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PERMITTEE:

Gulf Coast Recycling, Inc.
1901 N. 66th Street
Tampa, FL 33619

PERMIT/CERTIFICATION

Permit No.: AC29-258634
County: Hillsborough
Expiration Date: 06/15/96
Project: Secondary Lead Smelting
Facility

8-1-95

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-209, 62-210, 62-212, 62-272, 62-275, 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:

For the modification of a secondary lead smelting facility to incorporate reasonably available control technology provisions for lead emissions. The facility recycles spent automotive and industrial lead acid batteries to produce lead ingots. Batteries arrive by truck. The batteries are cut open and the acid is separated in a settling tank. A tumbler separates the lead battery groups from the casing. The casings are reduced by a hammermill and then sent into a flotation and separation device. Separated plastics are blown into trucks and battery posts are routed to the refining operation. Lead bearing muds and rubber from the separation/flotation process are sent to the blast furnace along with sludge from the acid settling tank.

Battery groups are stored in piles in a partially enclosed structure. One blast furnace is used for the melting of battery groups and plant scrap lead, coke, limerock, cast iron, and re-run slag are charged to the furnace via a skip hoist with a manually opened charge door at the top of the furnace. An agglomerating furnace is used to melt flue dust that is collected and fuses the particles together. The fused material is subsequently broken and re-fed to the blast furnace.

Lead and slag are both tapped and collected at the base of the furnace. Lead is tapped to form buttons which are transported to the refining area. Refining lead includes producing soft lead, hard lead, and calcium lead which is accomplished in three 52-ton kettles all fired with natural gas. After refining is completed, drosses are removed and lead is cast into ingots. The dross is returned to the blast furnace.

Slag is stored and processed in an enclosed area. The slag is crushed and then mixed with cement to stabilize the slag. The resulting mixture is used for construction projects at the facility or disposed of off site.



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PROCESS DESCRIPTION: (continued)

Particulate matter and lead emissions from the blast and agglomerating furnace are controlled by a 25,000 ACFM ten compartment baghouse fabricated by Gulf Coast Recycling (GCR) and was modelled after a Wheelabrator-Frye Dustube Model 126, Series 55 shaker baghouse. Emissions from the blast furnace charging are captured by a hood and vented to a 9,000 ACFM two compartment shaker baghouse fabricated by GCR. The blast and agglomerating furnace tapping emissions are captured by a hood and vented to a 7,000 ACFM one compartment shaker baghouse similar in design to the previously mentioned baghouse. Particulate matter and lead emissions from the refining kettles are controlled by two Wheelabrator-Frye, Model 126 baghouses in parallel and exhausted through a common stack at a design flow rate of 17,000 ACFM. Emissions from the slag grinder are controlled by a 3,500 ACFM baghouse. Fugitive emissions of particulate matter and lead from process operations and the facility grounds are controlled through the use of water sprays, enclosures, reasonable precautions and specific work practices as specified in the specific conditions.

Emissions of nitrogen oxides, carbon monoxide, sulfur dioxide, and volatile organic compounds from the furnace operations are uncontrolled.

Location: 1901 N. 66th Street, Tampa

UTM: 17-364.05 E 3093.5 N NEDS NO: 0057 Point ID: 01 - Furnace Exhaust
02 - 3 Refining Kettles
04 - Furnace Tapping
06 - Furnace Charging
07 - Slag Processing
08 - Facility Grounds
(including battery breaking operation)

Replaces Permit No.: AC29-184883, AC29-217704

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SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. 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.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-209, 62-210, 62-212, 62-272, 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.]
4. The total emissions from the secondary lead smelting facility shall not exceed 45 tons of particulate matter and 7.6 tons of lead for any consecutive twelve month period. Total emissions of other pollutants emitted by the furnace operation are being addressed in a pending PSD construction application reference DEP File No. 209018, PSD-FL-215. [Construction Application dated 09/30/94]
5. Hours of operation shall not exceed 7,800 hours for blast furnace operation, 6000 hours for refining operation, and 1664 hours for slag processing operation for any consecutive twelve month period. [AC29-184883, AC29-217704, and Construction Application dated September 30, 1994]
6. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320, F.A.C.]

