Florida Department of
Environmental Protection
South District Office
Post Office Box 2549
Fort Myers, Florida 33902-2549

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

September 22, 2011

FedEx Tracking No. 701698315000482

Entered into OCULUS South District

Garden Street Iron & Metal Inc. of SW Florida
c/o Mr. Rob Weber
3350 Metro Parkway
Fort Myers, Florida 33902

Re: Lee County - SW
Garden Street Iron & Metal (Waste Tire Processing Center)
Modifications to Permit No. 0296251-001-WT/02, WACS ID No. 00098386
Application No. 0296251-002-WT/02

Dear Mr. Weber:

The Department hereby approves the permit modifications requested by Garden Street Iron & Metal Inc. of SW Florida in correspondence (dated August 12, 2011 and received August 15, 2011) to modify the referenced Permit.

The modifications are approved as Permit Modification No. 0296251-002-WT/02. Please attach this letter to Operation Permit No. 0296251-001-WT/02, as it becomes a part of that Permit. All other conditions of the Permit remain unchanged.

The modifications to the existing Specific Conditions [Specific Condition Nos. 5, 6, 16, and 17] and the addition of two (2) new Specific Conditions [Specific Condition Nos. 22 and 23] to the current Permit are as follows:

5. The Permittee shall strictly abide by the storage limit of 16,000 waste tires at any one time on the site and comply with all applicable storage requirements in F.A.C. Rule 62-711.540.

6. The 50 foot x 70 foot waste tire (3,000 tires) and 75 foot x 100 foot processed tires (8,000 tires) storage areas shall be clearly marked. The areas are to be identified as waste tire and processed tire storage only. The blending storage area does not need to be marked. The quantity of waste tires in the blending area should not exceed 5,000 tires at any time. The waste tires shall be kept in one designated area within the blending area. The waste tire designated area within the blending area can be relocated depending on the operational needs of the facility.

16. The Permittee shall keep a copy of the "Revised" Operations and Emergency Preparedness Manuals at the site at all times.

17. **FINANCIAL RESPONSIBILITY:**

a) Financial Assurance Mechanism:

The Permittee shall maintain, in good standing, the financial assurance mechanisms established to demonstrate proof of financial assurance. Support documentation and evidence of inflation adjustment increases within the time frames specified in Rule 62-701.630, F.A.C. All submittals in response to this Specific Condition shall be sent to:

Florida Department of Environmental Protection
Financial Coordinator - Solid Waste Section
2600 Blair Stone Road, Mail Station 4565
Tallahassee, Florida 32399-2400

b) Annual Cost Estimates:

The Permittee shall annually adjust the long-term care cost estimate(s) for inflation using Form 62-701.900(28). Adjustments shall be made in accordance with F.A.C. Rule 62-701.630(4), and, as applicable, 40 CFR Part 264.142(a) and 254.144(a). An owner or operator using a letter of credit, guarantee bond, performance bond, financial test, corporate guarantee, trust fund or insurance shall submit the adjusted cost estimate(s) between January 1 and March 1. An owner or operator using an escrow account shall submit the adjusted estimate(s) between July 1 and September 1. All submittals in response to this Specific Condition shall be sent to:

Florida Department of Environmental Protection
South District Office
Post Office Box 2549
Fort Myers, Florida 33902-2549

With a copy to:

Florida Department of Environmental Protection
Financial Coordinator - Solid Waste Section
2600 Blair Stone Road, Mail Station 4565
Tallahassee, Florida 32399-2400

22. The Permittee shall ensure that the temperature within the above-ground piles of processed tires over ten feet high shall be monitored and that the temperature within the pile does not exceed 300 degrees Fahrenheit in accordance with F.A.C. Rule 62-711.540(4).

23. The Permittee shall submit to the District office an updated Form 62-701.900(5), Financial Mechanisms for Solid Waste Management facilities Requiring Closure and /or Long-term Care, effective date January 6, 2010 adjustment statement of closure cost estimate pursuant to F.A.C. Rule 62-711.500(3) which reflects the increased cost estimate to dispose of the permitted quantity of 16,000 waste tires, as outlined in Section 6 of the Operations Manual, no later than thirty (30) days from the date of this letter permit modification. The Permittee shall submit a copy of the updated closure cost estimate along with a new financial instrument corresponding to the closure cost estimate to: Solid Waste Financial Coordinator, Department of Environmental Protection, 2600 Blair Stone Road, Mail Station 4565, Tallahassee, Florida 32399-2400. **The permittee shall not increase the number of waste tires stored on site until the financial instrument has been approved.**

Should you need further information regarding the substantial modification, please feel free to contact Mr. Albert McLaurin at 239-344-5605 or by e-mail to Albert.McLaurin@dep.state.fl.us.

NOTICE OF RIGHTS

The Department's *Notice of Modification* will be considered final, unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, Florida Statutes (F.S.). The petition must contain the information required by Florida Administrative Code (F.A.C.), Rule 28-106.201 or Rule 28-106.301, and must be filed (received) within fourteen (14) days of receipt of this written notice in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. A copy of F.A.C., Chapter 28-106 can be found at:

http://fac.dos.state.fl.us

Mediation is not available in this proceeding.

Any party to this 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, Florida Rules of Appellate Procedure, with the clerk of the Department 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 of appeal must be filed within thirty (30) days after this order is filed with the clerk of the Department.

Executed in Lee County, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Jon M. Iglehart
Director of District Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency Clerk herby certifies that this NOTICE OF PERMIT MODIFICATION ISSUANCE and all copies were mailed before the close of business on **September 22, 2011**, to the listed persons.

FILING AND ACKNOWLEDGMENT

FILED, on this date, under Section 120.52(7), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk)	**09-22-2011** (Date)

Attachment
JMI/ADM/se

Copies furnished to:

William T. Keene, P.E., Keene Engineering, Inc. tim@keenefl.com
Charles Emery, DEP charles.emery@dep.state.fl.us
Albert D. McLaurin, DEP albert.mclaurin@dep.state.fl.us
Bill Krumbholz, DEP bill.krumbholz@dep.state.fl.us
Jay Standiford, DEP james.standiford@dep.state.fl.us

CERTIFICATION

Permit Modification No.: 0296251-002-WT/02

Project: Garden Street Iron & Metal (Waste Tire Processing Center)

Substantial Modification of Permit No. 0296251-001-WT/02 to Allow Facility to Increase the Number of Waste Tires On-Site From 8,000 to 16,000 and Modify Site Waste and Processed Tire Storage Layouts

I HEREBY CERTIFY that the engineering features, described in the application referenced above, provide reasonable assurance of conformance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code, Chapter 62. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise, including, but not limited to, the electrical, mechanical, structural, and geological features.

Albert David McLaurin, P.E.

License No. 54835

Department of Environmental Protection
South District Office

(Signature)

SEPTEMBER 22, 2011
(Date)

ALBERT DAVID McLAURIN
LICENSE
No. 54835
STATE OF FLORIDA
PROFESSIONAL ENGINEER

(Seal)

McLaurin, Albert

From: Crandall, Lea
Sent: Thursday, September 22, 2011 12:29 PM
To: McLaurin, Albert
Cc: Emery, Charles; Krumbholz, Bill; Standiford, James; Edwards, Susan
Subject: RE: WACS#98386 - Garden Street Iron & Metal: Petitions for Notice of Application

Hi,

No petitions were filed.

Thanks,
Lea

Lea Crandall
Agency Clerk
Office of General Counsel
3900 Commonwealth Blvd., MS 35
Tallahassee, FL 32399-3000
Phone (850) 245-2212
Fax: (850) 245-2303

Florida's Water - Ours to Protect: Check out the latest information on Florida Water Issues at http://www.protectingourwater.org/ presented by the Florida Department of Environmental Protection.

From: McLaurin, Albert
Sent: Thursday, September 22, 2011 12:24 PM
To: Crandall, Lea
Cc: Emery, Charles; Krumbholz, Bill; Standiford, James; Edwards, Susan
Subject: WACS#98386 - Garden Street Iron & Metal: Petitions for Notice of Application

Ms. Crandall,

The above referenced facility published the "Notice of Application" on August 30, 2011. The 14 day waiting period should have expired on September 14, 2011. The permit number is 0296251-002-WT/02. Has OGC received any petitions against this permit application. Thank you.

Regards,

Albert D. McLaurin, P.E.
Program Administrator
Florida Department of Environmental Protection
South District Office
2295 Victoria Avenue, Suite 364
P.O. Box 2549
Fort Myers, FL 33902-2549
Phone: 239-344-5605
Fax: 850-412-0590

NEWS-PRESS

Published every morning – Daily and Sunday

Fort Myers, Florida

Affidavit of Publication

STATE OF FLORIDA
COUNTY OF LEE

Before the undersigned authority, personally appeared
Jessica Braband
who on oath says that he/she is the
Legal Assistant of the News-Press, a daily newspaper, published at Fort Myers, in Lee County, Florida; that the attached copy of advertisement, being a

Notice of Action

In the matter of:
Application Submitted to the Florida Department of Environmental Protection
In the court was published in said newspaper in the issues of

AUGUST 30, 2011

Affiant further says that the said News-Press is a paper of general circulation daily in Lee, Charlotte, Collier, Glades and Hendry Counties and published at Fort Myers, in said Lee County, Florida and that said newspaper has heretofore been continuously published in said Lee County; Florida, each day, and has been entered as a second class mail matter at the post office in Fort Myers in said Lee County, Florida, for a period of one year next preceding the first publication of the attached copy of the advertisement; and affiant further says that he/she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before me this 30th day of August, 2011.

by **Jessica Braband**
personally known to me or who has produced

as identification, and who did or did not take an oath.

Notary Public

Print Name Shawnmarie Pitts
My commission Expires: 3/15/2013

NOTARY PUBLIC-STATE OF FLORIDA
Shawnmarie Pitts
Commission # DD870574
Expires: MAR. 15, 2013
BONDED THRU ATLANTIC BONDING CO., INC.

