



Florida Department of Environmental Protection

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Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

NOTICE OF ADMINISTRATIVELY CORRECTED AIR CONSTRUCTION PERMIT

In the Matter of a Request for Administrative Correction:

EnviroFocus Technologies, LLC (EFT)
1901 North 66th Street
Tampa, Florida 33619

Authorized Representative: Mr. John Tapper
Chief Operating Officer

Project No. 0570057-029-AC

Administrative Correction to:
Permit No. 0570057-020-AC
PSD-FL-404

Hillsborough County

Dear Mr. Tapper

Enclosed is an administrative correction for Air Construction Permit No. 0570057-020-AC (PSD-FL-404) for EnviroFocus Technologies, LLC lead-acid battery recycling facility which is located in Hillsborough County at 1901 North 66th Street in Tampa, Florida. The UTM coordinates for the site are Zone 17, 364.0 kilometers (km) East and 3093.5 km North. This action involves the updating of emission unit numbers to reflect the new emission units in the upgraded facility. The upgrading of the facility to a totally enclosed, modern facility was authorized by the Department of Environmental Protection (Department) in Air Permit No. 0570057-020-AC (PSD-FL-404)

This administrative correction is issued pursuant to Rule 62-210.360, Florida Administrative Code (F.A.C.), and Chapter 403, Florida Statutes (F.S.). This corrective action does not alter the effective dates of the existing permit.

The Department will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions must be filed within 14 days of receipt of this administratively corrected permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes

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the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, 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 must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

for Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

JFK/sa/dlr

NOTICE OF ADMINISTRATIVELY CORRECTED AIR CONSTRUCTION PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Administratively Corrected Air Construction Permit was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. John Tapper, EnviroFocus Technologies, LLC: jtapper@gopherresource.com

Mr. Jerry Campbell, Hillsborough County EPC: campbell@epchc.com

Mr. Russell S. Kemp, P.E., Environ: rkemp@environcorp.com

Ms. Heather Ceron, EPA Region 4 (ceron.heather@epa.gov)

Ms. Barbara Friday, DEP OPC: (barbara.friday@dep.state.fl.us)

Ms. Lynn Searce, DEP OPC: (lynn.searce@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

NOTICE OF ADMINISTRATIVELY CORRECTED AIR CONSTRUCTION PERMIT

The following descriptions and permit conditions are revised as indicated for each section and subsection. ~~Strikethrough~~ is used to denote the deletion of text while Double-underlines are used to denote the addition of text. All changes are emphasized with **yellow highlighting**.

Permit Being Administratively Corrected: Permit No. 0570057-020-AC (PSD-FL-404)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

This project creates the following emissions units.

ID No.	<u>New</u> Emission Unit Description
02126	Battery breaking area including plastics plant
02230	Feed dryer
0231	Collocated reverb furnace
02427	(4) plastic pellet silos
02529	Propane vaporizer (1) and soda ash slurry heaters (2)
02637	500 kilowatt (kW) emergency generator

This project modifies or deletes the following emissions units.

ID No.	<u>Existing</u> Emission Unit Description
00132	Collocated blast furnace
004	Tapping and charging (DELETED)
0028	(1) Soda ash silo receiving silo and (2) soda ash processing silos (MODIFIED)
00936	Facility grounds and roadways (MODIFIED)
01133	Furnace tapping, charging and lead refining (process fugitive emissions).
01334	Combustion exhaust consisting of 10 oxy/fuel burners and associated stacks fueled by natural gas and propane as a backup to heat the refining kettles.
0135	Building ventilation (MODIFIED)

SECTION 2. ADMINISTRATIVE REQUIREMENTS

No changes were made to Section 2.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Battery Breaking Area

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
02426	<u>Battery breaking area</u> including a maximum 60 tons per hour (TPH) hammer mill, separation equipment, plastics plant and wet impingement scrubber.

In the battery breaker area, spent batteries are conveyed to a hammer mill where they are crushed into primarily metallic lead, lead salts and plastics. After desulfurization, the lead salts are transferred to the material charging storage area along with the metallic lead. The majority of the plastic is shipped off-site for recycling or sent to the on-site plastic plant where it is reduced in size by a small wet hammer mill then melted and extruded into water to form plastic pellets. The plastic pellets are dried by a spin dryer and transferred pneumatically to one of the four plastic pellet silos (EU ID 0247).

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

B. Lead Smelting

This section of the permit addresses the following emissions units.

ID No.	Emission Unit Description
00132	Collocated blast furnace
02230	Feed dryer
0231	Collocated reverb furnace

The metallic lead and desulfurized lead salts from the battery breaker area are conveyed to the 40 TPH feed dryer to remove most of the moisture prior to being feed into the reverb furnace. The feed dryer is fueled by 10 mmBtu per hour (mmBtu/hr) natural gas burners (with propane as a backup fuel). PM and Pb emissions from the feed dryer are controlled by a shaker type baghouse with a design flow rate of 18,000 acfm at approximately 200 degrees Fahrenheit (°F) before being ducted to the process stack.

The reverb furnace is heated using primarily natural gas or propane as a backup fuel. Molten soft lead from the reverb furnace will be conveyed through channels called launders directly to the refining kettles. The reverb furnace is fired by 23 mmBtu/hr burners. Slag from the reverb furnace and other lead bearing scrap materials will be fed to a blast furnace that produces hard lead. Metallurgical coke will be combined with slag to help supply fuel for the blast furnace smelting process.

