

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blairstone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor
Jeff Kottkamp
Lt. Governor
Michael W. Sole
Secretary

November 14, 2008

Electronically Sent – Received Receipt Requested.

Mr. John Tapper jtapper@gopherresource.com
Chief Operating Officer
Envirofocus Technologies, LLC
1901 North 66th Street
Tampa, Florida 33619

Re: Request for Additional Information (RAI)
Project Number: 0570057-020-AC

Dear Mr. Tapper:

On October 15, 2008 the Florida Department of Environmental Protection (Department) received your response to our RAI dated September 12, 2008. Since that date, a new national ambient air quality standard (NAAQS) for lead (Pb) was issued by the Environmental Protection Agency (EPA). According to our joint discussions with EPA, the new NAAQS is immediately applicable. This requires submittal of additional information to insure compliance with the new NAAQS.

It has been determined that additional information is required before your permit application can be further processed. The Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. EPA NAAQS. Due to the recent EPA revision of the National Ambient Air Quality Standard (NAAQS) for lead, please revise the application regarding lead, including updating the modeling analysis. [Rule 62-4.070, F.A.C. Reasonable Assurance]
2. Modeling. Please verify that all sources within the Significant Impact Area (SIA) for each pollutant were modeled. [Rule 62-4.070, F.A.C. Reasonable Assurance]
3. Particulate Matter (PM). With regards to the PM₁₀ Prevention of Significant Deterioration (PSD) Increment and NAAQS modeling, please update Table 5-21 to show maximum concentrations, not just the impacts from particular receptors where the Envirofocus facility was significant. [Rule 62-4.070, F.A.C. Reasonable Assurance]
4. Receptor Grid. With regards to modeling, is the receptor grid for the increment and NAAQS analyses for PM and lead at or below 100 meter spacing in areas of significance? [Rule 62-4.070, F.A.C. Reasonable Assurance]

5. PM₁₀ Increments. With regards to the PM₁₀ increment and NAAQS modeling, please explain how it was determined that receptors over the thresholds were not located in the SIA of the Envirofocus facility. Were the SIA, increment and NAAQS receptor grids exactly the same where thresholds were violated? Explain how the Access Database regarding this issue was developed. For example, please explain what the columns in the "Tables" or "Queries" selections refer to within the database. Also, please explain the source groups within the modeling. [Rule 62-4.070, F.A.C. Reasonable Assurance]
6. Road Modeling. Appendix B in the application, under the "roads" tab states that shipping will occur between the hours of 6 am and 10 pm. However, roads were only modeled from 7 am to 10 pm. Please clarify this discrepancy. [Rule 62-4.070, F.A.C. Reasonable Assurance]
7. Eagan Minnesota Pb Recycling Facility. Please provide any available historical Pb monitoring data in and around the Eagan Minnesota Lead Recycling Facility. We are interested in trends over the years as the facility was progressively modernized and production was expanded. In addition, please provide descriptions of when pollution control improvements took place at the facility. [Rule 62-4.070, F.A.C. Reasonable Assurance]
8. Future NAAQS Compliance at Eagan Facility. Review the most recent ambient data at Eagan and how it compares with the new NAAQS. Please advise of the planned measures, if any, needed to insure the Eagan facility will comply with the new NAAQS for Pb. [Rule 62-4.070, F.A.C. Reasonable Assurance]
9. Envirofocus Hillsborough County (Tampa) Recycling Facility. Please provide a construction timeline with the major tasks involved if and when modification of this facility proceeds with emphasis on the measures taken to control fugitive emissions of contaminated soil during construction and their corresponding scheduling. [Rule 62-4.070, F.A.C. Reasonable Assurance]
10. Comments of the Environmental Protection Commission of Hillsborough County (EPCHC). EPCHC is the local compliance authority and recently permitted a number of improvements at the site. They are assisting the Department in the review of the present application. Please review and address their comments listed in the attached memorandum.
11. Comments of the EPA Region 4. EPA advised they will provide comments on November 14. We will forward them after receipt. They provided a good idea of their issues during our joint meeting with them on November 3, 2008.

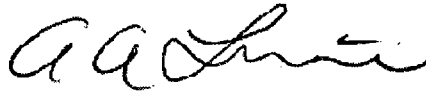
We look forward to discussing the comments directly with your staff and consultants in the near future.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C., requires that all applications for a construction permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. You are reminded that Rule 62-4.055(1), F.A.C., now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

Envirofocus RAI
Project Number: 0570057-020-AC
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If you should have any questions, please contact Mr. David Read at 850/414-7268 or Debbie Nelson at 850/921-9537.