Emission Limitations

Furnace Operations (One blast furnace, one agglomerating furnace, and tapping and charging operations for the furnace)

7. The permittee shall not allow lead emissions to exceed the following:
 - A) 0.010 grains/dscf and 3% opacity for the blast and agglomerating furnace. [Rule 62-296.603(1)(a), F.A.C.]
 - B) 0.002 gr/dscf and 3% opacity at the exit of the baghouse for blast furnace charging. [Rule 62-296.603(1)(b), F.A.C.]
 - 1) 3% opacity from the closed charge doors on the blast furnace during furnace operation.
 - 2) 6% opacity from the charge doors on the blast furnace during charging operations.

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- C) 0.002 gr/dscf and 3% opacity for slag and product tapping for the blast and agglomerating furnaces at the exit of the baghouse. [Rule 62-296.603(1)(c), F.A.C.]
- D) 1.810 lbs./hr. and 5% opacity for the blast and agglomerating furnace. [40 CFR 52.535(c)(1)(i) and (iv)]
- E) 0.060 lbs./hr. and 5% opacity for slag and product tapping from the blast and agglomerating furnaces. [40 CFR 52.535(c)(1)(i) and (iv)]
- F) 0.220 lbs./hr. and 5% opacity for blast furnace charging at the exit of the baghouse. [40 CFR 52.535(c)(1)(i), (ii), and (iii)]
 - 1) 5% opacity from closed charge doors during furnace operation.
 - 2) 10% opacity from charge doors during charging operations.

8. The permittee shall not allow particulate matter emissions to exceed the following:

- A) 50 mg/dscm (0.022 gr/dscf) and 20% opacity for the blast furnace. [40 CFR 60.122(a) and Rule 62-296.800, F.A.C.]
- B) 0.03 gr/dscf, 5.2 lb/hr, and 20.4 tons per any 12 consecutive month period for blast furnace.
- C) 0.03 gr/dscf, 0.79 lb/hr, and 3.1 tons per any 12 consecutive month period for the furnace tapping operations. [Rule 62.296.700, FAC]
- D) 0.03 gr/dscf, 2.14 lb/hr, and 8.35 tons per any 12 consecutive month period for the furnace charging operations. [Rule 62.296.700, FAC]

9. Blast furnace operations may be subject to additional pollutant emission and operational limitations pending issuance of permit pursuant to the facility's PSD application submitted reference DEP File No. 208018, PSD-FL-215.

Refining Operation (3 natural gas fired 52-ton refining kettles and associated pigging machines)

10. The permittee shall not allow lead emissions to exceed the following:

- A) 0.0002 gr/dscf and 3% opacity for the refining kettles. [Rule 62-296.603(1)(d), F.A.C.]
- B) 0.400 lbs./hr. and 5% opacity for three refining kettles. [40 CFR 52.535(c)(1)(i) and (ii)]

11. No more than two 52-ton refining kettles shall be operated at a time. [40 CFR 52-535(c)(1)(vi)]

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12. The refining kettles shall be fired only with natural gas at a maximum heat input rate of 4.0 MMBTU/hr. per kettle. [AC29-184883]

13. The permittee shall not allow particulate matter emissions from the lead refining area baghouse to exceed 0.03 gr/dscf, 4.04 pounds/hr. and 12.12 tons per year. [Rule 62-296.700, F.A.C. and AC29-184883]

14. Maximum production from the refining kettles shall not exceed 30,000 tons/yr. of finished lead. [AC29-184883]

15. Any time that a kettle is being heated to refine lead or to bring it to temperature prior to receiving a charge of lead or it contains a charge of lead irregardless of whether heat is being applied, the kettle shall be vented to the baghouse and the baghouse shall be operational. This time shall count towards the 6,000 hours allowed during any twelve (12) consecutive month period. [AC29-184883]

Miscellaneous Operations (Slag handling and processing, battery cracking operation)

16. The permittee shall not allow lead emissions to exceed the following: [Rule 62-296.603(e) and (f), F.A.C.]

- A) 3% opacity for the battery cracking operations.
- B) 0.0000333 gr/dscf for the slag handling and processing operations which includes receiving hopper, and conveyor drop/crusher sources collectively.
- C) 3% opacity for the entire slag handling and processing operations which include receiving hopper and conveyor drop/crusher collectively and the structure housing the processing operation.

