# FLORIDA DEPARTMENT OF Environmental Protection

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**PERMITTEE**

EnviroFocus Technologies, LLC (dba Gopher Resources)
6505 Jewel Avenue
Tampa, Florida 33619

Authorized Representative:
Angela Fogarty, Environmental Director

Air Permit No. 0570057-037-AC (PSD-FL-404E)
Permit Expires: December 31, 2021
Minor Air Construction Permit
EnviroFocus Technologies
Refined Lead Production Increase

**PROJECT**

This is the final air construction permit, which authorizes EnviroFocus to increase the refined lead production rate from 150,000 tons per year (TPY) to 200,000 TPY, install a new coke feeder for the Reverb Furnace (emission unit (EU) 031), install low range differential pressure (dP) sensors to control the furnace draft/damper position, increase the annual throughput of the Alkaline Reagent Silo (EU 028), and increase the annual charge rate of the Reverb Furnace. The proposed work will be conducted at the existing EnviroFocus Technologies (EFT) Facility, which is a Primary Metal Industry categorized under Standard Industrial Classification No. 3341 for Secondary Smelting & Refining of Nonferrous Metals. The existing facility is in Hillsborough County at 1901 N 66th Street in Tampa, Florida. The UTM coordinates are Zone 17, 364 kilometers (km) East and 3093.5 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

**STATEMENT OF BASIS**

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes 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

David Lyle Read, P.E.

Digitally signed by David Read
Date: 2019.11.06 07:26:25 -05'00'

*For:*
Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

## CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package 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.

Ms. Angela Fogarty, EnviroFocus Technologies (Angela.Fogarty@gopherresource.com)
Mr. Russell Kemp, P.E., Ramboll (rkemp@ramboll.com)
Ms. Aubrey Jones, Ramboll (ajones@ramboll.com)
Ms. Diana Lee, Hillsborough County EPC (lee@epchc.org)
Ms. Kelly Fortin, EPA Region 4 (Fortin.kelly@Epa.gov)
Ms. Lynn Scearce, DEP OPC: (lynn.scearce@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.

Lynn Scearce Digitally signed by Lynn Scearce
Date: 2019.11.06 07:31:12 -05'00'

## FACILITY DESCRIPTION

The EFT Facility is a lead acid battery recycling plant in Hillsborough County which recycles automotive and industrial lead-acid batteries, as well as other lead-acid bearing scrap materials to produce lead ingots. The process involves several key operations (or steps) including: the receiving of batteries and recyclable materials; battery breaking and separation into lead, lead salts, plastic and acid electrolyte; storage and containment of recovered lead and lead waste; acid neutralization and wastewater treatment; lead smelting and refining; casting; and shipping.

Each regulated EU at the existing facility is listed in the table below and those affected by this permitting action are highlighted in blue.

| EU No. | Emission Unit Description |
|---|---|
| 026 | Battery Breaking Area |
| 028 | Alkaline Reagent Silo |
| 030 | Feed Dryer |
| 031 | Collocated Reverb Furnace |
| 032 | Collocated Blast Furnace |
| 033 | Furnace Tapping, Charging and Refining |
| 034 | Combustion Gases from Refining Kettles |
| 035 | Building Ventilation |
| 036 | Facility Grounds and Roadways |
| 037 | Emergency generator |
| 038 | Additional building ventilation |

*{Permitting Note: This project does not authorize any physical modifications that would result in a change of emissions to the building ventilation systems identified under EU 035 and 038. Only the referenced maximum lead production rate from the enclosed facility is revised, as seen in Section 3, Subsection D of this permit.}*

## PROPOSED PROJECT

The purpose of this project is to increase the refined lead production rate from 150,000 TPY to 200,000 TPY. A portion of this production increase will be achieved by optimizing the position of the Reverb Furnace burners (EU 031). The existing burners will not be replaced. The position and angle of the existing burners will be adjusted to improve heat utilization and decrease wear of the furnace refractory. The remaining production increase will be achieved through optimizing the process and does not require physical modification of the facility. Yet, the permitted annual charge rate limit of the Reverb Furnace will be increased from 262,800 TPY to 338,400 TPY to align with the limit for the upstream feed dryer (EU 030). Additionally, EnviroFocus is planning to install low range dP sensors to control furnace draft/damper position. This change is simply an instrumentation improvement/upgrade and will not impact the lead production rate. A new coke feeder will also be installed for better control of coke addition to the Reverb Furnace to optimize the lead smelting rate.