Notice of Application Submitted to the Florida Department of Environmental Protection

The applicant, Garden Street Iron & Metal, Inc. c/o Rob Weber, President, 3350 Metro Parkway, Fort Myers, Florida 33916, announces submittal of an application to the Department for a permit to modify a Waste Tire Processing Facility, specifically identified as Garden Street Tire Processing Facility. The Facility is located at 3350 Metro Parkway, Fort Myers in Lee County, Florida 33916. This application (No. 0296251-002-WT/02, WACS ID No. 98386) is being processed by the Department and is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida. Any comments or objections should be filed in writing with the Department at this address or mailed to P.O. Box 2549, Fort Myers, Florida 33902-2549. Comments or objections should be submitted as soon as possible to ensure that there is adequate time for them to be considered in the Department's decision on the application.
Aug 30 No. 1436585

Waste Tire Processing Facility
Permit Modification Application

Facility: GARDEN STREET IRON & METAL
(WASTE TIRE PROCESSING CENTER)
WACS ID NO. 000098386

Location: 3350 METRO PARKWAY
FORT MYERS, FLORIDA 33916

Applicant: GARDEN STREET IRON & METAL INC. OF S.W. FLORIDA
ROB WEBER, PRESIDENT

Submitted to: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
PO BOX 2549
FORT MYERS, FLORIDA 33902-2549

Prepared by: KEENE ENGINEERING, INC.
PO BOX 2770
FORT MYERS, FLORIDA 33902

keene
ENGINEERING, INC

Date: August 12, 2011

Entered into
DOCUWORKS
South District

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SOUTH DISTRICT

BOOK 1 OF 2

August 12, 2011

Mr. Albert McLaurin, PE
Florida Department of Environmental Protection
2295 Victoria Ave, Ste. 364
Fort Myers, Florida 33901

Re: Garden Street Iron and Metal Waste Tire Processing Facility
Permit No. 0296251-001-WT/02, WACS ID No. 00098386
Permit Modification Application

Dear Mr. McLaurin:

Please find attached our application to modify the above reference permit for Garden Street Iron and Metal. The main item being modified in this application is the total number of tires to be on site at any given time. We are requesting that this number be raised from 8,000 to 16,000 tires. In addition to the application, Appendix A to the application, the Operation Manual, has been updated and included herewith.

Additionally, the closing cost estimate has been revised and is a part of the appendix. Once it meets with your approval, we will have the financial assurance document updated.

Should you have any questions, do not hesitate to give me a call

Sincerely,
KEENE ENGINEERING, INC.

William T. Keene

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D.E.P. South District

William T. Keene, PE
President
45915

Enclosures

Cc: Garden Street Iron and Metal, applicant

PO Box 2770, Fort Myers, Florida 33902
(239) 939-0524 (239) 939-1968 fax

Waste Tire Processing Facility
Permit Modification Application

Facility: GARDEN STREET IRON & METAL
(WASTE TIRE PROCESSING CENTER)
WACS ID NO. 000098386

Location: 3350 METRO PARKWAY
FORT MYERS, FLORIDA 33916

Applicant: GARDEN STREET IRON & METAL INC. OF S.W. FLORIDA
ROB WEBER, PRESIDENT

Submitted to: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
PO BOX 2549
FORT MYERS, FLORIDA 33902-2549

Prepared by: KEENE ENGINEERING, INC.
PO BOX 2770
FORT MYERS, FLORIDA 33902

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SOUTH DISTRICT

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AUG 15 2011
D.E.P. South District

keene
ENGINEERING, INC

Date: August 12, 2011

DEPARTMENT OF ENVIRONMENTAL PROTECTION
0296251
002-WT/02
PERMIT
SEPT. 22, 2011
ADM
STATE OF FLORIDA

WILLIAM TIMOTHY KEENE
LICENSE
No. 45915
STATE OF FLORIDA
PROFESSIONAL ENGINEER

8-12-11

William T. Keene, PE 45915 Date

BOOK 1 OF 2

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WASTE TIRE PROCESSING FACILITY
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Reset Form | Print Form

Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEP Form # 62-701.900(23)
Form Title: Waste Tire Processing Facility Permit Application
Effective Date: January 6, 2010
Incorporated in Rule 62-711.530(6)

Waste Tire Processing Facility Permit Application

Permit No. 0296251-001-WT / 02

Renewal ☐ Modification ■ Existing unpermitted facility ☐ Proposed new facility ☐

DEPARTMENT OF ENVIRONMENTAL PROTECTION 0296251-002-WT/02 PERMIT Sept. 22, 2011 ADM STATE OF FLORIDA

Part I-General Information:

A. Applicant Information:

1. Applicant Name: Garden Street Iron & Metal Inc. of S.W. Florida
2. Applicant Street Address: 3350 Metro Parkway
3. City: Fort Myers, Fl. County: Lee Zip: 33916
4. Applicant Mailing Address: 3350 Metro Parkway
5. City: Fort Myers, Fl. County: Lee Zip: 33916
6. Contact person: Rob Weber Phone: (239)337-5865 FEID No: 65-0101411
7. Have any enforcement actions been taken by the Department against the applicant relating to the operation of any solid waste management facility in this state? This includes any Complaint, Notice of Violation, or revocation of a permit or registration, as well as any Consent Order in which a violation of Department rules is admitted. It does not include a Warning Letter, Warning Notice, Notice of Noncompliance, or other similar document which does not constitute agency action.
   Yes ☐ **No** ■ **If yes**, attach a history and description of the enforcement actions.

B. Facility Information:

1. Facility Name: Garden Street Iron & Metal (Waste Tire Processing Center)
2. Facility Street Address (Main Entrance): 3350 Metro Parkway
3. City: Fort Myers, Fl. County: Lee Zip: 33916
4. Facility Mailing Address: 3350 Metro Parkway
5. City: Fort Myers State: Florida Zip: 33916
6. Contact Person: Rob Weber Phone: (239)337-5865
7. Facility Location Coordinates:

   Section: 30 Township: 44S Range: 25E

   Latitude: 26 Deg. 37' 4.4" N. Longitude: 81 Deg. 51' 13.8"W
8. Anticipated date for starting construction constructed and for completion of construction constructd
9. Anticipated date for receipt of tires upon approval and for start of processing upon approval

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Mail completed form to appropriate district office listed below

Northwest District	Northeast District	Central District	Southwest District	South District	Southeast District
160 Government Center	7825 Baymeadows Way, Ste. 200 B	3319 Maguire Blvd., Ste. 232	13051 N. Telecom Pky	2295 Victoria Ave., Ste. 364	400 North Congress Ave.
Pensacola, FL 32501-5794	Jacksonville, FL 32256-7590	Orlando, FL 32803-3767	Temple Terrace, FL	Fort Myers, FL 33902-2549	West Palm Beach, FL 33401
850-595-8360	904-807-3300	407-894-7555	813-632-7600	239-332-6975	561-681-6600

C. Land Owner Information (*if different from applicant*):

1. Owner's name: _____
2. Land owner's mailing address: _____
3. City: _____ State: _____ Zip: _____
4. Authorized Agent: _____ Agent's phone ( ) _____
5. Current lease expires: _____

D. Facility Operator Information (if different from applicant):

1. Operator's name: _____
2. Operator's mailing address: _____
3. City: _____ State: _____ Zip: _____
4. Contact person: _____ Phone: ( ) _____

E. Preparer of Application:

1. Name of person preparing application: William T. Keene, P.E., Keene Engineering, Inc.
2. Mailing address: P.O. Box 2770
3. City: Fort Myers State: Florida Zip: 33902
4. Phone: (239)939-0524
5. Affiliation with facility: consulting engineer

Part II-Operations:

A. Facility type (check appropriate box):

■ Waste tire processing facility.

☐ Waste tire processing facility with on -site disposal of processed tires or processing residuals.

☐ Waste tire processing facility with on -site consumption of waste tires or processing residuals.

☐ Permitted solid waste management facility modification to allow wa ste tire site and processing.

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B. Type of processing facility (check as many as apply):

■Shredder ☐Cutter ☐Chopper ☐Incinerator only ☐Incinerator with energy recovery
☐Pyrolysis ☐Supplemental fuel user ☐Other, explain _____

C. Storage: Indicate the maximum quantities of whole waste tires, processed waste tires, and processing residuals, expressed in tons, to be stored at the facility, in accordance with Rule 62-711.530(2), F.A.C.

	Outdoor Storage(tons)	Outdoor Storage (sq.ft)	Indoor Storage (tons)	Indoor Storage (sq.ft)	**Total Storage (tons)**
Whole waste tires:	140	27,500	0	0	140
Processed tires: *	100	11,900	0	0	100
Processing residuals:					
TOTALS:	240	39,400	0	0	240

Included with other shredded material (fluff) in the final waste bunker, see operations plan regarding shredding of tires and other waster products.

D. For reporting quantity of tires in tons, tires will be: weighed on site ■ weighed off site ☐ weights will be calculated ☐

E. Facilities that will not be disposing of processed tire s or processing residual on the facility site must indicate the permitted solid waste management facility where processed tires or residuals will be disposed.

1. Name of facility Highlands County Solid Waste Management Center - Class I Landfill
2. Street address: 12700 Arbuckle Creek Road
3. City: Sebring County: Highlands Zip: 33870

F. Facilities that will be delivering processed tires to consuming facilities must describe the existing or proposed markets for those processed tires.
Consumed at the Highlands County Class I Landfill for use in the leachate/gas collection system, and as an alternative cover for the interior slopes of the landfill only in accordance with F.A.C. 62-711.400(3)(a).

Part III-Attachments:

A. Facility design

NOTE: All maps, plan sheets, drawings, isometrics, cross sec tions, or aerial photographs shall be legible; be signed and sealed by a registered professional engineer responsible for their preparation; be of appropriate scale to show clearly all required details; be numbered, referenced to narrative, titled, have a legend of symbols used, contain horizontal and vertical scales (where applicable), and specify drafting or origination dates; and use uniform scales as much as possible, contain a north arrow and use NGVD for all elevations.