17. Particulate matter emissions from the slag handling and processing operation shall be less than one ton per year in order to exempt this operation from particulate RACT. [Rule 62-296.700(2)(c), F.A.C.]

18. The average lead content of the slag processed shall not exceed 7% lead by weight on an annual basis. (The range of lead content is usually 5 to 9% lead by weight.) Only slag generated on-site may be processed. [AC29-217704]

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19. Process rates for each specified operation shall not exceed the following: [Construction Permit AC29-217704, AC29-184883 and Construction Application dated 09/30/94]

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<u>Source</u>	<u>Process Rate</u>
Blast Furnace	4.53 tons charged/hour*
Refining Kettles	52 tons of lead charged per batch per kettle
Slag Processing	6 tons of slag processed/hr.

* Raw material charging rates on a daily basis shall be consistent with the following percentages: 88% lead scrap and re-run slag, 7% coke, 2.5% limerock, and 2.5% cast iron.

Testing Methods and Procedures

20. Test the emissions for the following pollutant(s) within 150 days of receipt of this permit and submit 2 copies of test data to the Air Compliance Section of the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. Testing procedures shall be consistent with the requirements of 40 CFR 60 and Rule 62-297, F.A.C.:

(X) Pb
(X) PM
(X) Opacity

21. Compliance with the emission limitations of Specific Condition Nos. 7, 8, 10, and 16 shall be determined using EPA Methods 1, 2, 3, 4, 5, 9, and 12 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. In the case of the Method 9, Section 2.5 shall be excluded, pursuant to 40 CFR 52.535(b)(5); Thus waiving the six minute averaging period and establishing an instantaneous standard as established in Specific Condition Nos. 7.D., 7.E., 7.F., 8.A., and 10.B.

22. The permittee shall provide at least the minimum requirements for stack sampling facilities as specified in 40 CFR 60.8(e)(1), (2), (3) and (4) and Rule 62-297-345(1), (2), (3), F.A.C. Source sampling platforms, platform access, and other associated work areas, whether permanent or temporary, shall be in accordance with Occupational Safety and Health Administration standards per 29 CFR 1910, Subparts D and E.

23. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity as specified in Specific Condition No. 19. If it is impracticable to test at capacity, then the source may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days

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for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. For the blast furnace and refining kettles, the type and amounts of materials charged during the test must also be included. Testing of refining operation must be accomplished while two kettles are operating. Failure to submit the input rates and actual operating conditions may invalidate the test. [Rule 62-4.070(3), F.A.C.]

24. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County 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 contact person who will be responsible for coordinating and having such test conducted. [Rules 62-297.340(1)(i) and 62-209.500, F.A.C.]

25. Visible emissions test must be conducted in accordance with the following requirements:

- A) The visible emission tests on the lead refining area baghouse and the building shall be at least thirty (30) minutes in duration pursuant to Rule 62-297, F.A.C., and shall be conducted concurrent with one of the Method 12 runs. [Permit No. AC29-184883]
- B) The visible emission test on the blast furnace shall be thirty (30) minutes in duration pursuant to Rule 62-297, F.A.C., and shall be conducted concurrent with one of the Method 12 runs.
- C) The visible emission tests on the blast furnace charging operation shall each be thirty (30) minutes in duration, pursuant to Rule 62-297.330, F.A.C. Readings shall be taken on the:
 - 1) Charge door on the blast furnace during charging (closest potential emission point).
 - 2) Closed charge doors on the blast furnace during furnace operation (closest potential emission point).
 - 3) Baghouse exhaust during blast furnace operation.
- D) The visible emission test on the blast furnace tapping shall be thirty (30) minutes in duration pursuant to Rule 62-297.330, F.A.C. Readings shall be taken only during product tapping on the baghouse exhaust and on the tapping doors.

26. 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 Rule 62-210, 62-212, 62-252, 62-272, 62-273, 62-275, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated,

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it may 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 62-297.340(2), F.A.C.]

Monitoring and Recordkeeping

27. The permittee shall minimize emissions at all times, including periods of startup, shut down, and malfunction in a manner consistent with good air pollution control practice. [40 CFR 60.11(d) and Rule 62-4.070(3), F.A.C.]

28. The permittee shall petition to revise this permit if affected, within 90 days of any revision to the lead SIP as detailed in 40 CFR 52.535.

