team
- Potential sources of air pollution
- Best Management Practices
- Site Compliance Evaluation Program

Training Guide

1. Permit requirements:

- Objectionable odors are prohibited.
- Visible emissions from emissions unit ID # 001 shall not exceed an average of 10% opacity over the highest 24 consecutive readings on the Visible Emissions Test under normal operating conditions.
- The permittee shall not cause or allow to be discharged the emissions of air pollutants from any activity that would be greater than 20 % opacity. 20% opacity means smoke or dust that would block out 20 % of the background using EPA Method 9.
- The permittee must take reasonable precautions to prevent emissions of unconfined particulate matter (dust). Water mist sprayers shall be used on conveyor systems, roads and parking areas will be monitored and cleaned and cranes will minimize material drop height to help control fugitive dust.
- The permittee must conduct annual visible emissions test by the end of October.
- The permittee must develop and implement an Air Pollution Prevention Plan.

2. Air Pollution Prevention Plan objectives:

- To develop a Pollution Prevention Team
- To identify potential sources of air pollution at the Auto Shred facility
- To describe the Best Management Practices that will minimize or eliminate potential sources of air pollution at the Auto Shred facility
- To develop a site compliance evaluation program, employee training program and a record keeping and reporting program that will comply with the terms and conditions of the air permit

3. Pollution Prevention Team

The Pollution Prevention Team is responsible for developing, implementing, maintaining and revising the plan. The Pollution Prevention Team consists of:

- Paul Martin and Tony Schultz, Environmental and Safety Directors
- Marc Jaffe, James Heal, George Jorge, Mill Operator, Auto Shred Recycling

4. Potential Sources of Air Pollution

- Emissions point 001, the wet scrubber on the mill.
- Emissions point 002, fugitive emissions.
Fugitive emissions consist of:
 - Roads and parking lots
 - Barge loading conveyers
 - Crane loading operations

5. Best Management Practices:

Operational Controls

- Implement a recyclable control program
- Use water sprayers on the conveyer system and re-feed
- Use water sprayers on the shredded stock pile
- Load prepared material directly into barge when barge is available
- Use wind baffles and covers on the conveyer system
- Operate damp shredding system
- Operate spray towers on prepared ferrous stock piles
- Operate portable sprayer when loading barges
- Minimize material drop height from cranes
- Operate sweeping system on a regular basis
- Paved roadways, storage and parking areas.
- Monitor facility for fugitive emissions
- Report explosions to DEP
- Log in the explosions on the shredder report

Good house keeping

- Sweep and clean accessible paved areas and roadways
- Use a water truck on roadways and unpaved areas

Preventative Maintenance

- Maintain shredder cyclones and wet scrubber systems
- Maintain closed loop water system
- Maintain water sprayers on conveyer
- Maintain water truck and sweeper

6. Site Compliance Evaluation Program

- Conduct annual Air Pollution Prevention Plan inspection
- Conduct annual employee training
- Conduct annual visible emissions test

VII. Compliance Evaluation Inspections

Compliance Evaluations Inspections are conducted at least once per year. These evaluations confirm the accuracy of the description of potential pollution sources presented in this APPP, determine the effectiveness of this APPP, and assess compliance with the terms of the Air Operation Permit. Members of the Pollution Prevention Team or a qualified designee conduct the evaluations. Compliance Evaluation Inspections consist of the following elements:

- Modify or update the APPP to reflect current conditions
- Visually inspect and evaluate the potential pollution sources at the facility
- Evaluate the BMP's to determine whether they are adequate and have been properly implemented
- Inspect structural air quality control measures to ensure they are working properly

A Comprehensive Site Compliance Evaluation Report is prepared following each evaluation. The APPP shall be revised as needed within one month of the inspection report. Any changes made to the plan must be implemented within twelve weeks of the inspection report.

Exhibit No. 5

Auto Shred Recycling, L.L.C., respectfully request that the following changes be made to Permit No. 0330121-002-AO:

1. The language used to describe the shredder production rate in Section I, Subsection A and in Section III, Subsection A.1, should be changed to " 44.1 gross tons of shredded steel per scheduled operating hour.
2. The word "shear" needs to be removed from Section II.4.

AUTO SHRED INDUSTRIES
PENSACOLA, FLORIDA

THEORETICAL SCRUBBER EMISSIONS
CONTROL EFFICIENCY

Shredder Capacity¹: 50 cars/hr @ 2000 lb/car

Estimated Average Emission Rate¹ : 8.2 lb/hr

Theoretical Maximum Emission¹: 36 ton/year
Based on 24 hr/day, 365 day/yr

Typical Metal to Waste Ratio: 3:1

Typical Waste in System: 25,000 lb/hr

System Efficiency: $\frac{\text{Controlled Emission}}{\text{Uncontrolled Emission}}$

$$e = \frac{8.2 \text{ lb/hr}}{25000 \text{ lb/hr}}$$

$$e = 99.97\%$$

¹As presented in original permit application, Permit No. A017-159156

WZB

WET SCRUBBER SYSTEM PREVENTATIVE MAINTENANCE CHECKLIST

Date: _____

Technician: _____

WEEKLY PROCEDURES:

RESULTS

ACTION TAKEN

Check pump and fan motor for unusual vibration, noise or heat

Inspect system for leaks

Check system dampers for proper operation

MONTHLY PROCEDURES:

RESULTS

ACTION TAKEN

Inspect spray system

Check condition of fan bearings, belts and seals

Inspect fan impeller and blades for solids buildup and erosion

Check piping for erosion or plugging

Inspect ductwork, fan and structural supports for deterioration/ damage

COMMENTS: _____

DAMP SHREDDING SYSTEM PREVENTATIVE MAINTENANCE CHECKLIST

Date: _____

Technician: _____

MONTHLY PROCEDURES:

RESULT

ACTION TAKEN

Check air flow pressure

Check hoses and pipes for leaks

Check spray nozzles for plugging

Comments: _____

#1 CYCLONE PREVENTATIVE MAINTENANCE CHECKLIST

Date: _____

Technician: _____

MONTHLY PROCEDURES:	RESULTS	ACTION TAKEN
Inspect cyclone and ductwork for plugging	_____	_____
Check for proper damper settings	_____	_____
Check condition of cyclone walls and fan blades	_____	_____
Inspect dust discharge mechanisms for leakage from dust discharge	_____	_____

Comments: _____

#2 CYCLONE PREVENTATIVE MAINTENANCE CHECKLIST

Date: _____

Technician: _____

MONTHLY PROCEDURES:	RESULTS	ACTION TAKEN
Inspect cyclone and ductwork for plugging	_____	_____
Check for proper damper settings	_____	_____
Check condition of cyclone walls and fan blades	_____	_____
Inspect dust discharge mechanisms for leakage from dust discharge	_____	_____

Comments: _____

