



Job 6

February 7, 2008

FEDEX: TRK# 860119815757

Joseph Graham  
Florida Department of Environmental Protection  
Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Re: **Response to Letter Concerning Permit Renewal Application**

Dept. Of Environmental Protection

Progress Rail Services  
4198 East C-462  
Wildwood, Florida 34785  
FDEP File Project No. 1190009-009-AO  
FDEP Facility No. 1190009

FEB 08 2008

Southwest District

Dear Joseph:

Progress Rail Services (PRS) received your letter dated January 9, 2008 indicating that further information was needed by February 8, 2008 to continue processing the permit renewal for the above-referenced facility. Each of the three information requests in the letter are listed below in bold followed by our response.

- **A copy of the most recent visible emission test report, conducted in the 12-month period prior to March 21, 2008, as required by Specific Condition Nos. 11 and 18.C. of your current operation permit (1190009-008-AO);**

A visible emission test was conducted on January 18, 2008 when the facility had accumulated sufficient material to meet the feed requirement. A copy of the test report submitted to PRS is enclosed. The test showed compliance with permit conditions.

- **An updated process description for the facility which removes references to the dry chemical feed (see paragraph 2, lines 6-8 of the Process Description), and any other changes necessary to reflect the operation of this facility;**

The facility reviewed the process description text and recommended revising lines 6 through 10 (italicized) as follows:

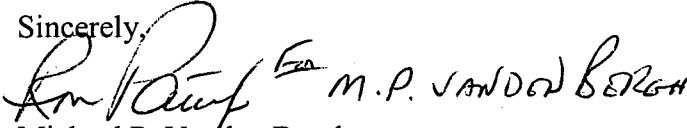
*“.....front-end loader. The power cable is pre-chopped and placed in a materials feed bin. Feed rollers insert the pre-chopped cable into the Model T-15 Primary Granulator. The granulator dissects the cable and a minimum of 90% of the metal is liberated from the insulating plastic. After removing.....”*

- **A corrected Process Flow Diagram which reflects the correct location of the granulator and removes references to chemical feed, and any other changes necessary to reflect the operation of this facility.**

A revised flow diagram is enclosed. The reference to chemical feed has been removed and two minor labeling changes have been made. The granulator location is appropriate.

If you have questions or need further information, please contact me at (256) 505-6022 or Ron Patterson at (800) 245-4985.

Sincerely,



Michael P. Vanden Bergh  
Director of Environmental Services  
Progress Rail Services Corporation

Dept. Of Environmental Protection

FEB 08 2008

Southwest District

Enclosures

Cc: Ron Patterson  
Steve Hunt

**Golder Associates Inc.**

6241 NW 23rd Street, Suite 500  
Gainesville, FL USA 32653  
Telephone (352) 336-5600  
Fax (352) 336-6603  
www.golder.com



January 31, 2008

073-87657

Progress Rail Services  
3550 Hobson Road, Suite 102  
Woodridge, IL 60517

Attention: Mr. Ron Patterson, Sr. Environmental Engineer,

RE: 2008 VISIBLE EMISSION TESTING FOR PROGRESS RAIL SERVICES' WILDWOOD FACILITY FDEP PERMIT NO. 1190009-008-AO

Dear Mr. Patterson:

On January 18, 2008, Golder Associates Inc. conducted USEPA Method 9 visible emission (VE) testing on the Power Cable Reclamation Cyclone Separator, located at Progress Rail Services' Wildwood Facility. During the 30 minute observation period no visible emissions were observed. The process rate of the cable reclamation facility during the observation period was 7.35 tons/hr of copper power cable. This is within the required 90 to 100% of the permitted process rate, of 8.0 tons/hour, specified in Specific Condition 16 of the facility air operating permit. Therefore, the results of the visible emissions observations indicate that this unit is in compliance with the permit's specific conditions.

Enclosed are copies of the field data sheet and VE testing certifications for your records and for submittal to the regulatory agency. Should you have any questions regarding these test results please feel free to contact me at 352-336-5600.

Sincerely,

GOLDER ASSOCIATES INC.

A handwritten signature in black ink, appearing to read 'Michael J. Arrants'.

Michael J. Arrants  
Certified VE Evaluator

A handwritten signature in black ink, appearing to read 'Robert C. McCann'.

Robert C. McCann  
Air Resources Leader

Dept. Of Environmental Protection  
FEB 08 2008  
Southwest District

Enclosures

cc: S. Hunt / GCS  
GNV Document Production



# VISIBLE EMISSION OBSERVATION FORM

Method Used (Circle One) Method 9 203A 203B Other: \_\_\_\_\_

Company Name PROGRESS RAIL SERVICES

Facility Name WILDWOOD FLORIDA

Street Address 4198 EAST SR 462

City WILDWOOD State FL Zip 34785

Process CHOPPING COPPER CABLE / WIRE Unit # 2.35 TPH

Control Equipment POWER CABLE RECLINATION Operating Mode \_\_\_\_\_

Control Equipment CYCLONE SEPARATOR Operating Mode NORMAL

Describe Emission Point  
~ 2' SQUARE STACK THAT IS ~ 15' NORTH OF CYCLONE

Height of Emission Point Start ~ 30' End ~ 30' Height of Emission Point Ref. to Observer Start ~ 25' End ~ 25'

Distance to Emission Point Start ~ 150' End ~ 150' Direction to Emission Point (Degrees) Start 253 End 253