As part of the proposed project, EnviroFocus requests that the annual throughput limit for the alkaline reagent silo (EU 028) be increased from 25,000 TPY to 45,000 TPY. An increase in the reagent usage is required to desulfurize the additional feed needed to achieve a lead production rate of 200,000 TPY. The hourly silo fill rate, which is currently limited to 50 tons per hour (TPH), will not change.

Permit No. 0570057-035-AC was issued in July 2017 and authorized the replacement of the burner on the existing Reverb Furnace, along with other miscellaneous minor changes. The lead production increase would not be achievable without the installation of this new burner. Therefore, Permit No. 0570057-035-AC is considered to be part of the same project to increase the annual refined lead production rate. The PSD avoidance limits

established by Permit No. 0570057-035-AC are being revised to include the emission increases resulting from this permitting action.

## FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400 (PSD), F.A.C.
- The project includes units subject to applicable New Source Performance Standards (NSPS) in Title 40, Part 60 of the Code of Federal Regulations.
- The project includes units subject to applicable National Emissions Standards for Hazardous Air Pollutants (NESHAP) in Title 40, Part 63 of the Code of Federal Regulations.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Environmental Protective Commission of Hillsborough County (EPCHC), Air Management Division, 3629 Queen Palm Drive, Tampa, Florida 33619. The telephone number of the EPCHC is 813-627-2600.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Source Obligation:

   a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   [Rule 62-212.400(12), F.A.C.]

9. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required

for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050 and Chapter 62-213, F.A.C.]

10. PSD Avoidance Limits **(Applicable to EU 026 & EU 030 - EU 034)**: The total emissions from EU 026 and EU 030 - EU 034 shall not exceed 815.5 TPY of carbon monoxide (CO), 61.0 TPY of volatile organic compounds (VOC) and 749.5 TPY of sulfur dioxide ($SO_2$) on a 12-month averaging basis. For the process stack, compliance with the CO and $SO_2$ emissions shall be demonstrated by continuous emissions monitoring systems (CEMS) on a 12-month rolled monthly averaging basis. For the hygiene stack, compliance with the $SO_2$ emissions shall be demonstrated by CEMS on a 12-month rolled monthly average basis. Stack testing shall be conducted on the hygiene stack and process stack to determine the VOC emission rates. For the battery breaking area (EU 026), compliance with the VOC and $SO_2$ emissions shall be demonstrated by stack testing. Compliance for EU 034 (Combustion Gases from Refining Kettles), shall be determined by multiplying the monthly heat input rate by the appropriate AP-42 emission factor for natural gas or propane combustion.

    [Application No. 0570057-057-AC; and Rule 62-212.400(12), F.A.C. (PSD Avoidance)]

11. Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions.

    a. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 10 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.

    b. The permittee shall report to the Department's permitting and compliance authority within 60 days after the end of each calendar year during the 10-year period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

        (1) The name, address and telephone number of the owner or operator of the major stationary source;

        (2) The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;

        (3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and

        (4) Any other information that the owner or operator wishes to include in the report.

    c. The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

    d. The permittee shall compute and report annual emissions in accordance with Rule 62-210.370(2), F.A.C. as provided by Appendix C of this permit. For this project, the permittee shall use the following methods in reporting the actual annual CO, VOC, and $SO_2$ emissions for EU 026 & EU 030 - EU 034:

        (1) For the process stack, compliance with the CO and $SO_2$ emissions shall be demonstrated by CEMS on a 12-month rolled monthly averaging basis. For the hygiene stack, compliance with the $SO_2$ emissions shall be demonstrated by CEMS on a 12-month rolled monthly average basis. Stack testing shall be conducted on the hygiene stack and process stack to determine the VOC emission rates.

(2) For the battery breaking area (EU 026), compliance with the VOC and $SO_2$ emissions shall be demonstrated by stack testing.