1. A topographic or section map of the facility, including the surrounding area for one mile, no more than one year old, showing land use and zoning within one mile of the facility
2. A plot plan of the facility on a scale of not less than one inch equals 200 feet. At a minimum, the plot plan shall include
   a. The facility design, including the location and size of all storage and processing areas for used tires, unprocessed waste tires,processed waste tires, and waste tire processing residuals;
   b. All wetlands and water bodies within the facility or within 200 feet of any storage area;
   c. Stormwater control measures, including ditches, dikes, and other structures;
   d. Boundaries of the facility, legal boundaries of the land containing the facility, and any easements or rights of way that are within the facility or within 200 feet of any storage area;
   e. Location, size, and depth of all wells within the facility or within 200 feet of any storage area;
   f. All structures and buildings that are, or will be, constructed at the fac ility; include those used in storage and processing operations;
   g. All areas used for loading and unloading;
   h. All access roads and internal roads, including fire lanes;
   i. Location of all fences, gates, and other access control measures; and
   j. Location of all disposal areas within the facility.

B. Facility operation.

1. A description of the facility's operation, process and products including how waste tires will be received and stored.
2. A description of the equipment used for processin g tires. This description shall include the make, model, and hourly capacity of each piece of equipment.
3. Description of the waste from the process, the amount of waste expected and how and where this waste will be disposed of.
4. Statement of the maximum daily throughput and the planned daily and annual throughput.
5. A description of how the operator will maintain compliance with each of the storage requirements of Rule 62 - 711.540, F.A.C.
6. A copy of the emergency preparedness manual for the facil ity with a statement of the on site and off site locations where that manual will be maintained.
7. A copy of the fire safety survey
8. A description of how 75% of the annual accumulation of waste tires will be removed for disposal or recycling.

C. Completed closing plan for the facility as required by Rule 62 -711.700(2) and (3), F.A.C.

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D. Attach proof of financial responsibility as requirement by Rule 62 -711.500(3) OR a calculation showing that financial assurance documents, currently on file with the Department, are sufficient to assure closing of the waste tire site as well as any other solid waste management facility at that location.

E. A letter from the land owner (if different from applicant) authorizing use of the land as a waste tire pr ocessing facility.

F. If waste tires will be consumed or diposed of at the facility, attach a description of the other environmental permits that the applicant has for this use, including, permit number, date of issue, and name of issuing agency

G. The permit fee as required in Rule 62-4, F.A.C.

Part IV-Certification:

A. Applicant:

The undersigned applicant or authorized representative of Garden Street Iron & Metal Inc. of S.W. Is aware that statements made in this form and attached information are an application for a Florida Permit from the Florida Department of Environmental Protection and certifies that The information in this application is true, correct and complete to the best of his knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chap ter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Department will be notified prior to the sale or legal transfer of the facility.

Signature of Applicant or Authorized Agent	Rob Weber, President Name and Title	8-15-11 Date

B. Professional Engineer registered in Florida.

This is to certify that the engineering features of this waste tire processing facility have been Designed/examined by me and found to conform to engineering principals applicable to such facilit ies. In my professional judgment, this facility, when properly maintained and operated will comply with all applicable statues of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions for proper maintenance and operation of the facility.

Signature	P.O.Box 2770 Mailing Address
William T. Keene Name and Title	Fort Myers, Fl. 33902 City, State, Zip
45915 Florida Registration Number	239-939-0524 Telephone number

(please affix seal)

WILLIAM TIMOTHY KEENE
LICENSE
No. 45915
STATE OF
FLORIDA
PROFESSIONAL ENGINEER

8-12-11
Date

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APPLICATION NARRATIVE

GARDEN STREET IRON & METAL
(Waste Tire Processing Center)

The following narrative is intended to accompany the Waste Tire Processing Facility Permit Modification Application for the above reference project, FDEP application form 62-701.900(23). Part and item references refer to sections of the application form.

Part I - General Information

A. Applicant Information:
A.1. – The applicant name is Garden Street Iron and Metal, Inc. of S.W. Florida.

Items A.2. thru A.7. - Please see the application form.

B. Facility Information:
Items B.1. thru B.7. - Please see application form.

Item B.8. and B.9. – Garden Street Iron and Metal is an existing scrap processing facility which completed construction in May of 2008. A permit to operate a waste tire processing facility at Garden Street Iron & Metal was issued by FDEP on December 9, 2009, Permit/Certification No. 0296251-001-WT/02. The facility is presently operating.

Item B.9. – Please see application form.

C. Land Owner Information:
Please see application form.

D. Facility Operation Information:
Please see application form.

E. Preparer of Application:
Please see application form.

Part II – Operations

A. Facility Type
This application is for Modification to the approved Waste Tire Processing Facility Permit.

B. Type of Processing Facility
The waste tires are processed by a shredder. A greater explanation is provided in the operations manual.

C. Storage

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Please see application form for quantities of waste tire to be processed. Also see closing estimates in the Operations Manual. The waste tires which are being disposed of and not stored for possible resale will be placed in the main tipping area for the Garden Street shredder. This area is shown on the engineering drawings (sheets 2, 3, 3a, and 3c) and referred to as the "feed stock blending area".

The following table shows how the total tons of processed tires are calculated.

Passenger Car Tires	14,000	x	0.01	tons/tire	=	140
OTR Tires	2,000	x	0.05	tons/tire	=	100
				Total Tons		240

D. Please see application form.

E. Please see application form.

F. Please see application form.

Part III – Attachments

A. Facility Design
Please see the Facility Design Narrative.

B. Facility Operation
Please see the Appendix A - Operation Manual.

C. Please see the attachments to the Operations Manual for the Closing Plan.

D. Financial Assurance will be provided once the closing estimate has been approved by the Department.

E. The land owner is also the applicant.

F. No waste tires will be consumed at the facility.

G. The permit fee has been provided previously.

Part IV – Certification

A. Applicant:
Please see the application form.

B. Professional Engineer in the State of Florida.
Please see the application form.

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FACILITY OPERATION NARRATIVE

GARDEN STREET IRON & METAL
(Waste Tire Processing Center)

Tire Processing Permit Modification Application
Part III –B.1. thru B.8.

1. Description of facility's operation, process and products including how waste tires will be received and stored. (Application Part III.B.1.)

The shredder plant is located on the northwest quadrant of the property. Sheet 2A and Sheet 3 depict the location of the facility within the overall property boundaries. Sheet 3D of the accompanying plan set depicts the flow of waste tires through the facility.

The facility is design primarily for the disassembly of scrap metal item such as automobiles, light and heavy trucks and trailers, appliances, machinery, and other items which contain metal. This facility is capable of efficiently removing nearly all of the metallic components from these waste items and reintroducing these metals into the raw material stream for manufacturers. The primary products created from this process are ferrous shred and non-ferrous mixed metal shred consisting primarily of aluminum. The rest of the component material from the recycled items is deposited in the final waste bunker. This material is generally referred to as fluff or ASR (Automotive Shredder Residue). It consists of rubber, plastic, foam, fabric, glass and soil. Currently, the waste tires are being received and processed along with the normal recycling operation. The steel is removed for recycling and the rubber is included in the fluff waste. This application, if approved, will allow the facility to store the tires incoming for a period of 4 to 7 days, at which point the waste tires would be processed independent of the normal recycling operation.

Scrapped automobile being placed onto the in-feed conveyor.

The time period of storage is dependent upon the maintenance of the shredder. The shredder blades are changed and the fluff bunker is removed every few days depending on the quantity of material processed. The waste tires will be processed through the clean machine, providing a rubber material free of fluff. This would produce clean tire shred suitable for recycling or other repurpose uses.

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Please note that tires which are attached to a scrapped vehicle, truck or trailer are not accounted for separately from the scrap metal and will not be reported on quarterly reports.

The vehicles carrying the bulk waste tire deliveries are weighed on the incoming and outgoing truck scales. The quantity of waste tires is determined by the net difference in vehicle weight. All customer data is recorded in the facility's "point of sale" (POS) system. The POS system is a software program called Scrap Dragon. This system provides centralized data collection, storage, and recording of financial transactions including the weight of any scrap or waste tires received by the facility. The tonnage of bulk waste tires received is listed on the quarterly reporting to FDEP.

Scrap material being handled at the feed stock blending area, near the in-feed conveyor. Harris Shredder is in the background.

Once weighed, customers are directed to the designated waste tire storage area on the sheet 3B of the plans. This designated storage area is to be clearly marked on site with a painted yellow line. At this location, waste tires are stacked until processing.

When waste tire processing is started, the waste tires are placed onto the in-feed conveyor and shredded into sufficiently small pieces suitable for recycling. See photos below for close-up views of the final waste material. It is expected that all bulk waste tire deliveries accepted will be shredded in this fashion.

Existing used truck tires taken off of box trailers that have been scrapped. These are located in the Used Tire Storage Area.

The waste tire storage areas will be able to hold 16,000 tires, including approximately 1,500 over the road (OTR) tires. The OTR take offs will be stored on edge in a single layer as shown in the photo. It is estimated that the maximum number of waste tires stored in this fashion is about 1500 OTR tires. Please note that some of these tires remain mounted on rims preventing any chance of collecting water inside the tire. The maximum number of waste tires potentially placed in this storage area, however, is 3,000 OTR tires.

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In the case of a prolonged breakdown of equipment, major bulk tire accounts will be asked to temporarily suspend deliveries until the shredding equipment has been restored.

Note, the entire processing area is paved with and 8" thick 5000 psi concrete slab. This prevents scrap material from being mixed into the underlying soils. Also note that no products are anticipated to be produced from the waste tires process at this facility.

2. A description of the equipment used for processing tires. This description shall include the make, model, and hourly capacity of each piece of equipment. (Application Part III.B.2.)

