COMMISSION
Kevin Beckner
Rose V. Ferlita
Ken Hagan
Al Higginbotham
Jim Norman
Mark Sharpe
Kevin White

Roger P. Stewart Center
3629 Queen Palm Dr. • Tampa, FL 33619
Ph: (813) 627-2600

Fax Numbers (813):

Admin.	627-2620	Waste	627-2640
Legal	627-2602	Wetlands	627-2630
Water	627-2670	ERM	627-2650
Air	627-2660	Lab	272-5157

Executive Director
Richard D. Garrity, Ph.D.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Mr. Joseph Petti, Compliance Manager
OneSteel Recycling, Inc.
4943 Port Sutton Road
Tampa, Florida 33619

Dear Mr. Petti:

Re: Hillsborough County - AP

Enclosed is Permit Number 0571404-002-AC to operate a scrap metal processing facility located at 3310 Port Sutton Road, Tampa, Florida, 33619, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, Florida, 33619 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 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

cc: Steven C. Cullen, P.E., Koogler & Associates, Inc.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 6/9/10 to the listed persons.

Clerk Stamp
FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

Patricia S. Tora 6/9/10

Clerk Date

FINAL DETERMINATION

FOR

OneSteel Recycling, Inc. – Dock Facility

Hillsborough County

Construction Permit

Application Number

0571404-002-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

June 3, 2010

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on August 4, 2009 that included an Intent to Issue Permit No. 0571404-002-AC to OneSteel Recycling, Inc. (OSR), located at 3310 Port Sutton Road, Tampa, Florida 33619. The "after-the-fact" air construction permit allows for the operation of a scrap metal processing facility.

The Public Notice of Intent to Issue was published in The Tampa Tribune on September 30, 2009.

COMMENTS/CHANGES

No comments were received by the Environmental Protection Commission of Hillsborough County from the public on the draft construction permit.

CONCLUSION

The final action of the Environmental Protection Commission of Hillsborough County is to issue the FINAL construction permit as attached.

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Executive Director
Richard D. Garrity, Ph.D.

PERMITTEE:
OneSteel Recycling, Inc. – Dock Facility
3310 Port Sutton Road
Tampa, Florida 33619

PERMIT/CERTIFICATION
Permit No.: 0571404-002-AC
County: Hillsborough
Expiration Date: August 4, 2010
Project: Scrap Metal Processing Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the EPC and made a part hereof and specifically described as follows:

This project is for an "after-the-fact" air construction permit to operate a scrap metal processing facility located a 3310 Port Sutton Road, Tampa, Florida. The scrap metal processing operations will be conducted according to the specified work practice standards, and the use of water and reasonable precautions to control unconfined particulate matter emissions stipulated in the specific conditions of this permit and the attached best management plan.

OneSteel Recycling, Inc., Dock Facility is a scrap metal processing facility that receives scrap iron materials from commercial accounts. The scrap metal material is delivered by open-bed truck, unloaded by dumping, or by grapple or magnetic crane, cut to a desired reduced size by mechanical shears or oxy-fuel torch, if necessary, and finally loaded onto a ship or barge for transport off-site. The facility uses three (3), non-road mobile cranes and a bulldozer to process the scrap metal received at the facility. Shredded scrap metal is piled near the dock, no further processing is necessary prior to ship loading. Heavy scrap metal (HSM) may be staged for sizing by a non-road mobile, mechanical shear or an oxy-fuel torch cutting operation. The heavy scrap iron is cut to a manageable size, approximately 5 to 6 feet long. The bulldozer or cranes are used to move the processed HSM to the dock for ship loading. Three (3), ship-mounted grapple cranes are used to load the processed scrap metal from the dock onto the vessel.