(3) Compliance for EU 034 (Combustion Gases from Refining Kettles), shall be determined by multiplying the monthly heat input rate by the appropriate AP-42 emission factor for natural gas or propane combustion.

(4) As defined in Rule 62-210.370(2), F.A.C., the permittee shall use a more accurate methodology if it becomes available.

e. Baseline emissions of CO, VOC and $SO_2$ were determined to be 364.8 TPY, 27.6 TPY and 261.2 TPY, respectively. The could have accommodated emissions were determined to be 360.7 TPY for CO, 5.73 TPY for VOC and 452.3 TPY for $SO_2$.

[Application 0570057-057-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]

12. Design Fan Speeds & Design Motor Capacities: This permit does not authorize construction on the fans, fan speeds, or motors to any control device. The permittee shall provide the design revolutions per minute (RPM) and the design motor capacities in brake horsepower (BHP) with the application required in **Section 2, Condition 9**. Any changes in the design fan speeds or the design motor capacities would require an air construction permit prior to making a change. Prior to the issuance of this permit, the following design specifications have been provided:

| EU No. | EU Description | Control Device | Design Fan Speed (RPM) | Design Motor Capacity (BHP) |
|---|---|---|---|---|
| 026 | Battery Breaking Area | Scrubber | 2,336 | 114.44 |
| 030 | Feed Dryer | Dryer Baghouse | 1,760 | 86.0 |
| 031 | Reverb Furnace | everb and Blast Baghouse | 1,800 | 345 |
| 032 | Blast Furnace | | | |
| 033 | Furnace Tapping, Charging, and Refining | Hygiene Baghouse | 971 | 107.1 |
| 035 | Building Ventilation | Torit Filters A B C | 1,420 | 156 |
| 038 | Additional Building Ventilation | Torit Filters D, E | 1,393 | 246 |

a. Fan speed and motor capacities based on a temperature of 70°F and fan static pressure of 20.0" of water.
b. Fan speed and motor capacities based on a temperature of 250°F and fan static pressure of 25.5" of water.
c. Fan speed and motor capacities based on a temperature of 325°F and fan static pressure of 28.0" of water.
d. Fan speed and motor capacities based on a temperature of 70°F and fan static pressure of 17.5" of water.
e. Fan speed and motor capacities based on a temperature of 70°F and fan static pressure of 12.0" of water.
f. Fan speed and motor capacities based on a temperature of 70°F and fan static pressure of 16.0" of water.

[Application 0570057-057-AC; and Rule6-24.070(3), F.A.C.]

13. Other Permits. The conditions of this permit supplement all previously issued air construction and operation permits for these emissions units. Unless otherwise specified below, these conditions are in addition to all other applicable permit conditions and regulations. The facility remains subject to all of the requirements contained in all previously issued air construction permits for this facility. [Rule 62-4.070, F.A.C.]

Changes to any previously established permit conditions are highlighted in yellow with deletions shown in ~~strike through~~ text and additions in double underline text.

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. Alkaline Reagent Silo (EU 028)

This section of the permit addresses the following emissions unit.

| EU No. | Emission Unit Description |
|---|---|
| 028 | Alkaline Reagent Silo |

The alkaline reagent is received and stored in the 85' high silo. The alkaline reagent is then transferred from the silo to the desulfurization process and to the sulfur dioxide scrubber, which is used to control the $SO_2$ emissions from the reverb and blast furnaces. Emissions from the silo consist of PM and are controlled by a Modu-Kleen (from Dynamic Air Hypoly Filter) bin vent filter atop of the silo that filters the air displaced from the silo loading operation.