Vertical Angle to Obs. Pt. Start 10° End 10° Direction to Obs. Pt. (Degrees) Start 253 End 253

Distance and Direction to Observation Point from Emission Point Start SAME POINT End S/P

Describe Emissions Start NONE APPARENT End N/A

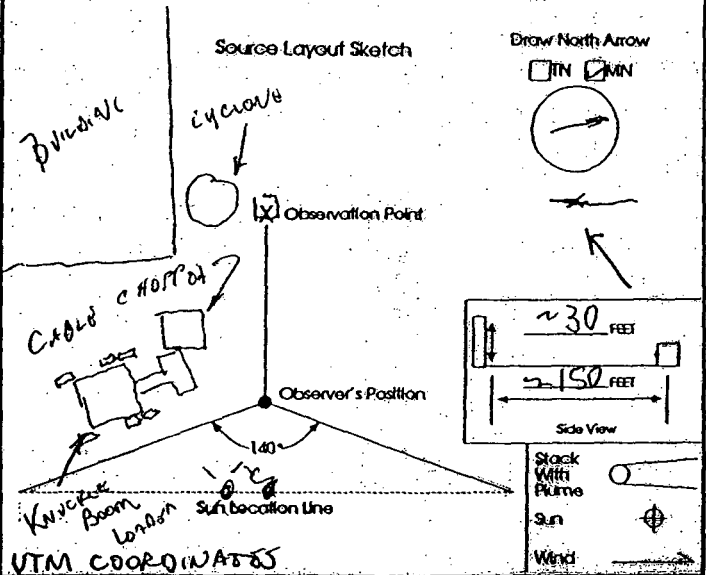
Emission Color Start N/A End N/A Water Droplet Plume Attached  Detached  None

Describe Plume Background Start TRBS / SKY End SAME

Background Color Start GREEN End GRN/BLU Sky Conditions Start OVERCAST End SAME

Wind Speed Start 3-5 End 3-5 Wind Direction Start N-NE End N-NW

Ambient Temp. Start 64 End 65 Wet Bulb Temp. 63 RH Percent 95+



Additional Information 119009-008-AD

SUN & ESTIMATED DUE TO CLOUD COVER

Form Number P 501 Page 1 of 1  
Continued on VEO Form Number \_\_\_\_\_

Observation Date 18 JAN 08 Time Zone EST Start Time 1030 End Time 1100

| Min | Sec | 0 | 15 | 30 | 45 |
|-----|-----|---|----|----|----|
| 1   | 0   | 0 | 0  | 0  | 0  |
| 2   | 0   | 0 | 0  | 0  | 0  |
| 3   | 0   | 0 | 0  | 0  | 0  |
| 4   | 0   | 0 | 0  | 0  | 0  |
| 5   | 0   | 0 | 0  | 0  | 0  |
| 6   | 0   | 0 | 0  | 0  | 0  |
| 7   | 0   | 0 | 0  | 0  | 0  |
| 8   | 0   | 0 | 0  | 0  | 0  |
| 9   | 0   | 0 | 0  | 0  | 0  |
| 10  | 0   | 0 | 0  | 0  | 0  |
| 11  | 0   | 0 | 0  | 0  | 0  |
| 12  | 0   | 0 | 0  | 0  | 0  |
| 13  | 0   | 0 | 0  | 0  | 0  |
| 14  | 0   | 0 | 0  | 0  | 0  |
| 15  | 0   | 0 | 0  | 0  | 0  |
| 16  | 0   | 0 | 0  | 0  | 0  |
| 17  | 0   | 0 | 0  | 0  | 0  |
| 18  | 0   | 0 | 0  | 0  | 0  |
| 19  | 0   | 0 | 0  | 0  | 0  |
| 20  | 0   | 0 | 0  | 0  | 0  |
| 21  | 0   | 0 | 0  | 0  | 0  |
| 22  | 0   | 0 | 0  | 0  | 0  |
| 23  | 0   | 0 | 0  | 0  | 0  |
| 24  | 0   | 0 | 0  | 0  | 0  |
| 25  | 0   | 0 | 0  | 0  | 0  |
| 26  | 0   | 0 | 0  | 0  | 0  |
| 27  | 0   | 0 | 0  | 0  | 0  |
| 28  | 0   | 0 | 0  | 0  | 0  |
| 29  | 0   | 0 | 0  | 0  | 0  |
| 30  | 0   | 0 | 0  | 0  | 0  |

Observer's Name (Print) MICHAEL J. ARFANTS  
 Observer's Signature [Signature] Date 18 Jan 08  
 Organization GOLDER ASSOCIATES INC  
 Certified By ETA Date 8 Aug 07

# VISIBLE EMISSIONS EVALUATOR

This is to certify that

## MICHAEL ARRANTS

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue.

8/8/2007 352905  
DATE OF SCHOOL CERT NUMBER  
ORLANDO, FL ARR214104  
SCHOOL LOCATION STUDENT ID NUMBER

### EASTERN TECHNICAL ASSOCIATES

#### MICHAEL ARRANTS

ARR214104 STUDENT ID NUMBER

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue and expires on the date below.

ORLANDO, FL 8/8/2007 352905  
SCHOOL LOCATION DATE OF SCHOOL CERT NUMBER  
ORLF06 2/7/2008  
LAST LECTURE EXPIRATION DATE BEARER

Customer Support  
Debbie or Sheila

919-878-3188

[www.eta-is-opacity.com](http://www.eta-is-opacity.com)