29. The permittee shall maintain records of all process control operating parameters and process upsets. They shall include nature and duration of upsets and emission control equipment malfunction, a detailed description of the nature and duration of the upset or malfunction, the expected effects on emissions and corrective actions taken or planned to avoid recurrences. Such records shall be available at the plant site for inspections by the Region IV Administrator of EPA or its authorized agent for a period of at least two years. [40 CFR 52.535 and 40 CFR 60.7(b)]

30. The permittee shall maintain continuous records of plant process and emission control operations as necessary to determine continuous compliance. Such records shall include reports of all process operations and control equipment operating parameters. Such records shall also include reports of all types of process upsets and emission control equipment malfunctions detailing the nature and duration of the upset or malfunction, the expected effects on emissions, and the corrective actions taken or planned to avoid recurrences. Such records shall be available at the plant site for inspection for a period of at least two (2) years. [40 CFR 52.535(b)(4)]

31. No owner or operator of a lead processing operation shall cause, allow, or permit the emissions of lead, including emissions of lead from vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, charging, melting, tapping, casting, storing or handling, unless reasonably available control technology is employed to control such lead emissions. RACT measures shall include but not be limited to the following: [Rule 62-296.601(2), F.A.C. and Construction Application dated September 30, 1994]

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- A) All control measures listed in Specific Condition No. 39 of this permit.
- B) Modify the lead well tapping load doors and the duct connection to decrease the introduction of tramp air.
- C) Install a strip curtain inside of the charging door enclosure to reduce the area to be evacuated and partially seal off the large opening of the enclosure where the skip hoist enters.
- D) Maintain blast gate style dampers so that it will be possible to balance the air flow and maximum capture at pickup point for furnace operations.
- E) Install and maintain slide gates in the exit of the baghouse hoppers to prevent the re-entrainment of dust collected in the screw conveyor on the hygiene baghouses.
- F) Maintain water application system to control fugitive plant emissions for the slag processing operation, battery breaking operation, raw material storage, dross wetting, sprinklers along the south boundary, and remaining sprinkler systems on facility grounds.
- G) Maintain wind breaks and panels installed along bottom of the agglomerating furnace, southside of the furnace baghouse support structure, south and west sides of group pile storage building, and windbreak installed along the entire south property boundary.
- H) Maintain vegetation coverage on at least 10% of the structureless area of plant grounds.
- I) Twice daily during plant operation vacuum paved areas using a HEPA filter equipped vacuum.
- J) Install tire wash for frontend loader at the entrance of the group pile storage building to prevent tracking of lead bearing materials outside the area.
- K) Close and vegetate old stormwater pond until final use of the area is determined.*
- L) Eliminate slag transfer with frontend loader through the plant. Slag will be stored, handled, and processed in enclosed structures.
- M) Use only trained personnel for furnace operations.

* Completion pending DEP approval.

32. To show compliance with Specific Condition No. 18, no less than once per month the permittee shall test the slag for lead content prior to undergoing the slag processing. Lab results shall be maintained for the most recent two year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request. [Rule 62-4.070(3), F.A.C.]

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SPECIFIC CONDITIONS: (continued)

33. In order to document compliance with the tons per year limitations of Specific Condition No. 19, lead and particulate matter emissions shall be calculated using the methodology outlined in construction permit AC29-217704. A table summarizing the method is included as Attachment A. [Rule 62-4.070(3), F.A.C.]

34. The permittee shall maintain daily records on the number of charges to the blast furnace and the make-up of each charge (i.e., groups, coke, limerock, etc.) to show compliance with Specific Condition No. 19. The permittee shall also maintain monthly inventory records showing types and quantities of materials charged to the furnace during the month. [Rule 62-4.070(3), F.A.C.]

35. The permittee shall adhere to the Operation and Maintenance Plan as specified in Attachment B of this permit for the control of particulate matter and lead emissions. The Operation and Maintenance Plan in Attachment A is an enforceable component of this permit. [Rule 62-296.700, F.A.C. and Rule 62-296.600(4), F.A.C.]

