ENVIRONMENTAL PROTECTION COMMISSION
HILLSBOROUGH COUNTY

8-1-95

ADMINISTRATIVE OFFICES, LEGAL & WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960
FAX (813) 272-5157

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

August 1, 1995
CERTIFIED MAIL # Z 286 203 801

Gulf Coast Recycling, Inc.
Mr. Willis M. Kitchen, President
1901 North 66th Street
Tampa, Florida 33619

CASE # 95-0728SKW057

NOTICE OF INTENT TO INITIATE ENFORCEMENT

Dear Mr. Kitchen,

SUBJECT: Facility located at 1901 North 66th Street, Tampa (S14 T29 R19)

The Environmental Protection Act of Hillsborough County, Chapter 84-446, Laws of Florida (Act), and Chapter 403, Florida Statutes, authorize and empower the Environmental Protection Commission of Hillsborough County (Commission) to enforce rules and regulations to protect, control, abate, and prohibit pollution in Hillsborough County. In this regard, you are hereby informed of the following:

1. Air monitoring data collected at a monitor located immediately north of the Gulf Coast Recycling, Inc. (GCR) facility indicates that the National Ambient Air Quality Standard for lead of 1.5 micrograms per cubic meter was exceeded during the first two calendar quarters of 1995. The quarterly averages were 4.5 and 2.2 micrograms per cubic meter, respectively. Commission staff believes that GCR's lead acid battery recycling operation is the primary source of ambient lead detected at this location. Section 62-272.300(2), F.A.C., and Section 1-3.22.1., Rules of the Commission, prohibit the operation of a source in such a manner as to result in the release of an air pollutant into the atmosphere which causes or contributes to a violation of an ambient air quality standard.

2. Results of an annual compliance test conducted by GCR on November 1-3, 1994, and received by Commission staff on December 13, 1994, reveal that GCR exceeded the maximum permitted process input rate during operation of the blast furnace. The actual process input rate during testing was between 6.14 and 6.56 tons per hour. Specific Condition No.

15 of Permit No. AO29-173310 (Permit) prohibits a raw material charging rate in excess of 4.58 tons per hour.

3. Specific Condition No. 19 of the Permit requires that GCR maintain daily and monthly records of raw material input to the blast furnace consistent with the requirements of Specific Condition No. 15. Based on its review of GCR's records, Commission staff believes that GCR's current record keeping format does not adequately fulfill the requirements of the Permit.

4. From February 4, 1994 to the present, Commission staff has received complaints from citizens living or working in areas adjacent to the GCR facility, alleging a nuisance caused by objectionable odors from the facility. On June 21, 1995 and on or about June 28, 1995, Commission staff detected objectionable odors while inspecting areas adjacent to the GCR facility. Based on wind direction and inspection of the surrounding area, staff believes that the source of the odor is the GCR facility. Section 1-3.22.3., Rules of the Commission, prohibits the discharge of any pollutant that causes or contributes to an objectionable odor. Section 16 of the Act prohibits any emission that causes or reasonably may be expected to cause a nuisance.

5. In response to the high ambient air lead recordings, Commission staff took numerous soil samples in the vicinity of the GCR facility. Several samples exceeded three times the average background lead concentration and may indicate a significant release as defined by EPA. A number of the samples also exceeded the Florida Department of Environmental Protection's soil cleanup goals for residential and industrial land uses.

You are here advised the Commission staff believes that the above facts demonstrate violations of the Act and the Florida Administrative Code, and we are therefore obligated to pursue enforcement for correction.

<u>Show cause</u>: Should you believe that the above information is incorrect or incomplete, you are requested to immediately show cause by providing us with any additional relevant information that may indicate that the above is not a violation.

In addition to correction, potential penalties for such violations include imposition of damages and civil penalties of up to $10,000 per violation. Each day in which the above violations continue or recur constitutes a separate violation subject to enforcement.

Settlement without litigation: Should you wish to settle this matter amicably, the Executive Director may be able to enter into a Consent Order containing mutually agreeable terms. Such an order normally contains conditions necessary to correct the violation, reimbursement of costs, and a settlement to the Pollution Recovery Fund. In return, the Executive Director will waive the right to proceed in court against you.