**PERMITS MODIFIED**

1. The following revision replaces Specific Condition 2 (Maximum Fill Rate) in Section 3, Subsection E of **Permit No. 0570057-030-AC (PSD-FL-404C):**

   Maximum Fill Rate: The maximum fill rate for each silo shall not exceed 50 TPH with a maximum capacity of 45,000~~25,000~~ tons per any consecutive twelve-month period.
   [Application No. 0570057-037~~020~~-AC; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

This section of the permit addresses the following emissions units.

| EU No. | Emission Unit Description |
|---|---|
| 030 | Feed Dryer |
| 031 | Collocated Reverb Furnace |
| 032 | Collocated Blast 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/hour) natural gas burners (with propane as a backup fuel). PM and Pb emissions from the feed dryer are controlled by a Foster Wheeler shaker type baghouse with a design flow rate of 18,000 actual cubic feet per minute (acfm) at approximately 200°F before being ducted to the 130-foot 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 30 MMBtu/hour burners. Slag from the reverb furnace and other lead bearing scrap materials will be fed to a blast furnace that produces hard lead. Other non-lead bearing fluxes and associated materials, including but not limited to coke, cast iron, silica, limerock, and shredded steel, are also added to the furnace as needed. Metallurgical coke will be combined with slag to help supply fuel for the blast furnace smelting process. Coke breeze may also be added to the slag as a reductant.

The blast furnace produces a slag (i.e., by-product) which will be either reused or reclaimed in the furnace. The slag is first tested using the EPA Methods 1311, 3005a and 6010b for sampling, preparation, digestion and analysis of Toxicity Characteristic Leaching Procedure extracts. If the slag is characteristically hazardous for lead, the material is treated with a stabilizing agent or returned to the furnaces for further reclamation. When the treatment process is chosen, the slag is tested again using the TCLP Methods 1311, 3005a and 6010b. The stabilizing agent is delivered in pre-filled super sacs from the supplier. Blast and Reverb Operating Collocated: Exhaust gases from both furnaces are ducted to a 10 MMBtu/hour afterburner, followed by a Foster Wheeler shaker type baghouse and a 54,000 acfm wet Sulfur Dioxide scrubber before being combined with the exhaust gases from the feed dryer for final discharge through the 130-foot process stack. Blast Operation Only Mode: Exhaust gases from the blast furnace are ducted to a blast only dedicated afterburner. The dedicated afterburner will require a startup period where the dedicated afterburner burners will be firing while the reverb burners are in high or low fire (dedicated afterburner standby mode). Once the dedicated afterburner reaches required temperature for operating, the reverb burners will be placed in banked mode.

## EQUIPMENT

1. Reverb Furnace: The permittee is authorized to make the following changes to the reverb furnace (EU 031).
   a. *Burners*. That permittee is authorized to reposition and adjust the angle of the existing reverb burners to improve fuel consumption, heat utilization and decrease wear of the furnace refractory.
   b. *Differential Pressure (dP) Sensors.* The permittee is authorized to install low range dP sensors to control furnace draft/damper position.
   c. *Coke Feeder.* The permittee is authorized to install a new coke feeder for better control of coke addition to the reverb furnace.

   [Application No. 0570057-037-AC; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

## PERMITS BEING MODIFIED

2. The following revision replaces Specific Condition 10 (Lead Production) in Section 3, Subsection B of **Permit No. 0570057-030-AC (PSD-FL-404C).**

Lead Production: The maximum refined lead produced from the EFT facility shall not exceed 200,000~~150,000~~ tons in any consecutive twelve-month period.
[Application No. 0570057-037~~020~~-AC and Rule 62-210.200(PTE), F.A.C.]

3. The following revisions replace the referenced specific conditions in **Permit No. 0570057-035-AC (PSD-FL-404D).**

   a. *Section 3, Subsection A, Specific Condition 1* (*Furnace Capacities)*

   Furnace Capacities: Any equipment or any other changes authorized as part of this permit, shall not result in any capacity increase of the reverb or blast furnaces. The reverb furnace shall still be limited to a maximum charge rate of ~~is~~ 960 tons per day (TPD) with a maximum capacity of 338,400~~262,800~~ tons in any twelve-month consecutive period. The blast furnace shall still have a maximum charge rate of 180 TPD with a maximum capacity of 65,700 tons in any twelve-month consecutive period. [Application No. 0570057-037~~035~~-AC; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

   b. *Section 3, Subsection A, Specific Condition 2* (*Lead Production)*

   ~~Lead Production: Any equipment or any other changes authorized as part of this permit, shall not result in any lead production increase. The maximum lead produced from the EFT facility shall continue not exceed 150,000 tons in any consecutive twelve-month period. [Application No. 0570057-035-AC; Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]~~

   c. *Section 3, Subsection A, Specific Condition 13* (*Nitrogen Oxides ($NO_X$) Emission Standard)*

