

APR 22 1993

SLAG STABILIZATION 5-21-93

Florida Department of Environmental Regulation

Southwest District

3804 Coconut Palm

Tampa, Florida 33619

Lawton Chiles, Governor

813-744-6100

Virginia B. Wetherell, Secretary

NOTICE OF PERMIT

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

Dear Mr. Kitchen:

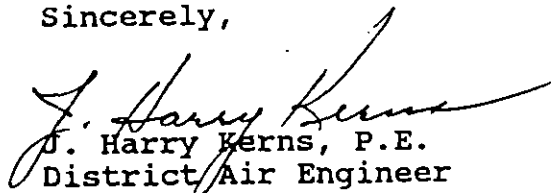
Re: Hillsborough County - AP

Enclosed is Permit Number AC29-217704 to construct a slag stabilization operation associated with a secondary lead smelting facility, 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 Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 Department.

Executed in Tampa, Florida.

Sincerely,


J. Harry Kerns, P.E.
District Air Engineer

JHK/LD/bm

cc: Environmental Protection Commission
of Hillsborough County
Robert E. Wallace, III, P.E., Environmental Engineering
Consultants, Inc.

Gulf Coast Recycling, Inc.
Tampa, FL 33619

Page Two

CERTIFICATE OF SERVICE

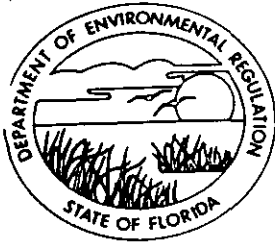
This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on APR 21 1993 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to Section
120.52(11), Florida Statutes, with the
designated Department Clerk, receipt of
which is hereby acknowledged.

Marilyn Quispe
Clerk

APR 21 1993
Date



Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm

813-744-6100

Tampa, Florida 33619

Virginia B. Wetherell, Secretary

PERMITTEE:

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

PERMIT/CERTIFICATION

Permit No.: AC29-217704
County: Hillsborough
Expiration Date: 02/01/94
Project: Slag Stabilization
Operation

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-209, 17-210, 17-212, 17-272, 17-275, 17-296, 17-297, and 17-4. 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 Department and made a part hereof and specifically described as follows:

For the construction of a slag stabilization operation consisting of a receiving hopper, a kinetic crusher, a vibrating sizing screen, a fixed location mixer with a 7 ton/batch capacity, and associated conveyors. The operation will be totally enclosed. The slag will be crushed and mixed with sodium silicate, Type I cement and water at a maximum process rate of 20 tons per hour.

Particulate and lead emissions from the receiving hopper and kinetic crusher operations will be controlled through the use of a water spray system and a 3,500 ACFM Baghouse modelled after a Wheelabrator-Frye Dustube Collection Model 126. Particulate and lead emissions from the vibrating screen and mixing operations will be controlled through the use of a water spray system in a total enclosure.

Location: 1901 N. 66th Street, Tampa

UTM: 17-364.048 E 2093.548 N **NEDS NO:** 0057 **Point ID:** 07

Replaces Permit No.: N/A

PERMITTEE:
Gulf Coast Recycling, Inc.

Permit No.: AC29-217704
Project: Slag Stabilization Operation

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.
2. Visible emissions from the slag stabilization operation shall not exceed 5% opacity. [Construction Application]
3. Hours of operation for the slag stabilization process shall not exceed 1,248 hours per year. [Construction Application]
4. Lead emissions from the slag stabilization process shall not exceed the following. [Construction Application]

<u>Source</u>	<u>lbs./hr.</u>	<u>TPY</u>
Receiving hopper, and conveyor drop/crusher (collectively)	0.001	0.0005
Conveyor drop/screen, conveyor drop/mixing, and conveyor drop/return of oversize operations (collectively)	N/A	0.0003

5. Particulate matter emissions from the slag stabilization process shall be less than one ton per year in order to exempt this operation from particulate RACT.
[Rule 17-296.700(2)(c)]
6. The average lead content of the slag processed in this operation 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. [Construction Application]
7. To show compliance with Specific Condition No. 6, no less than once per month the permittee shall test the slag for lead content prior to undergoing the stabilization process. 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 17-4.070(3), F.A.C.]
8. Test the keel cast building and the baghouse exhaust during operation of the slag stabilization process for visible emissions within thirty (30) days of startup by reading at the point of highest opacity emanating from the building which encloses the process or from the stack. The duration of the Method 9 test shall be at least thirty (30) minutes and it shall be done concurrent with one of the test runs required by Specific Condition No. 9. Two copies of the test data shall be submitted to the Environmental Protection Commission of Hillsborough County within forty-five (45) days of such testing.
[Rule 17-297, F.A.C.]

