

## Walker, Elizabeth (AIR)

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**From:** Linero, Alvaro  
**Sent:** Friday, September 12, 2008 4:49 PM  
**To:** jtapper@gopherresource.com  
**Subject:** Request for Additional Information - Envirofocus Battery Recycling Facility Modernization/Expansion  
**Attachments:** RequestAddInfo.pdf

**From:** Linero, Alvaro  
**Sent:** Friday, September 12, 2008 4:46 PM  
**To:** 'jtapper@gopherresource.com'; 'larry.eagan@efttampa.com'  
**Cc:** 'worley.gregg@epa.gov'; 'forney.kathleen@epa.gov'; 'davis.scott@epa.gov'; 'krivo.stanley@epa.gov'; 'campbell@epchc.com'; 'lee@epchc.org'; 'woodard@epchc.org'; 'rkemp@environcorp.com'; 'fburbach@environcorp.com'  
**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.

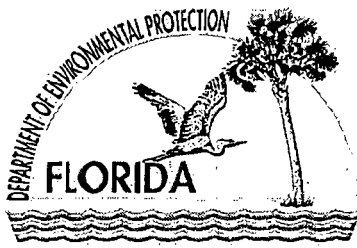
Please call Mr. David Read at 850-414-7268 or Debbie Nelson at 850-921-9537 if you have any questions. We look forward to discussing the status with your staff and consultant at an early date.

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

*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.*



# 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

September 12, 2008

*Electronically Sent – Received Receipt Requested.*

Mr. John Tapper [jtapper@gopheherresource.com](mailto:jtapper@gopheherresource.com)  
Chief Operating Officer  
EnviroFocus Technologies, LLC  
1901 North 66<sup>th</sup> Street  
Tampa, Florida 33619

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

Dear Mr. Tapper:

The Department has received your application for an Air Construction Permit by hardcopy submission on August 8, 2008 with the associated fee received on August 13, 2008. After review, it has been determined that the application is incomplete. In order to continue processing your application, 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. Eagan Minnesota Lead Recycling Facility. In Section 2, page 5 of the application it is indicated that stack tests from Eagan Minnesota facility were used to develop expected actual emissions estimates of pollutants for the reconstructed Tampa facility. Please provide a side-by-side comparison of the feed materials, major operational parameters such as material throughputs at various points in the recycling process, pollution control equipment for the emission units, and measures to control fugitive emissions throughout the process. Also please provide a table comparing in tons per year (tpy) at maximum production capacity the actual emissions at the Eagan facility with the expected actual emissions at the reconstructed Tampa facility. [Rule 62-4.070, F.A.C. Reasonable Assurance]
2. Hazardous Air Pollutant (HAP) Emissions Other Than Lead. In Section 2.3.1, page 6 of the application, it is indicated that trace amounts of HAPs emissions such as mercury and cadmium will be emitted from the reverb furnace. However, in the Table 5 of Appendix B no emission estimates are given for HAP from the reverb furnace. Please provide estimates of HAP emissions from the reverb furnace and any other emission units where trace amounts of HAP emissions are expected to occur. [Rule 62-4.070, F.A.C. Reasonable Assurance]
3. Blast Furnace Feedstock Materials. In Section 2.3.2, page 6 of the application, it is indicated that other lead-bearing scrap materials from primarily battery production facilities will be fed into the blast furnace. Please provide a description of these lead-bearing materials. [Rule 62-4.070, F.A.C. Reasonable Assurance]
4. Blast Furnace PM and Lead Emissions. In Section 2.3.3, page 6 of the application, it is indicated that PM and lead emissions from the blast furnace will be equal to the emissions from the Eagan

facility, while the potential emissions of these pollutants is assumed to be twice that of the Eagan facility. Please provide justification for this assumption.  
[Rule 62-4.070, F.A.C. Reasonable Assurance]

5. Blast Furnace Control Device HAP Reductions. In Section 2.3.3, page 7 of the application, it is indicated that HAP emissions from the blast furnace will in actuality be less than the estimates provided in the application due to the co-benefit HAP reduction provided by the sulfur dioxide scrubber. Please provide an estimate of the HAP reduction provided by the scrubber. [Rule 62-4.070, F.A.C. Reasonable Assurance]
6. Facility Wide Emission Totals. In Section 2.13, page 10, Table 2-1 of the application, Expected Actual and Potential Facility-Wide Emissions are summarized. With respect to lead emissions, please separate stack emissions from fugitive emissions resulting from paved and non-paved areas. [Rule 62-4.070, F.A.C. Reasonable Assurance]
7. Best Available Control Technology (BACT) Options. In Section 4 of the application the BACT determinations for each emissions unit at the facility are described. Please provide a discussion and summary table of the BACT utilized for similar emissions units with their permitted limits at other lead recycling plants in the United States.  
[Rule 62-4.070, F.A.C. Reasonable Assurance]
8. Particulate Matter Modeling Analysis. Please explain why emissions were modeled for the hours of 7:00 a.m. through 10:00 p.m. instead of the entire day. Further, please explain how maximum high, second-high increment modeled concentrations, listed in Table 5-20 of the application, were determined. The Department's modeling review showed higher results near source ID 23.
9. Modeled Building Parameters. With regards to Table 5-11 and the Particulate Modeling Analysis, please explain building ID E13-00 and E14-00 further. These buildings are also listed as sources in the modeling. However, E13 has a 0 lb/hr emission rate and both source release heights are different than the height of the buildings listed in the aforementioned table.
10. Rule 62-212.400(3)(h)(5), Florida Administrative Code (F.A.C.). Although growth impacts were addressed in the application, please provide further information to comply with this Rule, specifically to 1977.
11. Fugitive Emissions Control Plan. Please document how the project will meet the outstanding State Implementation Plan deficiency cited by EPA to submit and implement a Fugitive Emissions Control Plan.
12. Continued Compliance. Summarize how the project together with the Fugitive Emissions Control Plan will insure continued long term compliance with the lead (Pb) standard(s) even with an increase in permitted stack Pb emissions.
13. Modeling Files. Please submit the building or bpip file for this project. Further, please provide the Significant Impact Analysis files for each pollutant.
14. Modeling Source Parameters – Line/Volume Sources. Please explain why road ID 16 has a zero emission rate for particulate matter.
15. Modeled Emission Rates. Table 2.1 in the application details facility-wide emissions. Were the short-term and long-term modeled emission rates based on the "Expected Actual" or the "Potential Emissions"?
16. Roadway Fugitives. With regards to Appendix B Table 16 and 18, please provide the electronic spreadsheets to aid in the verification of emission rates.

17. Nitrogen Dioxide Increment Modeling. Several on property sources have emission rates of 0 pounds per hour. Please verify that these are sources that do not emit nitrogen dioxide. Further, please explain the source ID "existing".
18. Background Monitor Data. With regards to Particulate Matter and Lead, please provide background data that is more recent. If recent data is available, 2004 through 2007 would be more appropriate.
19. Nitrogen Dioxide Modeling. Please verify the results in Table 5-20. The increment modeled results equal the table results for the NAAQS (National Ambient Air Quality Standards) analysis. Further, please verify that only potential or allowable emission rates were used for the NAAQS analysis.
20. 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.

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.

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](mailto:worley.gregg@epa.gov)  
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