The main mechanical component for this facility is a 98 inch steel shredding rotary hammer mill manufactured by Harris Equipment. The model number is HS98115. This machine is capable of shredding entire automobiles into pieces small enough to be picked up by hand. The shredder has an operating capacity in excess of 100 tons per hour. The facility also has additional equipment that further sorts the shredded material into its main metallic, non-metallic, and waste components.

3. Description of waste from the process, the amount expected and how and where this waste will be disposed of. (Application Part III.B.3.)

It is expected the 100% of the waste tires received under the waste tire permit will be shredded and turned into a waste material. It is anticipated that the waste tire will be process separately as the incoming stream of waste tire collector customers is expected to be consistent and sufficiently large enough. Waste tires will have to be stored for a period of 4 to 7 days. This will not interfere with the existing and ongoing metal recycling operation. The processed tires will be stored in the new process tire stage area. Currently, the majority of the process shredded tires are being utilized as landfill leachate layer. Any processed tires not used in the fashion will be taken to the designated landfill.

Close-up view of material in the final waste bunker (Fluff).

Processed tire pieces from final waste bunker.

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4. Statement of the maximum daily throughput and the planned daily and annual throughput. (Application Part III.B.4.)

As stated above, this shredder has an hourly feed rate in excess of 100 tons/hour of blended material. An estimate of the maximum capacity of this shredder is as follows:

Hourly blended feed rate into the shredder	100 tons/hour+
Conservative percentage of waste tires	10%
Hourly rate of waste tires	10 tons/hour
Conversion factor for passenger tires	20 lbs/tire

Estimated rate of waste tire feed is as follows:

$$\frac{10 \text{ tons}}{\text{hour}} \times \frac{2{,}000 \text{ lbs}}{\text{ton}} \times \frac{1 \text{ tire}}{20 \text{ lbs.}} = \frac{1{,}000 \text{ tires}}{\text{hour}}$$

Presently, the shredder operates 5 to 6 hours per day, 6 days a week. This gives a processing capacity of 5,000 to 6,000 processed waste tires per day or 30,000 to 36,000 processed waste tires per week. Annually, the capacity would be 1,560,000 to 1,872,000 tires per year. This equates to approximately 15,600 to 18,720 tons at a conservative 10% blend rate.

Currently, the average daily throughput is 1,400 tires (14 tons +/-). The annual quantity of waste tires processed is estimate to be 420,000 tires (4,200 tons, +/-).

5. Description of how the operator will maintain compliance with each of the storage requirements of rule FAC 62-711.540. (Application Part III.B.5.)

Different from other tire processing facilities, the equipment necessary to shred the waste tires is permanently installed at this facility. And given the shredding capacity of the Harris mill, it is expected that the storage of tires will not be a major problem. Relatively speaking, the bulk waste tire component of the total facility operation is very small. The enclosed plans designate the areas in which tires will be stored and blended. These areas, though, will not be completely covered with waste tires at all times.

Compliance with the storage requirements of FAC 62-711.540 is assured by the following facts: 1. The facility is fenced, gated, and fully attended day and night preventing unauthorized deliveries. 2. The throughput capacity of the Harris mill is substantially greater than the quantity of tires to be stored. 3. Waste tires are currently being processed incidental to the automobile recycling operation and tire storage is not presently a problem. 4. The magnitude of the waste tire facility operation is a very small part of the overall facility operation and is much less likely, economically, to be allowed to become an operational or regulatory problem. And 5. Processed waste tire are removed shortly after processing and either repurposed or taken to the designated landfill.

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6. **A copy of the emergency preparedness manual for the facility with a statement of the on site and off site locations of where that manual will be maintained. (Application Part III.B.6.)**

The Emergency Preparedness Manual for the Garden Street Waste Tire Processing Center is included in Appendix A of this application. The operator should make his self familiar with the recommended steps to follow in the event of an emergency [FAC 62-711.540(1)(e)].

Please note that FDEP is required to be immediately be notified in the event of a fire or other emergency which poses an unanticipated threat to the public health or environment. Within two weeks of the event, a written report must be submitted to FDEP noting the origins of the emergency, actions taken to deal with the emergency, results of actions taken, and an analysis of the success of failure of the actions [FAC 62-711.540(1)(f)].

7. **Fire Safety Survey (Application Part III.B.7.)**

The Fire Safety Survey is included in Appendix A, Operations Manual, Division 4. This survey is to be updated annually by the Fort Myers Fire Department. The Fort Myers Fire Department Prevention Office may be contacted at 321-7350. Updates to the fire safety survey should be inserted into this manual for future reference [FAC 62-711.540(1)(d)].

8. **Description of how 75% of the annual accumulation of waste tires will be removed for disposal or recycling. (Application Part III.B.8.)**

"FAC 62-711.530(3) - At least 75 percent of the whole tires, used tires, and processed tires that are delivered to or are contained on the site of the waste tire processing facility at the beginning of each calendar year shall be processed and removed for disposal or recycling from the facility during the year, or disposed of on the site at a permitted solid waste management facility..."

All waste tires are processed by shredding into sufficiently small pieces that remain unmixed with other material and are suitable for recycling. The waste is removed from the facility upon processing and recycled. It is expected that virtually 100% of all processed waste tires, on an annual basis, will be removed from the site during each year. It is not expected that there will be an accumulation of waste other than the daily amount generated.

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FACILITY DESIGN NARRATIVE

GARDEN STREET IRON & METAL
(Waste Tire Processing Center)

Tire Processing Permit Modification Application
Part III –A.1 and A.2

The purpose of this narrative is to demonstrate compliance with the above referenced portion of the permit application and with FAC 62-711.540 Storage Requirements. The Permit Application Plan Set for the Garden Street Iron & Metal Waste Tire Processing Center is included as an exhibit to this narrative.

A. Facility Design

Item 1 – A topographic or section map of the facility, including the surrounding area for one mile, no more than one year old, showing land use and zoning within one mile of the facility.

The site aerial on Surrounding Land Uses and Zoning Map were submitted with the original application and have not been modified here.

Item 2 - A plot plan of the facility on a scale of not less than one inch equals 200 feet. At a minimum, the plot plan shall include:

a. The facility design, including the location and size of all storage and processing areas for used tires, unprocessed waste tires, processed waste tires, and waste tire processing residuals;

Please see the sheets 2, 2A, 3, 3A, 3B, 3C, and 3D of the engineering plans. These sheets all serve to provide a clear picture of the operations of the facility. These plans have been updated to reflect the requested permit modification.

Sheet 3, Processing Area Plan, is an enlargement of the northwest portion of the facility which contains the main scrap activity area. This sheet shows better the various component parts of the shredder and processing equipment. Please note that this entire area has been paved with 8 inches of 5000 psi concrete. This generally allows the site to be kept cleaner and prevent loss of material into the underlying soils. The processing area plan also gives a good indication of the size and clearances around of each of the waste tire areas and the locations of the onsite fire lanes and fire hydrants.

The final waste area is also shown and is located just south of the inbound scale. All tires processed through this facility are deposited into this bunker and disposed of in a landfill.

A fire safety survey was also conducted by the Fort Myers Fire Department on June 8, 2011. Their approval letter dated June 13, 2011, is included in Division 4 of Appendix A, Operations Manual. The locations of the storage and feed stock blending areas have been deemed acceptable by the Fire Department. Under state building code rules, the

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Fort Myers Fire Department is the Authority Having Jurisdiction (AHJ) relative to fire and life safety requirements for this site.

With respect to the question of residuals from the tire shredding activity, the only type of residuals expected are small fines and sand particles which escape from the shredding and sorting equipment. Sheet 2, General Site Plan, shows typical surface drainage flows in the area of the shredder and sorting equipment. This area is directed to a sludge and process water recovery tank located just west of the motor house which drives the shredder. This tank system and the contouring of the concrete pavement are designed to collect fine particles which cannot otherwise be collected with mechanical equipment. The water collected in this tank, including storm water runoff from this area, is stored and used as cooling water in the shredder. Unfortunately, the residual fines from tire processing facility shredding cannot be distinguished from the residuals generated from the ordinary scrap shredding presently occurring on this site.

Sheet 3A, 3B, and 3C are enlargements to show in better detail the waste tire storage areas. Sheet 3D of the plan set depicts basic customer and material flow through the site. The flow of processed waste tires has been illustrated.

b. All wetlands and water bodies within the facility or within 200 feet of any storage area;

There are no wetlands or water bodies within the facility or within 200 feet of storage areas.

c. Storm water control measures, including ditches, dikes, and other structures;

See sheet 3 of the engineering plans. The storm water control facilities in the vicinity of the tire processing area are shown. Note, this site has an Environmental Resource Permit from the South Florida Water Management District, permit no. 36-06271-P. Construction of the facility has been completed, certified by its design engineer, Barbot Steuart & Associates, Inc., and transfer of the permit to operation phase has been completed.

Additionally, the following Best Management Practices (BMP's) techniques are employed in the store water treatment system:

- Oil Skimmer
- Stormceptor Chamber
- Grassed Outfall Swale
- Outfall Control Structure with additional skimmer

Inspection of these devices will be conducted on a monthly basis. Correction of any malfunctions will be done immediately.

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Also, as part of the Emergency Preparedness Plan included in Division 3 of Appendix A, page 5 of 5, a filtering berm of shredded steel will be placed down slope of the waste and used tire storage area and the blending area in the case of a fire. It is intended for this berm to help to slow the runoff of fire fighting water and to provide a surface to help capture the debris prior to runoff into the stormwater management system.

d. Boundaries of the facility, legal boundaries of the land containing the facility, and any easements or rights of way that are within the facility or within 200 feet of any storage area.