PERMITTEE:
Gulf Coast Recycling, Inc.

Permit No.: AC29-217704
Project: Slag Stabilization Operation

SPECIFIC CONDITIONS:

9. Test the baghouse exhaust for lead emissions within 30 days of start-up of the slag stabilization operation. Two copies of the test data shall be submitted to the Air Section 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 17-297, F.A.C.

10. Compliance with the emission limitations of Specific Condition Nos. 2 and 4 shall be determined using EPA Methods 1, 2, 4, 9 and 12 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 17-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 17-297, F.A.C. and 40 CFR 60, Appendix A.

11. Testing of emissions must be conducted within 10% of the maximum permitted slag stabilization process rate of 20 tons/hr. A compliance test submitted at operating levels less than 90% of permitted capacities will automatically constitute an amended permit at the lesser rate until another test (showing compliance) at 90% of a higher capacity is submitted. Failure to submit the input rates and actual operating conditions may invalidate the test.
[Rule 17-4.070(3), F.A.C.]

12. The permittee shall notify 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 17-297.340(1)(i) and 17-209.500, F.A.C.]

13. In order to document compliance with the tons per year limitations of Specific Condition Nos. 4 and 5, lead and particulate emissions shall be calculated using the methodology outlined in the construction application. A table summarizing the method is included as Appendix A.
[Rule 17-4.070(3), F.A.C.]

14. In order to document compliance with Specific Condition Nos. 3, 4 and 5 the permittee shall maintain a record of slag stabilization operating hours (hours/day) and amount of slag stabilized (tons/day). These records shall be summarized on a monthly basis showing total hours and tons for the month and for the last 12 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.
[Rule 17-4.070(3), F.A.C.]

PERMITTEE:

Gulf Coast Recycling, Inc.

Permit No.: AC29-217704

Project: Slag Stabilization Operation

SPECIFIC CONDITIONS: (continued)

15. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 17-297.310(3), 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) Personnel shall ensure that all doors in the keel cast building are closed prior to operating the slag stabilization process 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 stabilization process.
- C) Slag stored in the bin located in keel cast building shall be wetted while loading into the receiving hopper.
- D) Personnel shall ensure collection hoods above the receiving hopper and kinetic crusher are on and operating prior to operating slag stabilization process.
- E) Supervisory inspections shall routinely be conducted during operations to ensure all above stated precautions are taken to reduce fugitive generation.

[Rule 17-297.310(3), F.A.C].

16. Submit to the Environmental Protection Commission of Hillsborough County, each calendar year on or before March 1, an emission report for this facility for the preceding calendar year containing the following information pursuant to Subsection 403.061(13), Florida Statutes:

- A) Annual amount of materials and/or fuels utilized.
- B) Annual emissions of lead and particulate (include calculation sheet and note basis of calculations).
- C) Any changes in the information contained in the permit application.

17. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 17-296, F.A.C., or any other requirements under federal, state, or local law.

[Rule 17-210.300, F.A.C.]

PERMITTEE:

Gulf Coast Recycling, Inc.

Permit No.: AC29-217704

Project: Slag Stabilization Operation

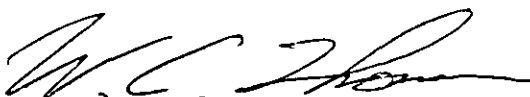
SPECIFIC CONDITIONS: (continued)

18. Four applications for an operating permit shall be submitted to the Environmental Protection Commission of Hillsborough County within 45 days of testing or at least 60 days prior to the expiration date of this permit, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the following:

- A) the appropriate application form (Certificate of Completion of Construction) noting any deviations from the construction permit application;
- B) the appropriate operation permit fee;
- C) the compliance test reports as required by Specific Condition Nos. 8 and 9 of this permit.
- D) a copy of the most recent months operating records as required by Specific Condition No. 14.

