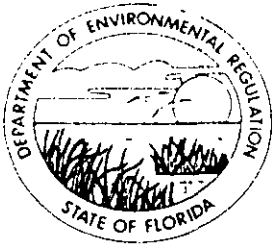


File Copy



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

April 22, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mrs. Joyce Morales-Carmella
Environmental & Health Manager
Gulf Coast Recycling, Inc.
1901 North 66th Street
Tampa, Florida 33619

Dear Mrs. Morales-Carmella:

RE: Response from a Meeting of March 11, 1993, and PSD Issues

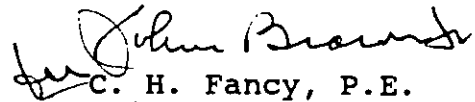
Based on a meeting held at the DARM conference room on March 11, 1993, which included Liz Deken (EPCHC) via the conference phone, the following information is to be submitted to the Department and EPCHC no later than May 28, 1993:

- 1) Submit to the Department and EPCHC a PSD application package, including all assumptions, calculations and reference materials, sealed by a registered Florida P.E., and the appropriate processing fee (as a supplement to the original application package proposal: AC 29-209018). The target date was determined based on your request in a December 30, 1992 letter, which was received by the EPCHC office on the same date. The target date was calculated from the date received.
- 2) BACT determination proposals are to be in accordance with Rule 17-212.410, Florida Administrative Code.
- 3) The SO₂ BACT determination proposals, that you will submit along with the application package, are to include material and chemical balances. The reason that this is required is for evaluation purposes and to establish exactly how much scrubbing media will be required to effectively scrub the SO₂ in the gas stream and the amount of solid waste that will be potentially generated; also, it was established that a minimum of 90% reduction of SO₂ should be considered, with higher removal efficiencies evaluated for cut-off purposes.
- 4) Submit a response to the information requested in EPCHC's incompleteness letter dated November 24, 1992, where it is not answered from the responses required above. Items Nos. 3 and 4 from that letter require submittal of outstanding information from the application. Please note where the response is located within the text that is being submitted.

Mrs. Joyce Morales-Carmella
Response Letter
April 22, 1993
Page 2

If there are any questions, please call Mr. Preston Lewis at
(904)488-1344 or write to me at the above address.

Sincerely,



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/BM/rbm

Attachments

cc: L. Deken, EPCHC
B. Thomas, SWD
B. Beals, EPA
D. Beason, Esq., DER

Ready File }
Bum Mitchell } 4-22-93

Attachments

COMMISSION
PHYLLIS BUSANSKY
JOE CHILLURA
PAM IORIO
SYLVIA KIMBELL
JAN KAMINIS PLATT
JAMES D. SELVEY
ED TURANCHIK



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TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

FAX (813) 272-5157

November 24, 1992

CERTIFIED MAIL # P 648 747 340

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

Re: Hillsborough County - AP
DER File No. AC29-209018

Dear Mr. Kitchen:

Please be advised that the Environmental Protection Commission of Hillsborough County (EPC) and the Florida Department of Environmental Regulation (DER) have completed their latest review of the above application and found it to be incomplete. In order to complete the review process two copies of the following additional information is being requested pursuant to Chapter 17-4.070, F.A.C.:

1. Pursuant to your October 26, 1992 response, the new furnace size was given as 36 inches by 72 inches and described as oval. Equipment is referred to in the project description of any permit by dimension (or capacity), description, and by a unique plant identification scheme. Please be advised that the new blast furnace will appear in the project description as 36" x 72" oval blast furnace No. 1. In addition, since no capacity was submitted for the unit, the capacity will be taken to be the requested permit allowable input process rate of 6 TPH.

