TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Liberty Tire Recycling, LLC
1251 Waterfront Place, Suite 400
Pittsburgh, PA 15222

Rockledge Mulch Plant
270 Barnes Boulevard, Rockledge
Facility ID No. 0090236

PROJECT

Project No. 0090236-002-AO
Application for Minor Source Air Operation Permit
Project Name: Mulch Processing Plant

COUNTY

Brevard County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Waste and Air Resource Programs
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767
DEP_CD@dep.state.fl.us

March 13, 2013

Prepared by: Stephen Amirault

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction and air operation permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. <u>Project Description:</u>

A. Applicant:

Mr. Jeffrey D. Kendall, CEO
Liberty Tire Recycling, LLC
1251 Waterfront Place, Suite 400
Pittsburgh, PA 15222
kendall@libertytire.com

B. Professional Engineer:

Mr. Scott A. McCann, P.E.
Golder Associates, Inc.
6026 NW 1st Place
Gainesville, FL 32607
Scott_McCann@GOLDER.com

C. Project Location:

Rockledge Mulch Plant
270 Barnes Boulevard
Rockledge, FL 32955

D. Project Summary:

As described in the permit, this project is the initial air operation permit for a used tire mulch processing operation and associated baghouse.

E. Application Information:

Application Received on: 02/20/2013
Application Complete on: 02/20/2013

II. PSD Applicability for Project

This project is not subject to PSD preconstruction review.

III. Rule Applicability

This project is subject to the requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Stationary Source General Requirements	Y	Not exempt from general permitting requirements.
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Unloading and mulch shredding operations are a source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Coating operations are a source of VOC and odors.
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Brevard County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.

Subject to:	Y/N	Comments
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS– 40 CFR 60)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	N	There is no applicable source category.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	Facility is not a Title V source.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements	Y	Annual VE testing is required for EU No. 001.

IV. Summary of Emissions

Pollutant	Potential Emissions (tpy)	Allowable Emissions (tpy)
PM	85.4[1]	58.5[2]
PM10	85.4[1]	58.5[2]
VOC	.00416[3]	
Total HAP	.00416[3]	
VE		Less than 5 percent (5%) opacity[4]

1. *Calculation based on exhaust grain loading emission factor of 0.03 gr/dscf and operational hours of 8,760 hours/year.*
2. *Calculation based on exhaust grain loading emission factor of 0.03 gr/dscf and operational hours limitation of 6,000 hours/year requested by facility in permit application dated 02/20/2013.*
3. *Calculations provided by the applicant in Construction Permit 0090236-001-AC Application based on VOC and HAP contents of coatings in use at the facility.*
4. *The lower visible emission standard is requested and accepted by the facility in permit application 0090236-002-A,O dated 02/20/2013, in lieu of annual compliance testing requirements for particulate emissions.*

V. Federal NSPS and/or NESHAP Provisions

There are no applicable NSPS or NESHAP provisions

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VII. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection, Waste & Air Resource Programs, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767 or by e-mail at DEP_CD@dep.state.fl.us.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to operate the aforementioned air pollution source in accordance with the permit and its conditions as stipulated (see attached).