See sheet 2 of the engineering plans. The boundary of the overall site is shown. Also, the centerlines of the railroad track easements are depicted.

e. Location, size, and depth of all wells within the facility or within 200 feet of any storage area;

See sheet 2 of the engineering plans. All of the ground water sampling and recovery wells have now been depicted. An additional deeper well which was installed with the previous land owner is also shown. This well is 4" in diameter and depth is unknown. This well is presently used for irrigation. The ground water monitoring and recovery wells are approximately 12 to 15 feet in depth.

f. All structure and buildings that are, or will be constructed at the facility; including those used in storage and processing operations;

See sheets 2, 2A and 3 of the engineering plans. All of the existing and proposed buildings at facility are depicted. The only building used as part of the tire processing facility is the two story ticket office building located on the northerly portion of the site. This building has the inbound and outbound vehicle scales adjacent to it. This building also contains the record keeping activities for the facility. No site improvements are planned as part of this permit modification.

g. All areas used for loading and unloading;

See sheet 3D of the engineering plans. This sheet depicts the general path of waste tires through the facility.

h. All access roads and internal roads, including fire lanes;

See sheets 2, 2A, 3, and 3D of the engineering plans.

i. Location of all fences, gates, and other access control measures; and

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See sheet 2 of the engineering plans. Please note that all entrances have automatic gates that are open during the daytime and automatically close in the evenings. The roadway frontages are fenced with a precast concrete fencing system. The southerly boundary abuts buildings and structures belonging to Gulf Paving. The westerly boundary abuts the CSX railroad right of way. This boundary has not been fenced to allow access to the railroad. Please note that the Seminole Gulf Railroad has its own police force and that the Garden Street facility has nighttime security guards and video surveillance. Vehicular access is not possible though these unfenced boundaries.

j. Location of all disposal areas within the facility.

See sheet 2 of the engineering plans. There is no disposal of solid waste at the Garden Street facility.

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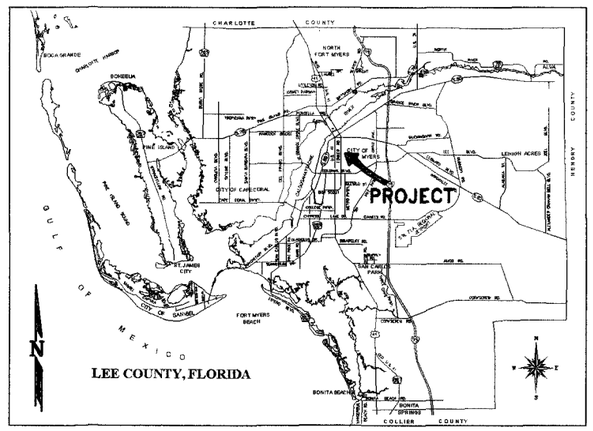
PERMIT APPLICATION PLANS

Garden Street Iron & Metal

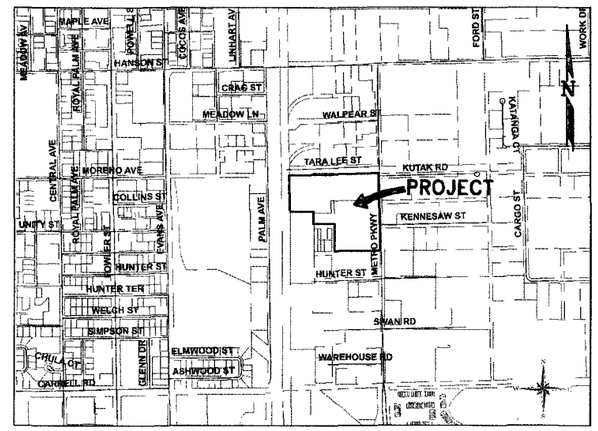
Waste Tire Processing Center

3350, FORT MYERS, FLORIDA 33916
SECTION 30, TOWNSHIP 44 S., RANGE 25 E.
LEE COUNTY, FLORIDA

STRAP # 30-44-25-P4-00108.0000



LOCATION MAP



VICINITY MAP

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SHEET INDEX:

1. COVER SHEET
2. EXISTING IMPROVMENTS PLAN
2A. GENERAL SITE PLAN
3. PROCESSING AREA PLAN
3A. FEED STOCK BLENDING AREA PLAN
3B. WASTE TIRE STORAGE AREA PLAN
3C. PROCESSED WASTE TIRE STORAGE AREA PLAN
3D. WASTE TIRE PROCESSING MATERIAL FLOW
4. SUROUNDING LAND USES WITHIN 1 MILE
5. PROJECT AERIAL

OWNER:
GARDEN STREET IRON & METAL INC.
OF S.W. FLORIDA
3350 METRO PARKWAY
FORT MYERS , FL. 33916
CONTACT: ROB WEBER
(239) 337-5865

SITE ENGINEER:
KEENE ENGINEERING, INC.
PO BOX 2770
FORT MYERS, FL. 33902
(239) 939-0524
(239) 939-1968 FAX

WILLIAM TIMOTHY KEENE
No. 45915
STATE OF FLORIDA
PROFESSIONAL ENGINEER

REV	DESCRIPTION	DATE
1	Revised per RAI and CEM Fire Dept.	07-31-09
2	Revised per RAI	09-07-09
3	Revised per RAI	10-5-09
4	Revised per RAI	11-6-10
5	Revised Bond Area, Add The Wire Storage Area	8-11-11

APPROVED
8-11-11

Keene ENGINEERING, INC.

KEENE ENGINEERING, INC.
10970 S. CLEVELAND AVE.
SUITE 303
FORT MYERS, FLA.33907
239-939-0524 PHONE
239-939-1968 FAX
ENG. BUS. NO. 7578

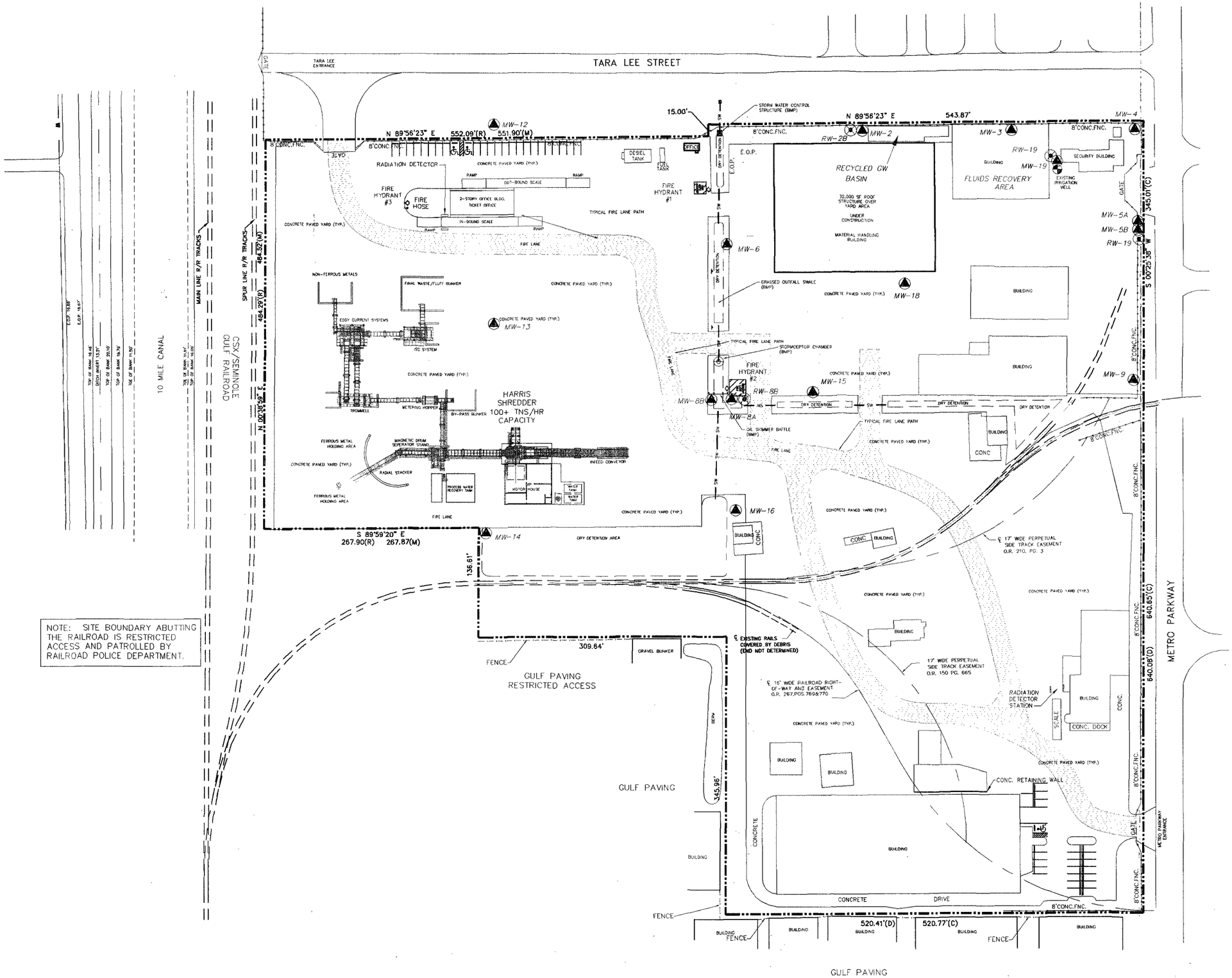
Garden Street Iron & Metal
Waste Tire Processing Center

COVER SHEET

SCALE:
24x36: N/A
11x17: N/A

SHEET 1 OF 5

DRAWING SET DATE: 8-11-11



NOTE: SITE BOUNDARY ABUTTING THE RAILROAD IS RESTRICTED ACCESS AND PATROLLED BY RAILROAD POLICE DEPARTMENT.

