



Florida Tire Recycling, Inc.

February 27, 1990

CERTIFIED MAIL

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Dept. of Environmental Reg.
West Palm Beach

Mr. Joseph W. Lurix
Solid Waste Permitting
Florida Department of
Environmental Regulation
Southeast District
1900 S. Congress Avenue, Suite A
W. Palm Beach, FL 33406

Re: Florida Tire Recycling, Inc., Permit No. WT56-165345

Dear Mr. Lurix:

This responds to your letter dated February 9, 1990, received by Florida Tire Recycling, Inc., on February 13, 1990, concerning Florida Tire's waste tire processing facility in St. Lucie County. I will respond to the numbered allegations set forth within your letter in the same order.

1. Your first allegation concerns the cost of removing processed waste tires from the Florida Tire site. Firstly, Florida Tire disagrees with the estimate of the amount of processed waste tires on-site. Setting aside our disagreement with your estimate of the cubic yards of material at the facility, our experience has been that processed waste tires run between 200 and 250 pounds per cubic yard, not the 450 pounds per cubic yard used in your estimate.

Moreover, for this material, the only disposal cost that Florida Tire would incur is the cost of transporting shredded tires to the St. Lucie County Landfill. Florida Tire has negotiated with St. Lucie County an agreement that will provide for the Landfill accepting shredded tire material as daily cover in exchange for Florida Tire transporting the material to the Landfill site. Of course, this material will meet the requirements of Fla. Admin. Code Rule 17-711.400(3)(A), the Rules and Regulations of the Florida Department of Transportation, and the St. Lucie County Code of Ordinances, as such may be amended from time to time. Thus, during the next period, the amount of shredded tire material stored at the Florida Tire site will be reduced significantly. We continue to believe that our estimated cost of closure as set forth within the permit application remains accurate.

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2. You have also alleged that the Florida Tire facility has exceeded its storage limit, which you have indicated is 1,500 tons per day. Apparently this somewhat unclear (tons vs. tons per day) condition is being read by the Florida Department of Environmental Regulation as flowing from Florida Tire's indication that, at the time of the permit, it was processing approximately 50 tons of waste tires per day. That indication, however, did not relate to the capacity of our equipment, which in fact is approximately 150 tons per day.

Given this apparent anomaly (our storage capacity greatly exceeds 1,500 tons, and our daily capacity to process waste tires likewise greatly exceeds 50 tons per day), we intend to request amendment of our permit accordingly. Please advise if there is any particular matter concerning this amendment that you wish addressed at the time of our filing.

3. Your next allegation indicates that our waste tire piles exceeded the maximum dimensions as set forth in Fla. Admin. Code Rule 17-711.540(2)(B). Please be advised that Florida Tire Recycling is moving expeditiously to correct this matter and will bring all processed waste tire piles into compliance within 60 days of the date of inspection.

4. Although I am somewhat unsure concerning this item, you have noted that our 6,000 square foot building did not, on the date of your inspection, house recycling equipment. As set forth in the permit application, Florida Tire formerly (through mid-December 1989) conducted recycling of various tire parts using a variety of equipment that was housed in the building. Copies of photographs depicting the equipment and operations are enclosed for your convenience. In late 1989, these operations were determined to be infeasible for a variety of factors, not the least of which was the lack of a semiskilled labor pool in St. Lucie County capable of using the involved equipment. In December 1989, the equipment was removed to a New England company that has been recycling used tires since 1977. Nonetheless, Florida Tire continues to shred nonrecyclable waste tires, and also continues to conduct a substantial used casing operation (identifying, retrieving, and reselling used tire casings for which a market exists for recapping purposes).

Concerning the structure, Florida Tire has been exploring for several months the possibility of developing a market for granulated rubber. Such an operation would involve substantial additions of equipment beyond the tire shredders currently on-site. Essentially, chips generated by Florida Tire's current shredding equipment would be further processed to produce granulated rubber. The most recent correspondence concerning Florida Tire's review of this process is enclosed.

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Florida Tire seeks to operate fully within the boundaries of its permits and all governing regulations. We have attempted to meet a very substantial need in an environmentally sensitive and business-like fashion. As noted above, any technical noncompliance with Florida Tire's permits or applicable regulations has been inadvertent and will be corrected immediately. Please let me know if additional information is needed.

Sincerely,


FLORIDA TIRE RECYCLING, INC.

John J. Wilson
Secretary-Treasurer

JJW

Enclosures