

MEMORANDUM

To: Mara Grace Nasca
District Air Program Administrator

Through: Cindy Zhang-Torres, P.E. *cf*
Air Program Permitting Supervisor

From: Joseph Graham, E.I.
Permitting Engineer Specialist

Date: March 27, 2008

Subject: Recommend permit 1190009-009-AO for Progress Rail Services Corporation be issued.

I recommend permit 1190009-009-AO for Progress Rail Services Corporation be issued. Day 90 for this application is May 8, 2008.

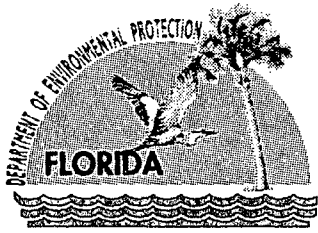
This application is for the renewal of Operation Permit No. 1190009-008-AO for a power cable reclamation facility.

Changes from the previous operation permit include:

- Updating SCs to most recent rule language and consistency with SWD permitting template
- Revision of SC 16 to remove option for testing below 90% of permitted throughput rate. Permittee agreed to the removal of this option (per telephone conversation 3/27/2008) in order to avoid addition of recordkeeping requirements to document compliance with 110% limit for testing below 90% of limit.
- Addition of Permitting Note to explain permit change above.

Compliance with permit conditions was verified during a site visit by N. Bahtic and J. Graham on December 28, 2007. VE test was conducted and passed on January 18, 2008. Compliance Section has no comments for incorporation in current permit. Enforcement Section mentions a CWOE violation from 1998, but no other activity.

Note: Facility is also permitted under EPA Hazardous Waste Rules (*see attached*). Facility had a hazardous waste compliance issue in 2003; this issue was resolved and facility is currently in compliance with applicable hazardous waste rules.



Jeb Bush
Governor

Department of Environmental Protection

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Colleen M. Castille
Secretary

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