Exhaust gases from both furnaces will be ducted to a new afterburner, followed by a shaker type baghouse and a wet scrubber before being combined with the exhaust gases from the feed dryer for final discharge through the new 130 foot process stack.

CONSTRUCTION

1. **Equipment:** The permittee is authorized to construct a feed dryer and a collocated reverb furnace and modify the existing collocated blast furnace consisting of the following equipment.
 - a. **Enclosure:** The applicant shall fully enclose and ventilate the feed dryer and the collocated blast and reverb furnaces before operation of these emission units can commence. Emissions from the dryer are controlled by a baghouse while emissions from the furnaces will be controlled by an afterburner, baghouse and wet scrubber. Fugitive emissions of PM and Pb from the dryer and furnaces due to process upsets and other sources within the enclosed facility will be vented to the Torit filter of the enclosed facility's ventilation system (EU ID 0435). [Application No. 0570057-020-AC; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

C. Furnace Tapping, Charging and Lead Refining

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
0433	Furnace tapping, charging and lead refining (process fugitive emissions).

Furnace tapping, charging and lead refining generate emissions that are termed as process fugitive emissions in the lead recycling process. This emissions unit includes the operations related to charging and tapping the collocated reverb and blast furnaces as well as the direct exhaust from the 10 refining kettles that receive and process lead from the furnaces. The emissions are captured by hooding, routed to a 72,000 acfm process fugitive emissions (hygiene) baghouse and exhausted via a 130 foot hygiene stack.

The refining kettles are indirectly heated by natural gas burners (EU ID 0434) described in Subsection D. Alloying and fluxing agents such as sulfur and niter (sodium nitrate) are mixed in to produce lead alloys that meet predetermined specifications. The pollutant emissions consist of PM, Pb, NO_x, VOC, SO₂ and trace metal HAP. The PM and metals HAP, including Pb, are controlled by the hygiene baghouse.

CONSTRUCTION

1. **Equipment:** The permittee is authorized to modify and construct a refining area capable of processing approximately 20 TPH of hard and soft lead and consisting of the following equipment.
 - a. **Enclosure:** The permittee shall include the operations related to charging and tapping the collocated reverb and blast furnaces as well as the direct exhaust from the 10 refining kettles that receive and process lead from the furnaces, hence forth called process fugitive emissions, within a fully enclosed and ventilated facility. Process fugitive emissions of PM and Pb are controlled by a baghouse. Fugitive emissions of PM and Pb due to process upsets and from other fugitive sources within the enclosed facility will be vented to the Torit filter of the enclosed facility ventilation system (EU ID 0435). [Application No. 0570057-020-AC; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

D. Refining Kettles Exhaust

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
0434	Combustion exhaust consisting of 10 burners and associated stacks fueled by natural gas and propane as a backup to heat the refining kettles.

The ten refining kettles are indirectly fired (i.e., the combustion products do not contact the process) utilizing individual oxygen enhanced burners. Therefore, the stacks that exhaust these combustion products are identified as a separate emission unit from the process fugitive emissions (EU ID No. 0433). The kettles' in-direct combustion emissions are vented to the atmosphere through three separate stacks.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

E. Soda Ash Silos

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
0028	The soda silos consist of a small soda ash receiving silo for receiving soda ash by truck and two larger soda ash process silos.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

F. Facility Grounds and Roadways

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
00936	Facility grounds and roadways controlled by wet suppression, vacuum sweeping and wheel washing.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

G. Building Ventilation

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
0135	Building ventilation of enclosed facility controlled by Torit filter.

EFT will enclose all process areas of the facility and ventilate the air exhausted from the facility through a large 195,000 acfm cartridge collector identified as the Torit filter. This air flow will produce an inward draft velocity at all openings in the building of 50 feet per minute (fpm) to prevent PM and Pb emissions from escaping uncontrolled. The filtered gases will be emitted from a new stack identified as the Torit stack.

CONSTRUCTION

1. **Equipment:** The permittee is required to construct in phases a fully enclosed and ventilated facility consisting of the following equipment.
 - a. **Enclosure:** The applicant shall construct a fully enclosed and ventilated facility that when completed will contain the feed dryer (EU ID 02230), blast furnace (EU ID 00132), reverb furnace (EU ID 02331) and furnace tapping and charging and refining (EU ID 011). The full enclosure shall be completed before the entire EFT facility commences operations that utilize all the emissions units cited in the previous sentence. As specified in Subsections III-A, -B and -C of this permit, individual emissions units may commence operations once they have been individually enclosed. Fugitive emissions consisting of PM and Pb within the enclosed facility are controlled by a Torit filter.
[Application No. 0570057-020-AC; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

H. Plastic Pellet Silos

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
0247	Four (4) plastic pellet silos

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

I. Propane Vaporizer and Slurry Heaters

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
0259	Propane vaporizer (1) with 1.2 mmBtu/hour burner and soda ash slurry heaters (2) with 0.25 mmBtu/hour burners.

Natural gas will be used as the primary fuel for many of the processes at the EFT facility, such as the furnaces (EU ID 00132 and EU ID 0231) and dryer (EU ID 02230). However, the site will maintain a propane tank to use in the event of natural gas curtailment. The propane tank operation will require the use of a propane vaporizer that includes a 1.2 mmBtu/hr burner.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

J. Emergency Generator

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
02637	One 500 kilowatt (kW) liquid fueled emergency generator