

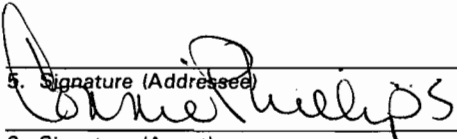
**SENDER:**

- 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 Fee will provide you the signature of the person delivered to and the date of delivery.

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

1.  Addressee's Address
2.  Restricted Delivery


Consult postmaster for fee.

<b>3. Article Addressed to:</b>  Mr. Willis M. Kitchen Gulf Coast Recycling, Inc. 1901 North 66th Street Tampa, FL 33619	<b>4a. Article Number</b> P 617 884 155
<b>5. Signature (Addressee)</b> 	<b>4b. Service Type</b> <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
<b>6. Signature (Agent)</b>	<b>7. Date of Delivery</b> 3-23-92  <b>8. Addressee's Address (Only if requested and fee is paid)</b>

PS Form 3811, November 1990 ☆ U.S. GPO: 1991-287-066 **DOMESTIC RETURN RECEIPT**

P 617 884 155

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



Sent to	
Mr. Willis M. Kitchen, Gulf Coast Recycling	
Street & No. 1901 N. 66th St.	
P.O., State & ZIP Code Tampa, FL 33619	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 3-20-92	
Permit: AC 29-184883	

PS Form 3800, June 1990

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT

In the matter of an  
Application for Permit by:

DER File No. AC 29-184883  
Hillsborough County

Mr. Willis M. Kitchen  
Gulf Coast Recycling, Inc.  
1901 North 66th Street  
Tampa, Florida 33619

Enclosed is Permit Number AC 29-184883 for the modification of the lead refining area, issued pursuant to Section(s) 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400  
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 3-20-92 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,  
on this date, pursuant to  
§120.52(11), Florida Statutes,  
with the designated Department  
Clerk, receipt of which is hereby  
acknowledged.

  
(Clerk)

3-20-92  
(Date)

Copies furnished to:  
R. E. Wallace, P.E.  
Bill Thomas, SWD  
I. Choronenko, EPCHC

Final Determination

Gulf Coast Recycling, Inc.  
Hillsborough, County  
Tampa, Florida

Modification of the Lead Refining Area  
Permit No. AC 29-184883

Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

March 13, 1992

## Final Determination

The revised Technical Evaluation and Preliminary Determination for modification of the lead refining area which involved the after-the-fact construction of the No. 3 refining kettle, a decrease in this facility's allowable lead limits, an increase in the hours of operation and the replacement of permit Nos. AC 29-12606 and AC 29-31028 at Gulf Coast Recycling, Inc. in Tampa, Hillsborough County, Florida, was distributed on February 4, 1992. The Notice of Intent to Issue was published in the Tampa Tribune on February 20, 1992. Copies of the evaluation were available for public inspection at the Department's Southwest and Tallahassee offices and at the Environmental Protection Commission of Hillsborough County (EPCHC) office in Tampa.

No comments were received regarding this project. The final action of the Department will be to issue the modified construction permit AC 29-184883 as proposed.



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**

Gulf Coast Recycling, Inc.  
1901 North 66th Street  
Tampa, Florida 33619

**Permit Number:** AC 29-184883

**Expiration Date:** June 30, 1992

**County:** Hillsborough

**Latitude/Longitude:** 27°57'43"N

82°22'49"W

**Project:** Lead Refining Area

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modification of the lead refining area including the after-the-fact construction of the No. 3 refining kettle, an increase in the hours of operation of the lead refining area and the replacement of permit Nos. AC 29-12606 and AC 29-31078. The lead refining area consists of three (3) refining kettles. Each kettle has a charging capacity of 52 tons per batch, is fired solely on natural gas with a maximum heat input rate of 4.0 MMBtu/hr per kettle. Each kettle produces a different lead product as detailed below:

- o Kettle No. 1 - Constructed in 1978 under the Department permit No. AC 29-126056. The kettle is used primarily to produce hard lead using a combination of blast lead, antimony, arsenic, sulfur, tin, red phosphorus and selenium, or to produce soft lead.
- o Kettle No. 2 - Constructed in 1980 under the Department permit No. AC 29-31078. The kettle is used primarily to produce calcium lead using a combination of soft lead from kettle No. 3 or No. 1, calcium and aluminum.
- o Kettle No. 3 - Constructed in 1984 without a Department permit. The kettle is used primarily to produce soft lead using a combination of blast lead, sodium nitrate, sodium hydroxide, sulfur, red phosphorus and aluminum or to produce hard lead.

Emissions of particulate matter and lead generated from the lead refining area are controlled by two (2) Wheelabrator-Frye Model 126 baghouses in parallel and exhausted through a common stack at a design air flow rate of 15,714 dscfm.

PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: June 30, 1992

This facility is located at 1901 North 66th Street, Tampa, Hillsborough County, Florida. The UTM coordinates are 364.048 km E and 3093.548 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received August 3, 1990.
2. DER incompleteness letter dated August 29, 1990.
3. Gulf Coast Recycling (GCR), Inc.'s response received November 13, 1990.
4. FDER/EPCHC and GCR, Inc.'s December 10, 1991 meeting record.
5. GCR, Inc.'s letter dated December 13, 1991.
6. GCR, Inc.'s letter dated January 7, 1992.

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

PERMITTEE:  
Gulf Coast Recycling, Inc.  
GENERAL CONDITIONS:

Permit Number: AC 29-184883  
Expiration Date: June 30, 1992

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: June 30, 1992

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and



PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: June 30, 1992

**GENERAL CONDITIONS:**

records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. The following restrictions and limitations shall apply for any consecutive twelve (12) month period: [Rule 17-4.070(3), F.A.C.]

- a. Hours of Operation: 6,000 hrs
- b. Maximum Heat Input Rate: 4.0 MMBtu/hr per kettle
- c. Fuel(s): Natural Gas
- d. Operating Mode: Only two (2) kettles may be operating at a time
- e. Production: 30,000 tons/year of finished lead

2. Total maximum allowable emissions of particulate matter from the lead refining area baghouse shall not exceed 0.03 gr/dscf, 4.04 pounds per hour and 12.12 tons per year. [Rule 17-2.650(2)(c)12.b., F.A.C.]

3. Total maximum allowable emissions of lead from the lead refining area baghouse shall not exceed 0.20 pounds per hour and 0.60 tons per year. [Construction Application]

4. Visible emissions from the lead refining area baghouse and building shall not exceed five (5) percent opacity. [40 CFR 52.535(c)(1)ii and VI]

PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: June 30, 1992

**SPECIFIC CONDITIONS:**

5. Test the emissions from the lead refining operation baghouse and the lead refining kettles for the following pollutant(s) at intervals of 12 months from November 13, 1991, (within  $\pm$  30 days) and submit 2 copies of test data to the Air Section of the Environmental Protection Commission of Hillsborough County office within forty-five (45) days of such testing. Testing procedures shall be consistent with the requirements of Rule 17-2.700, F.A.C.:

- (x) Particulates
- (x) Lead
- (x) Opacity

6. Compliance with the emission limitations of Specific Condition Nos. 2, 3 and 4 shall be determined using EPA Methods 1, 2, 3, 4, 5, 9 and 12 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 17-2.700, F.A.C. In the case of Method 9, Section 2.5 shall be excluded, pursuant to 40 CFR 52.535(b)(5); thus waiving the six minute averaging period and establishing an instantaneous standard. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 17-2.700, F.A.C. and 40 CFR 60, Appendix A.

7. The visible emission tests on the lead refining area baghouse and the building shall be at least thirty (30) minutes in duration pursuant to Section 17-2.700, F.A.C., and shall be conducted concurrent with one of the Method 12 runs.

8. The discharge of air pollutants which cause or contribute to an objectionable odor is prohibited. [Rule 17-2.620(2), F.A.C.]

9. Testing of emissions must be accomplished while two (2) kettles are operating. The actual charging rate and type of materials charged during the test shall be specific in each test result. Failure to include the actual process or production rate in the results may invalidate the test. [Rule 17-4.070(3), F.A.C.]

10. Non-process fugitive emissions (road dust, stockpiles, plant grounds, etc.) shall be minimized. Minimization efforts shall include such fugitive dust suppression activities as chemical stabilization, water spraying with appropriate runoff collection, resurfacing, sweeping, revegetation, and other EPA approved methods. [40 CFR 52.535(b)(2)].

11. The permittee shall maintain continuous records of plant process and emission control operations as necessary to determine continuous compliance. Such records shall include reports of all process operations and control equipment operating parameters. Such records shall also include reports of all types of process upsets and

PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: June 30, 1992

emission control equipment malfunctions detailing the nature and duration of the upset or malfunction, the expected effects on emissions, and the corrective actions taken or planned to avoid recurrences. Such records shall be available at the plant site for inspection for a period of at least two (2) years. [40 CFR 52.535(b)(4)]

12. The Environmental Protection Commission of Hillsborough County shall be notified in writing 15 days in advance of any compliance test to be conducted on this source. [Rules 17-2.800 and 17-2.710, F.A.C.]

13. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information pursuant to Subsection 403.061(13), Florida Statutes:

- (a) Annual amount of materials and/or fuels utilized
- (b) Annual emissions (note calculation basis)
- (c) Any changes in the information contained in the permit application

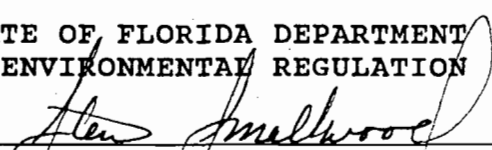
14. The permittee shall comply with all applicable provisions of F.A.C. Chapters 17-2 and 17-4, and the EPCHC rules.

15. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration date of the permit (F.A.C. Rule 17-4.090).

16. An application for an operation permit must be submitted to the EPCHC office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, operation and maintenance plan for the control equipment, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 20<sup>th</sup> day  
of March, 1992

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
STEVE SMALLWOOD, P.E., Director  
Division of Air Resources Mgmt.



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

TO: Steve Smallwood

FROM: Clair Fancy *CF*

DATE: March 13, 1992

SUBJ: Approval of Construction Permit AC 29-184883  
Gulf Coast Recycling, Inc.

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to construct

No comments were received during the public notice period.

I recommend your approval and signature.

CF/MB/plm

Attachments

*CHF*

*① Thank you -  
a well written permit  
Tell MB he did a good  
job on this one*

*② Give John Glanna  
copy of this permit  
for the Level 5IP file.*

*for  
3-20-92*

Check Sheet

Company Name: Gulf Coast Recycling  
Permit Number: AC 292-184883  
PSD Number: \_\_\_\_\_  
Permit Engineer: \_\_\_\_\_

**Application:**

- |  |                          |
|--|--------------------------|
| <input checked="" type="checkbox"/> Initial Application    | Cross References:        |
| <input checked="" type="checkbox"/> Incompleteness Letters | <input type="checkbox"/> |
| <input type="checkbox"/> Responses                         | <input type="checkbox"/> |
| <input type="checkbox"/> Waiver of Department Action       | <input type="checkbox"/> |
| <input type="checkbox"/> Department Response               |                          |
| <input type="checkbox"/> Other                             |                          |

**Intent:**

- Intent to Issue
  - Notice of Intent to Issue
  - Technical Evaluation
  - BACT or LAER Determination
  - Unsigned Permit
- Correspondence with:
- EPA
  - Park Services
  - Other
- Proof of Publication
  - Petitions - (Related to extensions, hearings, etc.)
  - Waiver of Department Action
  - Other

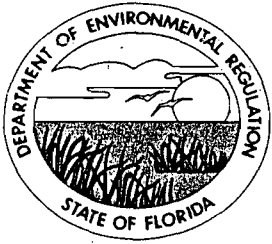
**Final**

**Determination:**

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

**Post Permit Correspondence:**

- Extensions/Amendments/Modifications
- Other



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

## FAX TRANSMITTAL SHEET

TO: MS JOYCE MORALES / MR. G. TOWNSEND

DEPARTMENT: GULF COAST RECYCLING

PHONE: FAX (813) 622-8388

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: \_\_\_\_\_

FROM: Mirza P. Baig

DEPARTMENT: DER - BAR

PHONE: FAX (813) 922-6979

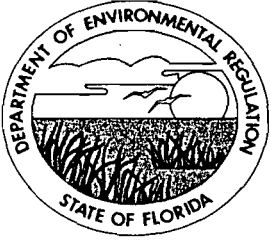
OPERATOR: Baig.

PHONE: (904) 488-1344

COMMENTS: I am Faxing a copy of the letter.  
The original letter is being sent by regular  
mail.

Thanks,

Mirza Baig.



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

## FAX TRANSMITTAL SHEET

TO: Darrel Graziani, P.E.

DEPARTMENT: EPCHC

PHONE: FAX (813) 272-5157

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: \_\_\_\_\_

FROM: Muza P. Baig

DEPARTMENT: DER - BAR

PHONE: FAX (813) 922-6979

OPERATOR: Baig.

PHONE: S.C. 278-1344

COMMENTS: Dear Darrel:

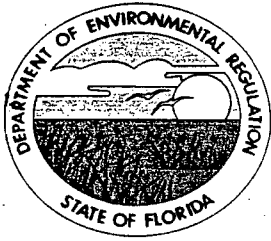
I am faxing you

a copy of the letter that I FAXED to

Joyce-Morales of GCR.

Thanks,

Muza



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

## FAX TRANSMITTAL SHEET

TO: D. GRAZIANI, P.E.

DEPARTMENT: HCEPC

PHONE: FAX 813-272-5157

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 3

FROM: PRESTON LEWIS, P.E.

DEPARTMENT: D.E.R.

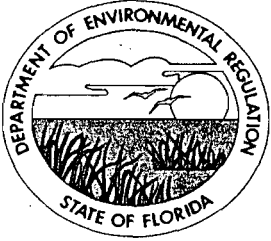
PHONE: FAX: 904-922-6979

OPERATOR: Mirza Baig.

PHONE: \_\_\_\_\_

COMMENTS: Sent the "Dual emission"  
letter for EPA





# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

## FAX TRANSMITTAL SHEET

TO: Mr. Darrel Graziani, P.E.

DEPARTMENT: AIR PERMITTING.

PHONE: FAX 813-272-7144

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 4

FROM: Mirza Baig

DEPARTMENT: (FAX 904-~~9~~922-6979)

PHONE: \_\_\_\_\_

OPERATOR: Baig.

PHONE: \_\_\_\_\_

COMMENTS: Dear Darrel:

Can you FAX your response back today.

Thanks,

Mirza



# GULF COAST RECYCLING, INC.

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

## RECEIVED

MAR 02 1992

February 27, 1992

Division of Air  
Resources Management

Barry Andrews  
Bureau of Air Regulation  
Florida Dept. of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: DER File # 29-184883

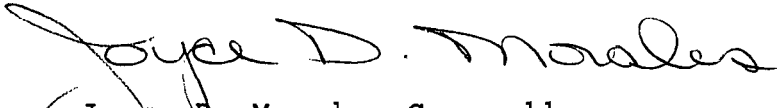
Dear Mr. Andrews:

Enclosed is the proof of publication of the "Notice of Intent to Issue" which appeared in the legal ad section of the Tampa Tribune on February 20, 1992.

If you have any questions, please do not hesitate to contact me.

Sincerely,

GULF COAST RECYCLING, INC.

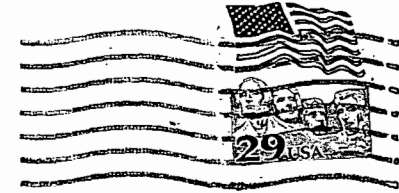
  
Joyce D. Morales-Caramella  
Environmental & Health Manager

cc: M. Daig  
B. Thomas, SW Dist  
D. Brayton, EPCRA

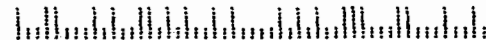


**GULF COAST RECYCLING, INC.**

1901 North 66th St.  
Tampa, Florida 33619



Mr. Barry Andrews  
Bureau of Air Regulation  
Florida Dept. of Environmental REgulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400



FEB 26 1992

THE TAMPA TRIBUNE

Published Daily  
Tampa, Hillsborough County, Florida

JM

State of Florida }  
County of Hillsborough } ss.

Before the undersigned authority personally appeared R. Putney, who on oath says that he is Accounting Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

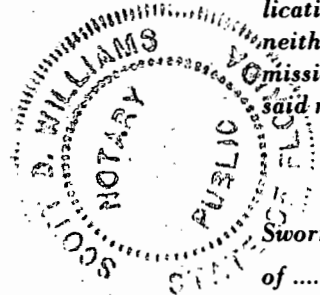
LEGAL NOTICE

in the matter of

STATE OF FLORIDA

was published in said newspaper in the issues of February 20, 1992

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa, in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm, or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



[Signature of R. Putney]

Notary Public, State of Florida  
My Commission Expires Sept. 3, 1994  
Bonded Thru Troy Fain - Insurance Inc.

Sworn to and subscribed before me, this 20 day of February, A.D. 19 92

[Signature of Scott D. Williams]

(SEAL)

STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL  
REGULATION NOTICE OF  
INTENT TO ISSUE PERMIT

The Department of Environmental Regulation gives notice of its intent to issue a permit to Gulf Coast Recycling, Inc., for the modification of the lead refining area. The modification includes the after-the-fact construction of the No. 3 refining kettle, a decrease in this facility's allowable lead limits, an increase in the hours of operation at the refining area and the replacement of Permit Nos. AC 29-12604 and AC 29-31078. This facility is located on 1901 North 66th Street, Tampa, Hillsborough County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this intent to issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes. The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;

- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Mon-Fri

through Friday, except legal holidays, at:  
Department of Environmental Regulation  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida  
32399-2400  
Department of Environmental Regulation  
Southwest District  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Environmental Protection Commission of Hillsborough County  
1410 North 21st Street  
Tampa, Florida 33605

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of publication of this notice will be considered in the Department's final determination.

**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 next to the article number.

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:  
 Willis M. Kitchen  
 Gulf Coast Recy. Inc.  
 1901 N. 66th St.  
 Tampa, FL 33619

4a. Article Number  
 P 617 884 146

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

7. Date of Delivery  
 2-7-92

5. Signature (Addressee)  
 Willie Phillips

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

6. Signature (Agent)

PS Form 3811, October 1990

★ U.S. 9PD: 1990-273-861

**DOMESTIC RETURN RECEIPT**

P 617 884 146

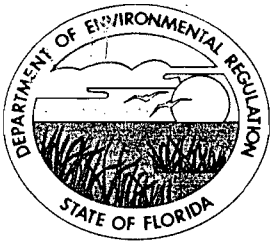


**Certified Mail Receipt**

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

Sent to Willis Kitchen	
Street & No. Gulf Coast R.	
P.O., State & 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, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date 2-5-92	
AC 29-184883	

PS Form 3800, June 1990



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

February 4, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Kitchen:

Attached is one copy of the revised Technical Evaluation and Preliminary Determination and proposed construction permit to Gulf Coast Recycling, Inc. for the modification of the lead refining area. This facility is located on 1901 North 66th Street, Tampa Hillsborough County, Florida.

Please publish the attached "Notice of Intent to Issue" in the legal ad section of a newspaper of general circulation in the area affected and submit the proof of publication to the Department within seven (7) days of publication, along with any written comments you wish to have considered concerning the Department's proposed action, to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.  
Chief

Bureau of Air Regulation

CHF/MB/kt

Attachments

c: R. E. Wallace, P.E.  
B. Thomas, SWD  
I. Choronenko, EPCHC  
G. Worley, EPA  
J. Glunn, FDER

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of an  
Application for Permit by:

Gulf Coast Recycling, Inc.  
1901 N. 66th Street  
Tampa, Florida 33619

DER File No. AC 29-184883  
Hillsborough County

---

INTENT TO ISSUE

The Department of Environmental Regulation gives notice of its intent to issue a modified air construction permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below. The Department is issuing this Intent to Issue for the reasons stated in the attached revised Technical Evaluation and Preliminary Determination.

The applicant, Gulf Coast Recycling, Inc. applied on August 3, 1990, to the Department of Environmental Regulation for an after-the-fact construction permit for kettle No. 3. The applicant modified this construction permit application on December 13, 1991. The modification includes the after-the-fact construction of the No. 3 refining kettle, a decrease in this facility's allowable lead limits, an increase in the hours of operation at the lead refining area and the replacement of permit Nos. AC 29-12606 and AC 29-13078. This facility is located on 1901 N. 66th Street, Tampa, Hillsborough County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a modified air construction permit is required for the proposed work.

Pursuant to Section 403.815, Florida Statutes and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a

newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department, at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

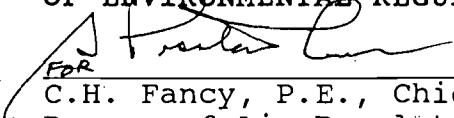
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's



final action may be different from the position taken by it in this intent. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this intent in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
FOR  
C.H. Fancy, P.E., Chief  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
(904)488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 2-5-92 to the listed persons.

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**

FILED, on this date, pursuant to S.120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Keri Jaker      2-5-92  
Clerk    Date

Copies furnished to:

R. E. Wallace, P.E.  
B. Thomas, SW District  
I. Choronenko, EPCHC  
G. Worley, EPA  
J. Glunn, FDER

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF INTENT TO ISSUE PERMIT

The Department of Environmental Regulation gives notice of its intent to issue a permit to Gulf Coast Recycling, Inc., for the modification of the lead refining area. The modification includes the after-the-fact construction of the No. 3 refining kettle, a decrease in this facility's allowable lead limits, an increase in the hours of operation at the refining area and the replacement of Permit Nos. AC 29-12606 and AC 29-31078. This facility is located on 1901 North 66th Street, Tampa, Hillsborough County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Department of Environmental Regulation  
Southwest District  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347

Environmental Protection Commission  
of Hillsborough County  
1410 North 21st Street  
Tampa, Florida 33605

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Revised  
Technical Evaluation  
and  
Preliminary Determination

Gulf Coast Recycling, Inc.  
Hillsborough County  
Tampa, Florida

Lead Refining Area  
Permit Number: AC 29-184883

Florida Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

January 27, 1991

I. Application

A. Applicant

Gulf Coast Recycling, Inc.  
1901 North 66th Street  
Tampa, Florida 33619

B. Project and Location

This project involves issuing a construction permit for the modification of the lead refining area. The modification involves the after-the-fact construction of the No. 3 refining kettle, a decrease in this facility's allowable lead limits, an increase in the hours of operation and the replacement of permit Nos. AC 29- 12606 and AC 29-31028. Emissions from the lead refining area are controlled by two (2) Wheelabrator-Frye Model 126 baghouses in parallel and vented to a common stack.

The applicant, Gulf Coast Recycling, Inc. (GCR), operates a secondary lead smelter at 1901 North 66th Street, Tampa, Hillsborough County, Florida. The UTM coordinates are Zone 17, 364.048 km North and 3093.548 km East.

C. Background Information

GCR, Inc. had constructed kettle No. 3 in 1984 without a Department permit. Although a construction permit was never issued, the operation of kettle No. 3 was addressed in operation permit No. AO 29-95365 that was issued on January 28, 1985. Later, EPA pointed out that an after-the-fact construction permit must be issued for kettle No. 3 for federal enforceability purposes.

On August 3, 1990, GCR, Inc. submitted an application for an after-the-fact construction permit (No. AC 29-184883) for kettle No. 3. A Technical Evaluation and Preliminary Determination and proposed construction permit were issued by the Department on February 8, 1991.

The Department issued a Final Determination along with a construction permit on May 9, 1991, with the exception of a minor change in Specific Condition No. 1.

The construction permit was unacceptable to GCR, Inc. and as a result they appealed the Final Determination to the Second District Court (Appeal No. 91-01768) on June 7, 1991. On August 20, 1991, GCR, Inc. filed a motion for an extension of time requesting until September 14, 1991, to file the initial brief. The Department granted the time extension and agreed to attempt to resolve this matter in a meeting.

On December 10, 1991, a meeting was held in Tallahassee between the representatives of the Department, GCR, Inc. and EPCHC. EPA Region IV was invited to attend the meeting but was unable to attend. After the meeting the Department informed EPA that the following was agreed to by all parties:

1. GCR, Inc. would submit a letter to amend the construction permit application to cover the entire refining area, not just kettle No. 3.
2. A decrease in this facility's allowable lead emissions limits from 0.40 lbs/hr to 0.20 lbs/hr.
3. Limit the production of finished lead to 30,000 tons/year from the lead refining area.
4. A particulate emission limit of 0.03 grs/dscf.
5. An increase in operating time from 4,368 to 6,000 hrs/year.
6. Change the charging capacity for kettle No. 3 from 50 to 52 tons/batch.
7. And a request that the operation and maintenance plan previously submitted by GCR, Inc. not be included with the construction permit application.

Consequently, a revised Technical Evaluation and Preliminary Determination and draft permit are being issued for public comment.

#### D. Facility Category

The GCR Tampa facility is currently classified as a major lead source by State definition. The facility engages in activities best described in Major Group 33, Industry Group 334 and Industry No. 3341 of the Standard Industrial Classification Manual and the NEDS Source Classification Codes 3-04-004-01, 02, 07, 09, 10, and 14.

## II. Project Description

The project involves the modification of the lead refining area and includes the after-the-fact construction of the No. 3 refining kettle, an increase in the hours of operation of the lead refining area and the replacement of permit Nos. AC 29-12606 and AC 29-31078. The lead refining area consists of three (3) refining kettles. Each kettle has a charging capacity of 52 tons per batch, is fired solely on natural gas at a maximum heat input rate 4.0 MMBtu/hr per kettle. Each kettle produces a different lead product as detailed below:

- o Kettle No. 1 - Constructed in 1978 under the Department permit No. AC 29-126056 the kettle is used primarily to produce hard lead using a combination of blast lead, antimony, arsenic, sulfur, tin, red phosphorus and selenium or to produce soft lead.

- o Kettle No. 2 - Constructed in 1980 under the Department permit No. AC 29-31078 the kettle is used primarily to produce calcium lead using a combination of soft lead from kettle No. 3 or No. 1, calcium and aluminum.
- o Kettle No. 3 - Constructed in 1984 without a Department permit the kettle is used primarily to produce soft lead using a combination of blast lead, sodium nitrate, sodium hydroxide, sulfur, red phosphorus and aluminum or to produce hard lead.

Emissions of particulate matter and lead generated from the lead refining area are controlled by two (2) Wheelabrator-Frye Model 126 baghouses in parallel and exhausted through a common stack at a design air flow rate of 15,714 dscfm.

### III. Rule Applicability

This facility is in an area designated nonattainment for ozone (Rule 17-2.410, F.A.C.), unclassified for particulate matter and lead (Rule 17-2.430, F.A.C.), and attainment for the other criteria pollutants (Rule 17-2.420, F.A.C.).

This project is not subject to the requirements of Rule 17-2.500, Prevention of Significant Deterioration, F.A.C. or Rule 17-2.510, New Source Review for Nonattainment Areas, F.A.C., since the modification does not result in a significant increase in lead or particulate matter emissions.

This project is subject to the requirements of Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C., since the project is a modification by State definition.

This project is not subject to the requirements of Rule 17-2.600, Specific Emission Limiting and Performance Standards, F.A.C., since there are no standards for lead refining operations.

This project is subject to the requirements of Rule 17-2.610, General Particulate Emission Limiting Standards, F.A.C., since the refining area is a source of particulate matter emissions.

This project is subject to the requirements of Rule 17-2.620, General Pollutant Emission Limiting Standards, F.A.C., since the refining area is potentially a source of odors.

This project is subject to the requirements of Rule 17-2.650, Reasonably Available Control Technology, F.A.C., since the refining operation is considered a miscellaneous manufacturing process.

This project is subject to the requirements of Rule 17-2.660, Standards of Performance for New Stationary Sources, F.A.C., Subpart L - Standards of Performance for secondary lead smelters.

This project is not subject to the requirements of Rule 17-2.670, National Emission Standards for Hazardous Air Pollutants, F.A.C., since there are no standards for lead refining operations.

This project is subject to the requirements of Chapter 84-446, Laws of Florida, Chapter 1-1 and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County and the Federal Implementation Plan found in 40 CFR 52.520.

#### IV. Source Impact Analysis

##### A. Emissions

<u>Pollutant</u>	<u>Current Actuals</u>	<u>Future Allowables</u>	<u>Increase</u>
Particulate Matter	0.882 lbs/hr 1.93 T/yr	4.04 lbs/hr 12.12 T/yr	10.19 T/yr
Lead	0.003 lbs/hr 0.0066 T/yr	0.20 lbs/hr 0.60 T/yr	0.593 T/yr
Visible Emissions	0%	5%	NA

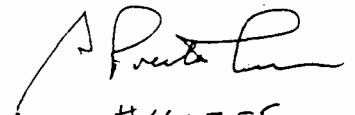
##### B. Air Quality Impacts

The current ambient air quality standard for lead is set at 1.5 micrograms per cubic meter, on a quarterly average. Since 1990, the Environmental Protection Commission of Hillsborough County has been conducting site specific ambient air quality monitoring for lead at this facility. To date, the monitoring has not exceeded identified an exceedance of the ambient air quality standard. The highest quarterly average to date occurred during the second quarter of 1991 with a reading of 1.53 micrograms per cubic meter.

A dispersion modeling exercise was not required for this modification since allowable lead emissions were being decreased by approximately 50% from those previously modeled. In addition, the refining area has been operating under the restrictions contained in the permit since 1985 and no changes are expected.

#### V. Conclusion

Based on the information provided by GCR, the Department has reasonable assurance that the lead refining area, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.

  
#41755



This project is not subject to the requirements of Rule 17-2.670, National Emission Standards for Hazardous Air Pollutants, F.A.C., since there are no standards for lead refining operations.

This project is subject to the requirements of Chapter 84-446, Laws of Florida, Chapter 1-1 and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County and the Federal Implementation Plan found in 40 CFR 52.520.

IV. Source Impact Analysis

A. Emissions

<u>Pollutant</u>	<u>Current Actuals</u>	<u>Future Allowables</u>	<u>Increase</u>
Particulate Matter	0.882 lbs/hr 1.93 T/yr	4.04 lbs/hr 12.12 T/yr	10.19 T/yr
Lead	0.003 lbs/hr 0.0066 T/yr	0.20 lbs/hr 0.60 T/yr	0.593 T/yr
Visible Emissions	0%	5%	NA

B. Air Quality Impacts

The current ambient air quality standard for lead is set at 1.5 micrograms per cubic meter, on a quarterly average. Since 1990, the Environmental Protection Commission of Hillsborough County has been conducting site specific ambient air quality monitoring for lead at this facility. To date, the monitoring has not exceeded identified an exceedance of the ambient air quality standard. The highest quarterly average to date occurred during the second quarter of 1991 with a reading of 1.53 micrograms per cubic meter.

A dispersion modeling exercise was not required for this modification since allowable lead emissions were being decreased by approximately 50% from those previously modeled. In addition, the refining area has been operating under the restrictions contained in the permit since 1985 and no changes are expected.

V. Conclusion

Based on the information provided by GCR, the Department has reasonable assurance that the lead refining area, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provisions of Chapter 17-2 of the Florida Administrative Code.



*Preston Lewis*  
#41755



# GULF COAST RECYCLING, INC.

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

*Patty*  
*For file*  
*end date of*  
*this has not been*  
*done*  
*Preston*  
**RECEIVED**  
JAN 9 1992 1/10/92  
Division of Air  
Resources Management

January 7, 1992

Mr. Mirza Baig  
Florida Dept. of Environmental Regulation  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Gulf Coast Recycling, Inc., Construction Permit  
Application, DER File # AC29-184883

Dear Mr. Baig:

On December 13, 1991, I sent a letter to Darrel Graziani, Environmental Protection Commission of Hillsborough County, requesting that the after-the-fact construction permit application submitted by Gulf Coast Recycling in August 1990, be amended.