In the hope that an amicable resolution of this matter can be reached, we request that you respond in writing within 10 days of receipt of this Notice to explain the cause(s) of the above circumstances. Please include the steps you have taken or propose to take to prevent a recurrence so that we can better determine what corrections need to be undertaken. If you would like to meet with staff to discuss any issue or the requirements for settlement, please contact Kay Strother at 272-5530.

Please mail or deliver your response or any questions you have to the Air Management Division, 1410 North 21st Street, Tampa, Florida 33605, to the attention of Kay Strother. We anticipate that this matter can be resolved through settlement and appreciate your cooperation in addressing this expeditiously.

Sincerely,

Jerry Campbell /for

Iwan Choronenko
Director
Air Management Division

cc: Sara M. Fotopulos, Chief Counsel
Bill Thomas, DEP-SW
William B. Taylor, IV
Joyce Morales-Caramella, Gulf Coast Recycling, Inc.
Sheila Luce, Waste Management Division, EPC

LEAD-RACT

TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

FOR

Gulf Coast Recycling, Inc.

Hillsborough County

Construction Permit

Application Number

AC29-258634

Environmental Protection Commission of

Hillsborough County

Tampa, FL

April 21, 1995

I. Project Description

A. Applicant:

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

Mr. Willis M. Kitchen
President

B. Engineer:

John B. Koogler, Ph.D., P.E.
P.E. No.: 12925
Koogler & Associates Environmental Services
4014 N.W. 13th Street
Gainesville, FL 32609

C. Project and Location:

The applicant submitted an application to address the Lead RACT provisions pursuant to Rule 62-296.600, F.A.C. The operation has been assigned NEDS Source Classification Code Nos. as shown in the table below and Standard Industrial Classification Code 3341 (Secondary Smelting/Refining Nonferrous Metals).

Operation	SCC No.
Furnace Operations	3-04-004-03
	3-90-008-99
	3-04-004-99
Refining Operations	3-04-004-07
	3-04-004-09
	3-04-004-14
Miscellaneous	3-05-007-12
	3-05-007-09

The facility is located at 1901 N. 66th Street, Tampa, UTM Coordinates 17-364.05 East and 3093.5 North, Hillsborough County.

D. Process and Controls:

The facility recycles spent automotive and industrial lead-acid batteries to produce lead ingots. Batteries arrive at the facility by truck and are off-loaded directly to the battery cutting process area. The batteries are then cut open and the acid separated in a setting tank. A tumbler separates the lead battery groups from the casings. The casings are reduced by a hammermill and then are sent into a floatation and separation device. Separated plastics are blown into trucks and battery posts are routed directly 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 setting tank.

Battery groups are stored in piles in a partially enclosed structure. Battery groups for the blast furnace charge are taken from the older piles. One blast furnace is used for the melting of battery groups and plant scrap lead. A blast furnace charge is composed of lead, coke, limerock, cast iron, and return slag. Material is charged via a skip hoist with automatically opened charge doors at the top of the furnace. An agglomerating furnace is used to melt flue dust that is collected and fuses the particles together to form a large solid piece of material collected by a receiving vessel. From there the fused material is 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. Blast lead buttons are transported to the refining area. Refining lead includes soft lead, hard lead, and calcium lead. Refining is accomplished in three 50-ton kettles all fired with natural gas. After refining is completed, drosses are removed and lead is cast into ingots by a pigging machine. The dross is returned to the blast furnace. Some lead is imported and processed in the refining operation.

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

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. Particulate matter and lead emissions from the blast furnace charging are captured by a hood and vented to a 9,000 ACFM two compartment shake type baghouse fabricated by GCR and also modelled after the Wheelabrator-Frye Dustube Model 126 baghouse. Particulate matter and lead emissions from the blast and agglomerating furnace tapping operations 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 a 17,000 ACFM two compartment shaker baghouse. Emissions from the slag processing are controlled with the use of a 3,500 ACFM shaker type baghouse. Fugitive emissions of particulate matter and lead from process and grounds are controlled through the use of water spray, reasonable precautions, and specific work practices. Flue gas emissions from the furnace operations containing NOx, CO, SO_2, and VOC are uncontrolled.