2. Gulf Coast Recycling (GCR) has indicated that SO₂ emissions from the blast furnace in part can be directly affected by the amount of iron charged. There may be affects from the materials as well. In addition, GCR has also indicated there is currently not a good method available for measuring how much material is charged on a weight basis for the batch operation. Conducting a test at the rate requested in the permit application would show only for the period of the test and for conditions existing during the test if the requested allowable can or can not be met. A test would only be considered acceptable as reasonable assurance for compliance if a material balance could be done on the process and

Mr. Willis M. Kitchen
November 24, 1992
Page 2

show where all the sulfur comes in and leaves the process. Given the variable nature of the sulfur in the scrap and the materials, this does not appear to be possible with any degree of confidence. Testing at the proposed process rate is denied at this time because it would not serve any purpose since a material balance can not be completed.

Based on the information available and due to the variability of the process, GCR can not provide EPC and DER reasonable assurance that the emission limitation for SO₂ can be met at the requested process rate. If you have additional information that you would like the EPC and DER to consider please submit it with your response.

3. In the October 26, 1992 response a request was made by GCR to set the permitted allowable rates just below each pollutants trigger for PSD and other applicable regulations. Table 500-2 in Chapter 17-2.500, F.A.C., lists the pollutant triggers for PSD determinations. This information in Table 500-2 can be used to establish allowable rates. Please be advised that before the emission limitations can be set as requested, GCR must request specific limitations and then provide reasonable assurance that the limitations can be met.

Some of the allowable limitations requested by GCR in previous responses are inconsistent. The latest response requested the PM allowable rate be set at 1.64 lbs./hr. The Pb requested allowable rate was 1.81 lbs./hr. Since Pb is a fraction of the PM, the PM allowable must be equal to or greater than the Pb allowable. In addition, no specific rates have been requested for the charging and tapping operation, which are also part of this application. Also capture efficiency and fugitive losses from the charging and tapping operating have not been addressed.

Please submit an allowable particulate and lead emission rate for each of the following: blast furnace, charging operation, and tapping operation. Include capture efficiency and fugitive losses from the charging and tapping operations. Please be advised that the Department is using 374 lbs./hr. as the requested allowable emission rate for SO₂ from the blast furnace. If this is incorrect, please advise us of the correct rate in your response.

Based on the information submitted, the EPC and the DER have determined that PSD significant levels have been exceeded for SO₂. In addition, without controls the increments have been exceeded for CO (see item No. 5 of this letter). Please complete part VI (Best Available Control Technology) of the application in accordance with Chapter 17-2.500, F.A.C. and submit to DER in Tallahassee.

Willis M. Kitchen
November 24, 1992
Page 3

4. If GCR wishes to use a control efficiency from an afterburner for determining CO and VOC emissions, Section IV of the application must be completed. The EPC and DER understand the MACT standards are not available yet, however, the PSD considerations must be addressed now. GCR may want to consider looking into the Early Reduction Program to see if you qualify for compliance extensions to meet the MACT standards if the afterburner is installed now.

"NOTICE! Pursuant to the provisions of Section 120.600 F.S., if the Department does not receive a response to this request for information within 90 days of the date of this letter, the Department will issue a final order denying your application. You need to respond within 30 days after you receive this letter, responding to as many of the information requests as possible and indicating when a response to any unanswered question will be Mr. submitted. If the response will require longer than 90 days to develop, an application for new construction should be withdrawn and resubmitted when completed information is available. Or for operating permits, you should develop a specific time table for the submission of the requested information for Department review and consideration. Failure to comply with a time table accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

Please be advised your application is being forwarded to the Bureau of Air Regulations Central Air Permitting staff in the Tallahassee DER office for processing as a PSD application. The response to this letter should be sent to Clair Fancy in Tallahassee and copies should be sent to EPC and DER Southwest District office.

If you have any questions, please feel free to contact me at (813) 272-5530.

Sincerely,



Liz Deken
Engineer

bm

cc: Dave Zell, FDER SW-District
Robert E. Wallace, P.E., Environmental Engineering
Consultants, Inc.
Preston Lewis, FDER-Tallahassee



GULF COAST RECYCLING, INC.