As you recently pointed out, I failed to ask that the three refining kettles be referred to as 52 T kettles instead of 50 T kettles. Please be advised that the kettle sizes have not changed. The liners in all three kettles are designed to contain 50 tons of molten lead. A lip has always been added around each kettle to prevent the molten lead from sloshing out during mixing. The lip increases the kettle capacity to 52 tons, therefore it is more appropriate to refer to the three kettles as 52 T kettles.

Gulf Coast Recycling, Inc. respectfully requests that the referenced permit application be further amended such that the refining kettles are referred to as 52 T kettles.

Sincerely,

GULF COAST RECYCLING, INC.

*Joyce Morales-Caramella*  
Joyce Morales-Caramella  
Environmental & Health Manager

cc: Preston Lewis, FDER ✓  
Darrel Graziani, EPC

MACFARLANE, FERGUSON, ALLISON & REILLY  
ATTORNEYS AND COUNSELORS AT LAW

RECEIVED

OCT 30 1991

200 NORTH GARDEN AVENUE  
P. O. DRAWER 2197  
CLEARWATER, FLORIDA 34617  
(813) 441-1763  
FAX (813) 441-9959

111 MADISON STREET  
2300 FIRST FLORIDA TOWER  
P. O. BOX 1531  
TAMPA, FLORIDA 33601  
(813) 223-2411  
FAX (813) 273-4396

210 SOUTH MONROE STREET  
P. O. BOX 82  
TALLAHASSEE, FLORIDA 32302  
Division of Air  
Resources Management  
(904) 222-8826  
FAX (904) 222-8826

IN REPLY REFER TO:

October 28, 1991

P.O. Box 1531  
Tampa, Florida

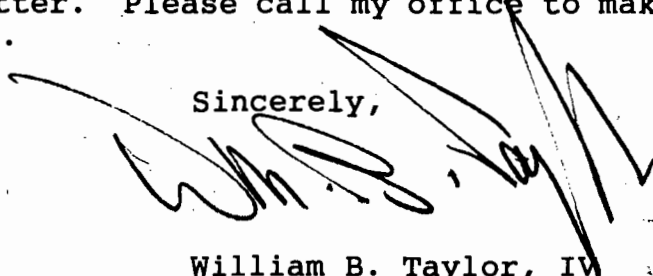
C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of  
Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Gulf Coast Recycling, Inc./Kettle #3

Dear Claire:

This will be a follow up of our conversation of Friday regarding the permit dispute between your agency and Gulf Coast Recycling. We respectfully request a meeting to discuss reaching a mutual resolution of this matter. Please call my office to make those arrangements. Thank you.

Sincerely,



William B. Taylor, IV

WBT:kbb  
cc: Gulf Coast Recycling, Inc.

PA  
HILLSBOURNE County  
District  
Claire  
Poester  
M192A  
Don BEASON



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 22, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Ref: Hillsborough County - A.P.  
Gulf Coast Recycling, Inc.  
Kettle No. 3 (AC 29-184883)

749  
OK  
GPC  
10/22/91  
Ba  
CF  
OK  
BA

Dear Ms. Morales-Caramella:

The Department is in receipt of your letter dated September 27, 1991, regarding a request to change Specific Condition No. 1 of the above referenced permit.

As stated previously, the Department was agreeable to modify Specific Condition No. 1 and increase the annual operating time from 4368 to 6000 hours if Gulf Coast Recycling, Inc. (GCRI) would conduct a stack test during the heating/cooling of the refining kettles, demonstrating that there was no increase in allowable lead and PM/PM<sub>10</sub> emissions (lbs/hr and tons/yr). It is clear from your letter dated September 27, 1991, that GCRI is not agreeable to meet these conditions.

Unfortunately, a request for an allowable emissions increase above the current allowable emissions for lead and PM/PM<sub>10</sub> and stack testing requirements cannot be handled through an amendment process. These type of requests can only be handled through a modification process that establishes federal enforceability through the public notice.

Accordingly, the Department hereby denies your request to change Specific Condition No. 1 of the permit. However, you may resubmit a permit modification application along with the appropriate processing fee.

Ms. Joyce Morales-Caramella  
Ref: AC 29-184883  
Page 2 of 2

Sincerely,

STEVE SMALLWOOD, P.E.  
Director  
Division of Air Resources  
Management

SS/CH/plm

c: Bill Thomas, SWD  
D. Graziani, EPCHC  
R. E. Wallace, P.E.  
Douglas Beason, OGC

10/25/91  
Chair Does not  
want to send this, yet.

Prentis

P.S.  
Chair Has had a  
call from their lawyer  
asking to meet with us  
in Tallahassee.



# GULF COAST RECYCLING, INC.

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

September 27, 1991

C.H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RECEIVED  
OCT 2 1991  
Division of Air  
Resources Management

Dear Mr. Fancy:

Gulf Coast Recycling, Inc. is in receipt of your letter dated September 10, 1991 requesting additional information in order to evaluate the requested change to Specific Condition No. 1 of Permit No. AC29-184883. I apologize for not submitting the information to you by September 16, 1991, as requested. Personal reasons kept me away from work most of last week.

As previously explained the "increase" in hours of operation in refining to 6000 hours should not result in an increase in actual emissions. Tons/year of emissions are calculated by multiplying the results from the annual stack test (pounds/hour) by the allowable hours of operation, presently 4368 hours. Please keep in mind that the stack test is performed while two kettles are operating. Future annual emissions would be calculated the same way, by multiplying the results from the annual stack test by the new allowable hours of operation, 6000 hours, however, there will not always be two kettles operating during those 6000 hours.

Emission rates will probably be lower during the heating and cooling of the refining kettles, however proving this point would be costly and would be difficult to take into account anyway when calculating annual emissions.

Gulf Coast Recycling, Inc. understands the Department's reluctance to increase the hours of operation to 6000 without the receipt of defensible information and respects the position taken by the Department. The information contained herein should alleviate the Department's concerns.

Current allowables for all operations at GCR and proposed future allowables for the refining operation are listed on an attached sheet. Current allowables were calculated by multiplying the permitted pounds/hour by the permitted hours of operation for each source. The proposed future allowables for refining were calculated by multiplying the current permitted pounds/hour by the requested hours of operation, 6000 hours.

In your letter you asked for a list of lead and particulate emissions in pounds/hour and tons/year from all sources at Gulf Coast Recycling,

C.H. Fancy  
September 27, 1991  
Page Two


to assure the Department that the increased hours will not trigger PSD. The requested increase in hours of operation is only for the refining area and does not affect the rest of the facility. Hours of operation for the furnace and keel cast operations will remain as permitted. PSD is triggered by a specific increase in annual emissions, 25 tons/year for particulate and 0.6 tons/year for lead. It would make no difference if there were twenty additional sources instead of four operating at GCR; as long as no other operations are changed the net increase in particulate and lead emissions will only be the increase reflected in the refining operation.

The increase in hours in refining will preclude GCR from maintaining its RACT exemption, however, this is not a problem since the Company has had operation and maintenance plans in place for its emission control equipment for several years. Attached is the updated operation and maintenance plan for the refining ventilation system.

I trust this information adequately responds to your September 10, 1991 request. If you have any questions or require additional information, please do not hesitate to call. Gulf Coast Recycling, Inc. has already stated its willingness to meet with you in Tallahassee.

Sincerely,

GULF COAST RECYCLING, INC.

  
Joyce Morales-Caramella  
Environmental & Health Manager

cc: Carter McCain

*M. Baig*  
*C. Thomas, SW Dist.*  
*V. Granados, EPCHC*  
*LHF/BA/PL*

GULF COAST RECYCLING, INC.

SOURCE	#/HR PART.	T/YR PART.	#/HR LEAD	T/YR LEAD	TOTAL HOURS
<u>Current Allowables:</u>					
Furnaces	2.15	8.38	1.81	7.06	7800
Furnace Tapping	0.40	1.56	0.06	0.23	7800
Furnace Charging	0.65	2.54	0.22	0.86	7800
Refining	1.0	2.18	0.40	0.87	4368
Keel Cast	0.20	0.24	0.08	0.10	2400

Proposed Future Allowables:

Refining*	1.0	3.0	0.40	1.2	6000
-----------	-----	-----	------	-----	------

Current Emissions: (From Air Operation Report for 1990)

Furnaces	0.709	2.77	0.079	0.08
Furnace Tapping	0.259	1.01	0.001	0.0039
Furnace Charging	0.186	0.73	0.003	0.012
Refining	0.882	1.93	0.003	0.0066
Keel Cast	0.15	0.0057	0.00032	0.000012

\*Proposed future allowables for other sources remain the same.



GULF COAST RECYCLING, INC.  
1901 N. 66th Street  
Tampa, FL 33619

OPERATION/MAINTENANCE PLAN  
REFINING VENTILATION

OPERATION PLAN

1. The baghouses fan shall be turned on prior to charging the refining kettles and shall remain on until all of the lead is pumped from the pot.
2. Every morning, the shaker motors will be manually actuated and the bags shaken for a minimum of two minutes.

MAINTENANCE PLAN

1. Manometer readings will be looked at at least once each day (if baghouses are in use). If the pressure drop is greater than four inches, the compartment will be shutdown and the bags shaken for a minimum of two minutes.
2. The shaker motors will be inspected each time they are manually actuated.
3. The stack will be observed each day for visible opacity. If there are any detectable emissions the system will be checked and baghouses entered, as necessary.
4. A complete visual inspection of the hoods, ductwork, baghouses and fans will be conducted once each week to check for outward signs of damage, leaks, etc. Any damage will be repaired immediately.
5. The hoppers shall be emptied three to four times each week.
6. Capture velocities within the hoods and dressing enclosures in the refining area will be measured quarterly. Low measurements will result in a thorough inspection of the ductwork, hoods, baghouses, etc. Necessary repairs will follow.
7. At least twice each year, the baghouses will be entered and checked for bags which need rehangng or replacing and to inspect for corrosion or other damage. The baghouses may be entered more frequently depending on parameters such as pressure drop, capture velocity or visible opacity.
8. This source shall be tested once each year in accordance with the permit requirements for the source.

GULF COAST RECYCLING, INC.  
REFINING VENTILATION

PHYSICAL OR CHEMICAL CHARACTERISTICS

1. Weight per unit time of raw materials input: 104,000 lbs/charge; approx. 8677 lbs/hr
2. Process temperature or pressure: up to 1300 degrees
3. Fuel or fuel mixture: natural gas
4. Chemical or physical data on product or raw materials: Blast lead, top lead, tin, antimony, and other alloying elements as required. Sulfur, sodium nitrate, sawdust, red phosphorus, etc, for softening lead.
5. Electrical power use rate by auxiliary equipment: 76.2 amps; 70 amp fan motor and 2-3.1 amp shaker motors

CONTROL EQUIPMENT DATA SPECIFICATIONS AND DESCRIPTION

1. Manufacturer: Gulf Coast Recycling, Inc.
2. Model name and number: similar to Wheelabrator-Frye, Model 126 Dust tube dust collector
3. Type: shaker type
4. Design flow rate: 17,000 CFM
5. Efficiency rating at design capacity: 99+ %
6. Pressure drop: 1 to 5 inches
7. Processing or materials handling systems: manual
8. Configuration, etc.: one drop out box, two baghouses in series. Each baghouse contains 204 bags (5" diameter x 122" long)

PERFORMANCE PARAMETERS FOR BAGHOUSES

1. Bag pressure drop: 1 to 5 inches
2. Gas flow rate: 16,500 CFM, actual

3. Air to cloth ratio: 2 to 1

4. Bag weave and material: 10 oz. acrylic, Snow Filtration # 7-137, sateen weave

5. Gas temperature, inlet and outlet: inlet-150 degrees, outlet-110 degrees

6. Bag cleaning cycle: shaker is manually actuated at least once each day and bags are allowed to shake for approximately two minutes

BEST AVAILABLE COPY

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.  
1.  Show to whom delivered, date, and addressee's address. 2.  Restricted Delivery  
*(Extra charge)†*

3. Article Addressed to: Mrs. Joyce Morales-Carranella Env. & Health Mgr. Gulf Coast Recycling, Inc. 1901 W. 66th St. Tampa, FL 33619	4. Article Number <b>P 832 538 949</b> Type of Service: <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> COD Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .
5. Signature - Addressee <input checked="" type="checkbox"/> <i>Thomas Phillips</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent <input checked="" type="checkbox"/>	
7. Date of Delivery 9-13-91	

PS Form 3811, Mar. 1987

\* U.S.G.P.O. 1987-178-268

DOMESTIC RETURN RECEIPT

P 832 538 949

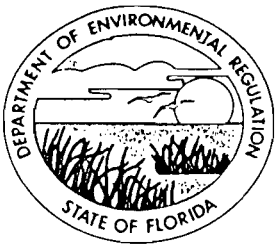


### Certified Mail Receipt

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

Sent to		<i>Joyce Morales-Carranella</i>
Street & No.		<i>Gulf Coast Recycling</i>
PO, State & ZIP Code		<i>Tampa, FL</i>
Postage		\$
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Address of Delivery		
TOTAL Postage & Fees		\$
Postmark or Date		9-11-91 AC 29-184883

PS Form 3800, June 1990



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

September 10, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Hillsborough County - A.P.  
Gulf Coast Recycling, Inc.  
Kettle No. 3 (AC 29-184883)

Dear Ms. Morales-Caramella:

This is to acknowledge your letter dated July 16, 1991, and recent phone conversations with Mr. Preston Lewis regarding your objection of Specific Condition No. 1 of the above referenced permit.

Specific Condition No. 1 of permit No. AC 29-184883 limits the operating time of the kettles (No. 1, 2, & 3) to 12 hrs/day, 7 days/wk, 52 wks/yr, and 4368 hrs/yr. In addition to this, if more than one kettle is operated simultaneously the operating time is calculated by accumulating the individual kettle times.

Your letter of July 16, 1991 requests that Specific Condition No. 1 be modified to allow the kettles to operate 7 days/wk, 52 wks/yr, and up to 24 hrs/day as long as the total operating time does not exceed 6000 hrs/yr. In addition, the total hours of operation should not be an accumulation of the individual hours from each kettle but rather the baghouse (serving all three kettles) operating time.

In order for the Department to change the operating time from 4368 hrs/yr to 6000 hrs/yr, a construction/modification permit application will be required.

However, the Department may modify Specific Condition No. 1 of the permit if you can provide us with the following information for operating 6000 hrs/yr:

1. The proposed maximum lead emissions in lbs/hr and tons/year, and how they are determined. Keep in mind current actual and future allowables.
2. The proposed maximum particulate emissions in lbs/hr and tons/year, and how they are determined. Keep in mind PM RACT.

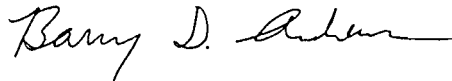


Ms. Joyce Morales-Caramella  
Page 2 of 2

3. An agreement to perform stack testing during the heating/cooling of the refining kettles, should you account for lower emission rates during these times.
4. The submission of an operation and maintenance plan on the baghouse for this source, since this facility will most likely be subject to PM RACT.
5. The submission of a list of lead and particulate emissions in lbs/hr and tons/year from all sources in this facility (which will assure the Department that the increased hours will not trigger PSD).

The Department would appreciate a response on or before September 16, 1991. Your cooperation in this matter will be appreciated. If you have any questions, please contact Mirza Baig at 904-488-1344.

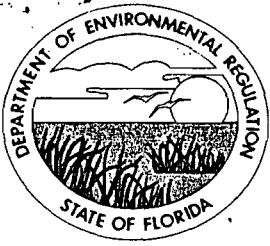
Sincerely,



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

CHF/MB/plm

c: Bill Thomas, SWD  
D. Graziani, EPCHC  
R. E. Wallace, P.E.  
OGC



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

## FAX TRANSMITTAL SHEET

TO: Mr. Jim Estler

DEPARTMENT: \_\_\_\_\_

PHONE: FAX: (813) 238-0036

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 3

FROM: Mirza P. Baig.

DEPARTMENT: BAR - DER

PHONE: FAX: (904) ~~922~~ 922-6979.

OPERATOR: Mirza.

PHONE: Jim.

COMMENTS: As per your request I am  
faxing this letter.

Thanks,

Mirza

MEMORANDUM

TO: Preston Lewis, FDER-Bureau of Air Quality  
FROM: Joyce Morales-Caramella, Gulf Coast Recycling  
DATE: September 4, 1991  
SUBJECT: Construction Permit for Refining Kettle

As per your request following is a chronology of events since GCR applied for an after-the-fact construction permit for refining kettle # 3. Not included in the chronology are a list of all the phone calls that have transpired between Mirza Baig, the County Environmental Protection Commission and myself. At one point, I spoke also with Barry Andrews.

- 08-03-90 GCR submits application for after-the-fact construction permit for kettle # 3
- 08-29-90 DER requests additional information. One question concerns hours of operation, rest concern raw materials being processed.
- 11-07-90 GCR response to 08-29-90 DER letter of incompleteness.
- 02-08-91 DER issues Technical Evaluation and Preliminary Determination and proposed construction permit
- 02-20-91 Intent to Issue Published in Tribune
- 02-25-91 GCR letter to Barry Andrews with certified copy of Notice of Intent to Issue, as published, and copy of Motion for Extension of Time to file petition. Letter explained there was a problem with the allowable particulate emissions. Motion for Extension of Time filed with DER Secretary and OGC.
- 03-04-91 GCR letter to Barry Andrews explaining that regulation cited in specific condition concerning particulate emissions was in error. Also, mass emission limit was miscalculated.
- 03-18-91 DER extends time for filing petition.
- 05-09-91 Final Determination/Notice of Permit issued to GCR. The error in the emissions was corrected, however, specific condition # 1 was rewritten to clarify how hours of operation are to be tracked. Said tracking would excessively limit hours of operation.



06-07-91 GCR appeals the Final Determination to Second District Court. Appeal No. 91-01768

08-20-91 GCR files motion for Extension of Time requesting til 9-14-91 to file initial brief. Appeal No. 91-01768

The information you read to me concerning the operation of kettles 1,2 and 3 was information provided in my letter to Mirza by way of example. The example was given for the purpose of determining how to calculate hours of operation and not as an SOP for the refining area.

You asked what GCR wants. In response I will state that GCR wants to continue manufacturing soft lead, hard lead and calcium lead. In order to do so, it must be able to operate the refining area more than 12 hours each day. The 12 hours of operation/kettle is an average. Sometimes the kettles are operated for a longer period of time. Kettle # 2 is operated for a shorter period of time.



# GULF COAST RECYCLING, INC.

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

RECEIVED

JUL 22 1991

July 16, 1991

Division of Air  
Resources Management

Mirza Baig  
Bureau of Air Regulation  
Florida Dept. of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Construction Permit AC 29-184883

Dear Mr. Baig:

As per our recent conversation, attorneys for Gulf Coast Recycling, Inc. have filed a Notice of Appeal with the District Court of Appeal seeking judicial review of the referenced permit. Specifically, Gulf Coast Recycling, Inc. objects to Specific Condition # 1 which sets forth the hours of operation for the entire refining area.

As presently written, Specific Condition # 1 can be interpreted such that the hours of operation for the refining area are essentially halved. It is difficult to explain the objection without first explaining the operation.

Three general types of lead are produced by Gulf Coast Recycling, Inc., hard lead, soft lead and calcium lead. Calcium lead only is made in kettle # 2. Kettle # 2 is therefore operated for four hours at a time during the making of calcium lead. Hard lead is made in kettles # 1 or # 3 and takes between 8 and 12 hours to make. Soft lead is made in kettles # 1 or # 3 and takes between 12 and 20 hours to make. The twelve hours of operation referred to in permit applications is an average of the hours of operation for the three types of lead  $[(4 \text{ hours} + 12 \text{ hours} + 20 \text{ hours})/3 \text{ kettles}]$ . Strictly limiting the operation of a single kettle to a maximum of 12 hours/day would not allow the Company to produce soft lead. Further, by tracking the hours of operation for each kettle, based upon the time from the start of a charge cycle to the end of the tap/pump cycle, implies that the total hours of operation (4368), referred to in the first paragraph, are based upon the addition of the hours each of the three kettles is on. This is not the case. Emission standards and hours of operation are based upon two kettles operating simultaneously. For example: If kettle # 1 operates from 12:00 am to 4:00 pm (16 hours) on July 21 and kettle # 3 operates from 3:00 am to 1:00 pm (10 hours) on July 21, the total hours of operation is not 26 as the permit now implies.

Mirza Baig  
July 16, 1991  
Page Two

The refining area actually averages about 116 hours of operation each week (from 7:00 pm Sunday evening until 3:00 pm Friday afternoon), 50 weeks each year. Much of that time, however, only one kettle is operating or a kettle is heating up or lead is just beginning to melt. Emissions during these times are not the same as when two kettles are in full operation during a stack test. The hours of operation were stated as 4368 to more accurately calculate total annual emissions.

In order to accurately reflect the hours of operation in refining, the total hours of operation should be restated as 6000 hours/year. The calculation of total emissions/year will be overestimated, however since it will be calculated as follows: As previously stated, two kettles are not always operating simultaneously.

$$\frac{[\text{emissions in pounds/hour}(2 \text{ kettles operating})] \times [6000 \text{ hours}]}{[2000 \text{ pounds/ton}]}$$

In order to eliminate any confusion in the future, I would suggest that Specific Condition # 1 be rewritten as follows:

1. The operation of this kettle is permitted at 50 weeks/year, 7 days/week. No more than two kettles may operate simultaneously and the total annual hours of operation for the entire refining area shall not exceed 6000 hours/year. Hours of operation shall be calculated as in the following examples:

On Friday (midnight to midnight) Kettle # 3 was operated from midnight to midday (12 hours), Kettle # 2 was operated from 11:00 am to 3:00 pm (4 hours) and Kettle # 1 was operated from 1:00 am to 10:00 am (9 hours) The total hours of operation for the refining area for that single day is 15 hours (midnight to 3:00 pm).

Hours of operation for the entire year shall be the total of hours operated during each day, as calculated above. A log of hours of operation shall be maintained for the entire life of this facility, for each kettle. The log books shall include, but not be limited to the following:

- (a) Date of operation
- (b) Clock time of the lighting of the kettle
- (c) Clock time of the end of the tap/pump cycle of the kettle

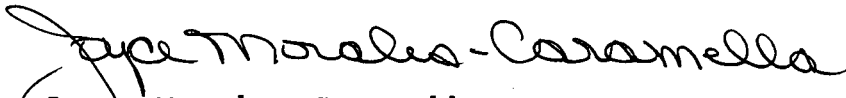
Mirza Baig  
July 16, 1991  
Page Three

- (d) Type and amount of materials charged to the kettle for each batch and kept on a daily basis
- (e) Type and amount of lead product pumped from the kettle during each batch and kept on a daily basis.
- (f) Name of GCR's employee monitoring the charging of the kettle

It is Gulf Coast Recycling, Inc.'s earnest desire to resolve this matter amicably and as expeditiously as possible. Within the next few days, briefs will have to be filed in the District Court of Appeal if this matter is not resolved or remanded back to FDER. As such, I again restate my offer to come to Tallahassee to discuss the matter and answer any additional questions or concerns you may have.

Sincerely,

GULF COAST RECYCLING, INC.

  
Joyce Morales-Caramella  
Environmental & Health Manager



# GULF COAST RECYCLING, INC.

1801 NORTH 66th STREET • TAMPA, FLORIDA 33618  
PHONE: (813) 626-6151 FAX: (813) 622-8388

FORMERLY: GULF COAST LEAD COMPANY  
FAX NUMBER 813-622-8388

TO FAX NO. 904 / 922-6979

DATE: July 16, 1991

COMPANY: EDER - Air Quality

ATTN: Mirza Baig

SUBJECT: Please call me  
before 9:30am Wednesday  
morning or call George  
Toussaint after 9:30am

FROM: George Toussaint

NO. OF PAGES FAXED: 40  
(including cover letter)

July 15, 1991

Mirza Baig  
Bureau of Air Regulation  
Florida Dept. of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Construction Permit AC 29-184883

Dear Mr. Baig:

As per our recent conversation, attorneys for Gulf Coast Recycling, Inc. have filed a Notice of Appeal with the District Court of Appeal seeking judicial review of the referenced permit. Specifically, Gulf Coast Recycling, Inc. objects to Specific Condition # 1 which sets forth the hours of operation for the entire refining area.

As presently written, Specific Condition # 1 can be interpreted such that the hours of operation for the refining area are essentially halved. It is difficult to explain the objection without first explaining the operation.

Three general types of lead are produced by Gulf Coast Recycling, Inc., hard lead, soft lead and calcium lead. Calcium lead only is made in kettle # 2. Kettle # 2 is therefore operated for four hours at a time during the making of calcium lead. Hard lead is made in kettles # 1 or # 3 and takes between 8 and 12 hours to make. Soft lead is made in kettles # 1 or # 3 and takes between 12 and 20 hours to make. The twelve hours of operation referred to in permit applications is an average of the hours of operation for the three types of lead [(4 hours + 12 hours + 20 hours)/3 kettles]. Strictly limiting the operation of a single kettle to a maximum of 12 hours/day would not allow the Company to produce soft lead. Further, by tracking the hours of operation for each kettle, based upon the time from the start of a charge cycle to the end of the tap/pump cycle, implies that the total hours of operation (4368), referred to in the first paragraph, are based upon the addition of the hours each of the three kettles is on. This is not the case. Emission standards and hours of operation are based upon two kettles operating simultaneously. For example: If kettle # 1 operates from 12:00 am to 4:00 pm (16 hours) on July 21 and kettle # 3 operates from 3:00 am to 1:00 pm (10 hours) on July 21, the total hours of operation is not 26 as the permit now implies.

Mirza Baig  
July 16, 1991  
Page Two

The refining area actually averages about 116 hours of operation each week (from 7:00 pm Sunday evening until 3:00 pm Friday afternoon), 50 weeks each year. Much of that time, however, only one kettle is operating or a kettle is heating up or lead is just beginning to melt. Emissions during these times are not the same as when two kettles are in full operation during a stack test. The hours of operation were stated as 4368 to more accurately calculate total annual emissions.

In order to accurately reflect the hours of operation in refining, the total hours of operation should be restated as 6000 hours/year. The calculation of total emissions/year will be overestimated, however since it will be calculated as follows: As previously stated, two kettles are not always operating simultaneously.

$$\frac{[\text{emissions in pounds/hour}(2 \text{ kettles operating})]}{[2000 \text{ pounds/ton}]} \times [6000 \text{ hours}]$$

In order to eliminate any confusion in the future, I would suggest that Specific Condition # 1 be rewritten as follows:

1. The operation of this kettle is permitted at 50 weeks/year, 7 days/week. No more than two kettles may operate simultaneously and the total annual hours of operation for the entire refining area shall not exceed 6000 hours/year. Hours of operation shall be calculated as in the following examples:

On Friday (midnight to midnight) Kettle # 3 was operated from midnight to midday (12 hours), Kettle # 2 was operated from 11:00 am to 3:00 pm (4 hours) and Kettle # 1 was operated from 1:00 am to 10:00 am (9 hours) The total hours of operation for the refining area for that single day is 15 hours (midnight to 3:00 pm).

Hours of operation for the entire year shall be the total of hours operated during each day, as calculated above. A log of hours of operation shall be maintained for the entire life of this facility, for each kettle. The log books shall include, but not be limited to the following:

- (a) Date of operation
- (b) Clock time of the lighting of the kettle
- (c) Clock time of the end of the tap/pump cycle of the kettle

Mirza Baig  
July 16, 1991  
Page Three

- (d) Type and amount of materials charged to the kettle for each batch and kept on a daily basis
- (e) Type and amount of lead product pumped from the kettle during each batch and kept on a daily basis.
- (f) Name of GCR's employee monitoring the charging of the kettle

It is Gulf Coast Recycling, Inc.'s ~~earnest~~<sup>earnest</sup> desire to resolve this matter amicably and as expeditiously as possible. Within the next few days, briefs will have to be filed in the District Court of Appeal if this matter is not resolved or remanded back to FDER. As such, I again restate my offer to come to Tallahassee to discuss the matter and answer any additional questions or concerns you may have.

Sincerely,

GULF COAST RECYCLING, INC.

Joyce Morales-Caramella  
Environmental & Health Manager



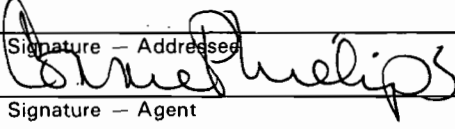
P 407 852 680  
**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)      2.  Restricted Delivery (Extra charge)

3. Article Addressed to:  Mr. Willis M. Kitchen, President Gulf Coast Recycling, Inc. 1901 North 66th Street Tampa, FL 33619	4. Article Number P 407 852 680 Type of Service: <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 Always obtain signature of addressee or agent and <b>DATE DELIVERED</b> .
5. Signature - Addressee X 	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery 5-13-91	

PS Form 3811, Apr. 1989

\*U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

PS Form 3800, June 1985

Sent to Mr. Willis M. Kitchen, Gulf Coast Recyc.	
Street and No. 1901 north 66th St.	
P.O., State and ZIP Code Tampa, FL 33619	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 5-19-91 Permit: AC 29-184883	



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

## STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMIT

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

May 9, 1991


Enclosed is construction permit AC 29-184883 for the after-the-fact construction of a 50 ton lead refining kettle. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



 C. H. Fancy, P.E.  
Chief

Bureau of Air Regulation

Copy furnished to:

R. E. Wallace, P.E.  
Bill Thomas, SWD  
I. Choronenko, EPCHC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of buisness on 5-9-91.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Kyra Deber 5-9-91  
Clerk Date

Final Determination

Gulf Coast Recycling, Inc.  
Hillsborough, County  
Tampa, Florida

50 Ton Lead Refining Kettle (No. 3)  
Permit No. AC 29-184883

Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

May 8, 1991

## Final Determination

The Technical Evaluation and Preliminary Determination for the permit to construct a 50 ton lead refining kettle (No. 3) at Gulf Coast Recycling, Inc. in Tampa, Hillsborough County, Florida, was distributed on February 8, 1991. The Notice of Intent to Issue was published in The Tampa Tribune on February 20, 1991. Copies of the evaluation were available for public inspection at the Department's Southwest and Tallahassee offices and at the Environmental Protection Commission of Hillsborough County (EPCHC) office in Tampa.

The Department has received comments from the EPCHC office and the applicant on February 25, 1991 and March 7, 1991, respectively. Since this facility consists of three similar kettles with annual operating time not to exceed 4,368 hours, with two kettles operating simultaneously in any combination, EPCHC would like the Department to specify the operation of this facility in detail in a log book. The applicant objects to the proposed Specific Condition No. 3 limiting particulate emissions to 0.022 gr/dscf or 0.0494 lbs/hr since the refining kettle is a pot furnace, not a blast or reverberatory furnace, and is not subject to 40 CFR 60.122(a). The Department concurs with the applicant's request and will change the particulate emission standard to 1.0 lbs/hr from Kettle No. 3 operations. However, this source will be subject to a visible emissions standard of less than 5% opacity as per 40 CFR 52.535(c)(1). Also, minor changes were made to Specific Condition No. 1 by the Bureau of Air Regulation for readability purposes.

The final action of the Department will be to issue construction permit AC 29-184883 with minor changes.

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

FAX (813) 272-5157



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
ADMINISTRATIVE OFFICES  
AND  
WATER MANAGEMENT DIVISION  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960

AIR MANAGEMENT DIVISION  
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION  
TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION  
TELEPHONE (813) 272-7104

February 15, 1991

RECEIVED  
FEB 25 1991

DER-BAQM

Mr. Mirza Baig  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Gulf Coast Recycling, Inc.  
Lead Refining Kettle No. 3  
AC29-184883

Dear Mr. Baig:

I have reviewed the Technical Evaluation and Preliminary Determination and the proposed construction permit for the above referenced 50 ton lead refining kettle.

