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Mr. James P. Wold Environmental Manager Gerdau Ameristeel – Jacksonville Steel Mill 16770 Rebar Road Baldwin, Florida 32234	
PS Form 3800, May 2000 See Reverse for Instructions	

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TO THE RIGHT OF RETURN ADDRESS

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1. Article Addressed to:

Mr. James P. Wold
 Environmental Manager
 Gerdau Ameristeel – Jacksonville Steel
 Mill
 16770 Rebar Road
 Baldwin, Florida 32234

2. Article Number
(Transfer from service label)

7000 1670 0013 3110 0048

COMPLETE THIS SECTION ON DELIVERY

- A. Signature**
X *[Signature]* ☐ Agent
☐ Addressee
- B. Received by (Printed Name)** *Harry Ervin* **C. Date of Delivery** *2/3/04*
- D. Is delivery address different from item 1?** ☐ Yes
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- 3. Service Type**
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| <input type="checkbox"/> Registered | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail | <input type="checkbox"/> C.O.D. |

- 4. Restricted Delivery? (Extra Fee)** ☐ Yes

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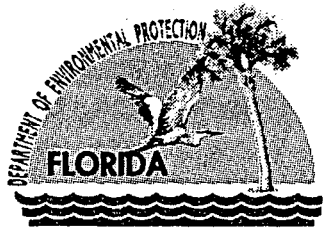
Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

RECEIVED

FEB 03 2006

BUREAU OF AIR REGULATION





Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

January 20, 2006

CERTIFIED MAIL - Return Receipt Requested

Mr. James P. Wold
Environmental Manager
Gerdau Ameristeel - Jacksonville Steel Mill
16770 Rebar Road
Baldwin, Florida 32234

Dear Mr. Wold:

RE: Request to Conduct Performance Tests While Using Vehicle Tires as a Carbon Source in the Mill's EAF

The Department received your letter on January 18, 2006, requesting permission to conduct performance tests while using vehicle tires as a carbon source in the mill's EAF. The proposal will require an air construction permit (including a Public Notice) to authorize the proposed trial test. Therefore, complete the appropriate application pages and have it signed by the Authorized Representative and sealed by a Professional Engineer (PE) registered in Florida; and, the PE of Record will be required to oversee the technical aspects of the proposed project and the performance tests. The application should include the following information:

1. Has the new EAF been installed, because the Department would be more interested in the tests being performed on the new unit than the existing one? Please see permit 0310157-007-AC/PSD-FL-349, which was issued on September 21, 2005, authorizing the construction of a new EAF and LMF.
2. Please provide the proposed pollutant testing methods that will be used in the performance tests. For particulate and metals, EPA Method 29 - Determination of Metals Emission from Stationary Sources should be used. However, if both EPA Methods 5 and 29 are proposed, the Department would not object. The metals of concern are lead (Pb), chromium (Cr), cadmium (Cd), and mercury (Hg). For mercury, EPA Method 101A could also be performed.
3. Since chlorine is contained in both bituminous coal and tires and in about the same amounts, what emissions are expected from this component? Has there been any testing conducted at any steel mill for this pollutant or resultant compounds, i.e., dioxin or furans? If so, please provide such documentation.
4. Regarding a potential modification and PSD concerns, what emissions data will be used for baseline emissions for comparative purposes? There didn't appear to be any proposed in the request. In addition and for comparative purposes, it is very important that the production throughput be equivalent for both the baseline tests and the tire substitution tests.
5. In the second paragraph of your letter, it was mentioned that there are several mini-mills already using tires in their processes and that summary data from emissions testing is available. Please provide us with that data, for it might be useful in establishing a testing protocol for your mill.
6. How many tests are you planning to perform and when are these tests to be conducted? Please be definitive in your response, as your request covers a two-week time period.

If you have any questions regarding this matter, please contact Mr. Bruce Mitchell at 904/413-9198 or write to me at the above letterhead address.