REVISIONS	DATE
1. Changes per DEP and CFM Fire Dept.	07-31-09
2. Changes per FDEP	09-07-09
3. Changes per FDEP	11-16-09
4. Changes per FDEP	11-3-09
5. Add Fire Lin. Inlet Bend Area, Add Tire Wire Pen.	11-8-10
6. Add Processed Tire Storage Area	4-4-11
7. Add Fire Lane	7-11-11
8. Rev. Fuel Tanks & Office Location	8-26-11

APPROVED 8-26-11

KEENE ENGINEERING, INC.
10970 S. CLEVELAND AVE.
SUITE 303
FORT MYERS, FLA.33907
239-939-5328 PHONE
239-939-5329 FAX
ENG. BUS. NO. 7578

Garden Street Iron & Metal Waste Tire Processing Center

EXISTING IMPROVEMENTS PLAN

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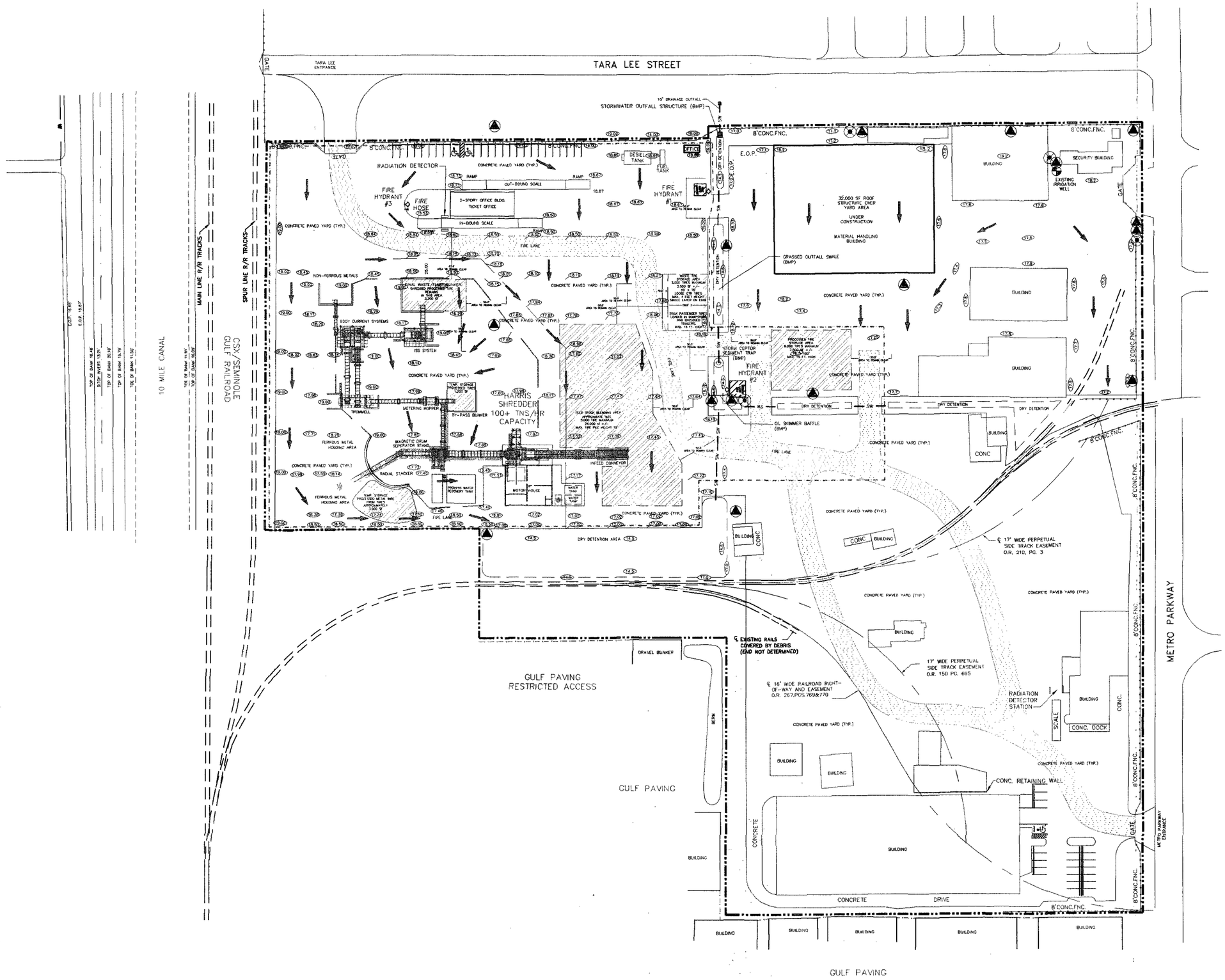
D.E.P. South District

SCALE:
24x36: 1" = 60'
11x17: 1" = 120'

SHEET 2 OF 5

DRAWING SET DATE: 8-26-11



LEGEND

- 18.19 — PAVEMENT ELEVATION
- FIRE LANE AREA
- TIRE STORAGE AREAS
- DRAINAGE FLOW PATTERN
- PROPERTY BOUNDARY
- WASTE TIRE PROCESSING CENTER LIMITS
- PRECAST CONCRETE FENCING
- SW — STORM WATER PIPE
- CHAINLINK FENCING
- FIRE HYDRANT
- GROUNDWATER RECOVERY WELL
- GROUNDWATER TESTING WELL
- IRRIGATION WELL

DATE	REVISIONS
07-31-09	Per FDEP and CSX Fire Dept.
08-07-09	Per FDEP
10-16-09	Per FDEP
11-6-10	Per Sr. Inland Bend Area, add The Way
11-8-10	Processor The Storage Area
1-11-11	------
5-11-11	------
8-26-11	Per Fire Lane Gates & Office location

APPROVED 8-26-11

KEENE ENGINEERING, INC.
10875 S. CLEVELAND AVE.
SUITE 303
FORT MYERS, FLA 33907
239-939-0524 PHONE
239-939-1988 FAX
ENG. BUS. NO. 7578

Garden Street Iron & Metal Waste Tire Processing Center
GENERAL SITE PLAN

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SCALE:
24x36: 1" = 60'
11x17: 1" = 120'

SHEET 2A OF 5

DRAWING SET DATE: 8-26-11

TARA LEE STREET

TARA LEE ENTRANCE

GATE

SPUR LINE R/R TRACKS

N

8' CONC. FNC.

RADIATION DETECTOR

CONCRETE PAVED YARD (TYP.)

RAMP

OUT-BOUND SCALE

FIRE HYDRANT #3

FIRE HOSE

2-STORY OFFICE BLDG.
TICKET OFFICE

IN-BOUND SCALE

FIRE LANE

DESIEL TANK

FUEL TANK

OFFICE

FIRE HYDRANT #1

DRY DETENTION

E.O.P.

STORM WATER CONTROL STRUCTURE (BMP)

32,000 SF ROOF STRUCTURE OVER YARD AREA

UNDER CONSTRUCTION

MATERIAL HANDLING BUILDING

SIGN

WASTE & USED TIRE STORAGE AREA

NO OPEN FLAME NIKOUNA LLAMA AREA

GRASSED OUTFALL SWALE (BMP)

4" Yellow Stripe

WASTE TIRE STORAGE AREA
3,000 TIRES MAXIMUM
3,500 SF +/-
50' X 70'
LOOSE OTR TIRES
MAX. 4 FEET HEIGHT
SINGLE LAYER ON EDGE

BULK PASSENGER TIRES LOADED IN DUMPSTERS AND ENCLOSED TRAILERS.
MAX. 15 FT. HIGH

PROCESSED TIRE STORAGE AREA
8,000 TIRES MAXIMUM
7,500 SF +/-
75' X 100'
MAX. 15 FT. HIGH

FIRE HYDRANT #2

STORMCEPTOR CHAMBER (BMP)

OIL SKIMMER BAFFLE (BMP)

NON-FERROUS METALS

18" SOLID CONC. WALL

FINAL WASTE/FLUFF BUNKER
SHREDDED PROCESSED TIRE REMAINS IN THIS AREA
3,200 SF

EDDY CURRENT SYSTEMS

ISS SYSTEM

NOTE: THE CUMMULATIVE MAXIMUM NUMBER OF WASTE TIRES ON SITE TO BE 16,000 TIRES. THIS INCLUDES THE STORAGE AREAS AND THE FEED STOCK BLENDING AREA.

TEMP. STORAGE PROCESSED TIRES
1,200 SF

TROMMELL

METERING HOPPER

BY-PASS BUNKER

HARRIS SHREDDER
100+ TNS/HR
CAPACITY

FEED STOCK BLENDING AREA
APPROXIMATE SIZE
5,000 TIRE MAXIMUM
24,000 sf +/-
MAX. TIRE PILE HEIGHT 15'

FERROUS METAL HOLDING AREA

MAGNETIC DRUM SEPERATOR STAND

RADIAL STACKER

INFEED CONVEYOR

TEMP. STORAGE PROCESSED METAL WIRE FROM TIRES APPROXIMATELY 3,000 SF

PROCESS WATER RECOVERY TANK

MOTOR HOUSE

WATER TANK

WATER TANK

DRY DETENTION AREA

BUILDING

CONC

LEGEND

- (18.19) PAVEMENT ELEVATION
- FIRE LANE AREA
- TIRE STORAGE AREAS
- DRAINAGE FLOW PATH
- PROPERTY BOUNDARY
- WASTE TIRE PROCESSING CENTER LIMITS
- PRECAST CONCRETE FENCING
- SW — STORM WATER PIPE
- CHAIN LINK FENCING
- FIRE HYDRANT
- GROUNDWATER MONITOR WELL
- GROUNDWATER TESTING WELL
- IRRIGATION WELL

DATE	REVISIONS
08-11-08	Revised Plan and CFW Fire Dept.
09-27-08	Revised Plan
10-16-08	Revised Plan
11-3-09	Revised Plan
11-12-10	Revised Water Area, Add "No Fire"
8-11-11	Revised Tire Storage Area
8-25-11	Revised Area
	Show Fuel Tanks & Office Location

APPROVED
OCT 27 2011
D.E.P.

TIMOTHY WILLIAM KEENE
LICENSED
No. 45915
STATE OF FLORIDA

Keene ENGINEERING, INC.