   $NO_X$ Emission Standard: $NO_X$ emissions from the feed dryer shall not exceed 0.21 lb/MMBtu and 2.1 pounds per hour (lb/hr) as demonstrated by a combined 42.2 lb/hr 30-day rolling CEMS average on the process stack. $NO_X$ emissions from the blast furnace and reverb furnace shall not exceed 0.80 lb/ton and 0.80 lb/ton of material charged, respectively, as demonstrated by a combined 42.2 lb/hr 30-day rolling CEMS average on the process stack. ~~$NO_X$ emissions from the process stack shall not exceed 158 tons per year (tpy) on a 12-month rolled month CEMS average basis~~. [Application No. 0570057-037~~035~~-AC; Rules 62-4.070(3), 62-210.200(PTE), and 62-212.400(10)(c), F.A.C.~~; and PSD Avoidance~~]

   d. *Section 3, Subsection A, Specific Condition 14* (*CO Emission Standard)*

   CO Emission Standard: CO emissions from the feed dryer and blast furnace and reverb furnace shall not exceed 204.7 lb/hr as demonstrated by a combined 30-day rolling CEMS average on the process stack. ~~CO emissions from the process stack shall not exceed 464 tpy on a 12-month rolled month CEMS average basis~~.
   [Application No. 0570057-037~~035~~-AC; Rules 62-4.070(3)~~;~~ and 62-210.200(PTE), F.A.C.~~; and PSD Avoidance~~]

   e. *Section 3, Subsection A, Specific Condition 15* (*$SO_2$ Emission Standard)*

   $SO_2$ Emission Standard: $SO_2$ emissions from the feed dryer, blast furnace and reverb furnace combined with $SO_2$ emission from the hygiene stack shall not exceed 202.24 lb/hr as demonstrated by a combined 30-day rolling CEMS averages on the hygiene and process stacks. ~~$SO_2$ emissions from the process stack shall not exceed 202 tpy on a 12-month rolled month CEMS average basis.~~ [Application No. 0570057-037~~035~~-AC; Rules 62-4.070(3)~~;~~ and 62-210.200(PTE), F.A.C.~~; and PSD Avoidance~~]

## C. Furnace Tapping, Charging and Refining (EU 033)

This section of the permit addresses the following emissions unit.

| EU No. | Emission Unit Description |
|---|---|
| 033 | Furnace Tapping, Charging and Refining |

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 the 130-foot hygiene stack.

The refining kettles, with a design processing rate of 66 TPH, are indirectly heated by natural gas burners (EU ID 034) 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, $SO_2$ and trace metal HAP. The PM and metals HAP, including Pb, are controlled by the hygiene baghouse.

The initial startup date of the furnace tapping, charging and lead refining was 12/15/12.

**PERMITS MODIFIED**

1. The following revision replaces Specific Condition 6 (Lead Production) in Section 3, Subsection C of **Permit No. 0570057-030-AC (PSD-FL-404C):**

   Lead Production: The maximum refined lead produced from the EFT facility shall not exceed 200,000~~150,000~~ tons in any consecutive twelve-month period.
   [Application No. 0570057-037~~020~~ and Rule 62-210.200(PTE), F.A.C.]

## D. Building Ventilation (EU 035 & 038)

This section of the permit addresses the following emissions units.

| EU No. | Emission Unit Description |
|---|---|
| 035 | Building ventilation of enclosed facility controlled by Torit filter. |
| 038 | Building ventilation of enclosed facility controlled by new Torit filter with secondary HEPA filter. |

EnviroFocus has enclosed all process areas of the facility and ventilated the air exhausted from the facility through two large 195,000 and 160,000 acfm Torit cartridge collectors identified as Torit filters. The 160,000 acfm Torit collector have a high efficiency particulate air (HEPA) filter downstream of the cartridge collector. This air flow produces an inward draft velocity at all openings in the building to prevent PM and Pb emissions from escaping uncontrolled. The filtered gases are emitted from two new stacks identified as the Torit stacks.