Sincerely,

Jeffery F. Koerner, P.E.
Permitting North Administrator
Bureau of Air Regulation

TLV/bm

cc: Richard Robinson, ERMD-EQD

"More Protection, Less Process"

Feb 8

Brown

Trina's Reading File

3/1/20/06 Printed on recycled paper.



RECEIVED

JAN 18 2006

BUREAU OF AIR REGULATION

Ms. Trina L. Vielhauer,
Chief, Bureau of Air Regulations
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

January 16, 2006

RE: Request for Test Production Run – Tires as Carbon Source in EAF

Gerdau Ameristeel is requesting temporary approval to test the use of vehicle tires as a carbon source for the Jacksonville Steel Mill electric arc furnace (EAF). If this test is successful, a permanent procedure will be developed to facilitate the use of tires as a carbon source and submit an application for your approval.

Several mini-mills in the United States are utilizing discarded tires as a feed stock to the electric arc furnace (EAF) in an effort to reduce and/or replace the conventional use of bituminous coal or petroleum coke (pet-coke). In addition to the steel belts and beads, the carbonaceous materials are incorporated into the steel bath to assist in the steel making process. Summary data from emission testing suggests that the use of tires may actually reduce SO₂ emissions from the EAF. Tire use is not expected to result in significant changes in emissions of NO_x, PM, or VOC.

The proposed process will be to unload a semi-truck of shredded tires into a temporary storage location. The shredded tires will then be loaded by bobcat into the flux bin and then loaded into the charge bucket for use in the EAF. During the temporary process various mixes of shredded tires and charge carbon will be used. The amount of tires used per heat will be documented during the trial period and submitted with the testing data. The use of tires in the EAF will not increase its' capacity. The test will include 40 heats and be completed within two weeks.

During these proposed test runs, performance tests will be performed to determine the EAF gaseous emissions. The stack tests will be performed for SO₂, NO_x, CO, and VOC. If the process is successful, we will design a permanent method and submit that modification request to our air permit for your approval.



Please let us know at your earliest convenience your position on this trial test over a two week period. Ideally, we would appreciate if we could have your approval by the middle of February then our test would be conducted in late February or early March.

If you have any questions, please do not hesitate to call.

Thank you,

A handwritten signature in black ink, appearing to read 'James P. Wold'.

James P. Wold
Environmental Manager
Jacksonville Steel Mill
904-266-4261 x133

cc: Richard L. Robinson, P.E., Manager Air Pollution Source Permitting Section
Donald R. Shumake, Vice President/General Manager
David Larocca, Project Engineer



RECEIVED

JAN 18 2006

BUREAU OF AIR REGULATION

Ms. Trina L. Vielhauer,
Chief, Bureau of Air Regulations
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

*1-18-06
Trina
I gave Jeff a
copy of the
Patty*

January 16, 2006

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James P. Wold
Environmental Manager
Jacksonville Steel Mill
904-266-4261 x133

cc: Richard L. Robinson, P.E., Manager Air Pollution Source Permitting Section
Donald R. Shumake, Vice President/General Manager
David Larocca, Project Engineer

CERTIFIED MAILMS# 5505 MC Acct # 5515

Department of Environmental Protection
 2600 Blair Stone Rd
 Tallahassee FL 32399-2400

**RETURNED FOR POSTAGE**

7000 1670 0013 3110 0116

7000 1670 0013 3110 0116

Sent To
 Mr. James P. Wold, Env. Mgr.
 Street, Apt. No. or PO Box No.
 16770 Rebar Road
 City, State, ZIP+4
 Baldwin, FL 32234

PS Form 3800, May 2000

See Reverse for Instructions

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1. Article Addressed to:
 Mr. James P. Wold, Env. Mgr.
 Gerdau Ameristeel
 Jacksonville Steel Mill
 16770 Rebar Road
 Baldwin, FL 32234

2. Article Number
(Transfer from service label)

7000 1670 0013 3110 0116

PS Form 3811, August 2001

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☐ Agent
☐ Addressee
X
 B. Received by (Printed Name) C. Date of Delivery

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 If YES, enter delivery address below: ☐ No

3. Service Type
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4. Restricted Delivery? (Extra Fee) ☐ Yes

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