Specific Condition No. 1 (attached) requires a log of hours of operation be maintained for the entire life of the facility, for each kettle. My only suggestion is that you describe in detail what the logs contain as a minimum. The following wording may be more appropriate:

Specific Condition No. 1. The operation of this kettle shall not exceed 12 hrs./day, 7 days/wk. and 52 wks./yr. No more than two kettles can operate simultaneously and the total annual hours of operation, in any combination, for the refining kettle area shall not exceed 4368. A log of hours of operation shall be maintained by the permittee for the entire life of this facility, for each kettle. The logbooks shall include, but not be limited to, the following information:

- 1) Date
- 2) Time of First Charge to the Kettle
- 3) Time of Last Charge to the Kettle
- 4) Daily Operating Hours
- 5) Type and Amount (in pounds) of Materials Charged
- 6) Type and amount of lead produced
- 7) Name of Gulf Coast Recycling, Inc. Representative Monitoring the Charging of the Kettle

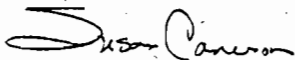
\* Operating time (hours) shall be determined from the time between (2) and (3) each day.

Mr. Mirza Baig  
February 15, 1991  
Page 2

Should you have any questions regarding the above suggestion  
please call me at (813) 272-5530.

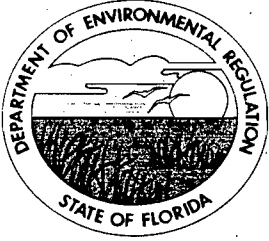
Thank you.

Sincerely,



Susan Cameron  
Air Permit Engineer

bm



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**

Gulf Coast Recycling, Inc.  
1901 North 66th Street  
Tampa, Florida 33619

Permit Number: AC 29-184883  
Expiration Date: Dec. 31, 1991  
County: Hillsborough  
Latitude/Longitude: 27°57'43"N  
82°22'49"W

Project: Lead Refining Kettle  
No. 3

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the after-the-fact construction of a 50 ton lead refining kettle (No. 3), fired by only natural gas with a maximum heat input of 4.0 MMBtu/hr. Emissions from kettles Nos. 1, 2, and 3 are controlled by two Wheelabrator-Frye Model 126 type baghouses at a designed flow of 15,714 dscfm. Only two kettles can operate simultaneously.

This facility is located at 1901 North 66th Street, Tampa, Hillsborough County, Florida. The UTM coordinates are 364.048 km E and 3093.548 km N.

The source was constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received August 3, 1990.
2. DER incompleteness letter dated August 29, 1990.
3. Gulf Coast Recycling, Inc.'s response received November 13, 1990.
4. EPCHC comments received February 25, 1991.
5. Applicant's comments received March 7, 1991.



PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: December 31, 1991

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: December 31, 1991

**GENERAL CONDITIONS:**

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: December 31, 1991

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and

**PERMITTEE:**  
Gulf Coast Recycling, Inc.

**Permit Number:** AC 29-184883  
**Expiration Date:** December 31, 1991

**GENERAL CONDITIONS:**

records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. The operation of this kettle is permitted at 52 wks/yr, 7 days/wk, but it shall not be operated more than 12 hrs/day. No more than two kettles may operate simultaneously and the total annual hours of operation, in any combination, for all three kettles in the refining kettle area shall not exceed 4368 hrs/yr. A log of hours of operation shall be maintained for the entire life of this facility, for each kettle. The log books shall include, but not be limited to the following:

- (a) Date of operation.
- (b) Clock time of the start of the charge cycle of the kettle.
- (c) Clock time of the end of the tap/pump cycle of the kettle.
- (d) Type and amount of materials charged (in lbs) to the kettle for each batch and kept on a daily basis.
- (e) Type and amount of lead product (in lbs) tapped/pumped from the kettle during each batch and kept on a daily basis.
- (f) Name of GCR's employee monitoring the charging of the kettle.

PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: December 31, 1991

**SPECIFIC CONDITIONS:**

2. Pursuant to 40 CFR 52.535(c)(1): lead emissions shall not exceed 0.400 lbs/hr and 0.8736 tons/year; visible emissions from the baghouse exhaust and from the refining kettles shall not exceed 5% opacity.
3. Pursuant to F.A.C. Rule 17-2.650(2)b.1, the particulate emissions from Kettle Nos. 1, 2 and 3 shall not exceed 1.0 lbs/hr and 2.18 tons/yr, as requested by the permittee in order to exempt the source from the requirements of particulate RACT.
4. Compliance with emission limitations of particulate matter, lead, and visible emissions shall be conducted within 90 days of issuance of this permit. Compliance tests shall be conducted using EPA Methods 1, 2, 3, 4, 9, and 12 contained in 40 CFR 60, Appendix A and adopted by reference in F.A.C. Rule 17-2.700. The minimum requirements for stack sampling facilities, source sampling, and reporting shall be in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A. Testing shall be conducted while two of the three kettles (initially kettle No. 3 along with any other kettle must be tested) are in operation. Visible emissions tests shall be conducted at the baghouse exhaust and kettle charging area for at least 60 minutes, simultaneously, along with the particulate tests.
5. Both baghouses must be employed during the operation of lead refining kettles.
6. Pursuant to F.A.C. Rule 17-2.620(2), this facility shall operate in such a way so as not to discharge air pollutants which will cause or contribute to an objectionable odor.
7. The EPCHC shall be notified in writing at least 15 days in advance of any compliance testing of this source.
8. The permittee shall comply with all applicable provisions of F.A.C. Chapters 17-2 and 17-4, and the EPCHC rules.
9. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration date of the permit (F.A.C. Rule 17-4.090).

PERMITTEE:  
Gulf Coast Recycling, Inc.

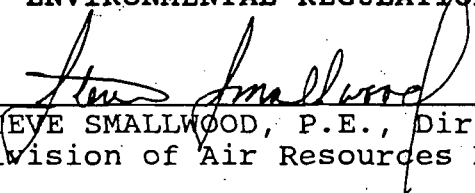
Permit Number: AC 29-184883  
Expiration Date: December 31, 1991

**SPECIFIC CONDITIONS:**

10. An application for an operation permit must be submitted to the EPCHC office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this 8<sup>th</sup> day  
of May, 1991

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

  
\_\_\_\_\_  
STEVE SMALLWOOD, P.E., Director  
Division of Air Resources Mgmt.



# GULF COAST RECYCLING, INC.

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

RECEIVED

MAR 07 1991

DER-BAQM

March 4, 1991

Mr. Barry Andrews, P.E.  
Bureau of Air Regulation  
Florida Dept. of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Gulf Coast Recycling, Inc.  
FDER File Number AC 29-184883

Dear Mr. Andrews:

Gulf Coast Recycling, Inc., formerly Gulf Coast Lead Company, Inc., has reviewed the draft proposed construction permit for refining kettle # 3 and offers the following recommendations regarding same. Specific Condition #3, appears to be in error in that NSPS applicability is incorrect. Refining kettle # 3 is subject to 40 CFR 60.122 (b) and not (a), since this is a pot furnace, not a blast or reverberatory furnace. Under (b), the applicable standard is a 10% opacity. There is not a mass emission standard specified for this source category. In addition, the mass emission limitation, in pounds/hour, represented in Specific Condition #3 was miscalculated.

In order to establish a mass emission standard for particulate on refining kettle # 3 and to revise the emission limitation for kettle # 2 (AC 29-31078, issued August 4, 1980), Gulf Coast Recycling proposes the following language for Specific Condition #3 of the proposed permit:

Pursuant to 40 CFR 60.122 (b) (Subpart L), visible emissions from this facility shall not exceed 10% opacity. The particulate emissions from Kettles # 1, 2 and 3 shall not exceed 1.0 lbs/hr and 2.18 tons/yr, as established by Gulf Coast Lead Company's letter of January 23, 1984 to the Department.

As per your conversation with Jim Estler, February 26, 1991, this revised condition should satisfy the Department's concern regarding Federal enforceability as defined in Section 17-2.100(81), F.A.C. To further insure Federal enforceability, Gulf Coast Recycling proposes the following language for Specific Condition #1 of the proposed permit:

Mr. Barry Andrews, P.E.  
March 4, 1991  
Page Two

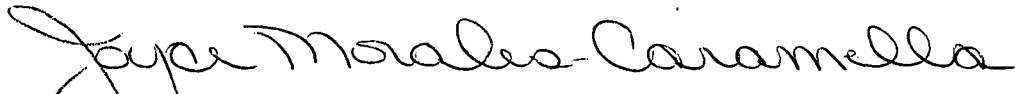
The operation of kettles # 1, 2 and 3 shall not exceed 12 hrs/day, 7 days/wk and 52 wks/yr. No more than two kettles can operate simultaneously and the total annual hours of operation, in any combination, for the refining area shall not exceed 4368. A log of hours of operation shall be maintained for the entire life of this facility, for each kettle.

Please advise the Company if there is any problem with this request prior to taking final Agency action. As you are aware, Gulf Coast Recycling has filed a Motion for Extension of Time, until March 11, 1991, before filing a Chapter 120.57 Petition for Hearing. Therefore, time is of the essence.

Thank you for your prompt attention to this matter.

Sincerely,

GULF COAST RECYCLING, INC.

  
Joyce Morales-Caramella  
Environmental & Health Manager

cc: Bill Thomas, FDER-Tampa

*M. Baig*  
*J. Glenn*  
*J. Campbell, EPCITC*





# GULF COAST RECYCLING, INC.

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

February 25, 1991

RECEIVED

FEB 28 1991

DER-BAQM

Mr. Barry Andrews  
Bureau of Air Regulation  
Florida Dept. of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Gulf Coast Recycling, AC 29-184883

Dear Mr. Andrews:

Enclosed is a certified copy of the Notice of Intent to Issue for permit number AC 29-184883, which appeared in the Tampa Tribune, February 20, 1991.

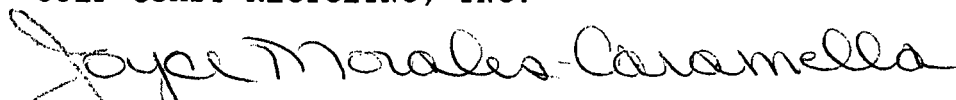
Also enclosed is a copy of a Motion for Extension of Time filed today with the Secretary of the Florida Department of Environmental Regulation. The allowable particulate emissions reflected in the proposed permit and the Technical Evaluation and Preliminary Determination prepared by FDER, appear to be in error.

I have already discussed the apparent error with Mirza Baig and he has stated he would review the calculations. Gulf Coast Recycling, Inc. is ready to meet, at your direction, in order to resolve this matter.

I look forward to hearing from you soon.

Sincerely,

GULF COAST RECYCLING, INC.

  
Joyce Morales-Caramella  
Environmental & Health Manager

cc: Bill Thomas, FDER-Tampa

*M. Baig*  
*J. Campbell*

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of an  
Application for Permit by:

DER File No. AC 29-184883

Gulf Coast Recycling, Inc.  
1901 N. 66th Street  
Tampa, Florida 33619

MOTION FOR EXTENSION OF TIME

COMES NOW the Petitioner, Gulf Coast Recycling, Inc. (GCR) and files its Motion for Extension of Time pursuant to Chapter 17-103.070, F.A.C. and in support thereof says:

An Intent to Issue the referenced permit has been received by GCR. Specific Condition Number 4, is issued pursuant to 40 CFR 60.122 (Subpart L). GCR objects to Specific Condition Number 4 and the conclusions (similarly stated to Condition 4) in the Technical Evaluation and Preliminary Determination which accompanied the permit.

The Florida Department of Environmental Regulation appears to have made an error in calculating allowable particulate emissions. Both the permit and the "Technical Evaluation and Preliminary Determination" state that particulate emissions from this facility shall not exceed either 0.022 gr/dscf; 0.0494 lbs/hr and lead emissions from the kettles shall not exceed 0.400 lbs/hr and 0.8736 tons/yr. The particulate rate in pounds/hour must be in error. The rate 0.0494 lbs/hr, is less than actual particulate emissions, far less than the present allowable for particulates (1.0 pounds/hours for refining) and far less even than allowable lead emissions.

GCR needs this extension of time in order to meet with DER and arrive at an amicable resolution. Attempts were made by

Joyce Morales-Caramella to contact Barry Andrews concerning the permit conditions but she was unable to reach him. She then contacted the Southwest District office and was advised to contact Mirza Baig. Mr. Baig stated that he would review the calculations and suggested the Company file either a Petition for Hearing or a Motion for Extension of Time.

If this filing does not toll the time in which to file a Chapter 120.57, Florida Statutes, Petition, please have this document serve as a request for such review. The issue which will be in dispute is Specific Condition Number 4 contained in the subject Permit.

WHEREFORE, Gulf Coast Recycling, Inc. respectfully requests an extension of time, until March 11, 1991, before filing a Chapter 120.57 Petition.

I HEREBY CERTIFY that the original and on copy of the foregoing was faxed to Carol M. Browner, Secretary of the FDER and one copy was faxed c/o the Office of General Counsel, on this 25th day of February, 1991. Copies were sent, via regular mail, to Barry Andrews, FDER-Tallahassee and Bill Thomas, FDER-Tampa, on this 25th day of February.

Respectfully submitted,

*Willis M. Kitchen*

---

Willis M. Kitchen, President  
Gulf Coast Recycling, Inc.  
1901 N. 66th Street  
Tampa, Florida 33619  
813/626-6151

**THE TAMPA TRIBUNE**

**Published Daily  
Tampa, Hillsborough County, Florida**

**State of Florida  
County of Hillsborough** } ss.

*Before the undersigned authority personally appeared  
R. Putney, who on oath says that he is Accounting Manager of The Tampa  
Tribune, a daily newspaper published at Tampa in Hillsborough County, Flori-  
da; that the attached copy of advertisement being a*

**LEGAL NOTICE**

in the matter of .....

**PERMIT**

was published in said newspaper in the issues of .....  
February 20, 1991

*Affiant further says that the said The Tampa Tribune is a newspaper published at  
Tampa, in said Hillsborough County, Florida, and that the said newspaper has her-  
etofore been continuously published in said Hillsborough County, Florida, each day  
and has been entered as second class mail matter at the post office in Tampa, in said  
Hillsborough County, Florida, for a period of one year next preceding the first pub-  
lication of the attached copy of advertisement; and affiant further says that he has  
neither paid nor promised any person, firm, or corporation any discount, rebate, com-  
mission or refund for the purpose of securing this advertisement for publication in the  
said newspaper.*

**Notary Public, State of Florida  
My Commission Expires Sept. 3, 1994  
Bonded Thru Troy Fain - Insurance Inc.**

*R. Putney*

Sworn to and subscribed before me, this ..... 20 day

February ..... A.D. 19 91

*Scott D. Williams*

(SEAL)

State of Florida  
Department of Environmental  
Regulation  
Notice of Intent to Issue  
The Department of Environ-  
mental Regulation hereby  
gives notice of its intent to  
issue a permit to Gulf Coast  
Recycling, Inc. for an existing  
50 ton lead refining kettle (No.  
3). Emissions from lead  
refining kettle Nos. 1, 2, and 3  
are exhausted through two  
baghouses to a common  
stack. Only two lead refining  
kettles can operate simultane-  
ously at any time. This facility  
is located on 1901 N. 66th  
Street, Tampa, Hillsborough  
County Florida. A determina-  
tion of Best Available Control  
Technology (BACT) was not  
required. The Department is  
issuing this intent to issue for  
the reasons stated in the Tech-  
nical Evaluation and Prelimi-  
nary Determination.  
A person whose substantial

interests are affected by the  
Department's proposed per-  
mitting decision may petition  
for an administrative proceed-  
ing (hearing) in accordance  
with Section 120.57, Florida  
Statutes. The petition must  
contain the information set  
forth below and must be filed  
(received) in the Office of Gen-  
eral Counsel of the Depart-  
ment at 2600 Blair Stone Road,  
Tallahassee, Florida 32399-  
2400, within fourteen (14) days  
of publication of this notice.  
Petitioner shall mail a copy of  
the petition to the applicant at  
the address indicated above  
at the time of filing. Failure to  
file a petition within this time  
period shall constitute a waiver  
of any right such person  
may have to request an ad-  
ministrative determination  
(hearing) under Section 120.57,  
Florida Statutes.

The Petition shall contain  
the following information:  
(a) The name, address, and  
telephone number of each  
petitioner, the applicant's  
name and address, the Depart-  
ment Permit File Number and  
the county in which the pro-  
ject is proposed;  
(b) A statement of how and  
when each petitioner received  
notice of the Department's ac-  
tion or proposed action;  
(c) A statement of how each  
petitioner's substantial  
interests are affected by the  
Department's action or pro-  
posed action;  
(d) A statement of the mater-  
ial facts disputed by  
Petitioner, if any;  
(e) A statement of facts  
which petitioner contends  
warrant reversal or modifica-  
tion of the Department's ac-  
tion or proposed action;

(f) A statement of which  
rules or statutes petitioner  
contends require reversal or  
modification of the Depart-  
ment's action or proposed ac-  
tion and;

(g) A statement of the relief  
sought by petitioner, stating  
precisely the action petitioner  
wants the Department to take  
with respect to the Depart-  
ment's action or proposed ac-  
tion.

If a petition is filed, an ad-  
ministrative hearing process  
is designed to formulate agen-  
cy action. Accordingly, the  
Department's final action may  
be different from the position  
taken by it in this Notice. Per-  
sons whose substantial  
interests will be affected by  
any decision of the Depart-  
ment with regard to the applica-  
tion have the right to  
petition to become a party to  
the proceeding. The petition  
must conform to the require-  
ments specified above and be  
filed (received) within 14 days  
of publication of this notice in  
the Office of General Counsel  
at the above address of the  
Department. Failure to  
petition within the allowed  
time frame constitutes a waiver  
of any right such person  
has to request a hearing  
under Section 120.57, F.S., and  
to participate as a party to  
this proceeding. Any  
subsequent intervention will  
only be at the approval of the  
presiding officer upon motion  
filed pursuant to Rule 28-5.207,  
F.A.C.

The application is available  
for public inspection during  
business hours, 8:00 a.m. to  
5:00 p.m. Monday through Fri-  
day, except legal holidays, at:  
Department of Environmental  
Regulation  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida  
32399-2400  
Department of Environmental  
Regulation  
Southwest District  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347  
Environmental Protection  
Commission  
of Hillsborough County  
1410 North 21st Street  
Tampa, Florida 33605  
Any person may send writ-  
ten comments on the pro-  
posed action to Mr. Barry An-  
drews at the Department's  
Tallahassee address. All  
comments mailed within 14  
days of the publication of this  
notice will be considered in  
the Department's final determi-  
nation.  
1590 2/20/91



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

FAX (813) 272-5157



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
ADMINISTRATIVE OFFICES  
AND  
WATER MANAGEMENT DIVISION  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960

AIR MANAGEMENT DIVISION  
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION  
TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION  
TELEPHONE (813) 272-7104

RECEIVED

February 15, 1991

FEB 25 1991

DER-BAQM

Mr. Mirza Baig  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Gulf Coast Recycling, Inc.  
Lead Refining Kettle No. 3  
AC29-184883

Dear Mr. Baig:

I have reviewed the Technical Evaluation and Preliminary Determination and the proposed construction permit for the above referenced 50 ton lead refining kettle.

Specific Condition No. 1 (attached) requires a log of hours of operation be maintained for the entire life of the facility, for each kettle. My only suggestion is that you describe in detail what the logs contain as a minimum. The following wording may be more appropriate:

Specific Condition No. 1. The operation of this kettle shall not exceed 12 hrs./day, 7 days/wk. and 52 wks./yr. No more than two kettles can operate simultaneously and the total annual hours of operation, in any combination, for the refining kettle area shall not exceed 4368. A log of hours of operation shall be maintained by the permittee for the entire life of this facility, for each kettle. The logbooks shall include, but not be limited to, the following information:

- 1) Date
- 2) Time of First Charge to the Kettle
- 3) Time of Last Charge to the Kettle
- 4) Daily Operating Hours
- 5) Type and Amount (in pounds) of Materials Charged
- 6) Type and amount of lead produced
- 7) Name of Gulf Coast Recycling, Inc. Representative Monitoring the Charging of the Kettle

\* Operating time (hours) shall be determined from the time between (2) and (3) each day.

Mr. Mirza Baig  
February 15, 1991  
Page 2

Should you have any questions regarding the above suggestion  
please call me at (813) 272-5530.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Susan Cameron".

Susan Cameron  
Air Permit Engineer

bm

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address.    2.  Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Willis M. Kitchen, President Gulf Coast Recycling, Inc. 1901 N. 66th Street Tampa, FL 33619	4. Article Number P 407 853 140
	Type of Service: <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
	Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Addressee X <i>Willis M. Kitchen</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery <i>Dec 91</i>	

PS Form 3811, Apr. 1989

\*U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

**P 407 853 140**  
**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

*U.S.G.P.O. 1989-234-555	
Sent to Mr. Willis M. Kitchen, Gulf Coast Recycling	
Street and No. 1901 N. 66th St.	
P.O., State and ZIP Code Tampa, FL 33619	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 2-8-91 Permit: AC 29-184883	

PS Form 3800, June 1985

Department of Environmental Regulation  
**Routing and Transmittal Slip**

To: (Name, Office, Location)

- 1 BARRY } FYI
- 2 CLAIR } FYI
- 3
- 4

Remarks:

HILLSBOROUGH City is PURSUING A PENALTY FOR THIS SOURCE FOR CONSTRUCTION W/O A PERMIT. IF NO SETTLEMENT IS REACHED, EPA WANTS THE LEAD DUE TO THE LEAD (Pb) INITIATIVE. EPA IS SENDING A 11A letter TO ADDRESS OTHER ISSUES. THIS PERMIT SHOULD BE APPROVED.

Jim Mirze  
 This stack has a damper that lets in excess air. The gr/dscft means little if the damper is open. Should the gr/dscft restriction have an excess air limit such as corrected to 76 Or is the 15/hr enough to ensure that the PM is adequately controlled?  
 John

From:

Jim P.

Date

2/7/91

Phone

445

Patty  
 send copy to Sharon Porter, EPA  
 so she knows permit is out  
 Clair





# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

February 8, 1991

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

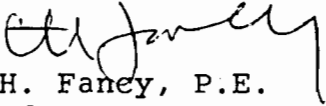
Mr. Willis M. Kitchen, President  
Gulf Coast Recycling, Inc.  
1901 N. 66th Street  
Tampa, Florida 33619

Dear Mr. Kitchen:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed construction permit to Gulf Coast Recycling, Inc. for an existing 50 ton lead refining kettle (No. 3). Emissions from lead refining kettles Nos. 1, 2, and 3 are exhausted through two baghouses to a common stack. Only two lead refining kettles can operate simultaneously at any time. This facility is located on 1901 N. 66th Street, Tampa, Hillsborough County Florida.

Please publish the attached "Notice of Intent to Issue" in the legal ad section of a newspaper of general circulation in the area affected and submit the proof of publication to the Department within seven days of publication, along with any written comments you wish to have considered concerning the Department's proposed action, to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

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

CHF/MB/plm

Attachments

c: R. E. Wallace, P.E.  
B. Thomas, Tampa DER  
I. Choronenko, HCEPC

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application for Permit by:

Gulf Coast Recycling, Inc.  
1901 N. 66th Street  
Tampa, Florida 33619

DER File No. AC 29-184883

---

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue an air construction permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Gulf Coast Recycling, Inc., applied on August 3, 1990, to the Department of Environmental Regulation for a construction permit for an existing 50 ton lead refining Kettle (No. 3). Emissions from lead refining kettle Nos. 1, 2, and 3 are exhausted through two baghouses to a common stack. Only two lead refining kettles can operate simultaneously at any time. This facility is located on 1901 N. 66th Street, Tampa, Hillsborough County Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) have the right to petition to become a party to the proceeding. The petition must conform to the requirements

specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



---

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

Copies furnished to:

R. E. Wallace, P.E.  
B. Thomas, Tampa DER  
I. Choronenko, HCEPC

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 2-7-91.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Kevin J. Baker  
Clerk

2-7-91  
Date

State of Florida  
Department of Environmental Regulation  
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Gulf Coast Recycling, Inc. for an existing 50 ton lead refining kettle (No. 3). Emissions from lead refining kettle Nos. 1, 2, and 3 are exhausted through two baghouses to a common stack. Only two lead refining kettles can operate simultaneously at any time. This facility is located on 1901 N. 66th Street, Tampa, Hillsborough County Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Department of Environmental Regulation  
Southwest District  
4520 Oak Fair Boulevard  
Tampa, Florida 33610-7347

Environmental Protection Commission  
of Hillsborough County  
1410 North 21st Street  
Tampa, Florida 33605

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation  
and  
Preliminary Determination

Gulf Coast Recycling, Inc.  
Hillsborough County  
Tampa, Florida

50 Ton Lead Refining Kettle No. 3  
Permit Number: AC 29-184883

Florida Department of Environmental Regulation  
Division of Air Resources Management  
Bureau of Air Regulation

February 8, 1991



## I. Application

### A. Applicant

Gulf Coast Recycling, Inc.  
1901 North 66th Street  
Tampa, Florida 33619

### B. Project and Location

The applicant, Gulf Coast Recycling, Inc. (GCR), operates a secondary lead smelter at 1901 North 66th Street, Tampa, Hillsborough County, Florida. The UTM coordinates are Zone 17, 364.048 km North and 3093.548 km East.

This project involves issuing a construction permit for an existing 50 ton lead refining kettle (No. 3). Emissions from lead refining kettle Nos. 1, 2, and 3 are exhausted through two Wheelabrator-Frye Model 126 baghouses to a common stack.

### C. Facility Category

The SIC Code is 3341 and the SCC Code is 3-04-004-01. GCR, Inc. applied for a construction permit on August 3, 1990 and was deemed complete on November 13, 1990.

## II. Project Description

GCR, Inc. is a major facility because lead emissions exceed 5 TPY. There are three lead refining kettles in operation at this facility. Kettle Nos. 1 and 2 were issued construction permits while kettle No. 3 was never issued a construction permit. According to EPCHC records, refining kettle No. 3 was constructed in 1983. A construction permit for this existing source is now being issued so that EPA can have federal enforceability.

Lead refining kettle No. 3 has a maximum capacity of 104,000 lbs. Each soft lead charge consists of blast lead, caustic, sulfur, red phosphorus, sodium nitrate, aluminum, and a small amount (about 2 lbs) of sawdust. Only two of the three lead refining kettles can operate simultaneously at any time. Emissions from these kettles are controlled by two Wheelabrator-Frye Model 126 baghouses in parallel and exhausted through a single stack, at a designed air flow of 16,530 ACFM. The filtering area per baghouse is about 2,736 sq. ft. Kettle No. 3 is fired by only natural gas with a minimum heat input of 4.0 MMBtu/hour.

## III. Rule Applicability

This facility is in an area designated nonattainment for

ozone (F.A.C. Rule 17-2.410), unclassifiable for particulate matter and sulfur dioxide (F.A.C. Rule 17-2.430), and attainment for the other criteria pollutants (F.A.C. Rule 17-2.420).

This project is not subject to the Prevention of Significant Deterioration regulations (F.A.C. Rule 17-2.500) and New Source Review for Nonattainment Areas (F.A.C. Rule 17-2.510) because it does not cause a significant emissions rate increase of any criteria pollutant.

The particulate emissions from this facility shall not exceed either of the following limitations: 0.022 gr/dscf; 0.0494 lbs/hr. The existing source at this facility is subject to NSPS and 40 CFR 52.535(c)(1)(c); Chapter 403, Florida Statutes; and Chapter 17-2, Florida Administrative Code. Lead emissions from these kettles shall not exceed 0.400 lbs/hour and 0.8736 tons/yr and visible emissions shall be less than 5% opacity.

#### IV. Source Impact Analysis

##### A. Emission Limitations

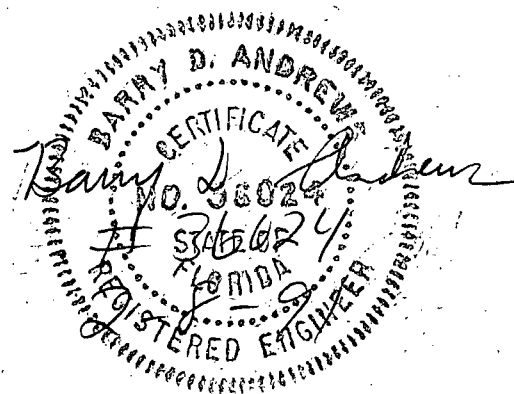
Pursuant to 40 CFR 60.122 (Subpart L), the particulate emissions shall not exceed either of the following limitations: 0.022 gr/dscf; 0.0494 lbs/hr. The lead emissions shall not exceed 0.400 lbs/hr and 0.8736 tons/yr. The visible emissions from this facility shall not exceed 5% opacity.

##### B. Air Quality Impacts

Lead refining kettle No. 3 was issued an operation permit (AO 29-95365) on January 28, 1985, but a construction permit was never issued. This source has been in operation for several years. According to the stack test conducted on February 13, 1990, this source was operating satisfactorily. It is expected that Florida's air quality standards will not be violated.

#### V. Conclusion

Based on the information provided by GCR, Inc., the Department has reasonable assurance that the 50 ton lead refining kettle (No. 3), as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.





# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

**PERMITTEE:**

Gulf Coast Recycling, Inc.  
1901 North 66th Street  
Tampa, Florida 33619

Permit Number: AC 29-184883  
Expiration Date: Dec. 31, 1991  
County: Hillsborough  
Latitude/Longitude: 27°57'43"N  
82°22'49"W

Project: Lead Refining Kettle  
No. 3

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the after-the-fact construction of a 50 ton lead refining kettle (No. 3), fired by only natural gas with a maximum heat input of 4.0 MMBtu/hr. Emissions from kettles Nos. 1, 2, and 3 are controlled by two Wheelabrator-Frye Model 126 type baghouses at a designed flow of 15,714 dscfm. Only two kettles can operate simultaneously.

This facility is located at 1901 North 66th Street, Tampa, Hillsborough County, Florida. The UTM coordinates are 364.048 km E and 3093.548 km N.

The source was constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received August 3, 1990.
2. DER incompleteness letter dated August 29, 1990.
3. Gulf Coast Recycling, Inc.'s response received November 13, 1990.

PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: December 31, 1991

**GENERAL CONDITIONS:**

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: December 31, 1991

**GENERAL CONDITIONS:**

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: December 31, 1991

**GENERAL CONDITIONS:**

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and

PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: December 31, 1991

**GENERAL CONDITIONS:**

records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**SPECIFIC CONDITIONS:**

1. The operation of this kettle shall not exceed 12 hrs/day, 7 days/wk and 52 wks/yr. No more than two kettles can operate simultaneously and the total annual hours of operation, in any combination, for the refining kettle area shall not exceed 4368. A log of hours of operation shall be maintained for the entire life of this facility, for each kettle.

2. Pursuant to 40 CFR 52.535(c)(1): lead emissions shall not exceed 0.400 lbs/hr and 0.8736 tons/year; visible emissions from the baghouse exhaust shall be less than 5% opacity; visible emissions from the refining kettles shall not exceed 5% opacity.

3. Pursuant to 40 CFR 60.122 (Subpart L), particulate emissions from this facility shall not exceed either of the following limitations: 0.022 gr/dscf; or 0.0494 lbs/hr.

4. Compliance with emission limitations of particulate matter, lead, and visible emissions shall be conducted within 90 days of issuance of this permit. Compliance tests shall be conducted using EPA Methods 1, 2, 3, 4, 9, and 12 contained in 40 CFR 60,

PERMITTEE:  
Gulf Coast Recycling, Inc.