KEENE ENGINEERING, INC.
10670 S. CLEVELAND AVE.
SUITE 103
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239-939-1988 FAX
ENG. BUS. NO. 7578

Garden Street Iron & Metal
Waste Tire Processing Center
PROCESSING AREA PLAN

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D.E.P. South District

SCALE:
24x36: 1" = 30'
11x17: 1" = 60'

SHEET 3 OF 5

DRAWING SET DATE: 8-26-11

63.6'
AREA TO REMAIN CLEAR

BLUFF BUNKER
PROCESSED TIRE
STORAGE AREA

50.0'
AREA TO REMAIN CLEAR

50.0'
AREA TO REMAIN CLEAR

CONCRETE PAVED YARD (TYP.)

CONCRETE PAVED YARD (TYP.)

50.0'
AREA TO REMAIN CLEAR

50.0'
AREA TO REMAIN CLEAR

70.0' ±

WASTE TIRE
STORAGE AREA
3,000 TIRES MAXIMUM
3,500 SF +/-
50' X 70'
LOOSE OTR TIRES
MAX. 4 FEET HEIGHT
SINGLE LAYER ON EDGE

50.0' ±

BULK PASSENGER TIRES
LOADED IN DUMPSTERS
AND ENCLOSED
TRAILERS.
MAX. 15 FT. HIGH

DRY DETENTION

CONCRETE PAVED YARD (TYP.)

50.0'
AREA TO REMAIN CLEAR

50.0'
AREA TO REMAIN CLEAR

PROCESSED TIRE
STORAGE AREA
8,000 TIRES MAXIMUM
7,500 SF +/-
75' X 100'
MAX. 15 FT. HIGH

FIRE LANE

FIRE
HYDRANT
#2

FIRE
DEPT
ACCESS

CONCRETE PAVED YARD (TYP.)

TEMP. STORAGE
PROCESSED TIRES
1,200 SF

BY-PASS BUNKER

HARRIS
SHREDDER
100+ TNS/HR
CAPACITY

FEED STOCK BLENDING AREA
APPROXIMATE SIZE
5,000 TIRE MAXIMUM
24,000 sf +/-
MAX. TIRE PILE HEIGHT 15'

50.0'
AREA TO REMAIN CLEAR

DRY DETENTION

50.0'
AREA TO REMAIN CLEAR

FIRE LANE

INFEED CONVEYOR

PROCESS WATER
RECOVERY TANK

MOTOR HOUSE

WATER
TANK

WATER
TANK

CONCRETE PAVED YARD (TYP.)

CONCRETE PAVI

FIRE LANE

DRY DETENTION AREA

BUILDING

CONC

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1	Add CEM Fire Dept.	07-31-09	
2	Revised Blend Area, Add Tire Wire	11-5-10	
3	Revised Tire Storage Area	8-11-11	

APPROVED
R. Keene

WILLIAM TIMOTHY KEENE
LICENSE No. 45915
STATE OF FLORIDA
PROFESSIONAL ENGINEER

KEENE ENGINEERING, INC.
10970 S. CLEVELAND AVE.
SUITE 303
FORT MYERS, FL 33907
239-939-1064 PHONE
239-939-1068 FAX
ENG. BUS. NO. 7578

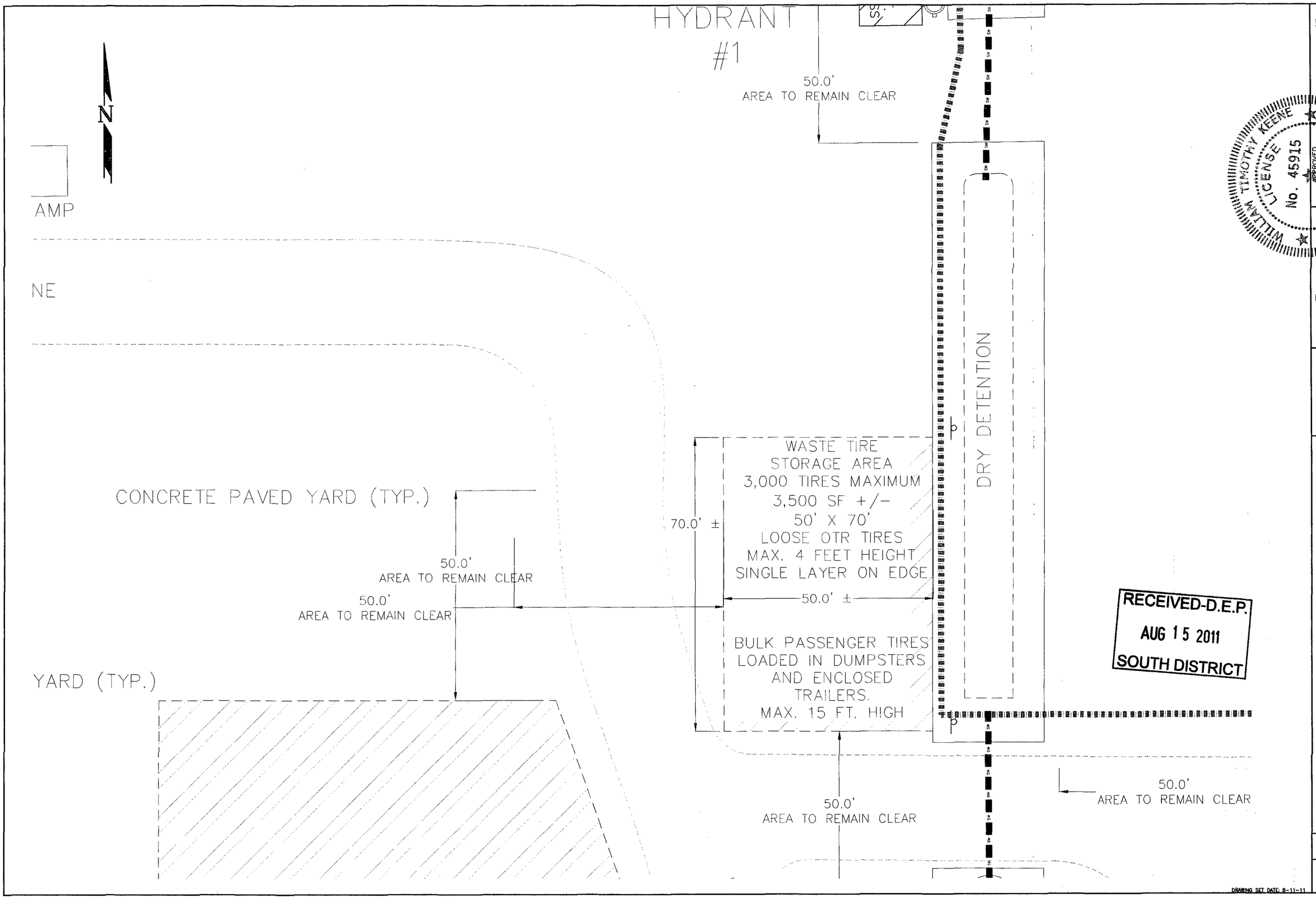
Garden Street Iron & Metal
Waste Tire Processing Center

FEED STOCK BLENDING AREA PLAN

SCALE:
24x36: 1" = 20'
11x17: 1" = 40'

SHEET
3A OF 5

DRAWING SET DATE: 8-11-11



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WILLIAM TIMOTHY KEENE
LICENSE
No. 45915
STATE OF FLORIDA

		DATE
1	Per FDEP and CPH Fire Dept.	07-31-09
2	Per FDEP	09-07-09
3	Per FDEP	11-4-09
4	Per FDEP	11-5-09
5	Per Lin. Wheel Bond Area, Add Tire Wa	11-6-10
6	Processed Tire Storage Area	8-11-11
7	Per Inland Area	

APPROVED
PER DEP

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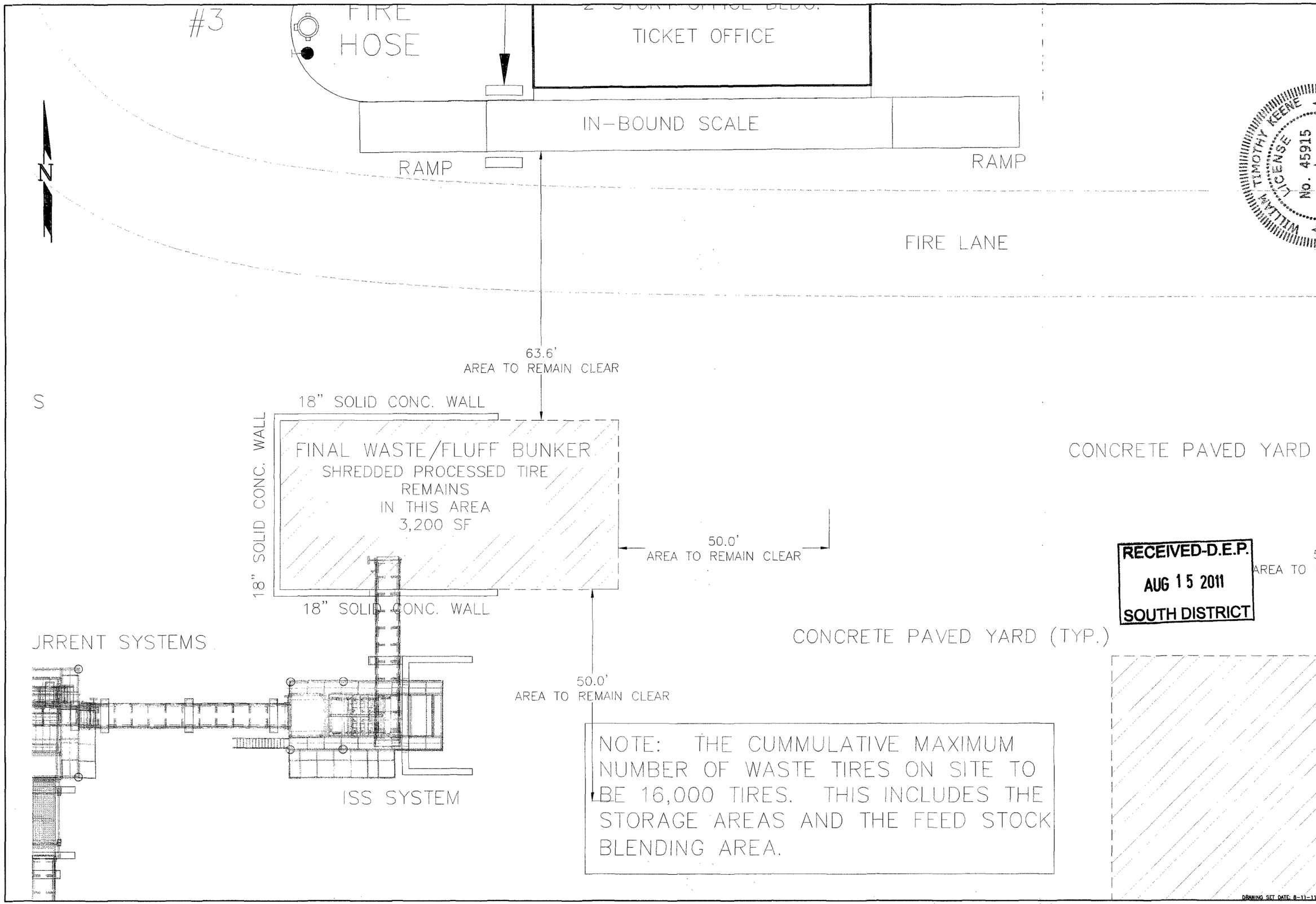
Garden Street Iron & Metal Waste Tire Processing Center