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

December 29, 1992

Liz Deken, Engineer
Environmental Protection Commission
of Hillsborough County
1410 N. 21st Street
Tampa, Florida 33605

RE: Hillsborough County - AP
DER File No. AC29-209018

RECEIVED
DEC 30 1992
E.P.C. OF H.C.
AIR PROGRAM

Dear Ms. Deken:

Gulf Coast Recycling, Inc. is in receipt of your most recent letter concerning the after-the-fact construction permit for the blast furnace.

The Company still maintains that PSD for sulfur dioxide has not been triggered because of the previously agreed upon method for establishing a baseline. Gulf Coast Recycling, however, will agree to perform a PSD determination to establish what controls for SO₂ are feasible and commits to installation of feasible controls provide it is granted sufficient time to do so.

Regarding paragraph 3 of your letter, the Company will submit a chart indicating requested allowables for particulate and lead emission rates, shortly after the results of the recent stack tests are received.

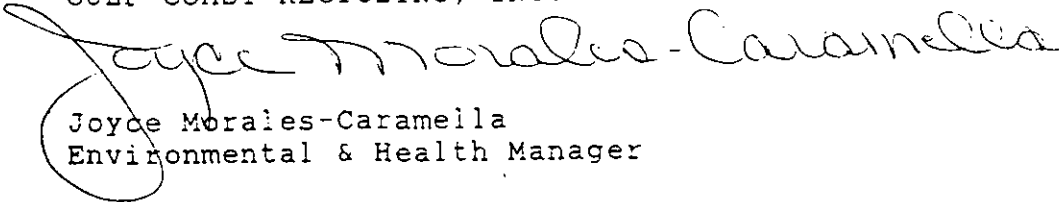
In paragraph 2 of your letter you refer to the lack of a material balance for sulfur. Please be advised that we are presently accumulating information from other secondary smelters and battery manufacturers in order to complete a material balance for sulfur.

Gulf Coast Recycling, Inc., respectfully requests that it be given 150 days to complete the referenced application to include PSD determinations for sulfur dioxide and carbon monoxide. The investigation into sulfur dioxide controls has already begun, and as discussed with you and Jerry Campbell during your recent visit, it is going to be a difficult and time consuming investigation.

If you have any questions or require additional information, please do not hesitate to call.

Sincerely,

GULF COAST RECYCLING, INC.


Joyce Morales-Caramella
Environmental & Health Manager

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

~~I also wish to receive the following services (for an extra fee):~~

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Joyce Morales-Carmella
 Gulf Coast Recycling
 1901 N. 66th St.
 Tampa, FL 33619

4a. Article Number
 P 360 528 707

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
 4-26-93

5. Signature (Addressee)
[Signature]

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Thank you for using Return Receipt Service.

P 360 528 707



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sender <i>Joyce Morales Co</i>	
Street <i>Gulf Coast Recy</i>	
City, State, ZIP <i>Tampa, FL</i>	
Postage	\$
Collection Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt, Endorsement to Whom & Date Delivered	
Return Receipt Showing to Whom Delivered and Addressee's Address	
OTOL Foreign & Fuel	\$
Postmark or Date <i>Response 4-23-93</i>	

PS Form 3800, June 1991

Carmella

COMMISSION
PHYLLIS BUSANSKY
JOE CHILLURA
PAM IORIO
SYLVIA KIMBELL
JAN KAMINIS PLATT
JAMES D. SELVEY
ED TURANCHIK

FAX (813) 272-5157



~~11/27~~ JB
CAF
Patty-
file
Gulf
Coast
Recycling

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November 24, 1992

Interesting!
I wonder what
this is all
about?
Director
12/11

CERTIFIED MAIL # P 648 747 340

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

RECEIVED

NOV 30 1992

Re: Hillsborough County - AP
DER File No. AC29-209018

Division of Air
Resources Management

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Mr. Willis M. Kitchen
November 24, 1992
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Willis M. Kitchen
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Sincerely,



Liz Deken
Engineer

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