Particulate matter (PM) emissions are generated from the handling and processing of scrap metal material. Since the facility is located in a particulate matter air quality maintenance area and has a potential to emit (PTE) of PM emissions greater than 15 TPY and 5 lb/hr, the processing of scrap metal is subject to the PM RACT requirements of Rule 62-296.711, Materials Handling, Sizing, Screening, Crushing and Grinding Operations. Therefore, the material handling operations are limited to a 5% opacity standard pursuant to Rule 62-296.711(2)(a), F.A.C. and Chapter 1-3.52(2), Rules of the EPC. The remaining activities, torch-cutting, non-road mobile equipment, and vehicle traffic, are subject to a 20% visible emission standard pursuant to Rule 62-296.320, F.A.C. Particulate matter emissions are controlled by following reasonable precautions to minimize the generation of unconfined PM as

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specified in the permit pursuant to Rule 62-296.320(4), F.A.C., and the best management practices document attached to this permit.

The facility uses water to control the PM emitted from material handling operations and to maintain the scrap metal storage piles wet, to the extent necessary to operate in compliance with the PM RACT visible emission standard of 5% opacity. According to the Department of Energy Technical Guide for Estimating Fugitive Dust Impacts from Coal Handling Operations (DOE FOSSIL Reference, 1984), the application of water sprays would reduce PM emissions from 50% to 90%, depending on the water droplet size and spray pattern. A control efficiency of 70% was applied to the PTE estimates for PM emissions from scrap metal processing operations at this facility.

The torch cutting operations are limited to no more than 2,400 hours per year. As a result, the potential to emit particulate matter from torch cutting operations is 0.3 TPY and thus, it is exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C. However, the visible emissions from the torch cutting operations are limited to the general 20% opacity standard as per Rule 62-296.320(b), General Visible Emissions Standard, F.A.C. and Chapter 1-3.52(1), Rules of the EPC.

Facility Information Summary

Location: 3310 Port Sutton Road, Tampa, Hillsborough County

UTM Coordinates: 17- 3596.5 E, 30877.4 N

Latitude: 27° 54' 26" N **Longitude:** 82° 25' 34" W

Facility ID No.: 0571404

Emission Unit ID Nos.:
001 – Scrap Metal Unloading
002 – Material Handling
003 – Vessel Loading

Specific Conditions:

1. **General Conditions.** A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

2. **Applicable Requirements.** Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

3. **Rules of the EPC.** All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

4. **Chapter 84-446, Laws of Florida.** The use of property, facilities, equipment, processes, products, or compounds, or any other act that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.

Operation and Emission Limitations

5. **Hours of Operation.** The facility is permitted to operate continuously; 8,760 hours per consecutive 12 month period, except for the torch cutting operations which are limited to 2,400 hours per consecutive 12 month period. [Rule 62-210.200 (Potential to Emit), F.A.C, and Air Permit Application received on May 13, 2009]

6. **Process & Production.** As requested by the permittee, the facility shall not unload and process more than 1.08 million tons of scrap metal in any consecutive 12 month period. [Rule 62-4.070(3), F.A.C., and Construction Application received May 13, 2009]

7. **Visible Emissions (VE).** Visible emissions from all scrap metal processing activities shall not exceed 5% opacity. Visible emissions from torch cutting activities and all other pollutant emitting activities (non-road mobile equipment) at the facility shall not be equal to or greater than 20% opacity. [Rules 62-296.711 and 62-296.320, F.A.C., and Chapter 1-3.52, Rules of the Environmental Protection Commission of Hillsborough County.]

8. **Open Burning.** Open burning is prohibited unless it is specifically authorized by a separate open burn permit issued by the EPC pursuant to Rule 62-296.320(3), F.A.C.

9. **Objectionable Odor.** The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62 210.200 (Definitions) and 62-296.320(2), F.A.C.]

Specific Conditions:

10. **Control of Unconfined PM.** All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not be limited to, the following:

A) Crane & loader operators shall maintain material drop heights to three (3) feet or less;

B) Vehicle speeds will be limited to 10 mph in unpaved areas and 15 mph in paved areas of the facility.

C) Wet roadways and unpaved areas as necessary to prevent excessive fugitive emissions. Paved areas shall be kept free of dirt and or debris by sweeping or vacuuming (no blowers permitted). If paved areas are not kept free of dirt and debris, they shall be maintained wet to the extent necessary to prevent excessive fugitive emissions.