Permit Number: AC 29-184883  
Expiration Date: December 31, 1991

**SPECIFIC CONDITIONS:**

Appendix A and adopted by reference in F.A.C. Rule 17-2.700. The minimum requirements for stack sampling facilities, source sampling, and reporting shall be in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A. Testing shall be conducted while two of the three kettles (initially kettle No. 3 along with any other kettle must be tested) are in operation. Visible emissions tests shall be conducted at the baghouse exhaust and kettle charging area for at least 60 minutes, simultaneously, along with the particulate tests.

5. Both baghouses must be employed during the operation of lead refining kettles.
6. This facility shall operate without objectionable odors.
7. The EPCHC shall be notified in writing at least 15 days in advance of any compliance tests.
8. The permittee shall comply with all applicable provisions of Florida Administrative Code Chapters 17-2 and 17-4, and Rule 1-1.04.1 of the Rules of EPCHC.
9. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
10. An application for an operation permit must be submitted to the Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-4.220).

Issued this \_\_\_\_\_ day  
of \_\_\_\_\_, 1991

**STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION**

\_\_\_\_\_  
STEVE SMALLWOOD, P.E., Director  
Division of Air Resources Mgmt.



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

FAX (813) 272-5157



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
ADMINISTRATIVE OFFICES  
AND  
WATER MANAGEMENT DIVISION  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960

AIR MANAGEMENT DIVISION  
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION  
TELEPHONE (813) 272-5784

ECOSYSTEMS MANAGEMENT DIVISION  
TELEPHONE (813) 272-7104

ENVIRONMENTAL PROTECTION COMMISSION  
of Hillsborough County

FAX Transmittal Sheet

DATE: 1-30-91

TO: Mirza Baig

FAX Phone: (904) 922-6979

Voice Phone: SUNCOM 278-1344

TOTAL NUMBER OF PAGES INCLUDING THIS COVER PAGE: 9

EPC FAX Transmission Line: (813) 272-7144 For retransmission or any FAX problems, call: (813) 272-7104

FROM: Darrel Graziani

(circle applicable phone number and organization below)

(813) 272-8530

(813) 272-5788

(813) 272-7104

Division

Waste Management

Ecology Management

Special Programs

UST Clean-Up

Environmental Engineer

Air Engineering

Solid/Hazardous Waste

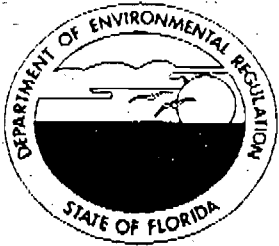
Environmental Assessment

UST Compliance

Compliance Enforcement

SPECIAL INSTRUCTIONS:

Gulf Coast Recycling Company "draft" operating permit. Call me if you have any questions. The permit is now out on waiver waiting for your construction permit. NSPS applies.



# Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

## STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMIT ISSUANCE

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

DER File No.: A029-173309  
County: Hillsborough

three (3)

Enclosed is Permit Number A029-173309 to operate ~~two~~ (2) 50 ton refining kettles, issued pursuant to Section 403.087, Florida Statutes.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee 32399-2400, within fourteen (14) days of receipt of this permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by petitioner, if any;

## BEST AVAILABLE COPY

Gulf Coast Lead Company, Inc.  
Tampa, FL 33619

Page Two

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends required reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice, in the Office of General Counsel at the above address of the Department. Failure to petition within the allotted time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

BEST AVAILABLE COPY

Gulf Coast Lead Company, Inc.  
Tampa, FL 33619

Page Three

Executed in Tampa, Florida

Sincerely,

J. Harry Kerns, P.E.  
District Air Engineer

JHK/DJG/bb

Attachment:

cc: Environmental Protection Commission  
of Hillsborough County  
Robert Wallace, III, P.E.

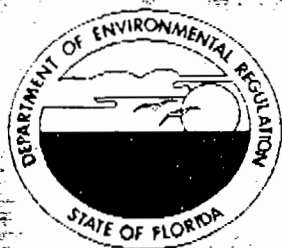
CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on \_\_\_\_\_ to the listed persons.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
Section 120.52(10), Florida Statutes,  
with the designated Department Clerk,  
receipt of which is hereby acknowledged.

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date



# Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachsmann, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

## PERMITTEE:

Gulf Coast Lead Company, Inc.  
1901 N. 66th Street  
Tampa, FL 33619

## PERMIT/CERTIFICATION

Permit No: A029-173309  
County: Hillsborough  
Expiration Date: ~~08/15/95~~  
Project: Nos. 1, and ~~2~~ Refining  
Kettles

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of ~~two (2)~~ <sup>three (3)</sup> gas-fired 50 ton refining kettles each with a maximum heat input of 1.28 mmBtu/hr. The No. 1 kettle (AC29-12606) is used to make hard lead by combining blast lead and proportionate amounts of antimony and tin. The No. 2 kettle (AC29-31078) is used to make calcium lead by combining soft lead with calcium. Emissions of particulate matter and lead generated by the refining kettles are controlled by a two (2) module baghouse fabricated by Gulf Coast Lead Company. Both kettles are subject to the New Source Performance Standards of 40 CFR 60, Subpart L.

Location: 1901 N. 66th Street, Tampa

UTM: 17-364.0 E 3093.6 N NEDS NO: 0057 Point ID: 02

Replaces Permit No.: A029-95365  
AC29-

→ The No. 3 Kettle (AC29- ) is used to make

BEST AVAILABLE COPY

PERMITTEE:  
Gulf Coast Lead Company,  
Inc.

PERMIT/CERTIFICATION NO.: AO29-173309  
PROJECT: Nos. 1 and 2 Refining Kettles

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.
2. This permit authorizes the operation of refining kettles No. 1 and No. 2 only. This permit may be amended at a later date incorporating kettle No. 3 after a valid Department construction permit has been issued. This facility is subject to the requirements of 40 CFR 52.
3. Pursuant to Rule 17-2.650(2)(b)1., F.A.C., this facility qualifies for an exemption of the Reasonably Available Control Technology (RACT) requirements since, at the request of the permittee, the total allowable emissions of the facility shall not exceed 4.4 pounds per hour and 14.9 tons per year.
4. Pursuant to the construction permits, the hours of operation of kettle No. 1 shall not exceed 3744 hours per year and kettle No. 2 shall not exceed 2400. These hours in combination shall not exceed 4368 hours per year to insure compliance with Specific Condition No. 3.
5. In order to insure compliance with Specific Condition No. 3, the maximum allowable particulate matter emissions from the baghouse controlling the sources authorized to operate under this permit shall be:

<u>Source</u>	<u>Emission Limitations</u>
---------------	-----------------------------

50 Ton Refining Kettles (3)	1.0 lbs./hr.
-----------------------------	--------------

*\* only two kettles may be operated at any given time*

6. Pursuant to 40 CFR 52.535(c)(1)(i), the maximum allowable lead emissions from the sources authorized to operate under this permit shall be:

<u>Source</u>	<u>Emissions Limitations</u>
---------------	------------------------------

50 Ton Refining Kettles 1 <sup>2</sup> and 3	0.400 lbs./hr. (.874 TPY)
---	---------------------------

7. Pursuant to 40 CFR 52.535(c)(1)(ii), visible emissions from the refining kettles shall not exceed five (5) percent opacity during refining operation.
8. Pursuant to 40 CFR 52.535(c)(1)(iv), visible emissions from the baghouse shall not exceed five (5) percent opacity.
9. Pursuant to 40 CFR 52.535(c)(1)(vi), the permittee shall not operate more than two (2) refining kettles at a time.

PERMITTEE: Gulf Coast Lead Company, Inc.  
 PERMIT/CERTIFICATION NO.: A029-173309  
 PROJECT: Nos. 1 and 2 Refining Kettles

SPECIFIC CONDITIONS: (continued)

10. Test emissions from the refining kettle baghouse and the refining kettles for the following pollutants at intervals of twelve (12) months from February 14, 1990 and submit 2 copies of test data to the Environmental Protection Commission of Hillsborough County within forty-five (45) days of such testing pursuant to Section 17-2.700, F.A.C.:

- (X) Particulates
- (X) Opacity
- (X) Lead

11. Compliance with the emission limitations of Specific Conditions Nos. 5, 6, 7 and 8 shall be determined using EPA Methods 1, 2, 3, 4 and 12 contained in 40 CFR 60, Appendix A and adopted by reference in Section 17-2.700, F.A.C. In the case of the Method 9, Section 2.5 shall be excluded, pursuant to 40 CFR 52.535(b)(5).; thus waiving the six minute averaging period and establishing an instantaneous standard. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Section 17-2.700, F.A.C. and 40 CFR 60, Appendix A.

12. The visible emission tests on the refining kettle baghouse and the refining kettles shall be thirty (30) minutes in duration pursuant to Section 17-2.700, F.A.C., and shall be conducted concurrent with one of the Method 12 runs. Emissions from the refining kettles shall be observed at the

13. Testing of emissions must be accomplished while both kettles are operating. The actual charging rate and type of materials charged during the test shall be specified in each test result. Failure to include the actual process or production rate in the results may invalidate the test [Rule 17-4.070(3), F.A.C.].

14. Pursuant to 40 CFR 52.535(b)(2), non-process fugitive emissions (road dust, stockpiles, plant grounds, etc.) shall be minimized. Minimization efforts shall include such fugitive dust suppression activities as chemical stabilization, water spraying with appropriate runoff collection, resurfacing, sweeping, revegetation, and other EPA approved methods.

PERMITTEE: Gulf Coast Lead Company, Inc.  
PERMIT/CERTIFICATION NO.: A029-173309  
PROJECT: Nos. 1 and 2 Refining Kettles

SPECIFIC CONDITIONS: (continued)

15. Pursuant to 40 CFR 52.535(b)(4), the permittee shall maintain continuous records of plant process and emission control operations as necessary to determine continuous compliance. Such records shall include reports of all process operations and control equipment operating parameters. Such records shall also include reports of all types of process upsets and emission control equipment malfunction, detailing the nature and duration of the upset or malfunction, the expected effects on emissions, and the corrective actions taken or planned to avoid recurrences. Such records shall be available at the plant site for inspection for a period of at least two (2) years.

16. Pursuant to Rule 1-1.04.1 of the Rules of the Environmental Protection Commission of Hillsborough County and consistent with Specific Condition No. 14, the permittee shall maintain ~~records~~ <sup>Monthly</sup> records on the ~~number of charges per day~~ <sup>number of charges per day</sup> of materials charged (pounds per hour) into the refining kettles.

17. Pursuant to Chapter 1-3.22(3) of the Rules of the Environmental Protection Commission of Hillsborough County, the permittee shall not allow the discharge of air pollutants which contribute to an objectionable odor.

18. The Environmental Protection Commission of Hillsborough County shall be notified in writing 15 days in advance of any compliance test to be conducted on this source.

19. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information pursuant to Section 403.061(13), Florida Statutes:

- (A) Annual amount of materials and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Any changes in the information contained in the permit application.

Duplicate copies of all reports shall be submitted to the Environmental Protection Commission of Hillsborough County.

20. Pursuant to Section 17-4.090, F.A.C., an application for renewal of permit to operate this source, completed in quadruplicate, shall be submitted to the Environmental Protection Commission of Hillsborough County at least 60 days prior to its expiration date.



PERMITTEE: Gulf Coast Lead Company, Inc. PERMIT/CERTIFICATION NO.: AO29-173309  
PROJECT: Nos. 1 and 2 Refining Kettles

Issued this \_\_\_\_\_ day of \_\_\_\_\_  
19\_\_\_\_.

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL REGULATION

Richard Garrity, Ph.D.  
Deputy Assistant Secretary

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

FAX (813) 272-5157



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
MAIN OFFICES  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960

AIR PROGRAM  
TELEPHONE (813) 272-5530

WASTE MANAGEMENT PROGRAM  
TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION  
TELEPHONE (813) 272-7104

January 10, 1991

RECEIVED

JAN 14 1991

DER-BAQM

Ms. Jewell Harper  
Chief  
Air Enforcement Branch  
Air, Pesticides and Toxics  
Management Division  
USEPA, Region IV  
345 Courtland Street  
Atlanta, Georgia 30365

Re: Gulf Coast Recycling Facility in Tampa

Dear Ms. Harper:

We recently received a report written by PEI dated September 1990 regarding their evaluation of the above referenced facility. Having completed our initial review, we offer the following comments:

1. The report lists 4 basic concerns: initial permitting of the sixty ton blast furnace and the associated agglomeration furnace, permitting in general regarding the 3 fifty ton melt kettles, lack of ambient lead data in the vicinity of the plant and excess opacity excursions from the tapping area. We would add a fifth concern possibly involving a source specific SIP revision. The stack was extended in 1988 to protect the ambient SO<sub>2</sub> standard in a nearby railway yard.
2. Attachment A is a brief summary of the sixty ton blast furnace and agglomeration furnace permitting. As you can read, the blast furnace was installed in 1984 with the County's and the District's prior knowledge. We apparently viewed this as a replacement of an existing source with no increase in PM, Pb or SO<sub>2</sub>. NOx, CO or VOC emissions were not considered. While we correctly subjected the new furnace to NSPS, we did not require a construction permit application and refer it to DARM for NSR and PSD considerations. Our thinking was that it was a minor source of PM and Pb and unregulated for the other pollutants; therefore, the "replacement" could be handled at the district level.

In order to remedy this situation, we recommend that GCR be required to file an after-the-fact construction permit which addresses NSR and PSD regulations. DARM would have the lead on the review. There should be no up front penalty as this was done with the EPC's and the DER's knowledge. While we are not as confident as PEI that a 50% increase in

Department of Environmental Regulation  
**Routing and Transmittal Slip**

To: (Name, Office, Location)

1.

MIRZA BAIG

2.

3.

4.

Remarks:

PLEASE REVIEW AND THEN  
LET'S DISCUSS.

From:

*Jim P.*

Date

1/15/91

Phone

45

Ms. Jewell Harper  
January 10, 1991  
Page 2

emissions occurred, we do agree that a full analysis is necessary. A quick check of our records does not support the increase suggested (see attachment B). Some older data has been archived and we will attempt to retrieve it.

Although we do not have a copy of the actual construction permit for the agglomeration furnace in our files, it appears that it was issued some time in 1979. The exhaust from this furnace and the sixty ton blast unit share the same stack, thus the NSPS standards have been applied to the agglomeration furnace since A029-78246 was issued in 1984. PEI seemed concerned that the most recent operating permit for the furnace operation did not specifically state that the agglomeration furnace was subject to NSPS. We will amend the permit accordingly, but this is a mere formality since it has met NSPS standards all along.

3. The last paragraph on page 14 of the report probably explains the erroneous conclusions PEI reached regarding the permitting of the refining kettles. PEI is correct that permit A029-173310 does not list any of the kettles, but they are incorrect in stating that no permit for these sources exists. Attachment C is a copy of the current operating permit for the twenty ton kettle. The permit under Attachment D covers the three fifty ton kettles which is now up for renewal. During our renewal review, we discovered that kettle #3 was constructed in 1983 without a construction permit. Consequently, GCR was instructed to apply for an after-the-fact construction permit and they have. It is being reviewed by DARM and EPC, and should be issued shortly. Once this is done the operating permit for all three kettles will be renewed. The permit will include all applicable NSPS and FIP limitations.

The resolution here is already underway and no further action would seem warranted.

4. EPC is now running an ambient lead monitor in the shadow of the plant. The first calendar quarter was completed December 31 and the final results are not available yet. Some individual readings were elevated. A second site is being considered as well.

You recall when the lead FIP was promulgated several years ago Hillsborough County had 4 significant stationary lead sources. The supporting documentation for the FIP recommended that two of the four facilities be monitored and GCR was not one of them. Although not tasked to do so, we took the initiative and ran monitors downwind of Johnson Controls and Pacific Chloride (the two targeted facilities). Since then Chloride shut down as did one of the other four, leaving Johnson Controls and GCR. We now have monitors in the vicinity of both. As such, no further action is necessary.

Ms. Jewell Harper  
January 10, 1991  
Page 3

5. The report notes that excess opacity was observed from the tapping area. Although it appeared to be a relatively short event caused by operator error, this could reoccur. The PEI recommendation to increase the fan size warrants further attention. In fact, it would seem reasonable to present all the recommendations on page twenty-one to GCR and elicit a response.
6. The last concern we have on GCR was not mentioned in the PEI report. Having attended a national permitting workshop this past month, we were told that stack extensions solely to protect the ambient standard should be reflected in a source specific SIP revision. If this is true, then the actions detailed in Attachment E should be considered for inclusion in the Florida SIP.

Given the above facts, we recommend that the EPC approach GCR to discuss the PEI report and any additional items the DER or the EPA may have. All corrective actions could be formalized with the necessary incentives (deadlines with penalties for missing them). As it appears that there may not be any emission violations short of the thirty second opacity excursion mentioned previously, and GCR had the EPC's and the DER's approval for their actions, it would seem inappropriate to handle this in the enforcement mode. Please consider our recommendations and advise us on how you and the State wish to proceed.

Sincerely,



Jerry Campbell, P.E.  
Assistant Director  
Air Management Division

cg

Attachments

cc: Jim Pennington

## Attachment A

Permitting History  
60 Ton Blast Furnace/Agglomeration (Slag) Furnace

<u>Date</u>	<u>Source</u>	<u>Permit #</u>	<u>Comment</u>
10/78	2 Blast Furnaces	AO29-12482	5 yr - Both 40 tonners
?	Slag Furnace	AC29-18438	Application submitted 3/79
1/81	2 Blast/1 Slag	AO29-12482	Revised AO to incorporate AC29-18438
12/83	- -	- -	SO <sub>2</sub> baseline tests done on 40 tonner
1/84	2 Blast/1 Slag	AO29-78246	5 yr - References 12/83 SO <sub>2</sub> test
3/84	- -	- -	12/83 are reviewed and approved (374#/hr)
?/84			New 60 ton furnace installed
1/85	2 Blast/1 Slag (Tapping & Charging included first time)	AO29-95366	374#/hr is in permit. NSPS is referenced. 1/85 tests are required.
1/85	- -	- -	10 1 hour SO <sub>2</sub> runs are made on new 60 ton furnace.
11/90	2 Blast/1 Slag	AO29-173310	Baseline & NSPS carried over.

1.68

# GULF COAST LEAD CO., INC.

## LEAD PRODUCTS -- WHOLESALE ONLY



OFFICE AND PLANT  
1901 NORTH 66TH STREET • TAMPA, FLORIDA 33619  
PHONE: 626-0303-626-6151

November 6, 1984

Mr. Jerry Campbell  
Hillsborough County Environmental  
Protection Commission  
1900 - 9th Avenue  
Tampa, Florida 33605

RECEIVED

NOV 6 1984

RECEIVED

Dear Jerry:

This letter will confirm the Company's understanding regarding the permit application for operation of the blast furnaces at Gulf Coast Lead Company. As explained to Richard Bowman and me at a meeting November 1, 1984, the blast furnace is being considered a new source rather than reconstruction and is therefore subject to NSPS. However, the facility is not subject to new source review.

Also, as discussed in the aforementioned meeting, information regarding sulfur dioxide emissions from the blast furnace were inadvertently omitted from the permit application. Sulfur dioxide emissions for the blast furnace are 374 pounds/hour, 1459 tons/year.

Presently, emissions test on the blast furnace are due annually, by January 13. It was agreed at the meeting that Gulf Coast Lead Company may delay the annual emissions test until such time as the new permits are issued. Delaying the emissions test would prevent the Company from having to perform duplicate tests should the new permits not be issued prior to January 13, 1985.

Sincerely,

GULF COAST LEAD COMPANY

*Joyce D. Morales-Caramella*  
Joyce D. Morales-Caramella  
Safety & Environmental Director

HILLSBOROUGH COUNTY  
ENVIRONMENTAL PROTECTION COMMISSION  
CONVERSATION RECORD

Date 11/1/84 Subject Lead SIP  
Time PM Permit No. \_\_\_\_\_  
Department \_\_\_\_\_  
M Joyce Morales/Richard Bowman Telephone No. \_\_\_\_\_  
Representing Gulf Coast Lead  
 Telephoned Me     Was Called     Scheduled Meeting     Unscheduled Meeting  
Other Individuals Involved in Conversation/Meeting \_\_\_\_\_

Summary of Conversation/Meeting

Discussed lead allocations for each unit and no problems were incurred. Gulf Coast Lead submitted applications and will be issued three permits. One permit will cover the blast and slag furnaces, one will cover the three 50 ton melt bottles and one will cover the 20 ton pool cast. The blast furnace will be subject to NSPS particulate and opacity regulations.

(continue on another sheet, if necessary)

Signature Jerry Campbell  
Title \_\_\_\_\_



HILLSBOROUGH COUNTY  
ENVIRONMENTAL PROTECTION COMMISSION  
CONVERSATION RECORD

Date March 9, 1984 Subject SO<sub>2</sub> Emissions  
Time PM Permit No. \_\_\_\_\_  
Department \_\_\_\_\_

By Joyce Morales / Richard Bousman Telephone No. \_\_\_\_\_  
Representing Gulf Coast Lead

Telephoned Me     Was Called     Scheduled Meeting     Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting \_\_\_\_\_  
Jim Estler

Summary of Conversation/Meeting \_\_\_\_\_

All agreed that the 12/7-9/83 test results for SO<sub>2</sub> on the blast furnace would establish the sources baseline at 374 pounds of SO<sub>2</sub> per hour. The test procedures and the purpose were discussed at a meeting in fall of 1982. Gulf Coast Lead now intends to use this 40 ton blast furnace as a backup to a new 60 ton furnace. The 60 ton furnace will be tested within a reasonable period after it comes on line. If the SO<sub>2</sub> emissions are greater than 374 #/hour and are significant based on Table 505-2, then Gulf Coast Lead will be subject to PSD for SO<sub>2</sub>. The current backup furnace for the 40 ton unit will be retired so that only two furnaces will be on site.

(continue on another sheet, if necessary)

Signature Jerry Campbell  
Title \_\_\_\_\_

4h2

# GULF COAST LEAD CO.

## LEAD PRODUCTS - WHOLESALE ONLY

Jerry



OFFICE AND PLANT  
1901 NORTH 66TH STREET • TAMPA, FLORIDA 33619  
PHONE: 626-0303-626-8151

RECEIVED

FEB 22 1984

H.C.E.P.C.

February 20, 1984

Mr. Jim Essler  
Fl. Dept. of Environmental Regulation  
7601 Highway 301 North  
Tampa, Florida 33610

Dear Mr. Essler:

Gulf Coast Lead Company, by this letter, hereby notifies you that we are preparing to rebuild the older of our two blast furnaces. Once the new blast furnace is completed it will be put into operation and the existing furnace will be partially dismantled and kept only as a reserve. The two blast furnaces will never be operated simultaneously.

The new furnace will have twenty-five percent greater capacity but will be operated fewer days each year in order to allow the operators more time off.

Some pollution control features of the new furnace and its operation follows:

- (1) Groups will be aged in the storage pile prior to being fed into the blast furnace. Thorough rinsing and draining of the groups will take place, removing sulfuric acid and thus decreasing the amount of sulfates fed to the furnace.
- (2) The air velocity in the furnace will be lower, reducing the particulate loading going into the baghouses.
- (3) The new furnace will have an oval configuration rather than the present round configuration. Charges will then not tend to build up unevenly in the furnace thus eliminating hot spots which reduce efficiency and increase emissions.
- (4) Due to the configuration of the new furnace, charges will also have a longer residence time allowing greater quantities of sulfates to become fixed in the slag.

Because of the aforementioned features and operation modifications and others, it is estimated that operation of the new blast furnace will not result in increased sulfur dioxide emissions and any increase in particulate emissions will be negligible.

Mr. Jim Essler  
February 20, 1984  
Page Two

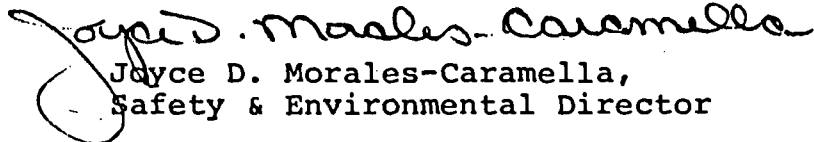
Once the new furnace is completed we will submit all the necessary information to supplement Operation Permit # A029-78246. At that time, we will also request that the furnaces, the slag and lead tap ventilation (Operation Permit # A029-41831), and the skip-hoist enclosure all be incorporated into one permit since they are all directly related to the blast furnace operation.

Attached, as agreed, is a report of ten tests run by Environmental Engineering Consultants, Inc. for sulfur dioxide emissions from the blast furnace at Gulf Coast Lead Company. The tests were conducted December 7, 8 and 9, 1983 and each test was run for a period of one hour to cover a complete cycle of the smelting operation.

If you have any questions or I can be of assistance, please do not hesitate to call.

Sincerely,

GULF COAST LEAD COMPANY

  
Joyce D. Morales-Caramella,  
Safety & Environmental Director

cc: Lonnie A. Payne, GCL  
Richard D. Bowman, GCL  
Jerry Campbell, HCEPC

# GULF COAST LEAD CO.

## LEAD PRODUCTS -- WHOLESALE ONLY



OFFICE AND PLANT  
1901 NORTH 66TH STREET • TAMPA, FLORIDA 33619  
PHONE: 626-0303-626-6151

December 5, 1983

Mr. Jerry Campbell  
Hillsborough County Environmental  
Protection Commission  
1900 - 9th Avenue  
Tampa, Florida 33605

Dear Mr. Campbell:

As discussed with you by phone, December 1, 1983, Environmental Engineering Consultants will be conducting emission tests for sulfur dioxide at Gulf Coast Lead Company on December 7, 8, and 9, 1983.

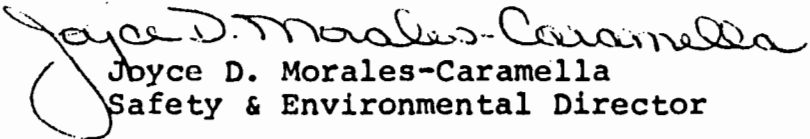
In the past, sulfur dioxide emission tests were always conducted over a twenty minute period for the furnaces. While discussing the wide variance in sulfur dioxide results during the past five years, it was decided that a twenty minute test was not representative since the operation of the blast furnace is cyclic. The blast furnace is charged approximately five times each hour and slag is tapped once each hour. While the slag is being tapped the smelting process essentially comes to a halt. In order to determine sulfur dioxide emissions during an entire cycle, the emission tests will be conducted for one hour each. Flow rates will be adjusted accordingly.

We respectfully request that a representative from the EPC and a representative from DER come out to Gulf Coast Lead Company to monitor the emissions tests since the results will be the basis for our sulfur dioxide cap.

If you have any questions please don't hesitate to call.

Sincerely,

GULF COAST LEAD COMPANY

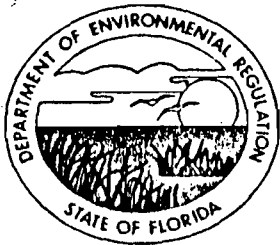
  
Joyce D. Morales-Caramella  
Safety & Environmental Director

Attachment B

SO<sub>2</sub> Emission History

<u>Year</u>	<u>Test Data (#/hr)</u>	<u>Annual Operating Record</u>		
		<u>Hours</u>	<u>Tons SO<sub>2</sub></u>	<u>Tons Material Charged</u> <sup>1</sup>
1990	324	NA	NA	NA
1989	339	7800	1321	27,349
1988	377	7800	1470	25,184
1987	353	7800	1377	25,763
1986	92	7610	349	22,420
1985		7464	1168	22,200
1984		7560	1421	25,100
1983	374		1360	

<sup>1</sup> Charge Materials: Lead  
Coke  
Limestone  
Iron



# Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

November 19, 1990

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

Dear Mr. Kitchen:

Re: Hillsborough County - AP  
Amendment to A029-130736  
22 Ton Pb Keel Cast Kettle  
with Baghouse

The Department is in receipt of your request to amend permit no. A029-130736 for the operation of a 22 ton lead melting kettle fired by natural gas at a maximum heat input rate of 1.28 MMBtu/hr. The following changes are hereby made:

CHANGE FROM: PERMITTEE:  
Gulf Coast Lead Company, Inc.  
1901 North 66th Street  
Tampa, FL 33619

CHANGE TO: PERMITTEE:  
Gulf Coast Recycling, Inc.  
1901 North 66th Street  
Tampa, FL 33619

Persons whose substantial interests are affected by this permit amendment have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5.201, F.A.C., and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes. This permit is final and effective on the date filed with the Clerk of the

Mr. Willis M. Kitchen  
Tampa, FL 33619

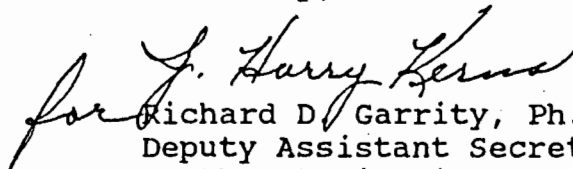
Page Two

Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time, this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

A copy of this letter must be attached to and becomes a part of permit number AO29-130736. If you have any questions, please call Mr. J. Harry Kerns of my staff at (813) 623-5561.

Sincerely,

  
Richard D. Garrity, Ph.D.  
Deputy Assistant Secretary  
Southwest District

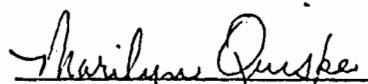
RDG/SMC/bb

cc: ✓ Environmental Protection Commission  
of Hillsborough County

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT AMENDMENT and all copies were mailed before the close of business on NOV 19 1990 to the listed persons.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
Subsection 120.52(10), Florida  
Statutes, with the designated  
Department Clerk, receipt of  
which is hereby acknowledged.

  
Clerk

NOV 19 1990  
Date

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.  
TAMPA, FLORIDA 33610-9544

813-623-5561  
SunCom—552-7612



RECEIVED

JUL 30 1987

E.P.C. of H.C.

BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

NOTICE OF PERMIT

Mr. Willis M. Kitchen  
Vice President  
Gulf Coast Lead Company, Inc.  
1901 North 66th Street  
Tampa, Florida 33619

Dear Mr. Kitchen:

Re: Hillsborough County - AP  
22 Ton Keel Cast Kettle w/Baghouse

Enclosed is Permit Number A029-130736 to operate a 22 ton lead keel cast kettle, issued pursuant to Section 403.087, Florida Statutes.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5.201, FAC, and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes. This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, FAC. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.



Mr. Willis M. Kitchen  
Tampa, Florida 33619

Page Two

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Tampa, Florida.

Sincerely,

*James L. McDonald*

James L. McDonald  
Air Permitting Engineer

JLM/js

cc: EPCHC ✓

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 7-17-87 to the listed persons.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
§120.52(10), Florida Statutes, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

*Jean Schest*  
Clerk

7-17-87  
Date

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION



SOUTHWEST DISTRICT

4520 OAK FAIR BLVD.  
TAMPA, FLORIDA 33610-9544

813-623-5561  
SunCom—552-7612

BOB MARTINEZ  
GOVERNOR

DALE TWACHTMANN  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

PERMITTEE:

Mr. Willis M. Kitchen  
Vice President  
Gulf Coast Lead Company, Inc.  
1901 North 66th Street  
Tampa, Florida 33619

PERMIT/CERTIFICATION

Permit No.: A029-130736  
County: Hillsborough  
Expiration Date: 7-15-92  
Project: 22 Ton Pb Keel Cast  
Kettle w/Baghouse

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of a 22 ton lead melting kettle fired by natural gas at a maximum heat input rate of 1.28 MMBtu/hr. Lead is manually loaded into the kettle and allowed to melt. The melted lead is then pumped into keel cast molds where it's allowed to cool. Emissions from the kettle are vented through a large hood covering the kettle to a 3500 ACFM Baghouse modeled after a Wheelabrator-Frye Dustube Collector Model 126. Emissions generated during the pouring of lead into molds are vented through a small portable hood to the baghouse.

