

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

March 18, 2009

Electronically Sent – Received Receipt Requested.

jtapper@gopherresource.com

Mr. John Tapper
Chief Operating Officer
EnviroFocus Technologies, LLC
1901 North 66th Street
Tampa, Florida 33619

Re: Request for Additional Information (RAI)
DEP File No. 0570057-020-AC

Dear Mr. Tapper:

On February 13 and 14, 2009 the Florida Department of Environmental Protection (Department) received the responses to our second RAI letter dated November 14, 2008. The second RAI primarily addressed EnviroFocus plans to comply with the new national ambient air quality standard (NAAQS) for lead (Pb) at the proposed expansion and modernization of the Tampa lead-acid battery recycling facility.

The new Pb NAAQS is immediately applicable to the Tampa facility. Consequently, EnviroFocus was asked to submit a new ambient air modeling analysis demonstrating compliance with the new standard.

After review of the submitted ambient air modeling analysis and other data provided in the response, it has been determined that additional information is required before your permit application can be further processed. 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. SCR and SNCR Feasibility. On page 8 of the Environ response dated February 14, 2009 it is stated that SCR and SNCR nitrogen oxides (NO_x) emissions control technologies are not technically feasible at secondary lead smelters. Among the reasons for this conclusion given in both the response cited above and the original air permit application are: ammonia interference that can impact the facility wastewater treatment system; excess ammonia requirements; safety issues; and, in the case of SCR, catalyst poisoning. Please provide documentation to the Department supporting these and any other reasons cited in the air permit application and response to support this conclusion with regard to the unsuitability of utilizing SCR or SNCR for the control of NO_x emissions at the expanded, modernized plant. [Rules 62-4.070 and 62-212.400, F.A.C.]

2. Significant Impact Area (SIA) Plus Buffer. Table 5-14 in Appendix F in the Environ response dated February 14, 2009 lists the facilities within the SIA plus buffer. The table only shows facilities for NO_x and particulate matter smaller than 10 microns (PM₁₀) and not Pb. Also, please explain how the table shows only three sources to be modeled for NO_x when Table 5-16 in the same appendix has several more facilities to be modeled for NO_x. Please respond with regards to particulate matter (PM) as well.
[Rule 62-4.070, F.A.C. Reasonable Assurance]
3. Rolling Averages. With regards to the Pb modeling analysis, the EPA issued draft guidance on dispersion modeling for lead which indicates that EPA is creating a post-processing program to calculate the rolling averages (see below for link to EPA web site). Please provide details on how the three-month rolling averages were determined for this project.
[Rule 62-4.070, F.A.C. Reasonable Assurance]

www.epa.gov/ttn/amtic/files/ambient/pb/Modeling%20Q&A.pdf
4. Modeling Receptor Grid. Attachment A in the response dated February 14, 2009 with regards to Pb compliance explains modeling results for the residential neighborhood and the two nearest monitors. Please provide a table with the results of the modeling analysis showing the maximum concentrations across the entire receptor grid and not only the three locations noted in attachment A. [Rule 62-4.070, F.A.C. Reasonable Assurance]

PM₁₀ Modeling Issues

5. According to Table 15 Emission Inventory in the response dated February 14, 2009, the emission rate is 0.01 lb/hr for the slurry heaters. The actual rate modeled is 0.0038 lb/hr. Please indicate which rate is correct. [Rule 62-4.070, F.A.C. Reasonable Assurance]
6. Sources 18_67, 68, 69, and 6_2 had incomplete modeling parameters in the input file, while Source 23_2 is missing. [Rule 62-4.070, F.A.C. Reasonable Assurance]
7. The Access database and spreadsheet provided only refer to PM₁₀ on a 24-hour basis. Where were the annual PM₁₀ results addressed? [Rule 62-4.070, F.A.C. Reasonable Assurance]
8. The Excel spreadsheet provided shows how the increment results were determined. Please clarify column F "inc." in the Excel spreadsheet. Are these numbers from all sources (increment consumers and the facility) or just increment consumers, as the name "inc" would suggest? [Rule 62-4.070, F.A.C. Reasonable Assurance]

Comments of the Environmental Protection Commission of Hillsborough County (EPCHC).