D) Control equipment (water hoses, spray nozzles, fire extinguishers, shovels, rakes, etc.) shall be properly maintained to perform its designed function.

E) Maintain piles wet to the extent necessary to operate in compliance with the applicable visible emission standard.

F) Operator of the crane, loader, or forklift used to deliver scrap to and/or from the torch cutting area must have a clear, unobstructed view of the area of hazardous operations at all times.

G) Remove oils, lubricants, and other combustible material from scrap metal prior to commencing torch cutting operations and follow the attached Scrap Yard BMP (Attachment B)

[Rules 62-4.070(3) and 62-296.320, F.A.C.]

11. **Weights & Measures.** The permittee shall maintain a truck scale to determine the amount of scrap metal received with an error of equal to or less than 10 percent. [Rule 62-4.070(3), F.A.C.]

12. **Scrap Yard Best Management Practices (BMP).** The BMP document is a part of this permit to be used as a reference guideline for employing best management practices. The permittee should continue to pursue and implement best management practices in conjunction with this guideline. [Rule 62-296.320, Rule 62-4.070(3), F.A.C.,]

Compliance Testing

13. **Annual Compliance Testing.** In order to demonstrate compliance with Specific Condition No. 7, the permittee shall perform visible emission tests annually, during each federal fiscal year (October 1 through September 30), with a target date established by the initial compliance test required in Specific Condition 14. [Rule 62-297.310(7)(a), and Chapter 1-3.50, Rules of the EPC]

Specific Conditions:

14. **Testing Requirements.** Visible emission opacity shall be tested by a certified observer in accordance with EPA Method 9 for a minimum of thirty (30) minutes and shall be taken at the point of highest opacity for each emission unit. [Rules 62-297.310(4)(a)2, and 62-296.711(3), F.A.C., and Chapter 1-3.50, Rules of the EPC]

15. **Compliance Test Notification.** The permittee shall notify the Air Compliance Section of the EPC 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. [Rule 62-297.310(7)(a)(9), F.A.C.]

16. Test Report Submittal. The permittee will submit two (2) copies of the compliance test report required by this permit to the Air Compliance Section of the EPC within forty-five (45) days after the test is complete. The test report shall contain sufficient detail on the source tested and the test procedures used to allow the EPC to determine if the test was properly conducted and the test results properly computed. [Rule 62-297.310(8), F.A.C.]

17. Special Compliance Testing. When the Environmental Protection Commission of Hillsborough County (EPC) 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 Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

Recordkeeping, Emission Factors, and Reporting Requirements

18. Records. In order to demonstrate continuous compliance with Specific Condition Nos. 5 and 6, the permittee shall maintain records of the scrap metal processing and torch cutting operations. The emission factor, 0.1 lb/ton of scrap handled, used to estimate the PM emissions is based on the average of the ISRI Title V Workbook, Table D-10.F and the AP-42, Table 12.10-7 factor for PM emitted to the atmosphere.

The facility records shall include, but not be limited to, the following:

A) Day, Month, and Year of the data recorded;

B) The total weight of scrap metal received, in short or metric tons (specified), on a monthly basis and the rolling total for the previous consecutive 12 month period;

C) The total hours of operation of the torch cutting operations, on a monthly basis and the rolling total for the previous consecutive 12 month period;

D) The total amount of diesel fuel consumed, in gallons on a monthly basis and the rolling total for the previous consecutive 12 month period;

E) The total PM emissions in tons per year for the facility using the 0.1 lb/ton of scrap handled emission factor, on a consecutive 12 month rolling basis.

Specific Conditions:

[Rules 62-4.070(3), and 62-4.160(14)(b), F.A.C.]

19. **Records Retention.** All records shall be completed by the end of the following month, shall be maintained onsite and made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request, and kept on file for at least three years from the date of measurement. [Rules 62-4.070(3), and 62-4.160(14)(b), F.A.C.]