Location: 1901 North 66th Street

UTM: 17-364.0E 3093.6N NEDS NO: 0057 Point ID: 05

Replaces Permit No.: A029-52355

PERMITTEE:  
Gulf Coast Lead  
Company, Inc.

Permit/Certification No.: A029-130736  
Project: 22 Ton Pb Keel Cast Kettle  
w/Baghouse

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate the enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.712(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by any order from the department.

PERMITTEE:  
Gulf Coast Lead  
Company, Inc.

Permit/Certification No.: A029-130736  
Project: 22 Ton Pb Keel Cast Kettle  
w/Baghouse

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as maybe required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purposes of;

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

(a) a description of and cause of non-compliance; and

(b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

PERMITTEE:  
Gulf Coast Lead  
Company, Inc.

Permit/Certification No.: AO29-130736  
Project: 22 Ton Pb Keel Cast Kettle  
w/Baghouse

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Certification of Compliance with State Water Quality Standards (Section 401. PL 92-500)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:  
Gulf Coast Lead  
Company, Inc.

Permit/Certification No.: AO29-130736  
Project: 22 Ton Pb Keel Cast Kettle  
w/Baghouse

14. (con't)

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. The maximum allowable emission from the melting kettle shall be:

<u>Pollutant</u>	<u>Emission Limitation</u>	<u>Regulation</u>
Particulates	0.20 lb/hr.	As requested by the Permittee to exempt the facility from RACT.
Lead	0.08 lb/hr.	Federal Lead Implementation Plan
Opacity	5%	Federal Lead Implementation Plan

2. The hours of operation of this source shall not exceed 2400 per year.

PERMITTEE:  
Gulf Coast Lead  
Company, Inc.

Permit/Certification No.: AO29-130736  
Project: 22 Ton Pb Keel Cast Kettle  
w/Baghouse

SPECIFIC CONDITIONS (con't):

3. Test the emissions for the following pollutant(s) at intervals of 12 months from the date March 19, 1987 and submit 2 copies of test data to the Air Section of the Environmental Protection Commission of Hillsborough County Office within forty five days of such testing (Section 17-2.700 (2), Florida Administrative Code (F.A.C.)).

(X) Particulates	( ) Sulfur Oxides
(X) Lead	( ) Nitrogen Oxides
(X) Opacity	( ) Hydrocarbons
	( ) Total Reduced Sulfur

\*Fuel analysis may be submitted for required sulfur dioxide emission test.

4. Testing of emissions must be accomplished while approximately 22 tons of lead are being melted. Failure to submit the input rates or operation at conditions which do not reflect actual operating conditions may invalidate the data (Section 403.161(1)(c), Florida Statutes).

5. Compliance with the emission limitations of Specific Condition No. 1 shall be determined using EPA Methods 1,2,3,4,9 and 12, contained in 40 CFR 60, Appendix A and adopted by reference in Section 17-2.700, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Section 17-2.700, F.A.C. and 40 CFR 60, Appendix A.

6. Any changes to the physical stack characteristics or flow parameters listed in the application which would affect the maximum modeled impact of 0.118 mg of lead per cubic meter shall be considered a modification of this permit. As a modification, the Permittee would be required to submit an application for prior approval.

7. The Environmental Protection Commission of Hillsborough County shall be notified in writing 15 days prior to compliance testing.

8. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as per Section 17-4.14, F.A.C.

- (A) Annual amount of materials and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Any changes in the information contained in the permit application.

Two copies of all reports shall be submitted only to the Environmental Protection Commission of Hillsborough County.

PERMITTEE:  
Gulf Coast Lead  
Company, Inc.

Permit/Certification No.: A029-130736  
Project: 22 Ton Pb Keel Cast Kettle  
w/Baghouse

SPECIFIC CONDITIONS (con't):

9. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Section 17-2.610 (3), F.A.C.. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.

10. Four applications to renew this operating permit shall be submitted to the Environmental Protection Commission of Hillsborough County 60 days prior to expiration date of this permit.

Issued this 17 day of July  
1987.

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL REGULATION

  
Richard D. Garrity, Ph.D.  
District Manager



# ATTACHMENT D

STATE OF FLORIDA

## DEPARTMENT OF ENVIRONMENTAL REGULATION

### SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610



BOB GRAHAM  
GOVERNOR

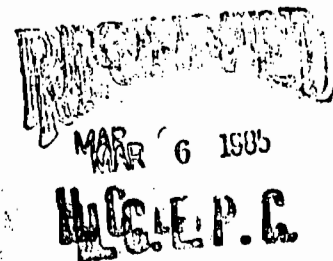
VICTORIA J. TSCHINKEL  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

March 4, 1985

Mr. Willis M. Kitchen, Vice President  
Gulf Coast Lead Company, Inc.  
1901 North 66th Street  
Tampa, FL 33619

RE: Hillsborough County - AP  
Gulf Coast Lead Company, Inc.  
A029-95365



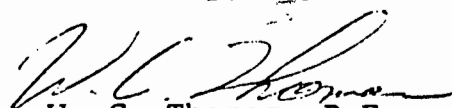
Dear Mr. Kitchen:

In response to a letter from Ms. Joyce Morales-Caramella dated February 7, 1985 requesting a correction on the page of permit number A029-95365, the Department hereby amends page one as specified on the attached.

This letter and the amended page one should be attached to and becomes a part of said permit. Gulf Coast Lead's efforts to clear up any of the confusion in regard to the old permits has been appreciated.

If we can be of further assistance, please feel free to give us a call.

Sincerely,

  
W. C. Thomas, P.E.  
District Air Engineer

JWE/js

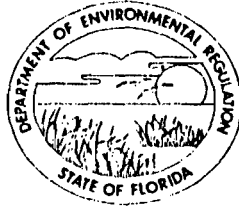
Attachment

cc: HCEPC ✓

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

PERMITTEE:

Mr. Willis M. Kitchen  
Vice President  
Gulf Coast Lead Company, Inc.  
1901 North 66th Street  
Tampa, FL 33619

PERMIT/CERTIFICATION

Permit No.: A029-95365  
County: Hillsborough  
Expiration Date: 1/9/90  
Project: Three Refining  
Kettles

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of three gas-fired 52 ton refining kettles. Kettle #3 receives blast lead and is charged with sulfur, sawdust,  $\text{NaNO}_3$  or red phosphorous to remove the antimony to form soft lead. Kettle #2 receives soft lead from Kettle #3 and is charged with calcium to form calcium lead. Kettle #1 receives blast lead and is charged with antimony to form hard lead. All three kettles are ducted to two baghouses (in parallel) and exhausted out a single stack. Only two kettles operate at the same time.

Location: 1901 North 66th Street, Tampa, Hillsborough County

UTM: 17-364.0E 3093.6N NEDS NO: 0057 Point ID: 02

Replaces Permit No.: A029-40712 (Kettle #2) & A029-27109 (Kettle #1)

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

January 28, 1985

Mr. Willis M. Kitchen  
Vice President  
Gulf Coast Lead Company, Inc  
1901 North 66th Street  
Tampa, FL 33619

RECEIVED

JAN 30 1985

W.C.E.P.A.

Dear Mr. Kitchen:

Re: Hillsborough County - AP  
Three Refining Kettles

Attached is Permit No. A029-95365. Should you object to the issuance of this permit or the specific conditions of the permit, you have a right to petition for a hearing pursuant to the provisions of Section 120.57, Florida Statutes. The petition must be filed within fourteen (14) days from receipt of this letter. The petition must comply with the requirements of Section 17-103.155 and Rule 28-5.201, Florida Administrative Code, (copies attached) and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32301. Petitions which are not filed in accordance with the above provisions are subject to dismissal by the Department.

In the event a formal hearing is conducted pursuant to Section 120.57(1), all parties shall have an opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witnesses and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exceptions to any order or hearing officer's recommended order, and to be represented by counsel.

If an informal hearing is requested, the agency, in accordance with its rules of procedure, will provide affected persons or parties or their counsel an opportunity, at a convenient time and

Mr. Willis M. Kitchen  
Tampa, FL

Page Two

place, to present to the agency or hearing officer, written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), Florida Statutes.

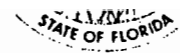
Sincerely,

  
Richard D. Garrity, Ph.D.  
District Manager

JWE/scm

Attachment: as stated

cc: HCEPC  
Robert E. Wallace, III, Jr.



BEST AVAILABLE COPY

PERMITTEE:  
Mr. Willis M. Kitchen  
Vice President  
Gulf Coast Lead Company, Inc.  
1901 North 66th Street  
Tampa, FL 33619

PERMIT/CERTIFICATION  
Permit No.: A029-95365  
County: Hillsborough  
Expiration Date: 1/9/90  
Project: Three Refining  
Kettles

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of three gas-fired 52 ton refining kettles. Kettle #1 receives blast lead and is charged with sulfur, sawdust, NaNO<sub>3</sub> or red phosphorous to remove the antimony to form soft lead. Kettle #2 receives soft lead from kettle #1 and is charged with calcium to form calcium lead. Kettle #3 receives blast lead and is charged with antimony to form hard lead. All three kettles are ducted to a single baghouse. Only two kettles operate at the same time.

Location: 1901 North 66th Street, Tampa, Hillsborough County

UTM: 17-364.0E      3093.6N      NEDS NO: 0057      Point ID: 02

Replaces Permit No.: A029-40712 (Kettle #1) & A029-27109 (Kettles #2 and #3.)

PERMITTEE:  
Gulf Coast Lead Company,  
Inc.

Permit/Certification No.: A029-95365  
Project: Three Refining Kettles

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate the enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.712(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by any order from the department.

to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as maybe required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purposes of;

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

(a) a description of and cause of non-compliance; and

(b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

PERMITTEE:

Permit/Certification No.: A029-95365

Gulf Coast Lead Company,  
Inc.

Project: Three Refining Kettles

## 14. (con't)

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

## SPECIFIC CONDITIONS:

1. Test the emissions for the following pollutant(s) at intervals of 12 months from January 18, 1984 and submit a copy of test data to the Air Section of the Hillsborough County Environmental Protection Commission Office within forty five days of such testing (Section 17-2.700 (2), Florida Administrative Code (F.A.C.)).

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Particulates | <input type="checkbox"/> Sulfur Oxides        |
| <input type="checkbox"/> Fluorides               | <input type="checkbox"/> Nitrogen Oxides      |
| <input checked="" type="checkbox"/> Opacity      | <input type="checkbox"/> Hydrocarbons         |
| <input checked="" type="checkbox"/> Lead         | <input type="checkbox"/> Total Reduced Sulfur |

\*Fuel analysis may be submitted for required sulfur dioxide emission test.



PERMITTEE:  
Gulf Coast Lead Company,  
Inc.

Permit/Certification No.: A029-95365  
Project: Three Refining Kettles

2. Maximum allowable emission from the baghouse shall be:

<u>Pollutant</u>	<u>Emissions Limitation</u>	<u>Regulation</u>
Particulates	1.0 #/hour	As requested by the permittee to exempt the facility from particulate RACT
Opacity	5%	As requested by the permittee to exempt the facility from particulate RACT
Lead	0.4 #/hour	Lead SIP

3. Compliance with the emission limitations of Specific Condition No. 2 shall be determined using EPA Methods 1, 2, 3, 4, 9 and 12 contained in 40 CFR 60, Appendix A and adopted by reference in Section 17-2.700, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Section 17-2.700, F.A.C. and 40 CFR 60, Appendix A.

4. The visible emission test shall be 30 minutes in duration and it shall be concurrent with one of the Method #12 runs.

5. Testing shall be conducted while 2 of the kettles are in operation and they are to be identified in the test report. The kettles operating during the test shall be alternated from year to year so that over a 2 year period all 3 will have been tested.

6. The hours of operation of this source shall not exceed 4368 per year.

7. The periodic replacement of a kettle liner due to the abuse of the soft lead refining process will be considered maintenance and will not require a construction application.

8. Any changes to the physical stack characteristics or flow parameters listed in this application which could affect the maximum modeled impact of 0.294 ug of Pb per cubic meter, shall be considered a modification of this permit. As a modification, the permittee would be required to submit an application for prior approval.

9. The Hillsborough County Environmental Protection Commission shall be notified in writing 15 days in advance of any compliance test to be conducted on this source.

PERMITTEE: Permit/Certification No.: A029-95365  
Gulf Coast Lead Company, Project: Three Refining Kettles  
Inc.

SPECIFIC CONDITIONS (con't):

10. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as per Section 17-4.14, F.A.C.

- (A) Annual amount of materials and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Any changes in the information contained in the permit application.

Duplicate copies of all reports shall be submitted to the Hillsborough County Environmental Protection Commission.

11. An application to renew this operating permit shall be submitted to the Department 60 days prior to the expiration date of this permit.

Issued July 4, 1982.

Modified this 28 day of January,  
1985.

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL REGULATION



Richard D. Garrity, Ph.D.  
District Manager

ATTACHMENT E

File GLL mt. JC 5/26/89  
Folder

COMMISSION  
PHYLLIS BUSANSKY  
RODNEY COLSON  
PAM IORIO  
RUBIN E. PADGETT  
JAN KAMINIS PLATT  
HAVEN POE  
JAMES D. SELVEY



ROGER P. STEWART  
DIRECTOR

1900 - 9th AVE  
TAMPA, FLORIDA 33605

TELEPHONE (813) 272-5960

MEMORANDUM

DATE: 5/23/89

TO: Jerry Campbell thru Tony D'Aquila

FROM: Bill Schroeder

SUBJECT: UCETA Ambient SO2 Monitor

In conjunction with the now-closed enforcement case involving Gulf Coast Lead, the UCETA monitor has been in place since November 1988. There have been no violations of the NAAQS for SO2, although readings above 100 PPB were noted on the following dates:

<u>DATE</u>	<u>TIME</u>	<u>PPB SO2</u>
12/6/88	800	165
12/7/88	600	125
"	700	120
12/12/88	1400	100
"	2000	125
12/24/88	1500	205
1/5/89	1000	145
1/18/89	1000	120
"	1500	100
4/13/89	500	115
"	600	105
4/29/89	1200	125
"	1300	135

Since no violations were noted, and since seasonal winds do not favor the location of the monitor in relation to the location of Gulf Coast Lead, I would suggest that we discontinue use of the monitor at this time.

COMMISSION  
RODNEY COLSON  
PAM IORIO  
RUBIN E. PADGETT  
JAN KAMINIS PLATT  
HAVEN POE  
JAMES D. SELVEY  
PICKENS C. TALLEY II



ROGER P. STEWART  
DIRECTOR  
1900 - 9th AVE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960

May 5, 1988

Mr. Willis Kitchen  
Vice President  
Gulf Coast Lead Company  
1901 North 66th Street  
Tampa, FL 33619

Re: Case No. 61024WES05701

Dear Mr. Kitchen:

The Commission has reviewed your response to the referenced violation and has found your response to be satisfactory. With receipt of a check from Gulf Coast Lead as required by item five [5] of the Consent Agreement, all requirements of the Agreement have been fulfilled. Please be advised that the Environmental Protection Commission of Hillsborough County will continue to monitor the ambient sulfur dioxide concentrations adjacent to your facility.

By receipt of this notice, be informed that the enforcement case noted above has been closed. Be advised that this notice in no way absolves your firm from the responsibility to observe all applicable regulations.

Thank you for your cooperation.

Sincerely,

Iwan Choronenko  
Deputy Director for Air Programs  
and Administration

KS/ks

cc Sara Fotopulos, EPC  
Bill Thomas, FDER  
Tom Gucciardo, FDER

CONSENT AGREEMENT

Whereas, Gulf Coast Lead operates a permitted facility at 1901 North 66th Street in Hillsborough County which operations involve a lead blast furnace, and

Whereas, the Commission staff has determined that emissions from said lead blast furnace are in compliance with the standards listed in their DER operating permit #A029-95366 [the Permit], and

Whereas, the Commission staff attributes complaints of odor and fumes received in 1986 and 1987 to some of the emissions from said facility, and

Whereas, exceedances of the ambient sulfur dioxide standards have been recorded in the vicinity of the facility, and

Whereas, Gulf Coast Lead proposes to spend approximately one hundred thousand dollars [\$100,000] to construct a 150 foot exhaust stack at the facility to alleviate the problem,

THEREFORE, the Gulf Coast Lead Company and the Director of the Environmental Protection Commission, in consideration of the following mutual covenants, hereby agree:

(1) Gulf Coast Lead agrees to construct, according to "Schedule A" here attached and incorporated, a new stack one hundred and fifty [150] feet tall to exhaust emissions from its furnaces covered under the Permit; and

(2) Gulf Coast Lead agrees to keep the Director advised of its progress in following the requirements of "Schedule A"; and

(3) The Director agrees to use a continuous analyzer in the adjacent rail yard for at least two months to monitor the effectiveness of the new stack in reducing ambient sulfur dioxide concentrations to comply with the Commission's three [3] hour and twenty-four [24] hour ambient standards; and

(4) The Director agrees to periodically allow Gulf Coast Lead personnel to observe the routine operation and maintenance of the analyzer; and

(5) Gulf Coast Lead agrees to pay the Commission, within ten [10] days of completion of the above monitoring, one thousand six hundred and fifty [\$1650] dollars to reimburse the costs of maintaining a continuous monitor; and

(6) Gulf Coast Lead agrees to pay the Commission one thousand one hundred [\$1100] dollars within fifteen [15] days of this agreement, to reimburse it for costs expended in investigating this matter.

(7) No admission of wrongdoing is expressed or implied by the Gulf Coast Lead Company by the signing of this agreement.

Gulf Coast Lead Company

Willis M. Kitchen  
by Willis Kitchen  
Vice President

EPC Director  
Tom Cardinale  
for  
-----  
Roger P. Stewart

Effective date 7/22/87



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

File Gulf Coast JE 6/25/87  
Lead  
Fol  


# Interoffice Memorandum

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

TO: Jerry Campbell  
FROM: Max Linn *ML*  
DATE: June 25, 1987  
SUBJECT: Gulf Coast Lead Modeling Project

RECEIVED

JUN 29 1987

E.P.C. of H.C.

I have reviewed the modeling results for the Gulf Coast Lead increased stack height proposal and, in general, found them to be adequate. To provide the Department even greater assurance that the SO<sub>2</sub> exceedance problem will be resolved, I performed an additional modeling run using 1970 data. I have enclosed a copy of the modeling results for your inspection. These results combined with KBN's results confirm that the raising of the Gulf Coast Lead stack to 150 feet should result in compliance with the short-term SO<sub>2</sub> standards.

If I can be of any further assistance on this matter don't hesitate to contact me.

ML/ss

cc: Bill Thomas, Tampa

Enclosure



MIRZA,  
FYI  
Jimp,  
1/4/91

SECTION 5  
CONCLUSIONS

From the data obtained and the observations made during the inspection, Gulf Coast was in compliance with all the provisions of the current blast furnace and agglomerating furnace operating permit (A029-173310) with one exception. During the inspection, a temporary release was observed at the blast furnace slag tap exhibiting an opacity of 80 percent. Pursuant to specific condition Nos. 7 and 10 of this permit, any instantaneous opacity observation at this source in excess of 5 percent constitutes a violation.

It should be noted, however, that neither the present operating permit (A029-173310) or the previous operating permit (A029-95366) included opacity limits for any emission sources other than the blast furnace and agglomerating furnace operations although the three 50-ton kettles are subject to the provisions of 40 CFR 60, Subpart L and the lead FIP.

The following are conclusions concerning the permitting of this source and the possible applicability of Federal regulatory programs:

1. The 60-ton furnace (new blast furnace) built without a construction permit (1983/84) constituted an approximate 50 percent net emissions increase in SO<sub>2</sub> and CO. ~~AFTER THE FACT CONSTRUCTION PERMIT IN-HOUSE.~~
2. The net emissions increase, in both pollutants, was greater than the respective significance levels.
3. PSD review should have been triggered for the construction of the new blast furnace.
4. Because the source has historically burned some plastic/rubber in the blast furnaces, the new furnace increased the net VOC emissions.
5. From recent EPA Method 25 stack test data at a similar facility, nonattainment NSR for ozone might have been triggered with the construction of the new blast furnace.

6. CO was never listed as a pollutant in either the permit applications or in the operating permits for the blast furnaces.
7. Only one of the three 50-ton refining kettles (No. 2) was ever permitted as subject to NSPS and is the only kettle presently permitted at the NSPS opacity limits.
8. Stack lead emission limits for the blast furnace and agglomerating furnace are permitted in accordance with the lead FIP, and particulate matter emission limits are at least as stringent as the NSPS limits.
9. Although the FIP limits mass lead emissions from the 50-ton refining kettles, the present operating permit incorporates no such limits or visible emission limits.
10. SO<sub>2</sub> emissions from the 60 ton blast furnace are presently limited to no more than 384.2 lb/h. This figure was calculated as the 12/83 baseline emission rate (374 lb/h) plus 40 tons/yr. Repermitting (apparently for PSD purposes) is mandated if the 384.2 lb/h limit is exceeded. This does not account for the net emissions increase due to the construction of the new furnace, which should have triggered PSD at that time.
11. According to EPA Region IV Air Enforcement Branch, the agglomerating furnace is synonymous with a reverberatory furnace and is thus subject to NSPS although not permitted as such by EPC.
12. No ambient lead air quality data are available in close proximity to this source. EPC is presently arranging for external power to place a hi-vol lead sampler near the site.
13. Since the Florida SIP for lead was disapproved, as noted earlier, a FIP was promulgated, thus no recommendation can be made regarding a SIP in this case.
14. The 30 second 80 percent opacity exceedance observed at the blast furnace slag tap constituted a violation of the FIP and operating permit No. A029-173310.



# GULF COAST RECYCLING, INC.

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

November 7, 1990

RECEIVED

NOV 13 1990

DER-BAQM

Mr. C. H. Fancy, P.E., Chief  
Bureau of Air Regulations  
Twin Towers Office Bldg.  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Hillsborough County - A.P.  
Gulf Coast Recycling, Inc.  
Refining Kettle No. 3

Dear Mr. Fancy:

Gulf Coast Recycling, Inc. has prepared the following responses to the letter of incompleteness for permit application No. AC 29-184883. The responses are in the order of the information requested in your letter dated August 29, 1990.

- 1.) The refining kettles will, at a maximum, be operated two (2) at a time. Therefore, a combination of two (2) of the three kettles in the refining area, operating simultaneously, will operate 12 hours/day, 7 days/week, 52 weeks/year; for a total of 4,368 hours/year.
- 2.) The use of saw dust in the refining process is still practiced. However, the quantity used is virtually insignificant. Two shovels full of saw dust, approximately two pounds, is sometimes used in the refining process to aide in the removal of impurities.
- 3.) The typical additives and quantities for each type of lead produced in the refining area are as follows and the maximum capacity of each kettle is 104,000 tons:

Soft Lead Charge

	<u>Losses</u>
102,580 Lbs Blast Lead	12 Lbs PM Emitted (permit max)
100 Lbs Caustic	4.8 Lbs Pb Emitted (permit max)
100 Lbs Sulfur	~3,983,2 Lbs Dross
20 Lbs Red Phosphorus	
1,000 Lbs Sodium Nitrate	
50 Lbs Aluminum	
100 Lbs Caustic	
50 Lbs Sodium Nitrate	
-----	-----
104,000 Lbs	~4,000 Lbs

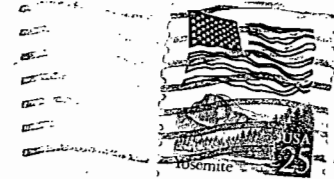
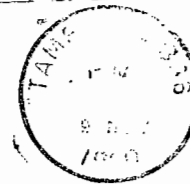
100,000

Lbs Soft Lead Produced

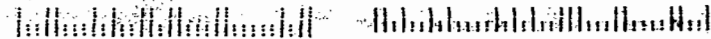


**Gulf Coast Recycling, Inc.**

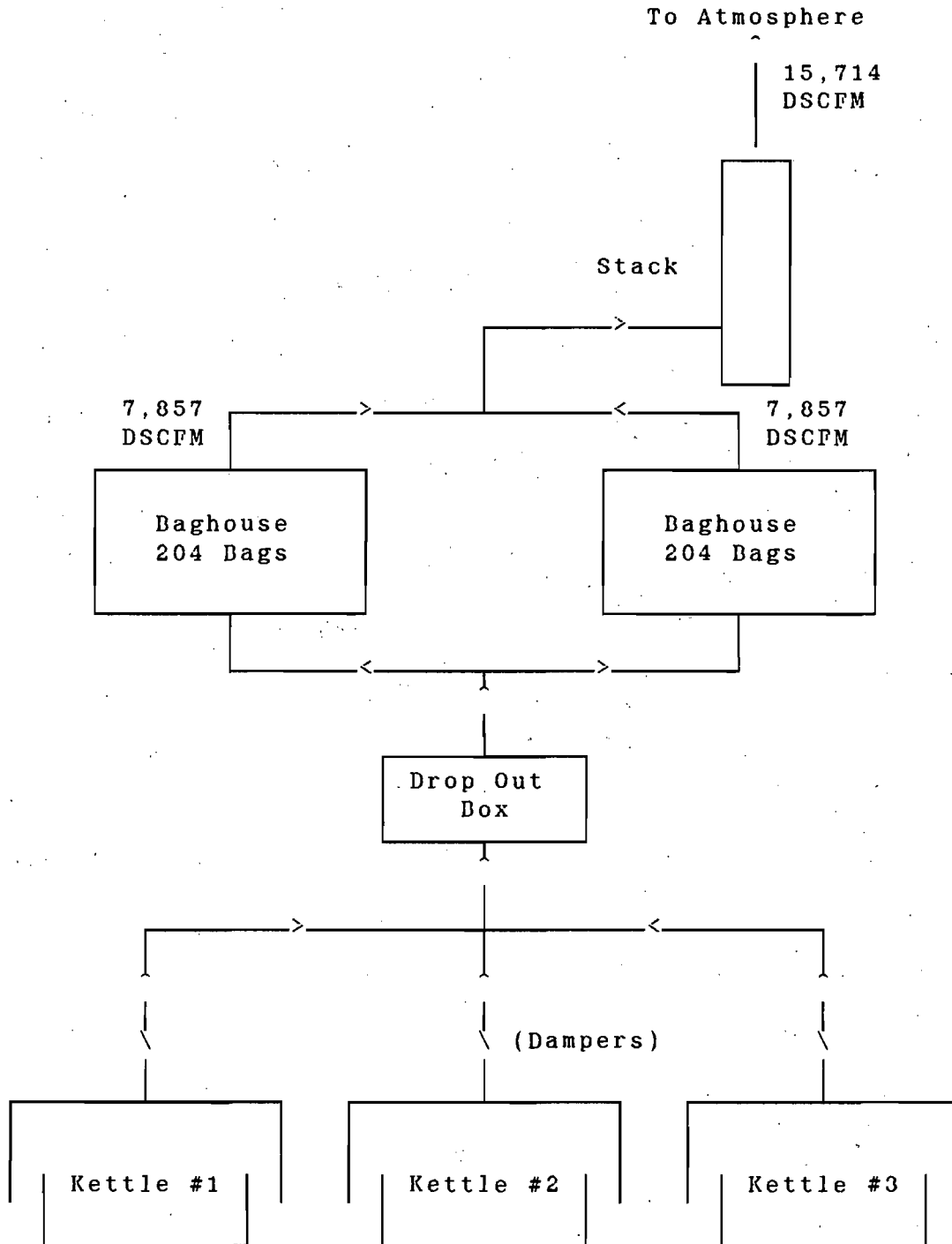
1901 North 66th St.  
Tampa, Florida 33619



Mr. C. H. Fancy, P.E., Chief  
Bureau of Air Regulations  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400



Gulf Coast Recycling, Inc.  
Refining Operation Emission Control Flow Diagram



Calcium Lead Charge

	<u>Losses</u>
103,835 Lbs Soft Lead	12 Lbs PM Emitted (permit max)
125 Lbs Calcium	4.8 Lbs Pb Emitted (permit max)
40 Lbs Aluminum	~1,983.2 Lbs Dross
-----	-----
104,000 Lbs	~ 2,000 Lbs
102,000	Lbs Calcium Lead Produced

Hard Lead Charge

	<u>Losses</u>
102,005 Lbs Blast Lead	12 Lbs PM Emitted (permit max)
100 Lbs Caustic	4.8 Lbs Pb Emitted (permit max)
100 Lbs Sulfur	~3,983.2 Lbs Dross
1,500 Lbs Antimony	
150 Lbs Tin	
110 Lbs Arsenic	
12 Lbs Red Phosphorus	
23 Lbs Selenium	
-----	-----
104,000 Lbs	~4,000 Lbs
100,000	Lbs Hard Lead Produced

4.) The total filtering area of the two baghouses is 5,471.3 square feet; with 2,735.6 square feet per baghouse. There are 204 bags in each baghouse. The volumetric air flow rate in the refining area emission control system is depicted in attachment A.

5.) The process input rate in the refining area during the February 13, 1990 stack test was as follows:

<u>Kettle No. 1</u>	<u>Kettle No. 3</u>
100,234 Lbs Blast Lead	99,405 Lbs Blast Lead
1,760 Lbs Antimony	50 Lbs Aluminum
140 Lbs Tin	1,000 Lbs Sodium Nitrate
110 Lbs Arsenic	100 Lbs Sulfur
200 Lbs Caustic	300 Lbs Caustic
-----	42 Lbs Red Phosphorus
102,444 Lbs Total	-----
	100,897 Lbs Total
93,744 Lbs Hard Lead	84,357 Lbs Soft Lead

Apparently the kettles were not emptied completely of refined lead on the date of the stack test.

During the time that this stack test was conducted the emissions totaled approximately 10.6 Lbs.

- 6.) There will be no credible increase in lead or particulate emissions since the operating conditions will be the same as it has been in the past. There will still be a maximum of two kettles in operation during the refining process.

Should you have any questions concerning this response, please contact me at (813) 626-6151.

Sincerely,

GULF COAST RECYCLING, INC.

*George Townsend*

George Townsend  
Regulatory Affairs Director

cc: Lonnie Payne  
Willis M. Kitchen  
Joyce M. Caramella  
Darrel Graziani, HCEPC

*M. Buig*  
*C. Holladay*  
File:GTA007  
*B. Thomas, SW Dist.*  
*J. Glenn*

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)      2.  Restricted Delivery (Extra charge)

<p>3. Article Addressed to:  <i>Mr. Willis M. Kitchen, Pres          Gulf Coast Recycling, Inc          1901 N. 66th St.          Tampa, Fl 33619</i></p>	<p>4. Article Number  <i>P 256 396 179</i></p> <p>Type of Service:  <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</p> <p>Always obtain signature of addressee or agent and <u>DATE DELIVERED.</u></p>
<p>5. Signature - Addressee  <i>X [Signature]</i></p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature - Agent  <i>X</i></p>	
<p>7. Date of Delivery  <i>11/15/80</i></p>	

PS Form 3811, Apr. 1989

\*U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT

P 256 396 179

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

\*U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

Sent to	<i>Willis Kitchen</i>
Street and No.	<i>Gulf Coast Recy.</i>
P.O., State and ZIP Code	<i>1901 N. 66th St.</i>
Postage	<i>Tampa, Fl</i>
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	<i>AC 29-184883 11-9-90</i>





# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

November 8, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Hillsborough County - A.P.  
Gulf Coast Recycling, Inc.  
Refining Kettle No. 3  
(AC 29-184883)

Dear Mr. Kitchen:

On August 29, 1990, the Bureau of Air Regulation mailed you a letter (copy attached) requesting more information on the above referenced project. To this date, we have not received a response to our letter.

Accordingly, please submit a response to our letter within 30 days of receipt of this letter, or the Bureau will recommend denial of your request for the permit.