E. Application Information:

Received on: September 30, 1994
Information Requested: October 28, 1994 and December 29, 1994
Application Complete: January 23, 1995

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, Chapters 62-209, 62-210, 62-212, 62-272, 62-275, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Nonattainment Areas, F.A.C., since this project does not meet the definition of a modification under the requirements of this rule.

This project is subject to the requirements of Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C., since the facility's operations are a source of air pollution.

This project is not subject to the requirements of Rule 62-296.400, Specific Emission Limiting and Performance Standards, F.A.C., since there is no category for secondary lead smelters.

This project is not subject to the requirements of Rule 62-296.310, General Particulate Emission Limiting Standards, F.A.C., since the facility's operations are subject to Rules 62-296.600 and 62-296.700, F.A.C.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the facility's operations could potentially contribute to an objectionable odors.

This project is not subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology (for volatile organic compound emitting facilities), F.A.C., since there is no source category for this operation.

This project is subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology for Lead, F.A.C., since it is located within the lead nonattainment area.

This project is subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology, F.A.C., since the particulate matter emissions for the facility are more than 15 tons/year and it is located in a maintenance area for particulate matter.

This project is subject to the requirements of Rule 62-296.800, Standards of Performance for New Stationary Sources, F.A.C., since the facility is a secondary lead smelter and there is a category for this type of operation.

This project is not subject to the requirements of Rule 62-296.810, National Emission Standard for Hazardous Air Pollutants, F.A.C., since there is not currently a source category for secondary lead smelters.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

III. Summary of Emissions (see Table A)

Inventory of Title III pollutants is estimated to be more than 25 TPY (> 31.8 TPY) collectively. HAPs emitted include metals, benzene, carbon disulfide, 1,3 butadiene, methyl chloride and styrene.

IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-209, 62-210, 62-212, 62-272, 62-275, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-209, 62-210, 62-212, 62-272, 62-275, 62-296, and 62-297, F.A.C.

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

Table A

Estimated Actuals

	PM			Opacity	Pb			NOx		VOC		CO		SO_2	
	gr/dscf	lb/hr	TPY		gr/dscf	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Furnace Operations															
Blast and Agglomerating Furnace	---	.321	1.01	0	---	.15	.046	1.98	6.27	33.10	105	683.32	2165.4	377.6	1230.8
Tapping Operations	---	.023	.074	0	---	.00025	.00079								
Charging Operations		.016	.051	0											
Refining Operations															
(3) Refining Kettles		.232	.67	0		.001	.003	---	---	---	---	---	---		
Natural Gas Heaters	---	---	---	---	---	---	---	---	1.837	---	.097	---	.367	---	.011
Miscellaneous															
Slag Processing	---	.0066	.004		---	.00046	.00029								
Facility Grounds and Miscellaneous Operations	---	---	---		---	.095	0.42								
TOTALS	---	---	1.81		---	---	.47		8.11	---	105.1	---	2165.8	---	1230.8

Allowables

	PM			Opacity	Pb			NOx*		VOC*		CO*		SO_2*	
	gr/dscf	lb/hr	TPY		gr/dscf	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Furnace Operations															
Blast and Agglomerating Furnaces	.03	5.24	20.43	3%	0.01		6.8							384.2	1498.4
Tapping	.03	.79	3.1	3%	.002		0.2								
Charging	.03	2.14	8.35	3%	.002		0.56								
Refining Operations															
(3) Refining Kettles	.03	4.04	12.12	3%	.0002	---	0.08								
Natural Gas Heaters	---	---	---		---	---	---	---	---	---	---	---	---	---	---
Miscellaneous															
Slag Processing	---	---	< 1	3%	.000033		.00079								
Facility Grounds and Miscellaneous Operations	---	---	---	3%	---	---	---	---	---	---	---	---	---	---	1498.4
TOTALS			45.0		---	---	7.6								

* These pollutants are being addressed in pending PSD application (DEP File No. 209018, PSD-FL-215).