[Rules 17-4.070(3) and 17-297.340(1)(a), F.A.C.].

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



For

Richard D. Garrity, Ph.D.
Director of District Management
Southwest District Office

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, 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. 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. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does 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, 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;
- (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.

11. This permit is transferable only upon Department approval in accordance with rule 17-4.120 and 17-730.300, Florida Administrative Code, 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)
- () Certification of compliance with State Water Quality Standards (Section 401, PL 92-500)
- () Compliance with New Source Performance Standard

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.

APPENDIX A

EMISSIONS CALCULATION METHOD

GULF COAST RECYCLING, INC. - AC29-217704

PM and Lead Potential Emission Calculations - Slag Stabilization

Source	Ef (lb/ton)	Lead* Content	Process Rate** (tph)	Controls		
				Water	Enclosure	Baghouse
Receiving Hopper	0.12			0.9		0.99
Conveyor Drop/Grinder	0.50			0.9		0.99
Conveyor Drop/Screen	0.12			0.9	0.99	
Conveyor Drop/Mixer	0.12			0.9	0.99	
Conveyor Drop/Oversize	0.12			0.9	0.99	

*Substitute value obtained from laboratory analysis.

**Substitute amount of slag processed.

APPENDIX D
OPERATION AND MAINTENANCE PLANS

In accordance with the requirements of FAC Rule 62-296.600(4), an operation and maintenance (O&M) plan is required for lead emission control devices, collection systems and processing systems. Lead oxide handling operations with a potential to emit 200 pounds or less of lead per year are exempt from this requirement.

An O&M plan applicable to all GCR's baghouses serving the blast furnace, slag tapping, furnace charging, lead refining and slag processing operations is presented in Section D.1. An O&M plan applicable to the water spray systems used to control lead emissions from the slag processing and battery breaking operations is presented in Section D.2. An O&M plan applicable to the road sweeper is presented in Section D.3. An O&M plan applicable to all the process systems is presented in Section D.4.

D.1 BAGHOUSES

Operation Plan

1. The baghouse fans will be turned on prior to commencing process operation and shall remain on until the process operation is concluded.
2. Every morning the charging, tapping and refining processes are in operation, a leadman or foreman in the area will manually actuate the shaker motors and shake the bags for a minimum of two minutes (the blast furnace baghouse system is equipped with automatic timers to actuate the shakers).

Maintenance Plan

1. Manometer readings will be checked each day the baghouses are in use. If the pressure drop exceeds the normal operating range, ^{once?} the compartment will be shutdown and the bags shaken for a minimum of two minutes. If this does not decrease the pressure drop, the baghouse may be entered to determine the problem.
2. The shaker motors will be inspected by a maintenance man at least once each week.
3. The stack will be observed each day for visible emissions. If there are any detectable emissions, the system will be checked and baghouses entered, as necessary.

4. A complete visual inspection of the hoods, ductwork, baghouses and fans will be conducted at least once each month to check for outward signs of damage, leaks, etc. Any damage will be repaired.
5. The charging, tapping and refining baghouse hoppers will be emptied at least once each week (the blast furnace baghouse system is equipped with a continuous screw conveying system for hopper clean-out).
6. The source will be tested once each year in accordance with the permit requirements for the source.

D.2 WATER SPRAY SYSTEMS

Operation Plan

1. The water sprays in the battery breaking area, the raw material storage area and those covering roadways will be turned on prior to commencing process operation and shall operate on a cycle that assures each area is adequately wetted. The adequacy of wetting will be determined by visual inspection.
2. Every morning the process is in operation, a leadman or foreman in the area will ensure proper operation of the water spray system.

Maintenance Plan

1. If the water spray does not cover the intended processing area, the water flow will be adjusted accordingly. If this does not provide an adequate spray, the spray system will be examined to determine the problem.
2. The water spraying operation will be observed for proper operation by plant personnel at least once a week. Any piping or spraying unit damage will be repaired immediately.