Your cooperation in this matter is appreciated.

Sincerely,

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

CF/MB/plm

c: R. E. Wallace, III, P.E.  
Bill Thomas, Tampa DER  
Iwan Choronenko, HCEPC



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

August 29, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Hillsborough County - A.P.  
Gulf Coast Recycling, Inc.  
Refining Kettle No. 3  
(AC 29-184883)

Dear Mr. Kitchen:

The Department has received an after-the-fact construction permit application for the above referenced project on August 3, 1990, and deemed it incomplete. Please provide the following information:

1. In Section II, Item E, the total annual hours of operation for the refining kettle area (which includes Kettle Nos. 1, 2 and 3) requested is 4368. But according to the operation permit No. AO 29-173309, Specific Condition No. 4, Kettle No. 1 shall not exceed 3744 hrs/yr and Kettle No. 2 shall not exceed 2400 hrs/yr and the hours in combination shall not exceed 4368 hrs/yr. How many hrs/yr do you plan to operate the Kettle No. 3 individually or in combination with Kettle No. 1 and No. 2?
2. According to operation permit No. AO 29-95365, Kettle No. 3 was permitted to receive sawdust along with other raw materials in its charge. Is sawdust still used as a raw material?
3. Section III, items A, B and C. According to Attachment 1, the list of additives amounts to 3580 lbs and the process input rate is 104,000 lbs/charge. Provide a detailed breakdown of all raw materials included in each charge. Also account for the 4000 lbs of materials lost/emitted during each charge.
4. Section III, item D. What is the total filtering area for each of the two baghouses? How many bags does each baghouse

Mr. Willis M. Kitchen  
August 29, 1990  
Page 2

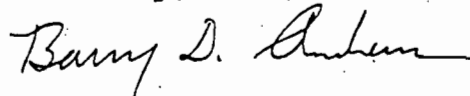
contain? Please submit a process flow diagram showing the volumetric flow rates (ACFM). If these two baghouses are in parallel, what percentage of the air flow passes through each baghouse?

5. In attachment 3, the actual particulate and lead emissions were 0.882 and 0.003 lbs/hr based on the stack test conducted on February 13, 1990. What was the process input rate during this stack test. Which kettles were in operation during this stack test? How much air flow (ACFM) was passing through each baghouse during this stack test? What was the opacity during this stack test?
6. What will be the contemporaneous emissions change for lead for this facility?

Processing of this application will continue as soon as the above referenced information has been received.

If you have any questions, please contact Mr. Mirza P. Baig of my staff at (904)488-1344.

Sincerely,



C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CF/MB/plm

c: R. E. Wallace, III, P.E.  
Bill Thomas, Tampa DER  
Ivan Choronenko, HCEPC

**SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.  
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1.  Show to whom delivered, date, and addressee's address. (Extra charge)      2.  Restricted Delivery (Extra charge)

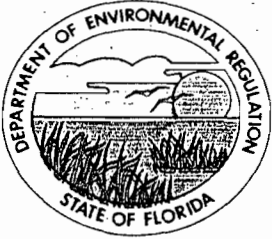
3. Article Addressed to: <i>Willis M. Kitchen, Pres.          Gulf Coast Recycling, Inc          1901 N. 66th St.          Tampa, FL 33619</i>	4. Article Number <i>P 280 742 415</i> Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Addressee <input checked="" type="checkbox"/>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent <input checked="" type="checkbox"/> <i>Home Philips</i>	

P 280 742 415  
**RECEIPT FOR CERTIFIED MAIL**  
 NO INSURANCE COVERAGE PROVIDED  
 NOT FOR INTERNATIONAL MAIL  
 (See Reverse)

\* U.S.G.P.C. 1989-234-555

Sent to	<i>Willis Kitchen</i>
Street and No.	<i>Gulf Coast Recycling</i>
P.O. State and ZIP Code	<i>1901 N 66th St Tampa, FL 33619</i>
Postage	
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	<i>8-31-90</i>
	<i>AC 99-184883</i>

PS Form 3800, June 1985



# Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

August 29, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Hillsborough County - A.P.  
Gulf Coast Recycling, Inc.  
Refining Kettle No. 3  
(AC 29-184883)

Dear Mr. Kitchen:

The Department has received an after-the-fact construction permit application for the above referenced project on August 3, 1990, and deemed it incomplete. Please provide the following information:

1. In Section II, Item E, the total annual hours of operation for the refining kettle area (which includes Kettle Nos. 1, 2 and 3) requested is 4368. But according to the operation permit No. AO 29-173309, Specific Condition No. 4, Kettle No. 1 shall not exceed 3744 hrs/yr and Kettle No. 2 shall not exceed 2400 hrs/yr and the hours in combination shall not exceed 4368 hrs/yr. How many hrs/yr do you plan to operate the Kettle No. 3 individually or in combination with Kettle No. 1 and No. 2?
2. According to operation permit No. AO 29-95365, Kettle No. 3 was permitted to receive sawdust along with other raw materials in its charge. Is sawdust still used as a raw material?
3. Section III, items A, B and C. According to Attachment 1, the list of additives amounts to 3580 lbs and the process input rate is 104,000 lbs/charge. Provide a detailed breakdown of all raw materials included in each charge. Also account for the 4000 lbs of materials lost/emitted during each charge.
4. Section III, item D. What is the total filtering area for each of the two baghouses? How many bags does each baghouse

Mr. Willis M. Kitchen  
August 29, 1990  
Page 2

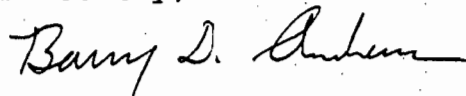
contain? Please submit a process flow diagram showing the volumetric flow rates (ACFM). If these two baghouses are in parallel, what percentage of the air flow passes through each baghouse?

5. In attachment 3, the actual particulate and lead emissions were 0.882 and 0.003 lbs/hr based on the stack test conducted on February 13, 1990. What was the process input rate during this stack test. Which kettles were in operation during this stack test? How much air flow (ACFM) was passing through each baghouse during this stack test? What was the opacity during this stack test?
6. What will be the contemporaneous emissions change for lead for this facility?

Processing of this application will continue as soon as the above referenced information has been received.

If you have any questions, please contact Mr. Mirza P. Baig of my staff at (904)488-1344.

Sincerely,



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

CF/MB/plm

c: R. E. Wallace, III, P.E.  
Bill Thomas, Tampa DER  
Ivan Choronenko, HCEPC

COMMISSION  
PHYLLIS BUSANSKY  
RODNEY COLSON  
PAM IORIO  
RUBIN E. PADGETT  
JAN KAMINIS PLATT  
HAVEN POE  
JAMES D. SELVEY



ROGER P. STEWART  
DIRECTOR

1900 - 9th AVE  
TAMPA, FLORIDA 33605

TELEPHONE (813) 272-5960

MEMORANDUM

Date August 7, 1990

**RECEIVED**  
AUG 23 1990  
DEN. ROOM

To Jim McDonald THRU: J. Harry Kerns, P.E.

From Darrel Graziano THRU: Jerry Campbell, P.E.

Subject: Gulf Coast Lead - Refining Kettles

Attached is permit no. AO29-173309 for the operation of the No. 1 and No. 2 refining kettles only.

The current waiver is due to expire on August 31, 1990 and I have been told that GCL will submit a new waiver to allow enough time for Tallahassee to issue the construction permit for the No. 3 kettle. However should they fail to submit the waiver I recommend that you issue the attached permit.

In reviewing this permit please be advised of the following differences:

1. Hours of operation of each kettle are limited to those contained in the original construction permits.
2. Incorporation of the Federal Implementation Plan for lead.
3. Daily record keeping.

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

Thank you.

bb



# Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION  
NOTICE OF PERMIT ISSUANCE

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

DER File No.: A029-173309  
County: Hillsborough

Enclosed is Permit Number A029-173309 to operate two (2) 50 ton refining kettles, issued pursuant to Section 403.087, Florida Statutes.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee 32399-2400, within fourteen (14) days of receipt of this permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by petitioner, if any;



(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends required reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice, in the Office of General Counsel at the above address of the Department. Failure to petition within the allotted time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Gulf Coast Lead Company, Inc.  
Tampa, FL 33619

Page Three

Executed in Tampa, Florida

Sincerely,

J. Harry Kerns, P.E.  
District Air Engineer

JHK/DJG/bb

Attachment:

cc: Environmental Protection Commission  
of Hillsborough County  
Robert Wallace, III, P.E.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on \_\_\_\_\_ to the listed persons.

FILING AND ACKNOWLEDGEMENT  
FILED, on this date, pursuant to  
Section 120.52(10), Florida Statutes,  
with the designated Department Clerk,  
receipt of which is hereby acknowledged.

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date



# Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

## PERMITTEE:

Gulf Coast Lead Company, Inc.  
1901 N. 66th Street  
Tampa, FL 33619

## PERMIT/CERTIFICATION

Permit No: AO29-173309  
County: Hillsborough  
Expiration Date: 08/15/95  
Project: Nos. 1 and 2 Refining  
Kettles

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of two (2) gas-fired 50 ton refining kettles each with a maximum heat input of 1.28 mmBtu/hr. The No. 1 kettle (AC29-12606) is used to make hard lead by combining blast lead and proportionate amounts of antimony and tin. The No. 2 kettle (AC29-31078) is used to make calcium lead by combining soft lead with calcium. Emissions of particulate matter and lead generated by the refining kettles are controlled by a two (2) module baghouse fabricated by Gulf Coast Lead Company. Both kettles are subject to the New Source Performance Standards of 40 CFR 60, Subpart L.

Location: 1901 N. 66th Street, Tampa

UTM: 17-364.0 E 3093.6 N NEDS NO: 0057 Point ID: 02

Replaces Permit No.: AO29-95365

PERMITTEE:  
Gulf Coast Lead Company,  
Inc.

PERMIT/CERTIFICATION NO.: AO29-173309  
PROJECT: Nos. 1 and 2 Refining Kettles

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.
2. This permit authorizes the operation of refining kettles No. 1 and No. 2 only. This permit may be amended at a later date incorporating kettle No. 3 after a valid Department construction permit has been issued.
3. Pursuant to Rule 17-2.650(2)(b)1., F.A.C., this facility qualifies for an exemption of the Reasonably Available Control Technology (RACT) requirements since, at the request of the permittee, the total allowable emissions of the facility shall not exceed 4.4 pounds per hour and 14.9 tons per year.
4. Pursuant to the construction permits, the hours of operation of kettle No. 1 shall not exceed 3744 hours per year and kettle No. 2 shall not exceed 2400. These hours in combination shall not exceed 4368 hours per year to insure compliance with Specific Condition No. 3.
5. In order to insure compliance with Specific Condition No. 3, the maximum allowable particulate matter emissions from the baghouse controlling the sources authorized to operate under this permit shall be:

<u>Source</u>	<u>Emission Limitations</u>
50 Ton Refining Kettles (2)	1.0 lbs./hr.

6. Pursuant to 40 CFR 52.535(c)(1)(i), the maximum allowable lead emissions from the sources authorized to operate under this permit shall be:

<u>Source</u>	<u>Emissions Limitations</u>
50 Ton Refining Kettles 1 and 2	0.400 lbs./hr. (.874 TPY)

7. Pursuant to 40 CFR 52.535(c)(1)(ii), visible emissions from the refining kettles shall not exceed five (5) percent opacity during refining operation.
8. Pursuant to 40 CFR 52.535(c)(1)(iv), visible emissions from the baghouse shall not exceed five (5) percent opacity.
9. Pursuant to 40 CFR 52.535(c)(1)(vi), the permittee shall not operate more than two (2) refining kettles at a time.

PERMITTEE:

Gulf Coast Lead Company,  
Inc.

PERMIT/CERTIFICATION NO.: AO29-173309

PROJECT: Nos. 1 and 2 Refining Kettles

SPECIFIC CONDITIONS: (continued)

10. Test emissions from the refining kettle baghouse and the refining kettles for the following pollutants at intervals of twelve (12) months from February 14, 1990 and submit 2 copies of test data to the Environmental Protection Commission of Hillsborough County within forty-five (45) days of such testing pursuant to Section 17-2.700, F.A.C.:

(X) Particulates  
(X) Opacity

(X) Lead

11. Compliance with the emission limitations of Specific Conditions Nos. 5, 6, 7 and 8 shall be determined using EPA Methods 1, 2, 3, 4 and 12 contained in 40 CFR 60, Appendix A and adopted by reference in Section 17-2.700, F.A.C. In the case of the Method 9, Section 2.5 shall be excluded, pursuant to 40 CFR 52.535(b)(5).; thus waiving the six minute averaging period and establishing an instantaneous standard. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Section 17-2.700, F.A.C. and 40 CFR 60, Appendix A.

12. The visible emission tests on the refining kettle baghouse and the refining kettles shall be thirty (30) minutes in duration pursuant to Section 17-2.700, F.A.C., and shall be conducted concurrent with one of the Method 12 runs.

13. Testing of emissions must be accomplished while both kettles are operating. The actual charging rate and type of materials charged during the test shall be specified in each test result. Failure to include the actual process or production rate in the results may invalidate the test [Rule 17-4.070(3), F.A.C.].

14. Pursuant to 40 CFR 52.535(b)(2), non-process fugitive emissions (road dust, stockpiles, plant grounds, etc.) shall be minimized. Minimization efforts shall include such fugitive dust suppression activities as chemical stabilization, water spraying with appropriate runoff collection, resurfacing, sweeping, revegetation, and other EPA approved methods.

PERMITTEE: Gulf Coast Lead Company, Inc.  
PERMIT/CERTIFICATION NO.: AO29-173309  
PROJECT: Nos. 1 and 2 Refining Kettles

SPECIFIC CONDITIONS: (continued)

15. Pursuant to 40 CFR 52.535(b)(4), the permittee shall maintain continuous records of plant process and emission control operations as necessary to determine continuous compliance. Such records shall include reports of all process operations and control equipment operating parameters. Such records shall also include reports of all types of process upsets and emission control equipment malfunction, detailing the nature and duration of the upset or malfunction, the expected effects on emissions, and the corrective actions taken or planned to avoid recurrences. Such records shall be available at the plant site for inspection for a period of at least two (2) years.

16. Pursuant to Rule 1-1.04.1 of the Rules of the Environmental Protection Commission of Hillsborough County and consistent with Specific Condition No. 14, the permittee shall maintain daily records on the average charging rates and type of materials charged (pounds per hour) into the refining kettles.

17. Pursuant to Chapter 1-3.22(3) of the Rules of the Environmental Protection Commission of Hillsborough County, the permittee shall not allow the discharge of air pollutants which contribute to an objectionable odor.

18. The Environmental Protection Commission of Hillsborough County shall be notified in writing 15 days in advance of any compliance test to be conducted on this source.

19. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information pursuant to Section 403.061(13), Florida Statutes:

- (A) Annual amount of materials and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Any changes in the information contained in the permit application.

Duplicate copies of all reports shall be submitted to the Environmental Protection Commission of Hillsborough County.

20. Pursuant to Section 17-4.090, F.A.C., an application for renewal of permit to operate this source, completed in quadruplicate, shall be submitted to the Environmental Protection Commission of Hillsborough County at least 60 days prior to its expiration date.

PERMITTEE:  
Gulf Coast Lead Company,  
Inc.

PERMIT/CERTIFICATION NO.: AO29-173309  
PROJECT: Nos. 1 and 2 Refining Kettles

Issued this \_\_\_\_\_ day of \_\_\_\_\_  
19\_\_\_\_.

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL REGULATION

---

Richard Garrity, Ph.D.  
Deputy Assistant Secretary

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

March 4, 1985

Mr. Willis M. Kitchen, Vice President  
Gulf Coast Lead Company, Inc.  
1901 North 66th Street  
Tampa, FL 33619

RE: Hillsborough County - AP  
Gulf Coast Lead Company, Inc.  
A029-95365

MAR 6 1985  
H.C.E.P.C.

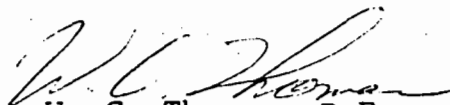
Dear Mr. Kitchen:

In response to a letter from Ms. Joyce Morales-Caramella dated February 7, 1985 requesting a correction on the page of permit number A029-95365, the Department hereby amends page one as specified on the attached.

This letter and the amended page one should be attached to and becomes a part of said permit. Gulf Coast Lead's efforts to clear up any of the confusion in regard to the old permits has been appreciated.

If we can be of further assistance, please feel free to give us a call.

Sincerely,

  
W. C. Thomas, P.E.  
District Air Engineer

JWE/js

Attachment

cc: HCEPC ✓



## DEPARTMENT OF ENVIRONMENTAL REGULATION

## SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610BOB GRAHAM  
GOVERNORVICTORIA J. TSCHINKEL  
SECRETARYDR. RICHARD D. GARRITY  
DISTRICT MANAGER

## PERMITTEE:

Mr. Willis M. Kitchen  
Vice President  
Gulf Coast Lead Company, Inc.  
1901 North 66th Street  
Tampa, FL 33619

## PERMIT/CERTIFICATION

Permit No.: A029-95365  
County: Hillsborough  
Expiration Date: 1/9/90  
Project: Three Refining  
Kettles

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of three gas-fired 52 ton refining kettles. Kettle #3 receives blast lead and is charged with sulfur, sawdust,  $\text{NaNO}_3$  or red phosphorous to remove the antimony to form soft lead. Kettle #2 receives soft lead from Kettle #3 and is charged with calcium to form calcium lead. Kettle #1 receives blast lead and is charged with antimony to form hard lead. All three kettles are ducted to two baghouses (in parallel) and exhausted out a single stack. Only two kettles operate at the same time.

Location: 1901 North 66th Street, Tampa, Hillsborough County

UTM: 17-364.0E 3093.6N NEDS NO: 0057 Point ID: 02

Replaces Permit No.: A029-40712 (Kettle #2) & A029-27109 (Kettle #1)

## DEPARTMENT OF ENVIRONMENTAL REGULATION

## SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610



RECEIVED

AUG 23 1990

DER-BAQM

BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

January 28, 1985

Mr. Willis M. Kitchen  
Vice President  
Gulf Coast Lead Company, Inc  
1901 North 66th Street  
Tampa, FL 33619

JAN 30 1985  
L.C.E.P.D.

Dear Mr. Kitchen:

Re: Hillsborough County - AP  
Three Refining Kettles

Attached is Permit No. A029-95365. Should you object to the issuance of this permit or the specific conditions of the permit, you have a right to petition for a hearing pursuant to the provisions of Section 120.57, Florida Statutes. The petition must be filed within fourteen (14) days from receipt of this letter. The petition must comply with the requirements of Section 17-103.155 and Rule 28-5.201, Florida Administrative Code, (copies attached) and be filed pursuant to Rule 17-103.155(1) in the Office of General Counsel of the Department of Environmental Regulation at 2600 Blair Stone Road, Tallahassee, Florida 32301. Petitions which are not filed in accordance with the above provisions are subject to dismissal by the Department.

In the event a formal hearing is conducted pursuant to Section 120.57(1), all parties shall have an opportunity to respond, to present evidence and argument on all issues involved, to conduct cross-examination of witnesses and submit rebuttal evidence, to submit proposed findings of facts and orders, to file exceptions to any order or hearing officer's recommended order, and to be represented by counsel.

If an informal hearing is requested, the agency, in accordance with its rules of procedure, will provide affected persons or parties or their counsel an opportunity, at a convenient time and

Mr. Willis M. Kitchen  
Tampa, FL

Page Two

place, to present to the agency or hearing officer, written or oral evidence in opposition to the agency's action or refusal to act, or a written statement challenging the grounds upon which the agency has chosen to justify its action or inaction, pursuant to Section 120.57(2), Florida Statutes.

Sincerely,

  
Richard D. Garrity, Ph.D.  
District Manager

JWE/scm

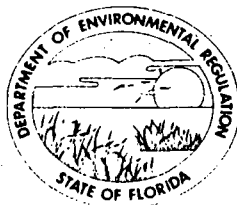
Attachment: as stated

cc: HCEPC  
Robert E. Wallace, III, Jr.

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH  
TAMPA, FLORIDA 33610



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

DR. RICHARD D. GARRITY  
DISTRICT MANAGER

PERMITTEE:

Mr. Willis M. Kitchen  
Vice President  
Gulf Coast Lead Company, Inc.  
1901 North 66th Street  
Tampa, FL 33619

PERMIT/CERTIFICATION

Permit No.: A029-95365  
County: Hillsborough  
Expiration Date: 1/9/90  
Project: Three Refining  
Kettles

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of three gas-fired 52 ton refining kettles. Kettle #1 receives blast lead and is charged with sulfur, sawdust,  $\text{NaNO}_3$  or red phosphorous to remove the antimony to form soft lead. Kettle #2 receives soft lead from kettle #1 and is charged with calcium to form calcium lead. Kettle #3 receives blast lead and is charged with antimony to form hard lead. All three kettles are ducted to a single baghouse. Only two kettles operate at the same time.

Location: 1901 North 66th Street, Tampa, Hillsborough County

UTM: 17-364.0E 3093.6N NEDS NO: 0057 Point ID: 02

Replaces Permit No.: A029-40712 (Kettle #1) & A029-27109 (Kettles #2 and #3.)

PERMITTEE: Permit/Certification No.: A029-95365  
Gulf Coast Lead Company, Project: Three Refining Kettles  
Inc.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate the enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.
3. As provided in Subsections 403.087(6) and 403.712(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by any order from the department.

PERMITTEE: Permit/Certification No.: A029-95365  
Gulf Coast Lead Company, Project: Three Refining Kettles  
Inc.

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as maybe required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purposes of;

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

(a) a description of and cause of non-compliance; and

(b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

PERMITTEE: Permit/Certification No.: A029-95365  
Gulf Coast Lead Company, Project: Three Refining Kettles  
Inc.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- ( ) Determination of Best Available Control Technology (BACT)
- ( ) Determination of Prevention of Significant Deterioration (PSD)
- ( ) Certification of Compliance with State Water Quality Standards (Section 401. PL 92-500)
- ( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE: Permit/Certification No.: A029-95365  
Gulf Coast Lead Company, Project: Three Refining Kettles  
Inc.

14. (con't)

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Test the emissions for the following pollutant(s) at intervals of 12 months from January 18, 1984 and submit a copy of test data to the Air Section of the Hillsborough County Environmental Protection Commission Office within forty five days of such testing (Section 17-2.700 (2), Florida Administrative Code (F.A.C.)).

- |                  |                          |
|------------------|--------------------------|
| (X) Particulates | ( ) Sulfur Oxides        |
| ( ) Fluorides    | ( ) Nitrogen Oxides      |
| (X) Opacity      | ( ) Hydrocarbons         |
| (X) Lead         | ( ) Total Reduced Sulfur |

\*Fuel analysis may be submitted for required sulfur dioxide emission test.



PERMITTEE:  
Gulf Coast Lead Company,  
Inc.

Permit/Certification No.: A029-95365  
Project: Three Refining Kettles

2. Maximum allowable emission from the baghouse shall be:

<u>Pollutant</u>	<u>Emissions Limitation</u>	<u>Regulation</u>
Particulates	1.0 #/hour	As requested by the permittee to exempt the facility from particulate RACT
Opacity	5%	As requested by the permittee to exempt the facility from particulate RACT.
Lead	0.4 #/hour	Lead SIP

3. Compliance with the emission limitations of Specific Condition No. 2 shall be determined using EPA Methods 1, 2, 3, 4, 9 and 12 contained in 40 CFR 60, Appendix A and adopted by reference in Section 17-2.700, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Section 17-2.700, F.A.C. and 40 CFR 60, Appendix A.

4. The visible emission test shall be 30 minutes in duration and it shall be concurrent with one of the Method #12 runs.

5. Testing shall be conducted while 2 of the kettles are in operation and they are to be identified in the test report. The kettles operating during the test shall be alternated from year to year so that over a 2 year period all 3 will have been tested.

6. The hours of operation of this source shall not exceed 4368 per year.

7. The periodic replacement of a kettle liner due to the abuse of the soft lead refining process will be considered maintenance and will not require a construction application.

8. Any changes to the physical stack characteristics or flow parameters listed in this application which could affect the maximum modeled impact of 0.294 ug of Pb per cubic meter, shall be considered a modification of this permit. As a modification, the permittee would be required to submit an application for prior approval.

9. The Hillsborough County Environmental Protection Commission shall be notified in writing 15 days in advance of any compliance test to be conducted on this source.

PERMITTEE: Permit/Certification No.: A029-95365  
Gulf Coast Lead Company, Project: Three Refining Kettles  
Inc.

SPECIFIC CONDITIONS (con't):

10. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as per Section 17-4.14, F.A.C.

- (A) Annual amount of materials and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Any changes in the information contained in the permit application.

Duplicate copies of all reports shall be submitted to the Hillsborough County Environmental Protection Commission.

11. An application to renew this operating permit shall be submitted to the Department 60 days prior to the expiration date of this permit.

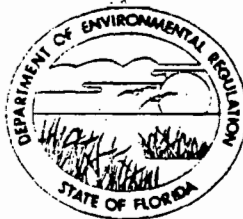
Issued July 4, 1982.  
Modified this 28 day of January,  
1985.

STATE OF FLORIDA DEPARTMENT OF  
ENVIRONMENTAL REGULATION



Richard D. Garrity, Ph.D.  
District Manager

TWIN TOWERS OFFICE BUILDING  
2600 SLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



*New file*  
*Mon 1/2*  
Gulf Coast Lead  
AC29-31078

BOB GRAHAM  
GOVERNOR  
JACOB D. VARN  
SECRETARY

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

August 4, 1980

Mr. Lonnie Payne, Vice President  
Gulf Coast Lead Company  
1901 North 66th Street  
Tampa, Florida 33619

**RECEIVED**

AUG 14 1980

**H.C.E.P.C.**

Dear Mr. Payne:

Enclosed is Permit Number AC 29-31078, dated August 4, 1980,  
to Gulf Coast Lead Company  
issued pursuant to Section 403, Florida Statutes.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

*Steve Smallwood*  
Steve Smallwood  
Bureau of Air Quality Management

**RECEIVED**  
AUG 23 1980  
DER-BAQM

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

F outing To District Offices	
And: fo Other Than The Addressee	
To: _____	Loctn.: _____
To: _____	Loctn.: _____
To: _____	Loctn.: _____
From: _____	Date: _____

TO: Jake Varn, Secretary, DER

FROM: Steve Smallwood, Chief, BAQM

DATE: August 1, 1980

SUBJ: Approval and Signature of Attached Air Construction Permit described below.

**RECEIVED**  
AUG 4 1980

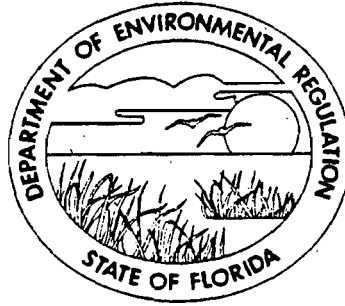
Attached please find one Air Construction Permit for which the applicant is Gulf Coast Lead Company. The proposed construction is for a lead refining kettle to be located in Tampa, Florida.

Day 90, after which the permit would be issued by default, is August 5, 1980.

The Bureau recommends your approval and signature.

*Bill Thomas*  
for Steve Smallwood

**RECEIVED**  
AUG 14 1980  
H.C.E.P.C.



STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL REGULATION

CONSTRUCTION  
PERMIT

NO. AC 29-31078  
GULF COAST LEAD COMPANY  
LEAD REFINING KETTLE  
TAMPA, FLORIDA

DATE OF ISSUANCE

4<sup>TH</sup> AUGUST 1980

DATE OF EXPIRATION

FEBRUARY 28, 1981

Jacob D. Varn  
JACOB D. VARN,  
SECRETARY

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM  
GOVERNOR  
JACOB O. VARN  
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Gulf Coast Lead Company  
1901 N. 66th Street  
Tampa, Florida 33619

PERMIT/CERTIFICATION  
NO. AC 29-31078

COUNTY: Hillsborough

PROJECT: Lead Refining Kettle

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2 and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a 50 ton lead refining kettle to be located at the Gulf Coast Lead facility, 1901 N. 66th Street in Tampa. The universal transverse mercator and latitude, longitude coordinates are: UTM Zone 17, 364.000E, 3093.500N and 27° 57' 35" by 82° 25' 31", respectively.

Construction shall be in accordance with the attached permit application and attached plans, documents and drawings except as otherwise noted on page 3, "Specific Conditions".

Attachments are as follows:

1. "Application to Construct Air Pollution Sources", DER form 17-1.122(16).

RECEIVED

AUG 14 1980

H.C.E.P.C.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed

PERMIT NO.: AC 29-31078  
APPLICANT: Gulf Coast Lead Company  
1901 N. 66th Street  
Tampa, Florida 33619

Specific Conditions

1. The maximum allowable total particulate emissions from the refining kettle shall be 0.034 pounds per hour or 0.04 tons per year. Visible emissions shall be less than 10% opacity.
2. The operating hours shall be limited to 12 hours per day 4 days per week, 50 weeks per year or 2400 hours per year.
3. The maximum allowable raw material inputs to the kettle shall be:

Blast lead	100,000 pounds per charge
Sulfur	250 pounds per charge
Sodium Nitrate	700 pounds per charge
Carbon	100 pounds per charge

Maximum fuel combustion shall be 14 gallons per hour of L.P. gas.

4. The operating permit shall require maintenance of records indicating operating hours, raw material input, finished product output and fuel consumption and shall be submitted annually in accordance with 17-4.14 FAC.
5. Emission tests for particulate and visible emissions shall be conducted for the refining kettle emission point in accordance with Methods 1 through 5, 40 CFR 60, Appendix A and Method 9, 40 CFR 60, Appendix A, respectively. The results of the tests shall be submitted to the Bureau of Air Quality Management for determination of compliance with applicable regulations and conditions of this permit.
6. Permittee shall notify the Bureau of Air Quality Management thirty days prior to any compliance testing of the facility and shall submit a test plan for approval. Upon demonstration of compliance with the operational limits of this permit and submission of a complete application for an operation permit to the FDER Southwest District office prior to 90 days before the expiration of this permit, the permittee may continue to operate in compliance with all terms of this permit until expiration of this permit or issuance of an operation permit.

Expiration Date: February 28, 1981

Issued this 4th day of August, 19 80  
*Jacob D. Varn*  
Jacob D. Varn

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

Final Determination

Gulf Coast Lead Company  
1901 North 66th Street  
Tampa, Florida

Lead Refining Kettle

Construction Permit  
Application Number:  
AC 29-31078

Florida Department of Environmental Regulation  
Bureau of Air Quality Management  
Central Air Permitting  
August 1, 1980



Gulf Coast Lead Company

Gulf Coast's Construction Application for a lead refining kettle in Tampa, Florida has been reviewed by the Bureau. Public notice of the Department's Intent to Issue was published in the Tampa Tribune on June 27, 1980. Copies of the preliminary determination and technical evaluation were available for public inspection at the office of the Hillsborough County Environmental Protection Commission, the Southwest District Office of DER and at the Bureau of Air Quality Management in Tallahassee.

No comments were received as a result of the Public Notice.

The final action by the Department will be to issue the applied for construction permit as presented in the draft copy.

Technical Evaluation  
and  
Preliminary Determination

Gulf Coast Lead Company  
1901 N. 66th Street  
Tampa, Florida

Lead Refining Kettle

Construction Permit

Application Number:

AC 29-31078

RECEIVED

AUG - 4 1980

H.C.E.P.C.

RECEIVED

AUG 14 1980

H.C.E.P.C.

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

June 13, 1980

## I. PROPOSED DEPARTMENT ACTION

The Department intends to issue the requested construction permit to Gulf Coast Lead Company to construct a new lead refining kettle to be located at 1901 North 66th Street in Tampa, subject to the public comment received as a result of this notice period.

