Document ID: E

O & M Plan

Trademark Metals Recycling, LLC
5220 Dover Street
Tampa, FL 33619-9636

Permit Number 0571289-002-AC

Operations and Maintenance Plan for Particulate Emissions from Material Handling, Shearing, Torch Cutting and Sand Flow Operations

September 29, 2004

1.0 Purpose

This plan specifically addresses the maintenance and controls required for proper operation of the sand flow system to control fugitive particulate emissions. Also included are reasonable precautions that minimize the generation of particulate emissions while handling / transferring scrap, shearing, torch cutting, and vehicular movement on site.

2.0 Controls for Process Equipment

Water is utilized at the transfer points for the shear. It is activated on an "as-needed" basis when the material being processed generates visible emissions. As a method of water conservation, the water spray system will be off when processing "clean" materials that do not produce fugitive emissions.

A water truck is maintained on site for watering the roadways thus controlling fugitive emissions. Watering will be performed as needed and will be documented in the "Water Truck Log Book". Appendix A shows a map of the facility and indicates the location where the water will be applied.

Water fire extinguishers are required within the torch cutting areas of the facility. Contractors using torch cutters are instructed to use these water extinguishers to immediately extinguish fires and smoldering scrap that produces visible emissions. Since oily scrap will not be processed with torches, alternate dry chemical fire extinguisher will not be used in the torch area. Dry chemical fire extinguishers are used at other locations within the facility. All fire extinguishers are inspected monthly and documented on the tag attached to each extinguisher.

3.0 Equipment Inspections

The following periodic checks are performed:

- During the first week of each calendar month an inspection will be performed and documented on the water truck. This inspection will be recorded on the form identified as Appendix B.

- During the first week of each calendar month an inspection will be performed on the water spray bar used to control fugitive emissions at the transfer points on the shear. This inspection will be recorded on the form identified as Appendix B.

4.0 Reasonable Precautions for Controlling Fugitive Particulate Emissions while Handling or Moving Scrap

The following items are proven techniques that aid in the control of unconfined particulate emissions from scrap processing facilities. These controls will be incorporated as they are deemed practicable for each specific operation in the yard.

- When transferring scrap with a grapple, the operator will raise the material only as high as necessary, and lower the grapple as close to the release point as possible without jeopardizing the processing equipment, prior to releasing the material.
- Water will be sprayed on piles of scrap that when moved produce excess particulate emissions. This water will be applied prior to transferring this material with a grapple crane where dust can be released when lifting or dropping inherently dusty scrap.
- Spray bars will be installed and utilized when necessary to wet material being transferred on conveyor belts to reduce the generation of unconfined particulate emissions.
- Pushing scrap with a loader often generates less unconfined particulate emissions when compared with moving material with a grapple crane. Where practicable, pushing material will be the preferred method for transferring scrap at this facility.
- A water truck will be used as needed to control excess dust on the interior traffic routes within the yard. This vehicle will be inspected prior to use and monthly inspections will be documented in Appendix B.
- Excess dust will be periodically removed from the paved roadways by sweeping with an in-house sweeping machine, or contracting a third party company to sweep interior traffic routes throughout the yard.

Appendix A

Trademark Metals Recycling LLC
5220 Dover Street
Tampa, Florida

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Tampa, FL 33619

Appendix B
Monthly Inspection Form

Date of Inspection: _____

Time of Inspection: _____

Water Truck:

Check the water truck for the following:

- ☐ All Water Ports Appear Operational
- ☐ Spray Bar Distributes Water Effectively
- ☐ The Vehicle is not Leaking Visible Oils, Antifreeze, Etc.
- ☐ The Windows are Kept Clean to Ensure Safety of Employees While Watering

Comments: _____

_____

Shear Water Spray Bar:

- ☐ Adequate Water Pressure for the Application of Water
- ☐ Spray Bar Distributes Water Effectively

Comments: _____

_____

_____

_____ _____
Signature Date