D.3 ROAD SWEEPER

Operation Plan

1. The road sweeper will be checked for proper operation of the vacuum system and the brushes prior to sweeping the roads.

Maintenance Plan

1. The air filter will be inspected regularly to ensure proper dust collection. The vacuum system and brushes will be inspected at least once each month to check for signs of damage, leaks, malfunction etc. Any damage will be repaired promptly.

D.4 PROCESS SYSTEMS

Operation Plan

1. Personnel shall ensure that all process equipment is operating properly.
2. Personnel shall ensure that applicable lead emission control systems are operating properly prior to commencing the process.
3. Personnel shall ensure that the exhaust systems associated with emission collection hoods are on and operating prior to commencing the process and that the hoods are in place and/or closed to the maximum extent possible during process operations.
4. Supervisory inspections shall routinely be conducted during operations to ensure all above stated precautions are taken to reduce process equipment malfunction.

Maintenance Plan

1. A complete visual inspection of the process equipment will be conducted at least once each month to check for signs of damage, leaks, malfunction etc. Any damage will be repaired immediately.

APPENDIX E

CURRENT AIR PERMITS



GULF COAST RECYCLING, INC.

1901 NORTH 66th STREET • TAMPA, FLORIDA 33619
PHONE: (813) 626-6151 FAX: (813) 622-8388

July 6, 1994

August 1, 94
+

Mr. Rick Kirby
Air Management Division
Environmental Protection Commission
of Hillsborough County
1401 N. 21st Street
Tampa, FL 33605

Re: Permit No. AC29-217704 - Slag Fixation Operation

Dear Mr. Kirby:

Gulf Coast Recycling, Inc. (GCR) received an extension on the above referenced permit which made the expiration date August 1, 1994. As yet this operation is still not fully functional and it is not likely that completion of the operation and the compliance demonstration can be completed by the current expiration date. Therefore, GCR is requesting another one hundred and eighty (180) extension of the construction permit. Also enclosed is check in the amount of \$50.00 to cover the fee requirements.

Should you have any questions or comments concerning this request, please let me know:

Sincerely,

George Townsend

File:GTA4-368



GULF COAST RECYCLING, INC.

1901 NORTH 66th STREET
TAMPA, FLORIDA 33619
(813) 626-6151



Barnett Bank of T

63-460
631

029889

DATE	CHECK NO.	CHECK AMOUNT
7/7/94	29889	\$50.00

FIFTY DOLLARS AND NO/100

PAY
TO
THE
ORDER
OF

▶ EPC OF HILLSBOROUGH COUNTY
1401 N. 21ST STREET
TAMPA, FL 33605
ATTN: AIR MANAGEMENT DIVISION

Willis M. Kitchem

⑈029889⑈ ⑆063104697⑆ 2712341126⑈

GULF COAST RECYCLING, INC.

VENDOR NO.

VENDOR NAME

TRANSACTION DATE	REFERENCE	GROSS AMOUNT	DEDUCTION	NET AMOUNT
	PERMIT NO. AC29-21770	-SLAG FIXATION OPERATION		
CHECK DATE	CHECK NO.	TOTAL GROSS	TOTAL DEDUCTION	CHECK AMOUNT



GULF COAST RECYCLING, INC.

1901 NORTH 66th STREET • TAMPA, FLORIDA 33619
PHONE: (813) 626-6151 FAX: (813) 622-8388

December 23, 1993

Permit expires
8/1/94

Mr. Rostam Parsi, Engineer
Air Program
Environmental Protection Commission
of Hillsborough County
1900 9th Avenue
Tampa, Fl 33605

Re: Permit Number AC29-217704

Dear Mr. Parsi:

As per our conversation during your visit to the facility on December 21, 1993. I wish to change the original request for permit extension in my letter dated November 1, 1993 from ninety (90) days to one hundred and eighty (180) days. Since my original letter we still have not received the necessary building permit to modify the building for the slag fixation operation. Therefore, we feel that the additional time will be required to, eventually, obtain the building permit and complete construction of the fixation operation.

Should you have any questions or comments concerning this request, please contact me at (813) 626-6151.

Sincerely,

George Townsend
Director, Regulatory Affairs

pc: Willis Kitchen
Jim Ester

File GTA4-317