Any person wishing to file comments on this proposed action, may do so by submitting such comments in writing to:

John Svec  
Florida Department of Environmental  
Regulation  
Bureau of Air Quality Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Any comments received within thirty days after publication of this notice will be considered and noted in the Department's final determination.

Any person whose substantial interests would be affected by the issuance or denial of this permit may request an administrative hearing by filing a petition for hearing in accordance with the provisions of Chapter 28-5, specifically as set forth in Section 27-5.15 (copy attached). Such petition must be filed within 14 days of the date of this notice. Such petition is to be filed with:

Mary Clark  
Office of General Counsel  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301

## II. SUMMARY OF EMISSION AND AIR QUALITY ANALYSIS:

a. The proposed construction is located in that portion of Hillsborough County which is declared "nonattainment" for the criteria pollutants, ozone and particulate. This location is an "attainment" area of the ambient air quality standard for the remaining criteria pollutants.

b. The significant source of emissions from the refining kettle is due to melting of the blast lead and the combustion of L.P. gas. Emissions are projected to be:

Pollutant	Actual Emissions (lb/hr)
Particulate (total)	0.030
Lead	0.008
Sulfur Dioxide	negligible
Carbon Monoxide	0.022
Hydrocarbon	0.005
Nitrogen Oxide	0.176

### III. SYNOPSIS OF APPLICATION:

#### a. Name and Address of Applicant:

Gulf Coast Lead Company  
 1901 North 66th Street  
 Tampa, Florida 33619

#### b. Description of Project and Controls:

Project consists of installation of a new 50 ton lead refining kettle (pot furnace) for refining or softening of lead, associated ventilation and a spark arrestor. Emissions are to be controlled using existing fabric filter baghouse Wheelabrator-Frye Dusttube Dust Collector currently used for alloying kettle and general plant ventilation. A portion of current alloyed lead production will be diverted to the proposed installation for softening. No increases in overall plant production capacity are proposed.

In the softening process, blast lead is melted and the oxide dross removed. The temperature of the pot is then lowered to approximately 650° F and solid sulfur is added to remove copper. The temperature is then raised and tin is removed as dross. The temperature is further increased to about 1200° F and sodium nitrate added to remove antimony. Finally, carbon is added to reduce surface lead oxide and to further remove impurities. This process, following initial melt through pumping of the pure lead for casting into "pigs" lasts 12 hours.

Tin and copper drosses are returned to the blast furnace to recover available lead. Antimony residues are added to the blast furnace during preparation of high antimony lead for alloying.

### IV. RULE APPLICABILITY:

This application is subject to the New Source Review requirements of 17-2.17 FAC for particulate and hydrocarbon emissions, since the proposed construction is located in the Hillsborough County Nonattainment Area for particulate and ozone. Since in both areas the emissions are less than the emission cutoff levels in 17-2.17(3)(a)1. Table II, the application is exempt from the provisions of 17-2.17(4) through (7).

The facility is a major emitting facility for sulfur dioxide emissions. Since the increase in sulfur dioxide emissions is de minimus, the source is not subject to the requirements of 17-2.04 Prevention of Significant Deterioration (PSD).

The project is subject to 17-2.23 FAC which requires the use of best and latest technology on new source. It is also subject to 17-4.07 FAC which authorizes the Department to impose reasonable permit conditions necessary to prevent air pollution.

V. FINDINGS:

1. Based on the data presented in the application and EPA emission factors published in AP-42, potential and actual emissions are projected to be equal to or less than:

Pollutant	Actual Emissions		Potential Emissions	
	lb/hr.	Tons/yr	lb/hr	Tons/yr
Particulate	0.034	0.04	3.4	4.0
Lead	0.008	0.01	0.8	1.0
Sulfur Dioxide*	negligible	-	negligible	-
Carbon Monoxide*	0.022	0.03	0.022	0.03
Hydrocarbon*	0.005	0.01	0.005	0.01
Nitrogen Oxide*	0.176	0.21	0.176	0.21

\*based upon combustion of 14 gallons per hour of LP gas

2. The increase in all pollutant emissions are de minimus and therefore the application is exempt from the requirements of 17-2.17(4) through (7) and 17-2.04 FAC.

3. New Source Performance Standard for secondary lead smelters limits visible emissions from pot furnaces to be less than 10% opacity.

4. Construction should commence and be completed within a reasonable time based on the projections included in the applications.

5. Construction should reasonably conform to the plans submitted.

6. The actual particulate emissions from the fabric filter emission point should be verified by a test standard test methods prior to the issuance of an operating permit. As part of the operating permit conditions, periodic tests on the emission point should be required.

VI. PROPOSED ALLOWABLE EMISSIONS AND PERMIT CONDITIONS:

See Draft Permits

Attachment: Rule 28-5



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICATION TO OPERATE/CONSTRUCT  
AIR POLLUTION SOURCES

RECEIVED  
AUG 14 1980  
H.C.E.P.C.  
MAY 7 1980  
H.C.E.P.C.

SOURCE TYPE: Secondary Lead Smelter  New  Existing  Minor New Source

APPLICATION TYPE:  Construction  Operation  Modification

COMPANY NAME: GULF COAST LEAD COMPANY COUNTY: HILLSBOROUGH

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) Lead Refining Kettle with Fabric Filter Baghouse

SOURCE LOCATION: Street 1901 N. 66th. Street City Tampa

UTM: East 364.000 North 3093.500

Latitude      °      '      "N Longitude      °      '      "W

APPLICANT NAME AND TITLE: Lonnie A. Payne, Vice-President

APPLICANT ADDRESS: 1901 N. 66th. Street, Tampa, Florida 33619

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Gulf Coast Lead Company

I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: Lonnie A. Payne  
Lonnie A. Payne, Vice-President  
Name and Title (Please Type)

Date: May 6, 1980 Telephone No. 813 626 6151

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been ~~designed~~/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed: Robert E. Wallace III  
Robert E. Wallace III, P.E.  
Name (Please Type)

Environmental Engineering Consultants, Inc.  
Company Name (Please Type)

P.O. Box 8386, Tampa, Fl. 33674  
Mailing Address (Please Type)

Florida Registration No. 21608 Date: May 6, 1980 Telephone No. 813 237 3781

<sup>1</sup>See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)

**SECTION II: GENERAL PROJECT INFORMATION**

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

**ATTACHMENT A**

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction July 1, 1980 Completion of Construction October 1, 1980

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Refining Kettle -----	8500.00	
Kettle Installation -----	30000.00	
Fabric Filter Baghouse ---	Existing	
Ductwork -----	5000.00	TOTAL ----- \$ 43500.00

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

- A029-12482: Issued
- A029-27109: Issued March 25, 1980; Expires March 25, 1985
- AC29-18438: Issued Jul. 6, 1979; Expires April 28, 1980

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? Yes  No

F. Normal equipment operating time: hrs/day 12; days/wk 4; wks/yr 50; if power plant, hrs/yr \_\_\_\_\_; if seasonal, describe: Kettle is charged with blast lead once daily, then various reagents for refining are added through out the period and then the purified lead is pumped to be cast into pigs.

G. If this is a new source or major modification, answer the following questions. (Yes or No) Yes - Minor New Source

- |   |            |
|---|------------|
| 1. Is this source in a non-attainment area for a particular pollutant?  | <u>Yes</u> |
| a. If yes, has "offset" been applied?   | <u>No</u>  |
| b. If yes, has "Lowest Achievable Emission Rate" been applied?  | <u>No</u>  |
| c. If yes, list non-attainment pollutants.  |            |
| <u>Oxidants, Total Suspended Particulate Matter</u>   |            |
| 2. Does best available control technology (BACT) apply to this source? If yes, see Section VI.  | <u>No</u>  |
| 3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII. | <u>No</u>  |
| 4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source?  | <u>Yes</u> |
| 5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source?                                       | <u>No</u>  |

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

**ATTACHMENT B**

**SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)**

**A. Raw Materials and Chemicals Used in your Process, if applicable:**

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Blast Lead	Lead/Part	98/100	100,000 per charge	2
Sulfur	Part.	100	250 " "	
Sodium Nitrate	Part.	100	700 " "	
Carbon	Part.	100	100 " "	

**B. Process Rate, if applicable: (See Section V, Item 1)**

1. Total Process Input Rate (lbs/hr): 101,050 lbs/charge = 8420 lbs/hr.

2. Product Weight (lbs/hr): 98,000 lbs/charge = 8167 lbs/hr.

**C. Airborne Contaminants Emitted: ATTACHMENT C**

Name of Contaminant	Emission <sup>1</sup>		Allowed Emission <sup>2</sup> Rate per Ch. 17-2, F.A.C.	Allowable <sup>3</sup> Emission lbs/hr	Potential Emission <sup>4</sup>		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
Particulate	0.03	0.04	17-2.05(2)	8.75	3.4	4.0	6
Lead	0.008	0.010	-	-	0.8	1.0	
Opacity	<10%		17-2.05(1b)	<10%	-	-	

**D. Control Devices: (See Section V, Item 4)**

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles <sup>5</sup> Size Collected (in microns)	Basis for Efficiency (Sec. V, It <sup>5</sup> )
Wheelabrator-Frye Dusttube Dust Collector, size 1217, Model 126, Series 55, Two Module Type	Part./Lead	99+ %	All Particulate >1u	Design + Test.

<sup>1</sup>See Section V, Item 2.

<sup>2</sup>Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E. (1), F.A.C. - 0.1 pounds per million BTU heat input)

<sup>3</sup>Calculated from operating rate and applicable standard

<sup>4</sup>Emission, if source operated without control (See Section V, Item 3)

<sup>5</sup>If Applicable



E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
L.P. Gas	7 gal/hr	14 gal/hr	1.28

\*Units Natural Gas, MMCF/hr; Fuel Oils, barrels/hr; Coal, lbs/hr

Fuel Analysis:

Percent Sulfur: neg Percent Ash: neg

Density: \_\_\_\_\_ lbs/gal Typical Percent Nitrogen: \_\_\_\_\_

Heat Capacity: \_\_\_\_\_ BTU/lb 91,500 BTU/gal

Other Fuel Contaminants (which may cause air pollution): \_\_\_\_\_

F. If applicable, indicate the percent of fuel used for space heating. Annual Average N/A Maximum \_\_\_\_\_

G. Indicate liquid or solid wastes generated and method of disposal.

Drosses are returned to blast furnace to recover lead and antimony

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 97 feet (existing) ft. Stack Diameter: 2.0 ft.

Gas Flow Rate: 27000 (6000 this source) CFM Gas Exit Temperature: 150 °F.

Water Vapor Content: 3 % Velocity: 143 FPS

SECTION IV: INCINERATOR INFORMATION

NA

Type of Waste	Type O (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq & Gas By-prod.)	Type VI (Solid By-prod.)
Lbs/hr Incinerated							

Description of Waste \_\_\_\_\_

Total Weight Incinerated (lbs/hr) \_\_\_\_\_ Design Capacity (lbs/hr) \_\_\_\_\_

Approximate Number of Hours of Operation per day \_\_\_\_\_ days/week \_\_\_\_\_

Manufacturer \_\_\_\_\_

Date Constructed \_\_\_\_\_ Model No. \_\_\_\_\_

	Volume (ft) <sup>3</sup>	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: \_\_\_\_\_ ft. Stack Diameter \_\_\_\_\_ Stack Temp. \_\_\_\_\_

Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM\* Velocity \_\_\_\_\_ FPS

\*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device:  Cyclone  Wet Scrubber  Afterburner  Other (specify) \_\_\_\_\_

Brief description of operating characteristics of control devices: \_\_\_\_\_

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.): \_\_\_\_\_

### SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

- Total process input rate and product weight – show derivation. ATTACHMENT C
- To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made. ATTACHMENT C
- Attach basis of potential discharge (e.g., emission factor, that is, AP42 test). ATTACHMENT C
- With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, etc.). ATTACHMENT C
- With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3, and 5 should be consistent: actual emissions = potential (1-efficiency). ATTACHMENT C
- An 8½" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained. ATTACHMENT E
- An 8½" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map). ATTACHMENT F
- An 8½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram. ATTACHMENT G

## PROJECT DESCRIPTION

Project consists of installation of a 50 ton lead refining kettle (pot furnace) for refining or softening of lead, associated ventilation and a spark arrester. Emissions are to be controlled using existing fabric filter baghouse currently used for alloying kettle and general plant ventilation. A portion of current alloyed lead production will be diverted to the proposed installation for softening. No increases in overall plant production capacity are proposed.

In the softening process, blast lead is melted and the oxide dross removed. The temperature of the pot is then lowered to approximately 650° F and solid sulfur is added to remove copper. The temperature is then raised and tin is removed as dross. The temperature is further increased to about 1200° F and sodium nitrate added to remove antimony. Finally, carbon is added to reduce surface lead oxide and to further remove impurities. This process, following initial melt through pumping of the pure lead for casting into "pigs" lasts 12 hours.

Tin and copper drosses are returned to the blast furnace to recover available lead. Antimony residues are added to the blast furnace during preparation of high antimony lead for alloying.

This project will result in compliance with all portions of the "Rules of the Florida Department of Environmental Regulation" Chapter 17-2 and "Standards of Performance for New Stationary Sources" 40 CFR Part 60, Subpart L.

## SUPPORTING INFORMATION - SECTION II PART G.

Source is to be located within Hillsborough County, Florida, within the non-attainment area for total suspended particulate matter described by a circle, 12 km in radius with its center located at the intersection of highways 60 and 41. This source has been determined to be a minor new source per the "Rules of the Department of Environmental Regulation", Chapter 17-2.02; a secondary lead producing facility with the potential to emit less than 100 tons per year. Estimated potential particulate matter emissions for this source are 4.0 tons/year. As this source is projected to emit less than 15 tons per year, it is exempt from the provisions of 17-2.17(4)-(7) (BACT). This source type is also described under "Standards of Performance for New Stationary Sources" (NSPS), 40 CFR 60, Subpart L, Secondary Lead Smelters. An opacity level of less than 10 % (per Method 9) is required for new refining kettles.

## SUPPORTING INFORMATION - SECTION III, PARTS C&amp;D

The softening process is a batch operation. Kettle charge capacity is 50 tons of finished lead. The operation requires 12 hours to complete and will be performed on an average of 4 days per week.

Uncontrolled particulate emissions were calculated using the factor for refining kettles from AP-42 (3rd. Edition); 0.8 pounds per ton charge. A particulate lead emission factor, 23% of the total particulate matter was obtained from Mr. Frank Newman of EPA's emission group at RTP, North Carolina. EPA is presently revising this section of AP-42, however and will probably reduce the total particulate factor, possibly as low as 0.04 pounds per charge. For this application, the more conservative value is used.

Particulate removal efficiencies of 99% and better are common for fabric filter devices in this industry. Using factors from AP-42, an efficiency approaching 99.7 % is indicated for the present baghouse system, based on the last compliance test reported (Jan. 1979). The most recent test report, March 1980 (not complete at this date) shows improved efficiencies and lower emission. These data are attached.

The addition of this new refining kettle is not expected to significantly affect the current overall emission from this facility.

The plant ventilation baghouse (No. 7) contains 5717 sq. ft. of cloth and presently receives approximately 6000 cfm. With the addition of the new kettle the fan capacity will be increased to 12000 cfm, resulting in a filtering velocity of 2 fpm, within good engineering practice for this source type and fabric type.

Compliance with the "Rules of the FDER", Chapter 17-2 and the "Code of Federal Regulation" 40 CFR 60, Subpart L will be established following construction using 40 CFR 60 Methods 1,2,5 and 9.

BEST AVAILABLE COPY

TABLE 1  
SOURCE TEST SUMMATION

COMPANY NAME: Gulf Coast Lead Company

SOURCE IDENTIFICATION: Blast Furnace + Melt Kettle

TEST FOR: Particulate, Sulfur Dioxide, Opacity

PROCESS WEIGHT RATE: 6.23 Tons per Hour

TEST DATE: January 19, 1979

*SO<sub>2</sub> 210 Tons/year*

Run No.	SCF	SCFM	% H <sub>2</sub> O	Stack Temp	% ISO	EMISSION:			
						lb/hr. Part	lb/hr. SO <sub>2</sub>	Opac	
1	42.347	17204	2.5	191	96.5	1.440	176		
2	32.892	17890	2.6	184	96.1	4.596	172		
3	36.245	18973	2.5	174	99.8	1.350	177		
						Average	2.462	175	0%
						Allowable*	12.000	N/A	20

STANDARD CONDITIONS: Dry, 68°F, 29.92 in. Hg.

\* Allowable Emission Based on Chapter 17-2.04 of the Rules of the FDER

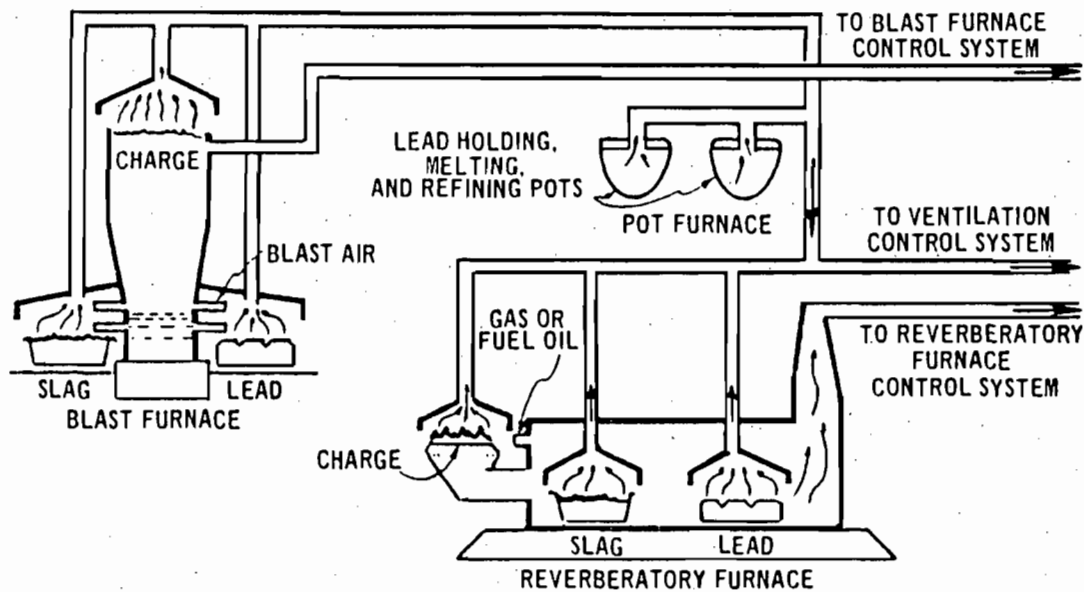


Figure 7.11-1. Secondary lead smelter processes.<sup>4</sup>

arsenic, copper, and antimony. The particles are nearly spherical and tend to agglomerate. Emission factors for reverberatory furnaces are presented in Table 7.11-1.

The most practical control system for a reverberatory furnace consists of a gas settling/cooling chamber and a fabric filter. This system effects a particulate removal of well in excess of 99 percent. Because of the potential presence of sparks and flammable material, a great deal of care is taken to control the temperature of the gas stream. In turn, the type of filter cloth selected depends upon stream temperature and such parameters as gas

Table 7.11-1. EMISSION FACTORS FOR SECONDARY LEAD SMELTING FURNACES WITHOUT CONTROLS<sup>a</sup>  
EMISSION FACTOR RATING: B

Furnace type	Particulates		Sulfur dioxide	
	kg/MT	lb/ ton	kg/MT	lb/ton
Reverberatory <sup>b</sup>	73.5 (28.0 to 156.5) <sup>c</sup>	147 (56 to 313)	40.0 (35.5 to 44.0)	80 (71 to 88)
Blast (cupola) <sup>d</sup>	96.5 (10.5 to 190.5)	193 (21.0 to 381.0)	26.5 (9.0 to 55.0)	53.0 (18 to 110)
Pot <sup>e</sup>	0.4	0.8	Neg	Neg
Rotary reverberatory <sup>f</sup>	35.0	70.0	NA <sup>g</sup>	NA <sup>g</sup>

<sup>a</sup>All emission factors expressed in terms of kg/MT and lb/ton of metal charged to furnace.

<sup>b</sup>References 2, 5 through 7.

<sup>c</sup>Numbers in parentheses represent ranges of values obtained.

<sup>d</sup>References 2, 7 through 9.

<sup>e</sup>Reference 7.

<sup>f</sup>Reference 3.

<sup>g</sup>NA—no data available to make estimates.

stream of  
the filter  
efficiency

Fabric fil

Dry cycl  
Wet cycl  
Settling  
Venturi

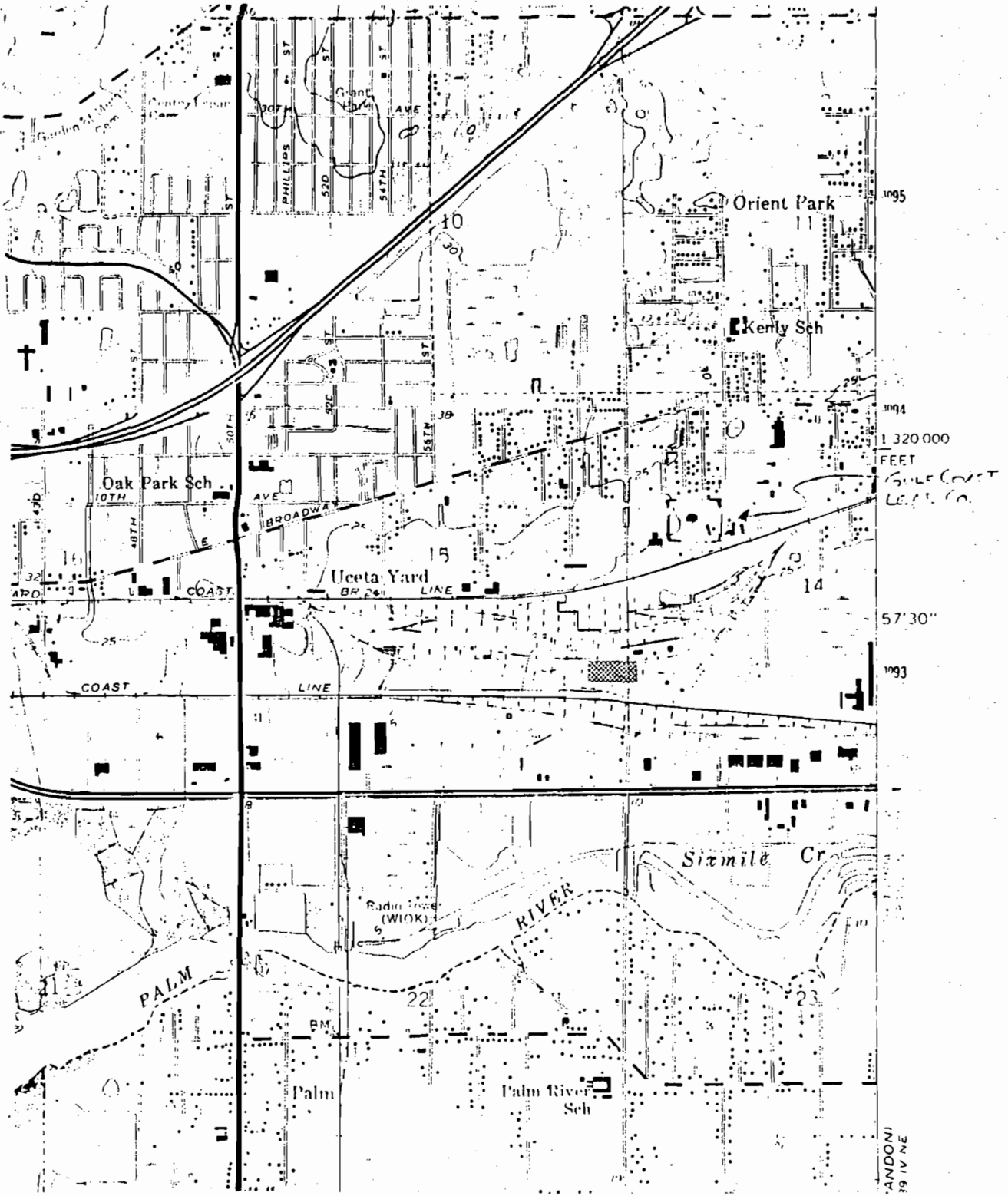
<sup>a</sup>Referenc  
<sup>b</sup>Referenc  
<sup>c</sup>Referenc  
<sup>d</sup>Referenc

Comb  
and othe  
(up to 4  
monoxid  
of the fu

Fabric  
to contr  
Represent  
7.11-3.

Comp  
tain a h  
furnaces.

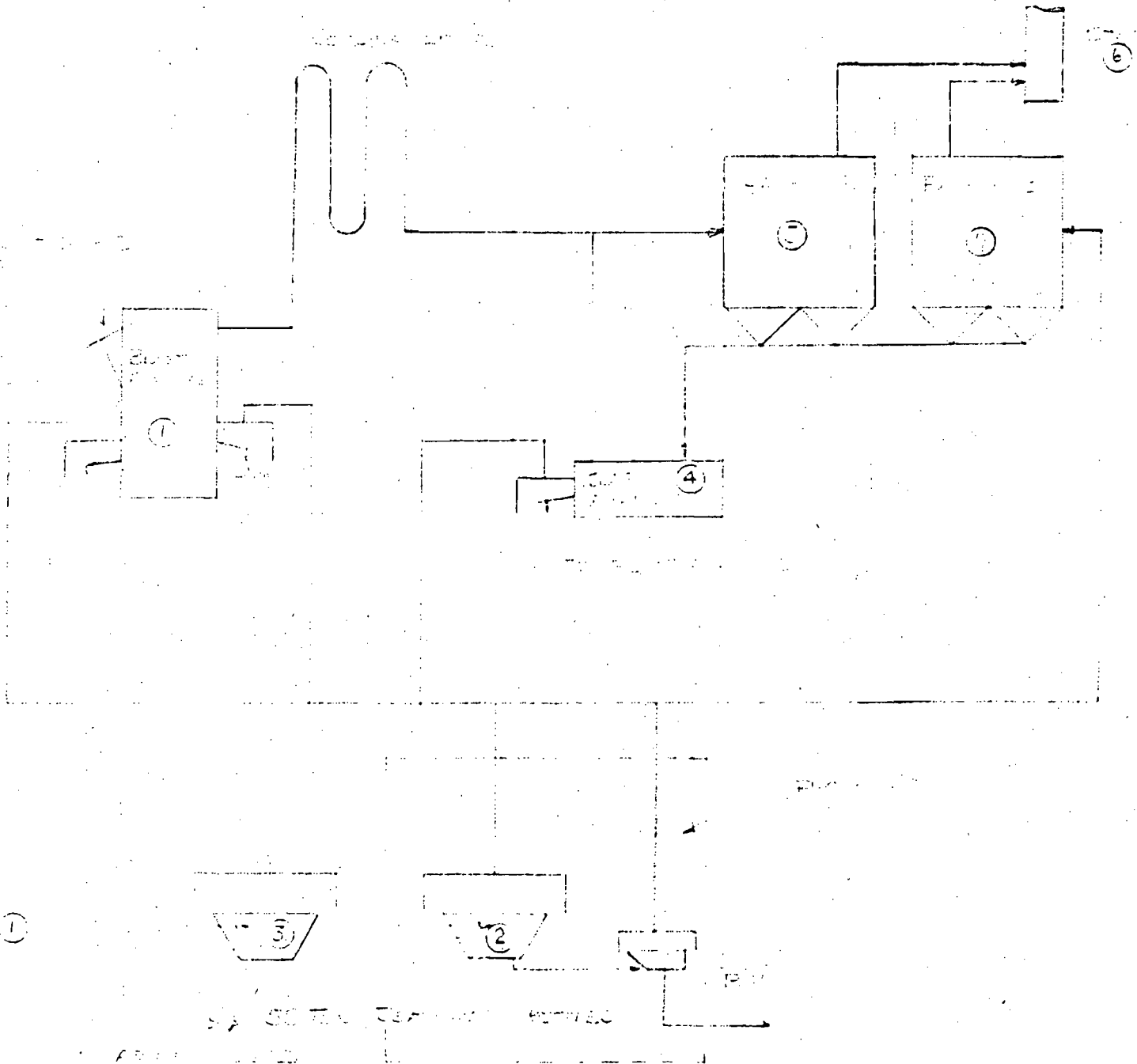
Referen  
Table 7



ENVIRONMENTAL ENGINEERING  
CONSULTANTS, INC.  
TAMPA FLORIDA




BEST AVAILABLE COPY

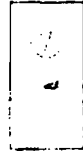
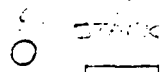
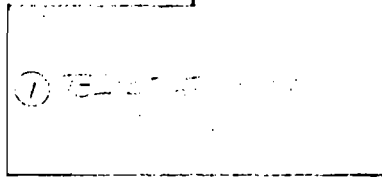
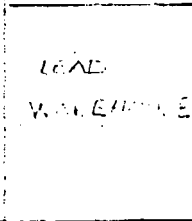
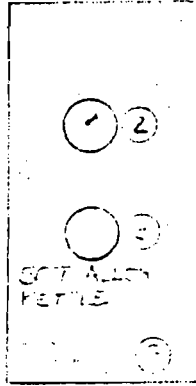
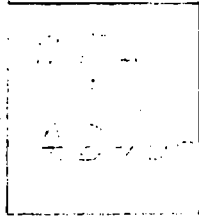


Flow - 7/1/11  
③

Flow - 7/1/11

**ENVIRONMENTAL ENGINEERING  
CONSULTANTS, INC.**  
TAMPA FLORIDA


BEST AVAILABLE COPY



TRAINING

LAYOUT

<b>ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.</b> TAMPA FLORIDA	

COMMISSION  
PHYLLIS BUSANSKY  
RODNEY COLSON  
PAM IORIO  
RUBIN E. PADGETT  
JAN KAMINIS PLATT  
HAVEN POE  
JAMES D. SELVEY



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
MAIN OFFICES  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960  
AIR PROGRAM  
TELEPHONE (813) 272-5530  
WASTE MANAGEMENT PROGRAM  
TELEPHONE (813) 272-5788

RECEIVED  
AUG 10 1990  
DER-BAQM

August 7, 1990

Mr. Barry Andrews  
Division of Air Resources Management  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Gulf Coast Recycling Inc.

Dear Mr. Andrews:

Attached are three (3) copies of an after-the-fact construction application for the above facility's No. 3 refining kettle and a check in the amount of \$200.

We have kept one copy and forwarded one copy to the District.

If you have any questions, please feel free to contact me at SUNCOM 543-5530.

Sincerely,

Darrel J. Graziani  
Chief, Air Permitting Section

bb

cc: J. Harry, Kerns, SW-District, FDER

1031

RECEIVED  
DER-MAIL ROOM  
1990 AUG 13 AM 10:34

COMMISSION  
PHYLLIS BUSANSKY  
RODNEY COLSON  
PAM IORIO  
RUBIN E. PADGETT  
JAN KAMINIS PLATT  
HAVEN POE  
JAMES D. SELVEY



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
MAIN OFFICES  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5960  
AIR PROGRAM  
TELEPHONE (813) 272-5530  
WASTE MANAGEMENT PROGRAM  
TELEPHONE (813) 272-5788

RECEIVED  
AUG 10 1990  
DER-BAQM

August 7, 1990

Mr. Barry Andrews  
Division of Air Resources Management  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE:- Gulf Coast Recycling Inc.

Dear Mr. Andrews:

Attached are three (3) copies of an after-the-fact construction applicaton for the above facility's No. 3 refining kettle and a check in the amount of \$200.

We have kept one copy and forwarded one copy to the District.

If you have any questions, please feel free to contact me at SUNCOM 543-5530.