Permit Applications and Transfers

20. **Operation Permit Application.** A complete application for an air operation permit shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of the completion date of the initial compliance test required in Specific Condition No. 13. To properly apply for an operation permit, the applicant shall submit the following:

A) The appropriate Department application form [see Rule 62-210.900, F.A.C. (Forms and Instructions)];

B) The appropriate operation permit application fee(s);

C) Copies of the records specified in Specific Condition 18 for the most recent three (3) months of operation.

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

21. **Transfer of Ownership.** If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

22. **Modifications.** The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation:

A) Alteration or replacement of any equipment or major component of such equipment;

B) Installation or addition of any equipment which is a source of air pollution;

Note: Items A and B are not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit. [Rules 62-210.300 and 62-4.070(3), F.A.C.]

23. Modification for Permit Extension. The permittee may request that this permit be extended as a modification of the permit. Such a request must be submitted to the EPC in writing before the expiration of the permit. Upon timely submittal of a request for extension, unless the permit automatically expires by statute or rule, the permit will remain in effect until final agency action is taken on the request. An

Specific Conditions:

extension shall be granted if the applicant can demonstrate reasonable assurances that the extended permit will comply with the standards and conditions applicable to the original permit. [Rule 62-4.080(3), F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

ATTACHMENT A - GENERAL CONDITIONS

(1) The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

(2) This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

(3) As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.

(4) This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

(5) This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

(6) The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

(7) The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

(a) Have access to and copy any records that must be kept under conditions of the permit;
(b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
(c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.

(8) If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

(a) A description of and cause of noncompliance; and
(b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is

expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

(9) In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is
consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

(10) The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

(11) This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

(12) This permit or a copy thereof shall be kept at the work site of the permitted activity.

(13) This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Compliance with New Source Performance Standards

(14) The permittee shall comply with the following:

(a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

(b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

(c) Records of monitoring information shall include:

1. The date, exact place, and time of sampling or measurements;
2. The person responsible for performing the sampling or measurements;
3. The dates analyses were performed;
4. The person responsible for performing the analyses;
5. The analytical techniques or methods used;
6. The results of such analyses.

(15) When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Attachment B

Scrap Yard Operations
Best Management Plan for Air Emissions
December 2007

Material Handling

1. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not be limited to, the following:

A) Crane & loader operators shall minimize material drop heights to three (3) feet or less.
B) Vehicle speeds will be limited to 10 mph in unpaved areas and 15 mph in paved areas of the facility.
C) Wet roadways and unpaved areas as necessary to prevent excessive fugitive emissions. Paved areas shall be kept free of dirt and or debris by sweeping or vacuuming (no blowers permitted). If paved areas are not kept free of dirt and debris, they shall be maintained wet to the extent necessary to prevent excessive fugitive emissions.
D) Control equipment (spray nozzles, fire extinguishers, shovels, rakes, etc.) shall be properly maintained to perform its designed function.
E) Maintain piles wet to the extent necessary to operate in compliance with the applicable visible emission standard.
F) Operator of the crane, loader, or forklift used to deliver scrap to and/or from cutting area must have a dear, unobstructed view of the area of hazardous operations at all times.

Torch Cutting

2. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter and incidental fires from torch cutting operations. Reasonable precautions shall include, but not be limited to, the following recommendations:

A) Maintain a fire extinguisher, water hose with nozzle, rakes and shovels to spread dirt, or other fire suppression equipment in a location immediately adjacent to all torch cutting activities.
B) The permittee shall be responsible for assuring material to be torch cut is free of grease, oil, debris, or other flammable material(s) prior to commencing torch cutting. Only exempt solvents shall be used to clean metal surfaces.
C) Immediately extinguish any incidental fires created from the torch cutting

operations. If necessary, a spotter shall be used to spot and extinguish incidental fires caused by the torch cutting activity.

D) The permittee is responsible for assuring there is a safe method to immediately extinguish incidental fires.

E) Flammable materials or debris shall be kept at least 100 feet from all torch cutting activities.