Sincerely,



A.A. Linero, Program Administrator
Special Projects Section

Cc: Gregg Worley, EPA Region 4 worley.gregg@epa.gov
Heather Abrams, EPA Region 4 abrams.heather@epa.gov
Stan Krivo, EPA Region 4 krivo.stanley@epa.gov
Stan Kukier, EPA Region 4 kukier.stan@epa.gov
Jerry Campbell, Hillsborough County EPC campbell@epchc.com
Dianna Lee, Hillsborough County EPC lee@epchc.org
Sterlin Woodard, Hillsborough County EPC woodard@epchc.org
Russell S. Kemp, Environ International Corp., P.E. rkemp@environcorp.com
Frank J. Burbach, Environ International Corp., P.E. fburbach@environcorp.com

Walker, Elizabeth (AIR)

From: Linero, Alvaro
Sent: Wednesday, October 29, 2008 3:40 PM
To: 'tomm@suwanneecement.com'
Cc: 'Horton Joe'; Kirts, Christopher; Strong, Greg; 'Cole Krishna';
'Abrams.Heather@epamail.epa.gov'; 'forney.kathleen@epa.gov';
'mlee@kooglerassociates.com'; Lago Natacha; 'celsom@vcsmc.com'
Subject: Request for additional Information; SAC Alternative fuels Application
Attachments: 016AC_259G_INC.pdf

Dear Sir/ Madam:

Attached is the a request for additional information related to the referenced project. Please send a "reply" message verifying receipt of the documents by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". We must receive verification that you are able to open the document. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Thank you.

A. A. Linero, Program Administrator

850-921-9523

Walker, Elizabeth (AIR)

From: Linero, Alvaro
Sent: Friday, November 14, 2008 4:03 PM
To: jtapper@gopherresource.com
Cc: Jerry Campbell, Hillsborough County EPC; Dianna Lee, Hillsborough County EPC; Sterlin Woodard, Hillsborough County EPC; Russell S. Kemp, Environ International Corp., P.E.; Frank J. Burbach, Environ International Corp., P.E.
Subject: RE: Updated Request for Additional Information - Envirofocus Battery Recycling Facility Modernization/Expansion
Attachments: RequestAddInfo_2.pdf; Thank You Ltr to Ms. Vielhauser - PSD Application modification to EnviroFocus Technologies, LLC Tampa FL.PDF

Re-send with EPA comments attached.

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Linero, Alvaro
Sent: Friday, November 14, 2008 2:54 PM
To: 'jtapper@gopherresource.com'
Cc: 'Gregg Worley, EPA Region 4'; 'Heather Abrams, EPA Region 4'; 'Stan Krivo, EPA Region 4'; 'Stan Kukier, EPA Region 4'; 'Jerry Campbell, Hillsborough County EPC'; 'Dianna Lee, Hillsborough County EPC'; 'Sterlin Woodard, Hillsborough County EPC'; 'Russell S. Kemp, Environ International Corp., P.E.'; 'Frank J. Burbach, Environ International Corp., P.E.'
Subject: Request for Additional Information - Envirofocus Battery Recycling Facility Modernization/Expansion

Dear Mr. Tapper:

Please refer to the attached letter regarding the status of our review of the application to expand the Envirofocus battery recycling facility in Tampa.

Please call Mr. David Read at 850-414-7268 or Debbie Nelson at 850-921-9537 if you have any questions. We look forward to discussing the status with your staff and consultant at an early date.

Please reply to this email to indicate its receipt.

Thank you.

A. A. Linero, Program Administrator
State of Florida
Department of Environmental Protection
1-850-921-9523

Walker, Elizabeth (AIR)

From: Linero, Alvaro
Sent: Friday, November 14, 2008 4:05 PM
To: Walker, Elizabeth (AIR)
Subject: FW: Delivery Status Notification (Relay)
Attachments: ATT245750.txt; RE: Updated Request for Additional Information - Envirofocus Battery Recycling Facility Modernization/Expansion

Elizabeth. Here is delivery confirmation and the actual letters we sent. Please print confirmation and letters for our files and update tracking accordingly for Envirofocus.

Thanks.

Al.

-----Original Message-----

From: Exchange Administrator
Sent: Friday, November 14, 2008 4:03 PM
To: Linero, Alvaro
Subject: Delivery Status Notification (Relay)

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

jtapper@gopherresource.com