

March 7, 2012

Mr. Alvaro A. Linero, PE

Administrator, Special Projects

Florida Department of Environmental Protection

Division of Air Resource Management

2600 Blair Stone Road, MS # 5505

Tallahassee, FL 32399-2400

Subject: Air Construction Permit

EnviroFocus Technologies, LLC – Tampa, FL

DEP File No. 0570057-20-AC

Dear Mr. Linero:

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DIVISION OF AIR
RESOURCE MANAGEMENT

Extension

Project No: 0570057-026-AC

This letter is intended to serve as an overall update regarding the status of the construction activities of the EnviroFocus Technologies (EFT) facility.

The construction process for all the upgrades for EFT is a phased construction approach. Construction was delayed for over a year due to this approach and building around the existing facility. This required us to coordinate the construction while keeping the logistics and utilities to the existing plant intact. The weather was also an unforeseen condition as the construction process was delayed by one month due to weather conditions.

Phase 1B of the construction activities are now underway. This phase began in November 2011 and will last until approximately June 2012. The following activities will be occurring during this time period:

- The old containment room was cleaned and pressured washed and then demolished. At the same time, the area where the air pollution control equipment used to be and the area around the blast furnace were demolished. The concrete from all these areas was hauled to an unpaved area on the smelter site, south of the hygiene building. The concrete was crushed and hauled back to the southwestern portion of the smelter site and used for fill or stockpiled for use as fill material.
- Footers, walls and filling of the area south and west and east of the blast furnace began during this time period.
- Upgrade to the Blast Furnace will be completed during this time period.
- Four one hundred ton kettles will be installed.
- A new final product casting system will be installed with a temporary block casting system.

Phase 2 construction activities are scheduled to be substantially completed in September 2012. The following activities will be occurring during this time period:

- Construction of the new material transfer area.
- Construction of the new finished goods area.
- Construction of the new shipping area.
- Construction of the spare parts warehouse
- Construction of the maintenance area.

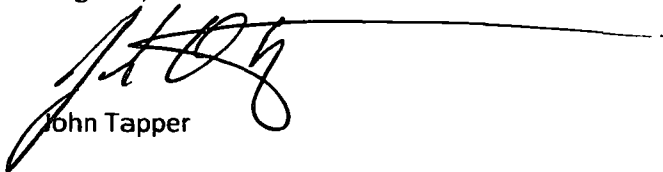
Phase 1C construction activities will overlap the time period of Phase 1B. This phase will be complete approximately in December 2012. The following activities will be occurring during this time period:

- Completion of the four one hundred ton kettles.
- New Refining control room.
- New refining industrial laboratory.
- Final block casting system.

EFT is requesting an extension of the Air Construction Permit's expiration date through December 31, 2013 from its current expiration date of June 30, 2012. This extension is required due to the phased construction schedule above, and will ensure adequate time is allowed for the preparation of the EFT application for a Title V Operation permit.

If you or any member of your staff should have questions or comments regarding this letter, or with regards to the project in general, please feel free to contact me using the information provided below.

Regards,



John Tapper

Gopher Resource

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cc: David Read – Florida Department of Environmental Protection

Diana Lee – Environmental Protection Commission of Hillsborough County