**PERMITS MODIFIED**

1. The following revision replaces Specific Condition 5 (Production) in Section 3, Subsection G of **Permit No. 0570057-030-AC (PSD-FL-404C):**

   Production: ~~Upon completion of the total enclosure, t~~The maximum refined lead produced from the enclosed facility shall not exceed 200,000~~150,000~~ tons any consecutive twelve-month period. [Application No. 0570057-037~~020~~-AC and Rule 62-210.200(PTE), F.A.C.]

## E. Facility Grounds and Roadways (EU 036)

This section of the permit addresses the following emissions unit.

| EU No. | Emission Unit Description |
|---|---|
| 036 | Facility Grounds and Roadways |

Vehicular traffic movement on plant roads and in parking areas produces fugitive emissions of PM and Pb. These fugitive emissions from paved areas at the plant are controlled by a variety of work practice standards, including vacuum sweeping and wet suppression. Also, as required by the Secondary Lead Maximum Achievable Control Technology (MACT), (40 CFR 63, Subpart X) the building has two mobile wheel wash stations to remove lead contamination from vehicles prior to exiting the building.

There are two ambient air monitoring stations for lead in Total Suspended Particles (Pb-TSP): EnviroFocus Special (EFS), Kenly Elementary School (Station ID: 12-057-0100). EFS is located at an adjacent property that is owned by Gopher Resources and is a non-regulatory special purpose monitor. Both devices operate at a sampling frequency of once every six days. Also, there are two other lead monitoring stations, the CSX Railyard [Station ID: 12-057-1066] and former Patent Scaffolding [Station ID: 12-057-1073], which are operated and maintained by the EPC.

### PERFORMANCE RESTRICTIONS

1. Permitted Capacity: The permittee is authorized to receive up to 45,000 tons of solid soda ash during a 12-month period (for feed desulfurization) by truck or by rail shipment. [Application No. 0570057-037-AC and Rule 62-210.200(PTE), F.A.C.]

### WORK PRACTICE STANDARDS

2. Additional Work Practice Standards:
   a. *Silt and Lead Sampling*. Upon submitting a Title V renewal application, the permittee shall include silt and lead sampling results utilizing the same protocols in sampling that was submitted in Application No. 0570057-037-AC. The sampling shall be completed no earlier than 60 days prior to the due date of a Title V permit renewal application. [Application No. 0570057-03-AC and Pb Attainment SIP]
   b. *Scrap Yard Cover*. The entire adjacent scrap yard, recently purchased by EnviroFocus, shall be covered with vegetation within six months of the effective date of this permit. [Pb Attainment SIP]
   c. *Scrap Yard Maintenance Plan*. With the Title V permit application, required by **Section 2, Condition 9** of this permit, the application shall include a Maintenance Plan to minimize fugitive dust arising from the scrap yard. The Maintenance Plan at a minimum shall include a landscaping protocol to include based on sprinklers (zones, times, durations, etc. to ensure the cover is health and there are and that there are minimal bare spots, i.e., open dirt surfaces. [Pb Attainment SIP]
   d. *Truck Traffic and Parking.* Trucks leaving, arriving or parking at the EFT Facility that are involved in delivery of feedstocks, are prohibited from traversing or parking at the adjacent scrap yard. Vehicle traffic is only permitted for maintenance purposes. A new air construction permit application will be required, with possible additional air dispersion modeling for lead, to allow trucks to utilize the scrap yard or to repurpose the scrap yard to another purpose such as storage. [Rules 62-4.070(3); 62-210.200(PTE) and 62-212.400(12), F.A.C. (PSD Avoidance)]

### RECORDS AND REPORTS

3. Operational Data: Records of the tons of solid soda ash received by truck during any 12-month period shall be submitted to the Department, upon request. [Rule 62-4.070(3), F.A.C.]

4. Design Concept Report: The 100% design concept for the vegetative cover of the scrap yard shall be submitted to the Permitting Authority and Compliance Authority within five business days from the receival date from an engineering firm. [Rule 62-4.070(3), F.A.C. and Pb Attainment SIP]