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**ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by**

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

Eric Logsdon
Director of Corporate Environmental
The David J. Joseph Company
300 Pike Street
Cincinnati, Ohio 45202

File No.: 0571404-005-AO
County: Hillsborough

Enclosed is Permit No. 0571404-005-AO to operate a scrap metal processing facility located at 3310 Port Sutton Road, Tampa, Florida 33619, issued pursuant to Section 403.087, Florida Statutes. Please read this new permit thoroughly as there are changes from the previous permit.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Dr, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of receipt of this permit. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication.

A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance

An agency with values of environmental stewardship in a culture of fairness and cooperation

Roger P. Stewart Center

3629 Queen Palm Drive, Tampa, FL 33619 - (813) 627-2600 - www.epchc.org

An Affirmative Action / Equal Opportunity Employer

with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based is required to contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number if known;

(b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;

(c) A statement of how and when the petitioner received notice of the EPC action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;

(f) A statement of specific rules or statutes that the petitioner contends requires reversal or modification of the EPC's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

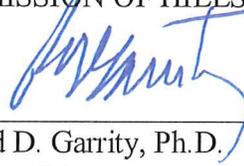
Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

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

EPC's Legal Office at 3629 Queen Palm Dr, Tampa, Florida 33619 and 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 the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY



Richard D. Garrity, Ph.D.
Executive Director

RDG/KRZ/krz

cc: Tammy Reed – Koogler and Associates, Inc. (treed@kooglerassociates.com)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on 3/27/15 to the listed persons.

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

Antonio Torres 3/27/15
Clerk Date

COMMISSION

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PERMITTEE:

Trademark Metals Recycling, LLC
TMR Tampa Export Yard
3310 Port Sutton Road
Tampa, Florida 33619

PERMIT/CERTIFICATION

Permit No: 0571404-005-AO
County: Hillsborough
Expiration Date: March 27, 2020
Project: Scrap Metal Processing Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-204, 62-210, 62-212, 62-213, 62-296, 62-297, and Chapter 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 Environmental Protection Commission (EPC) of Hillsborough County and made a part hereof and specifically described as follows:

Trademark Metals Recycling, LLC, TMR Tampa Export Yard, 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 can operate up to 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. The facility has the capability of using up to three (3) ship-mounted grapple cranes are used to load the processed scrap metal from the dock onto the vessel.

The scrap metal processing and torch cutting operations generate PM emissions. The annual throughput of scrap metal handling is limited to 1,080,000 ton/yr, and the hours of the torch cutting operation are limited to 2,400 hr/yr. The scrap metal processing operations are conducted according to the specified work practice standards for the control of unconfined particulate matter, and the use of water and reasonable precautions to control the PM emissions.

The facility is subject to PM RACT and to a visible emission standard of 5% opacity in accordance with Rule 62-296.711, F.A.C. and Chapter 1-3.52, Rules of the EPC, with the exception of the torch cutting operation, which is limited to a 20% opacity standard in accordance with Rule 62-296.320(b), F.A.C. and Chapter 1-3.52(1), Rules of the EPC.

Location: 3310 Port Sutton Road, Tampa, FL 33619

UTM Coordinates: 17- 3596.5 E, 30877.4 N

NEDS No.: 0571404

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

Replace Permit Nos. 0571404-003/004-AO

Reference Permit Nos. 0571404-001/002-AC

PERMITTEE:
Trademark Metals Recycling, LLC
TMR Tampa Export Yard

Permit/Certification No.: 0571404-005-AO
Project: Scrap Metal Processing Facility

PERMIT CONDITIONS:

1. A part of this permit is the attached General Conditions.
[Rule 62-4.160, F.A.C.]
2. 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. 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. 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.
5. 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 62-4.070(3), F.A.C. and Permit No. 0571404-001-AC]
6. As requested by the permittee, the facility shall not unload and process more than 1,080,000 tons of scrap metal in any consecutive 12 month period.
[Rule 62-4.070(3), F.A.C., and Permit No. 0571404-001-AC]
7. 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 EPCHC]
8. 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. 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 62-4.070(3) and 62-296.320(2), F.A.C.]
10. 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,

PERMITTEE:
Trademark Metals Recycling, LLC
TMR Tampa Export Yard

Permit/Certification No.: 0571404-005-AO
Project: Scrap Metal Processing Facility

PERMIT CONDITIONS:

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. 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. The BMP document (Attachment B) 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.,]

13. In order to demonstrate compliance with Specific Condition No. 7, the permittee shall perform visible emission tests annually for each emission unit (EU 001, EU 002 and EU 003), once every calendar year (January 1st - December 31st).

[Rule 62-297.310(8)(a)1., F.A.C. and Chapter 1-3.52(2), Rules of the EPCHC]

14. 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 1-3.52(3), Rules of the EPCHC]

15. 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.]

PERMITTEE:
Trademark Metals Recycling, LLC
TMR Tampa Export Yard

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Project: Scrap Metal Processing Facility

PERMIT CONDITIONS:

16. 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. 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.]

18. 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 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 on a monthly basis and the rolling total for the previous consecutive 12 month period (tons);
- 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 on a monthly basis and the rolling total for the previous consecutive 12 month period (gallons).

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

19. 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.]

20. 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.]

21. 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:

PERMITTEE:
Trademark Metals Recycling, LLC
TMR Tampa Export Yard

Permit/Certification No.: 0571404-005-AO
Project: Scrap Metal Processing Facility

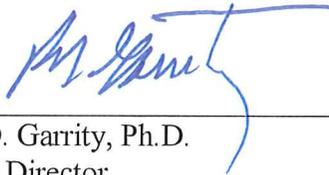
PERMIT CONDITIONS:

- 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.]

22. Prior to sixty days before the expiration of this operating permit, the permittee shall apply for a renewal of the permit using the current version of the permit renewal application form. A renewal application shall be timely and sufficient. If the application is submitted prior to sixty days before the expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the EPC or, if there is court review of the final agency action, until a later date is required by Section 120.60, Florida Statutes. [Rule 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY



Richard D. Garrity, Ph.D.
Executive Director

ATTACHMENT - 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, Florida Statutes (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 403.087(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. Not applicable to Air Permits.
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, are 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 reasonable 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.

ATTACHMENT - GENERAL CONDITIONS

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 Section 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.

11. This permit is transferable only upon Department approval in accordance with Rule 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 (NSPS)

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.

16. Not applicable to Air Permits.

17. Not applicable to Air Permits.

**Scrap Yard Operations
Best Management Plan for Air Emissions**

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 clear, 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

Attachment B

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

Attachment B

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 close 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: doped 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.

Attachment B

- 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 operator should immediately shut off 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.