Sincerely,

Darrel J. Graziani  
Chief, Air Permitting Section

bb

cc: J. Harry, Kerns, SW-District, FDER

1990 AUG 13 AM 10:34  
RECEIVED  
DER - MAIL ROOM



# GULF COAST RECYCLING, INC.

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

50  
RECEIVED

AUG 3 1990

E.P.C. OF H.C.  
AIR PROGRAM

Mr. Darrel Graziani, Chief  
Air Permitting Section  
Environmental Protection Commission  
of Hillsborough County  
1900 - 9th Avenue  
Tampa, Florida 33605

RE: DER File No. AO29-173309

Dear Mr. Graziani:

Enclosed are five copies of an after-the-fact construction permit application for Refining Kettle # 3 at Gulf Coast Recycling, Inc., formerly Gulf Coast Lead Company. Also enclosed are the appropriate checks for the FDER and EPC.

The operation of Refining Kettle # 3 was permitted from January 28, 1985 through January 9, 1990 under permit # AO29-95365.

Only two of the three refining kettles are ever operated simultaneously, hence the addition of Refining Kettle # 3 did not represent an increase in emissions, therefore the FDER allowed construction of the third kettle without benefit of a construction permit.

Gulf Coast Recycling, Inc. will continue to operate only two refining kettles at one time. There will be no increase in emissions.

If you have any questions, please do not hesitate to call.

Sincerely,

GULF COAST RECYCLING, INC.

Joyce Morales-Caramella  
Environmental & Health Manager

cc: Willis M. Kitchen  
Jim Estler



Florida Department of Environmental Regulation

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

DER Form # \_\_\_\_\_
Form Title \_\_\_\_\_
Effective Date \_\_\_\_\_
DER Application No. \_\_\_\_\_ (Filed in by DER)

AC 29-184883

200 pp
8-3-96
Recpl #151154

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Secondary Lead Smelter [ ] New<sup>1</sup> [X] Existing<sup>1</sup>

APPLICATION TYPE: [X] Construction [ ] Operation [ ] Modification

COMPANY NAME: Gulf Coast Recycling, Inc. COUNTY: Hillsborough

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) 50T Refining Kettle No. 3 w/baghouses

SOURCE LOCATION: Street 1901 N. 66th Street City Tampa

UTM: East 364.048 North 3093.548

Latitude 27° 57' 43" N Longitude 82° 22' 49" W

APPLICANT NAME AND TITLE: Willis M. Kitchen, President

APPLICANT ADDRESS: 1901 N. 66th Street, Tampa, Florida 33619

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative\* of Gulf Coast Recycling

I certify that the statements made in this application for a Air Pollution Source permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

\*Attach letter of authorization

Signed: Willis M. Kitchen

Willis M. Kitchen, President

Name and Title (Please Type)

Date: Telephone No. 813/626-6151

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

<sup>1</sup> See Florida Administrative Code Rule 17-2.100(57) and (104)

DER Form 17-1.202(1)

Effective October 31, 1982

Page 1 of 12

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed \_\_\_\_\_

Robert E. Wallace III, P.E.

\_\_\_\_\_  
Name (Please Type)

Environmental Engineering Consultants, Inc.

\_\_\_\_\_  
Company Name (Please Type)

P. O. Box 7854, Tampa, Florida 33673

\_\_\_\_\_  
Mailing Address (Please Type)

Florida Registration No. 21608

Date: 8/2/80

Telephone No. 813/237-3781

**SECTION II: GENERAL PROJECT INFORMATION**

- A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Controlling particulate emissions from a 50 ton refining Kettle No. 3 with two baghouse shared with refining Kettle No. 1 & 2. Only two kettles can ever operate simultaneously while the third kettle is idle. This project has been be in full compliance.

- B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction existing Completion of Construction existing

- C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Two baghouses, drop-out box, blower, stack, ductwork, hoods, engineering and installation: \$78,000.00.

- D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

A029-95365 Refining Kettles Nos. 1, 2 and 3 previously permitted under this operating permit.

E. Requested permitted equipment operating time: hrs/day 12 ; days/wk 7 ; wks/yr 52\*\* ;  
if power plant, hrs/yr \_\_\_\_\_ ; if seasonal, describe: Total annual hours of operation for  
the refining kettle area is 4368.

\*\* The operation time takes into account overlapping operation since there is more than  
one kettle. This source does not usually operate on Saturday or Sunday.

F. If this is a new source or major modification, answer the following questions.  
(Yes or No) N/A

1. Is this source in a non-attainment area for a particular pollutant? Yes  
a. If yes, has "offset" been applied? No  
b. If yes, has "Lowest Achievable Emission Rate" been applied? No  
c. If yes, list non-attainment pollutants. particulate, ozone
2. Does best available control technology (BACT) apply to this source?  
If yes, see Section VI. No
3. Does the State "Prevention of Significant Deterioration" (PSD)  
requirement apply to this source? If yes, see Sections VI and VII. No
4. Do "Standards of Performance for New Stationary Sources" (NSPS)  
apply to this source? No
5. Do "National Emission Standards for Hazardous Air Pollutants"  
(NESHAP) apply to this source? No

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply  
to this source? No\*
- a. If yes, for what pollutants? \_\_\_\_\_
- b. If yes, in addition to the information required in this form,  
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-  
cation for any answer of "No" that might be considered questionable.

\* The applicant has previously requested the emissions from the refining kettle area  
to be 1 lbs/hr., 2.184 tons/yr in order to qualify for the particulate RACT exemption  
on Subsection 17-2.650(2)(b)1 F.A.C. The applicant has also agreed to a 5% visible  
emission limitation from the stack. The 5% visible emission standard is also estab-  
lished under 40 CFR 52.535(c)(1)(iv). Refer to Specific Condition No. 2 of FDER's  
permit A0-29-95365.





D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Two Baghouses in parallel and exhausted out a single stack	Particulate	99%	micron	Engineering Judgement
- Both baghouses were fabricated by Gulf Coast Lead Co. (Patterned after Wheelabrator-Frye Model 126)				

E. Fuels

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
Natural Gas	.03846	.003846	4 mm BTU/hr.
	Per Kettle Values		

\*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: N/A Percent Ash: N/A  
 Density: N/A lbs/gal Typical Percent Nitrogen: N/A  
 Heat Capacity: N/A BTU/lb 1040 BTU/CF  BTU/gal  
 Other Fuel Contaminants (which may cause air pollution):

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average  Maximum

G. Indicate liquid or solid wastes generated and method of disposal.

Dross is recycled to blast furnace.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 25 ft. Stack Diameter: 2 ft.  
 Gas Flow Rate: 16,530\* ACFM 15714\* DSCFM Gas Exit Temperature: 95 °F.  
 Water Vapor Content: 2.0 % Velocity: 70 FPS  
 \*Based on 2/13/90 stack test.

SECTION IV: INCINERATOR INFORMATION N/A

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste \_\_\_\_\_  
 Total Weight Incinerated (lbs/hr) \_\_\_\_\_ Design Capacity (lbs/hr) \_\_\_\_\_  
 Approximate Number of Hours of Operation per day \_\_\_\_\_ day/wk \_\_\_\_\_ wks/yr. \_\_\_\_\_  
 Manufacturer \_\_\_\_\_  
 Date Constructed \_\_\_\_\_ Model No. \_\_\_\_\_

	Volume (ft) <sup>3</sup>	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: \_\_\_\_\_ ft. Stack Diameter: \_\_\_\_\_ Stack Temp. \_\_\_\_\_  
 Gas Flow Rate: \_\_\_\_\_ ACFM \_\_\_\_\_ DSCFM\* Velocity: \_\_\_\_\_ FPS

\*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device:  Cyclone  Wet Scrubber  Afterburner  
 Other (specify) \_\_\_\_\_

Brief description of operating characteristics of control devices: \_\_\_\_\_

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

**SECTION V: SUPPLEMENTAL REQUIREMENTS**

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]  
See Attachment 1.
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made. Actual emissions based on the 2/13/90 stack test for Kettles Nos. 1 and 3.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.) Same control device is used for Kettles Nos. 1 and 2, See FDER permit No. A029-95365.
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency). See response to No. 2 above.
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.  
See Attached.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).  
See Attached.
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.  
See Attached.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation. Attached check for \$200.00 for FDER.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

**SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY N/A**

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes  No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

Yes  No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

- |                           |                          |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:*           | 4. Capital Costs:        |

\*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height: ft. b. Diameter: ft.

c. Flow Rate: ACFM d. Temperature: °F.

e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device: b. Operating Principles:

c. Efficiency:<sup>1</sup> d. Capital Cost:

e. Useful Life: f. Operating Cost:

g. Energy:<sup>2</sup> h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device: b. Operating Principles:

c. Efficiency:<sup>1</sup> d. Capital Cost:

e. Useful Life: f. Operating Cost:

g. Energy:<sup>2</sup> h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:<sup>1</sup>

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:<sup>2</sup>

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:<sup>1</sup>

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:<sup>2</sup>

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

<sup>1</sup>Explain method of determining efficiency.

<sup>2</sup>Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

(8) Process Rate:<sup>1</sup>

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:<sup>1</sup>

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

(8) Process Rate:<sup>1</sup>

10. Reason for selection and description of systems:

<sup>1</sup>Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. \_\_\_\_\_ no. sites \_\_\_\_\_ TSP \_\_\_\_\_ ( ) SO<sub>2</sub>\* \_\_\_\_\_ Wind spd/dir

Period of Monitoring \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year

Other data recorded \_\_\_\_\_

Attach all data or statistical summaries to this application.

\*Specify bubbler (B) or continuous (C).



2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No
- b. Was instrumentation calibrated in accordance with Department procedures?  
[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling

- 1. \_\_\_\_\_ Year(s) of data from \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ to \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
month day year month day year
- 2. Surface data obtained from (location) \_\_\_\_\_
- 3. Upper air (mixing height) data obtained from (location) \_\_\_\_\_
- 4. Stability wind rose (STAR) data obtained from (location) \_\_\_\_\_

C. Computer Models Used

- 1. \_\_\_\_\_ Modified? If yes, attach description.
- 2. \_\_\_\_\_ Modified? If yes, attach description.
- 3. \_\_\_\_\_ Modified? If yes, attach description.
- 4. \_\_\_\_\_ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO <sup>2</sup>	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT 1  
GULF COAST RECYCLING, INC.  
LIST OF ADDITIVES USED FOR REFINING

Soft Lead:

1. Caustic 100 lbs.
2. Sulfur 100 lbs.
3. Red Phosphorus 20 lbs.
4. Sodium Nitrate 1,000 lbs.
5. Aluminum 50 lbs.
6. Caustic 100 lbs.
7. Sodium Nitrate 50 lbs.

Calcium Lead:

1. Start with soft lead and add
2. Calcium 125 lbs.
3. Aluminum 40 lbs.

Hard Lead:

1. Caustic 0 to 100 lbs.
2. Sulfur 100 lbs.
3. Antimony 1,500 lbs.
4. Tin 150 lbs.
5. Arsenic 110 lbs.
6. Red Phosphorus 12 lbs.
7. Selenium 23 lbs.

ATTACHMENT 2

EMISSIONS LIMITS FOR GULF COAST RECYCLING INC.

PARTICULATE AND LEAD

Source	Particulate Emissions lbs/hr	Emission Ratio Pb/PM	Pb Emissions lbs/hr	Hrs. of Operation Per Year	Tons/Yr PM	Tons/Yr Pb
Blast & Slag Furnaces	2.5	.723	1.81	7800	9.750	7.059
Blast & Slag Furnaces Tap Points	0.15	.40	0.06	7800	0.585	0.234
Skip Hoist	0.55	.40	0.22	7800	2.145	0.858
Refining Kettles (assumes 2 in operation)	1.0 <sup>a</sup>	.40 <sup>b</sup>	0.40 <sup>b</sup>	4368 <sup>c</sup>	2.184	0.874
Keel Cast Kettle	0.20	.40	0.08	2400	0.240	0.096
Total	4.4		2.57		14.904	9.121

<sup>a</sup> Based on stack test results and engineering judgement.

<sup>b</sup> Based on AP-42, Table 7.11-1 Note J.

<sup>c</sup> Total hours of operation for the refining kettle area. Two kettles will always operate simultaneously.

ATTACHMENT 3  
 PARTICULATE AND LEAD REFINING BAGHOUSE ACTUAL EMISSIONS  
FOR GULF COAST RECYCLING, INC.

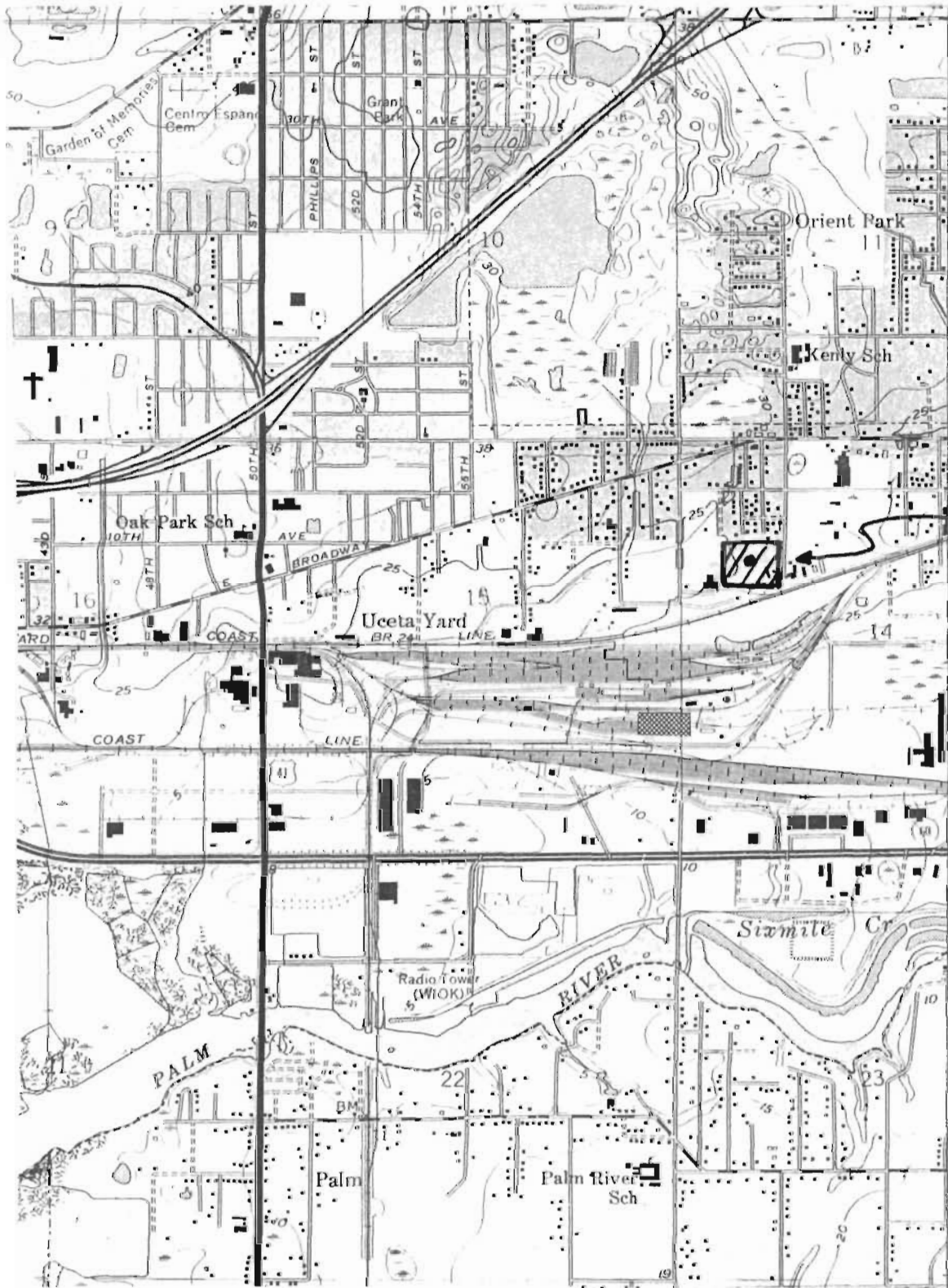
	Actual lbs/hr	Allowable lbs/hr	Actual Operating Hours hrs/yr	Actual tons/yr	Allowable <sup>c</sup> tons/yr
Particulate	0.882 <sup>a</sup>	1.0	3432 <sup>b</sup>	1.514	2.184
Lead	0.003 <sup>a</sup>	0.4	3432 <sup>b</sup>	0.005	0.874

a. Based on February 13, 1990 stack test.

b. Based on 1989 AOR operating hours.

c. Based on 4368 hours per year specified in Section II E of the application.

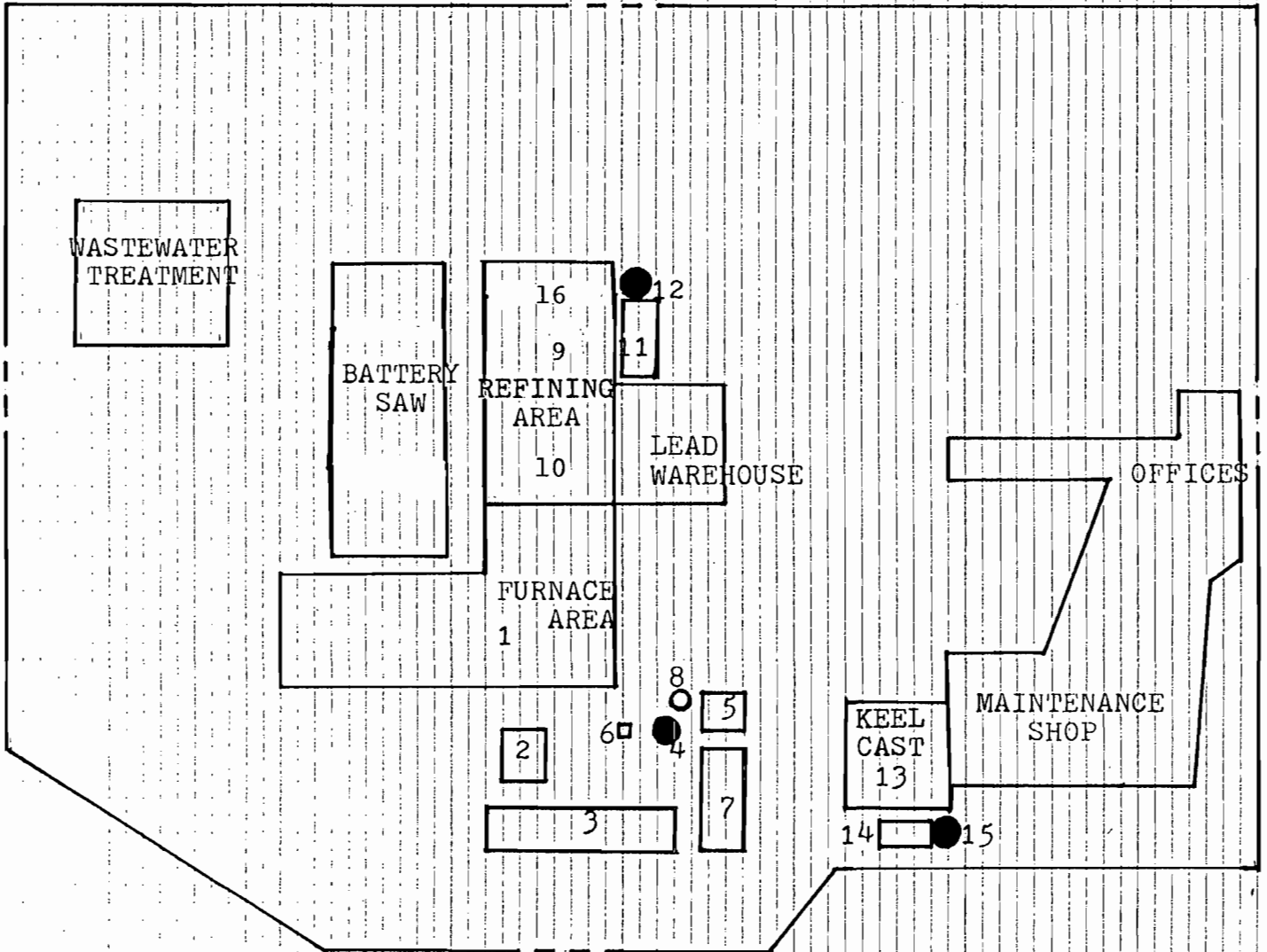
LOCATION - GULF COAST RECYCLING, INC.



Gulf Coast Recycling



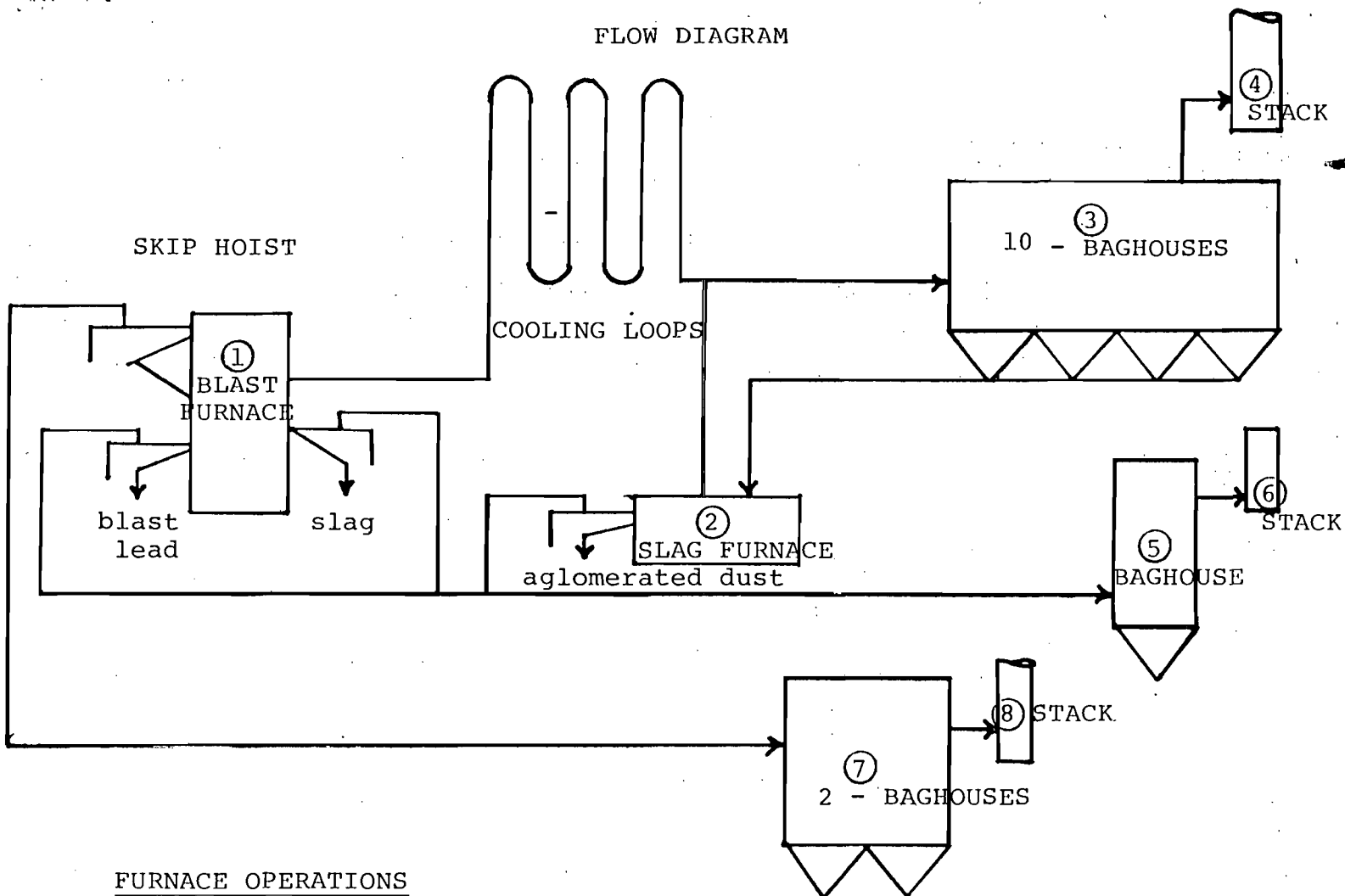
0.3 M  
0.6 M  
0.9 M  
1.2 M  
ANDON  
19 IV NE



GULF COAST RECYCLING, INC.

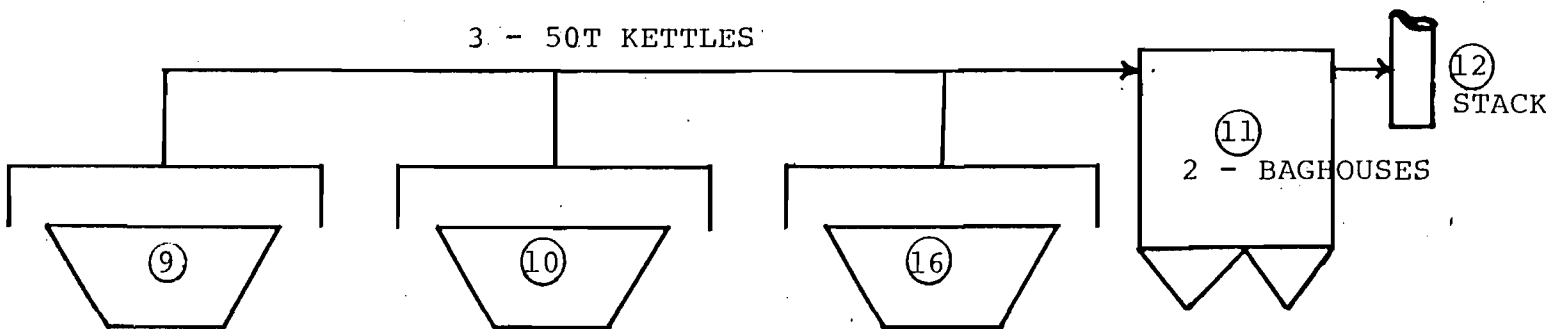
SITE PLAN

FLOW DIAGRAM

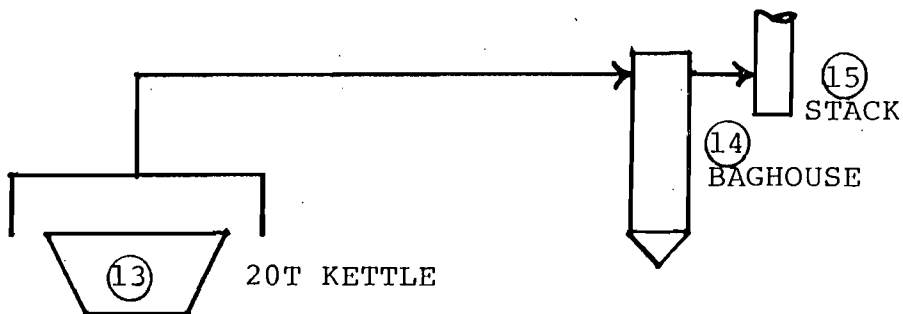


FURNACE OPERATIONS

3 - 50T KETTLES

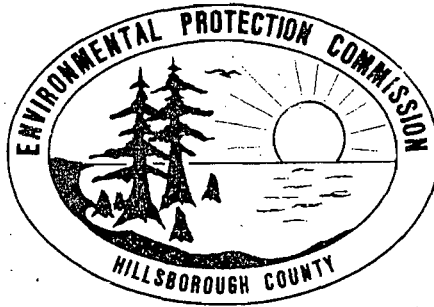


REFINING OPERATIONS



KEEL CAST OPERATIONS

COMMISSION  
PHYLIC BUBANSKY  
RONNEY COLSON  
PAM IORIO  
RUBIN E. PADGETT  
JAN KAMINIS PLATT  
HAVEN POE  
JAMES D. SELVEY



ROGER P. STEWART  
EXECUTIVE DIRECTOR  
MAIN OFFICES  
1900 - 9TH AVENUE  
TAMPA, FLORIDA 33605  
TELEPHONE (813) 272-5988  
AIR PROGRAM  
TELEPHONE (813) 272-5530  
WASTE MANAGEMENT PROGRAM  
TELEPHONE (813) 272-5788

RECEIVED

AUG 10 1990

DER-BAQM

August 7, 1990

Mr. Barry Andrews  
Division of Air Resources Management  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Gulf Coast Recycling Inc.

Dear Mr. Andrews:

Attached are three (3) copies of an after-the-fact construction applicaton for the above facility's No. 3 refining kettle and a check in the amount of \$200.

We have kept one copy and forwarded one copy to the District.

If you have any questions, please feel free to contact me at SUNCOM 543-5530.

Sincerely,

Darrel J. Graziani  
Chief, Air Permitting Section

bb

cc: J. Harry, Kerns, SW-District, FDER

Note:

I have asked EPC  
to send me a copy  
of A029-95365,  
etc. ASAP.  
8-20-90 Mija

RECEIVED  
DER - MAIL ROOM  
1990 AUG 13 AM 10:34





# GULF COAST RECYCLING, INC.

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

5c  
RECEIVED

AUG 3 1990

E.P.C. OF H.C.  
AIR PROGRAM

Mr. Darrel Graziani, Chief  
Air Permitting Section  
Environmental Protection Commission  
of Hillsborough County  
1900 - 9th Avenue  
Tampa, Florida 33605

RE: DER File No. AO29-173309

Dear Mr. Graziani:

Enclosed are five copies of an after-the-fact construction permit application for Refining Kettle # 3 at Gulf Coast Recycling, Inc., formerly Gulf Coast Lead Company. Also enclosed are the appropriate checks for the FDER and EPC.

The operation of Refining Kettle # 3 was permitted from January 28, 1985 through January 9, 1990 under permit # AO29-95365.

Only two of the three refining kettles are ever operated simultaneously, hence the addition of Refining Kettle # 3 did not represent an increase in emissions, therefore the FDER allowed construction of the third kettle without benefit of a construction permit.

Gulf Coast Recycling, Inc. will continue to operate only two refining kettles at one time. There will be no increase in emissions.

If you have any questions, please do not hesitate to call.

Sincerely,

GULF COAST RECYCLING, INC.

Joyce Morales-Caramella  
Environmental & Health Manager

cc: Willis M. Kitchen  
Jim Estler



**GULF COAST RECYCLING, INC.**

1901 NORTH 66th STREET  
TAMPA, FLORIDA 33619  
(813) 626-6151

First Florida Bank  
Tampa, Florida

63-26  
631

019006

DATE	CHECK NO.	CHECK AMOUNT
8/3/90	19006	\$200.00

PAY  
TO  
THE  
ORDER  
OF

FLORIDA DEPT. OF ENVIRONMENTAL  
REGULATION

*Willis M. Kitchen*



**GULF COAST RECYCLING, INC.**

1901 NORTH 66th STREET  
TAMPA, FLORIDA 33619  
(813) 626-6151

First Florida Bank  
Tampa, Florida

63-26  
631

019006

DATE	CHECK NO.	CHECK AMOUNT
8/3/90	19006	\$200.00

PAY  
TO  
THE  
ORDER  
OF

FLORIDA DEPT. OF ENVIRONMENTAL  
REGULATION

*Willis M. Kitchener*

Division of Air Resources Management  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Gulf Coast Recycling Inc.

Dear Mr. Andrews:

Attached are three (3) copies of an after-the-fact construction  
applicaton for the above facility's No. 3 refining kettle and a  
check in the amount of \$200.

We have kept one copy and forwarded one copy to the District.

If you have any questions, please feel free to contact me at  
SUNCOM 543-5530.

Sincerely,

*Darrel J. Graziani*

Darrel J. Graziani  
Chief, Air Permitting Section

bb

cc: J. Harry, Kerns, SW-District, FDER

1031

1990 AUG 13 AM 10:34  
RECEIVED  
DER-MAIL ROOM