36. The permittee shall keep the following records for a minimum of two years and make them available to any representative of the Department or the Environmental Protection Commission of Hillsborough County on request: [Rule 62-296.600(5), F.A.C. and 40 CFR 60.7(d)]

- A) Records of control equipment operating parameters are detailed in the Operation and Maintenance Plan in Attachment A of this permit and monitoring device calibration checks.
- B) Maintenance records on the control equipment, including black light tests, bag replacements, structural repairs, motor replacements and any adjustments that are made to monitoring devices.
- C) Records of control system and malfunctions or failures and corrective actions taken.

37. In order to document compliance with Specific Condition Nos. 4, 5, and 14, the permittee shall maintain a record processing operating hours (hours/day), amount of slag processed (tons/day), and refining kettles production. These records shall be summarized on a monthly basis showing total hours and tons for the month for the last twelve consecutive month period. These records shall be recorded in a permanent form suitable for inspection by the Department upon request, and shall be retained for at least a two year period. [AC29-217704 and Rule 62-4.070(3), F.A.C.]

38. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.310, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations,

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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) Personnel shall ensure that all doors in the slag fixation building are closed prior to operate the slag processing equipment and kept closed during operation.
- B) Personnel shall ensure that the water spray system for the receiving hopper, conveyors, kinetic crusher, vibrating sizing screen, and mixing operations are on and operating prior to operating the slag process equipment.
- C) Slag stored in the bin located in the slag fixation building shall be wetted while loading into the receiving hopper.
- D) Personnel shall ensure the collection hoods on the kinetic crusher is on and operating prior to beginning the slag processing.
- E) Supervisory inspections shall routinely be conducted during slag processing operations to ensure all of the above stated precautions are taken to reduce fugitive generation.

39. Pursuant to 40 CFR 52.535(b)(2), non-process fugitive emissions (road dust, stockpiles, plant grounds, etc.) shall be minimized. Minimization efforts shall include such fugitive dust suppression activities as chemical stabilization, water spraying with appropriate runoff collection, resurfacing, vacuuming, revegetation, and other EPA approved methods.

40. 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(39), 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: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

- A) Alteration or replacement of any equipment or major component of such equipment listed on page 1 of this permit.
- B) Installation or addition of any equipment which is a source of air pollution.

41. The permittee shall install, maintain and calibrate elapsed time meters on all the emission units covered under this permit. The meters shall be accurate within 10 percent (10%) and used to keep the records required by Specific Condition No 33. [Rule 62-4.070(3), F.A.C.]

42. The permittee shall propose methods to accurately monitor (within 10 percent) the maximum permitted rates stated in Specific Condition No. 19 and submit the same with the application to operate. [Rule 62-4.070(3), F.A.C.]

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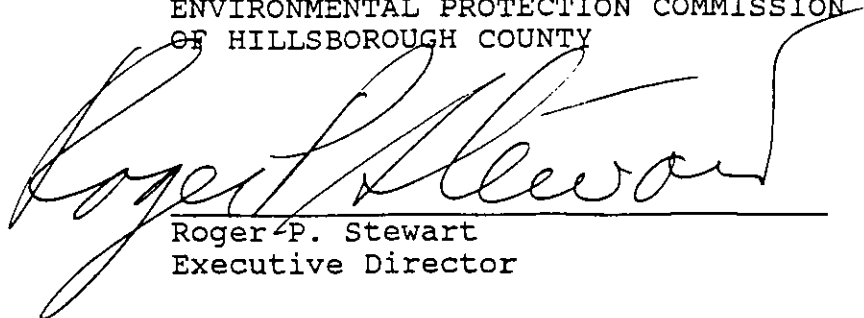
SPECIFIC CONDITIONS: (continued)

43. The permittee shall install, maintain and calibrate a device which continuously measures and records the pressure drop across the baghouses controlling the emission units covered under this permit. [Rule 62-4.070(3), F.A.C.]

44. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before March 1, completed DEP Form 62-210.900(4), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(2), F.A.C.]

45. Submit a completed Title V operating permit application (DEP Form No. 62-210.900(1)) in quadruplicate to the Environmental Protection Commission of Hillsborough County on or before November 15, 1995 or as specified by rule, along with compliance test results, certification that requirements of Specific Condition Nos. 32, 41 & 42 have been met, and an Operation and Maintenance Plan meeting the requirements of 62-296.700(6), F.A.C. for the furnace operation, tapping operation, and charging operation.

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY



Roger P. Stewart
Executive Director