3. The following are additional recommendations excerpted from the Institute of Scrap Recycling Industries, Safety Reference Manual, Version 1.1:

A) Torch cutting operators should be equipped with protective equipment that may include the following:
   a. Hardhats
   b. Safety shoes/boots
   c. Oil-resistive clothing or coverings
   d. Fire-resistant or retardant long gloves
   e. Fire-resistant or retardant coveralls/full body work clothing
   f. Fire-resistant or retardant long-sleeve shirt
   g. Respirator and hearing protection, as needed

B) Full face protection/safety glasses A portable fire extinguisher should be in close proximity to torch cutting area with visible signs indicating its location.

C) Compressed gas cylinders must not be moved or transported via magnet.

D) Clear all combustible material away from close proximity to torch cutting area.

E) As needed, establish written procedure for torch cutting in confined spaces, if applicable. Program should include: oxygen deficiency or oxygen enrichment in torch cutting area; personal protective equipment suited to torch cutting environment and breathing atmosphere; emergency escape and rescue procedures; securing torch cutting fuel and oxygen.

F) Establish written procedure for handling and storage of compressed gases that should include:
   a. maximum cylinder pressure
   b. maintenance of cylinder labels and markings
   c. storage of cylinders:
   d. away from sources of heat
   e. away from highly combustible materials such as oil or grease with valve protection caps in place for cylinders of over 30 pounds weight
   f. with valves closed
   g. valve end up
   h. oxygen cylinders stored separately from fuel gas cylinders or combustible materials.

G) Separation between oxygen and fuel-gas cylinders may be obtained by a

minimum distance of 20 feet, or by noncombustible barrier at least 5 feet high having a fire-resistance rating of at least 1/2 hour.

H) Remove regulators before moving or transporting cylinders.

I) Cylinders should not be placed where they might become part of an electric circuit.

J) Oxygen manifolds should be separated from fuel gas cylinders or combustible materials by:
   a. a minimum distance of 20 feet, or
   b. noncombustible barrier at least 5 feet high having a fire-resistance rating of at least 1/2 hour.

K) Each outlet on service piping from which oxygen or fuel gas is withdrawn to supply a portable outlet header should be equipped with a readily accessible shut-off valve.

L) Master shut-off valves for both oxygen and fuel gas should be provided at the entry end of a portable outlet header.

M) When propane cylinders are coupled, approved flash arresters should be installed between each cylinder and the coupler block.

N) When parallel lengths of oxygen and acetylene hose are taped together for convenience and to prevent tangling, not more than 4 inches out of 12 inches should be covered by tape.

O) Tagout procedure should be in place for fuel tanks and valves during equipment maintenance.

P) Prevent dose proximity to flammable liquid or gas containers.

Q) If located indoors, the area used for torch cutting should have forced air ventilation exhausted to the outside of the building or to a baghouse or other emission control device.

R) Exhaust ducts should not discharge near doors, windows or other air intakes in a manner that will permit reentry of effluents into a building.

S) Prevent slipping/tripping hazards in area of torch cutting pit.

T) Eye wash should be in close proximity to torch cutting area, with visible signs indicating its location.

U) Post and enforced "No Smoking" policy in area of torch cutting and gas storage.

V) Employees should stand upwind from torch cutting fumes.

W) Establish written and posted procedure prohibiting torch cutting of the following: dosed containers, hydraulic cylinders, combustible material unvented compressed gas cylinders, batteries, transformers, capacitors, asbestos-coated material, material with springs or other such devices, and radioactive material.

X) Hoses should be protected from sparks, hot slag, oil, grease, falling material and equipment running over them.

Y) Ensure that torch cutting area is not in close proximity to ventilation intake or exhaust ducts.

Z) Material to be cut should be secured to prevent fall or collapse during torch cutting operations.

AA) If during torch cutting operations a loud pop is heard, the operator should immediately shut off all torch valves then relight the torch.

BB) If during torch cutting operations a loud pop followed by a squeal is heard, this indicates a fire in the hose. The opera for should immediately shut of all cylinder valves and place the equipment out of service pending a maintenance check.

CC) Written preventive maintenance program, including documentation and retention of findings, maintenance completed, and corrections should be established.