



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.

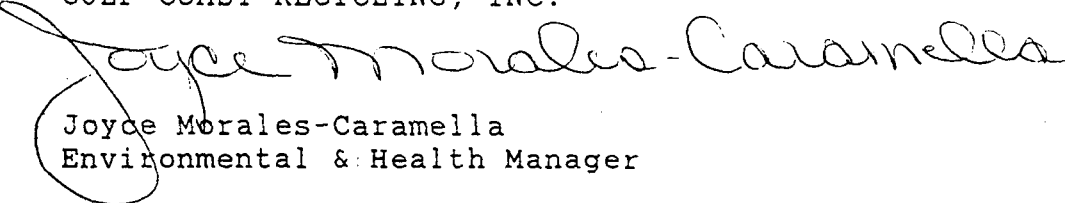
In paragraph 2 of your letter you refer to the lack of a material balance for sulfur. Please be advised that we are presently accumulating information from other secondary smelters and battery manufacturers in order to complete a material balance for sulfur.

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

<input type="checkbox"/> Registered	<input type="checkbox"/> Insured
<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD
<input type="checkbox"/> Express Mail	<input type="checkbox"/> 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)

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

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)

Sent to Joyce Morales-Carmella	
Street and No. Gulf Coast Recy	
City, State and ZIP Code Tampa, FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Response	4-23-93

PS Form 3800, June 1991

Mr. Preston Lewis
June 28, 1994
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7. Please address how the federally enforceable limitations on operations downstream of the blast furnace may be affected by an increase in the production rate of the blast furnace.
8. In the economic analysis for the proposed SO₂ emission control systems the following needs to be addressed:
 - 1) In a meeting with DEP and GCR in Tallahassee and Liz Deken by telephone, GCR indicated the tipping fee for disposal of lime waste from dryscrubbing was \$15/ton; however, in the PSD submittal a \$250/ton figure was used in the economic analysis. What does the \$250/ton figure represent and what was it based on?
 - 2) The economic analysis does not take into account the benefit received by operating the furnace without SO₂ controls since 1984.
 - 3) When evaluating dry scrubbing for SO₂ with lime, the option of using the dryscrubbing lime containing waste to treat the waste water on site and then disposing of the filter cake was not addressed. This option should be addressed and include in the economic feasibility.
 - 4) Economic analysis for the scrubbing options for SO₂ and the control options submitted should incorporate the benefits obtained by removal of other regulated air pollutants such as acid gases or HAPs.
 - 5) GCR should include in the economic benefit analysis how they are determining economic feasibility. What are the proposed cost of controls being compared or evaluated against?
9. Please indicate how you will provide offsets to alleviate the modelling exceedance of the 3-hour sulfur dioxide standard indicated in Table 4.3 of your PSD application. Neither the Department nor the Environmental Protection Commission of Hillsborough County is in a position to authorize any increase in emissions, regardless of the level of significance, when an ambient standard is being exceeded.

BEST AVAILABLE COPY

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Based on our review, we believe the above stated items should be addressed by GCR. Should you have any questions or require additional information about any of the material addressed in this letter, please contact Jerry Campbell or myself at (813) 272-5530.

Sincerely,

Liz Deken
Chief, Air Toxics Section

bm

Thank you for using Return Receipt Service.

<p>SENDER:</p> <ul style="list-style-type: none"> • 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. <p>3. Article Addressed to: Mr. Willis M. Kitchen, President Gulf Coast Recycling, Inc. 1901 North 66th Street Tampa, Florida 33619</p> <p>5. Signature (Addressee) <i>Willis M. Kitchen</i></p> <p>6. Signature (Agent)</p>	<p>I also wish to receive the following services (for an extra fee):</p> <p>1. <input type="checkbox"/> Addressee's Address</p> <p>2. <input type="checkbox"/> Restricted Delivery</p> <p>Consult postmaster for fee.</p> <p>4a. Article Number P 872 562 713</p> <p>4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> COD <input type="checkbox"/> Return Receipt for Merchandise</p> <p>7. Date of Delivery 7-1-94</p> <p>8. Addressee's Address (Only if requested and fee is paid)</p>
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PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 DOMESTIC RETURN RECEIPT

P 872 562 713



Receipt for Certified Mail

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

Sent to Mr. Willis M. Kitchen	
Street and No. 1901 North 66th Street	
P.O. State and ZIP Code Tampa, Florida 33619	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 6/29/94 AC 29-209018, PSD-FL-215	

PS Form 3800, JUNE 1991

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