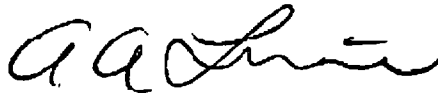
9. EPCHC is the local compliance authority and recently permitted a number of improvements at the facility. They are assisting the Department in the review of the present application and associated RAIs. Please review and address their comment given in the attached memorandum. [Rule 62-4.070, F.A.C. Reasonable Assurance]

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.

We look forward to discussing the comments directly with your staff and consultants in the near future. 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
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Frank J. Burbach, Environ International Corp., P.E.: fburbach@environcorp.com

MEMORANDUM

DATE: March 16, 2009
TO: Al Linero, P.E. - FDEP
FROM: Diana M. Lee, P.E. **THRU:** Sterlin Woodard, P.E.
SUBJECT: EnviroFocus Technologies, LLC. PSD Construction Permit Application

On February 13, 2009, the EPC received a copy of EnviroFocus' second RAI response to the Department's Request for Additional Information letter, dated November 14, 2008. Based on our review of the response, we have the following comment/question:

1. According to EnviroFocus, as stated in Attachment A of their response, in order to meet the new lowered lead standard of 0.15 ug/m^3 , EnviroFocus evaluated a variety of options and proposed three changes from their original permit application submittal. These changes include reducing the allowable emissions from lead-emitting stacks to a level closer to the projected actual emissions, raising the battery breaker scrubber stack from 90 ft to 130 ft to provide better dispersion and increasing the control efficiency of the use of wet suppression on fugitive emissions from paved surfaces. EnviroFocus is proposing lower lead emission limits on the battery breaker scrubber stack, the furnaces/process stack, refining & furnace fugitives/hygiene stack and the building enclosure/torit stack, based on results of stack testing performed on similar sources at the Gopher Resources smelter in Eagan, Minnesota. Pursuant to Rule 62-4.070(1), F.A.C., in order to provide reasonable assurance that the EnviroFocus facility in Tampa will be able to comply with the new proposed lead limits, please provide the most recent three year stack test summary information for the similar sources at the Eagan facility, which were used to propose the revised limits. In addition, please describe the type of control equipment used at these sources at the Eagan facility and the proposed control equipment at the EnviroFocus facility in Tampa, and how Eagan's control equipment compares to the Tampa's facility proposed control equipment, including but no limited to, manufacturer's information. Furthermore, please explain how EnviroFocus will control lead emissions that may be generated during the construction phase, which could consequently affect the lead NAAQS. Please include a proposed plan detailing the types of controls and actions, in addition to the sprinkler system currently used at the facility to control fugitive emissions that EnviroFocus will implement in order to minimize the lead emissions that may originate from the construction activities.

Walker, Elizabeth (AIR)

From: Linero, Alvaro
Sent: Wednesday, March 18, 2009 7:43 PM
To: Walker, Elizabeth (AIR)
Subject: FW: Request for Additional Information - Envirofocus Battery Recycling Facility Modernization/Expansion
Attachments: RequestAddInfo_3.pdf

Elizabeth:

Please update Envirofocus tracking to reflect incomplete status effective today (3/18/09).

Thanks.

Al.

-----Original Message-----

From: Linero, Alvaro
Sent: Wed 3/18/2009 7:40 PM
To: 'jtapper@gopherresource.com'
Cc: 'Gregg Worley, EPA Region 4'; 'Heather Abrams, EPA Region 4'; 'Stan Krivo, EPA Region 4'; 'Stan Kukier, EPA Region 4'; 'Jerry Campbell, Hillsborough County EPC'; 'Dianna Lee, Hillsborough County EPC'; 'Sterlin Woodard, Hillsborough County EPC'; 'Russell S. Kemp, Environ International Corp., P.E.'; 'Frank J. Burbach, Environ International Corp., P.E.'; forney.kathleen@epa.gov; Nelson, Deborah; Read, David
Subject: RE: 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