WASTE TIRE STORAGE AREA PLAN

SCALE:
24x36: 1" = 10'
11x17: 1" = 20'

SHEET
3B OF 5

DRAWING SET DATE: 8-11-11



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STATE OF FLORIDA

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REV.	DATE	DESCRIPTION
1	07-31-09	Add Fire Hydrant and GW Fire Dept.
2	10-07-09	Revised Per FDEP Comments
3	10-07-09	Revised Per FDEP Comments
4	11-3-09	Revised Per FDEP
5	11-8-10	Revised Blend Area, Add Tire Wire
6	11-3-09	Revised Per Storage Area
7	8-11-11	Revised Per Storage Area

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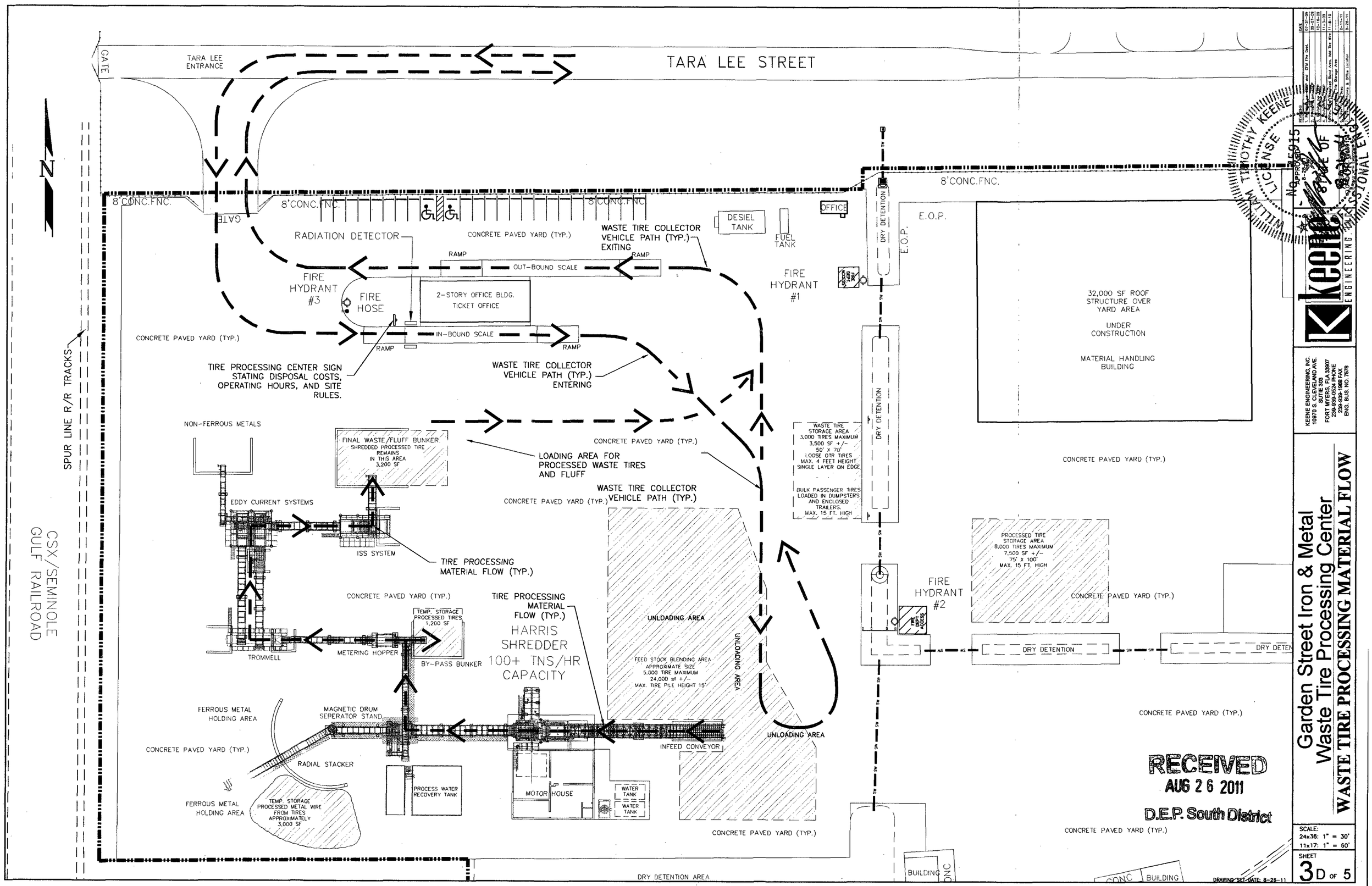
Garden Street Iron & Metal Waste Tire Processing Center

PROCESSED WASTE TIRE STORAGE AREA PLAN

SCALE:
24x36: 1" = 10'
11x17: 1" = 20'

SHEET 3C OF 5

DRAWING SET DATE: 8-11-11



REVISIONS	DATE
1. Revised per CEM Fire Dept.	07-31-09
2. Revised per comments	09-07-09
3. Revised per comments	10-14-09
4. Revised per comments	11-5-09
5. Revised per comments	11-18-10
6. Revised per comments, Tracked Bend Area, Add Tire Wire Storage Area	11-8-10
7. Revised per comments	4-4-11
8. Revised per comments, Tire Storage Area	5-5-11
9. Revised per comments & Office Location	6-28-11

TIMOTHY KEENE WILLIAM LICENSE No. 45915 STATE OF FLORIDA PROFESSIONAL ENGINEER

APPROVED 8-26-11

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Garden Street Iron & Metal
Waste Tire Processing Center
WASTE TIRE PROCESSING MATERIAL FLOW

SCALE:
24x36: 1" = 30'
11x17: 1" = 60'

SHEET 3D OF 5

Appendix A

Operations Manual

Facility: GARDEN STREET IRON & METAL
(WASTE TIRE PROCESSING CENTER)
WACS ID NO. 000098386

Location: 3350 METRO PARKWAY
FORT MYERS, FLORIDA 33916

Applicant: GARDEN STREET IRON & METAL INC. OF S.W. FLORIDA
ROB WEBER, PRESIDENT

Submitted to: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
PO BOX 2549
FORT MYERS, FLORIDA 33902-2549

Prepared by: KEENE ENGINEERING, INC.
PO BOX 2770
FORT MYERS, FLORIDA 33902

keene ENGINEERING, INC

DEPARTMENT OF ENVIRONMENTAL PROTECTION
029627-002-WI/02
PERMIT
Sept. 22, 2011
ADM
STATE OF FLORIDA

Date: August 12, 2011

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BOOK 2 OF 2

Appendix A

Operations Manual

Facility: GARDEN STREET IRON & METAL
(WASTE TIRE PROCESSING CENTER)
WACS ID NO. 000098386

Location: 3350 METRO PARKWAY
FORT MYERS, FLORIDA 33916

Applicant: GARDEN STREET IRON & METAL INC. OF S.W. FLORIDA
ROB WEBER, PRESIDENT

Submitted to: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
PO BOX 2549
FORT MYERS, FLORIDA 33902-2549

Prepared by: KEENE ENGINEERING, INC.
PO BOX 2770
FORT MYERS, FLORIDA 33902

DEPARTMENT OF ENVIRONMENTAL PROTECTION
0216271
CO2-WT/02
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Sept. 22, 2011
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STATE OF FLORIDA

keene
ENGINEERING, INC

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D.E.P. South District

Date: August 12, 2011

WILLIAM TIMOTHY KEENE
LICENSE
No. 45915
STATE OF
FLORIDA
PROFESSIONAL ENGINEER

8-12-11

William T. Keene, PE 45915 Date

BOOK 2 OF 2

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WASTE TIRE PROCESSING FACILITY
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Fire Safety Survey 4

Quarterly Reporting Form 5

Closing Plan
Copy of financial Assurance (Bond) 6

Facility Plan Set
24" x 36" 7

8

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FACILITY OPERATION PLAN

GARDEN STREET IRON & METAL
(Waste Tire Processing Center)
August 12, 2011

The following plan has been prepared for the use of the Garden Street Iron & Metal employees which will be operating the waste tire processing facility on a day to day basis. This discussion itemizes the relevant rules and documents with which the operators of the waste tire facility must be familiar.

I. Florida Department of Environmental Protection Waste Tire Processing Facility Permit.

The FDEP permit approval for the facility is included in the operation manual.

The permit was approved on December 9, 2009.

The permit will expire on December 9, 2014.

The application deadline for permit renewal is October 10, 2014.

The Financial Assurance anniversary date is _____.

There are conditions of approval for the permit. The above blanks are to be filled in once the permit has been issued by FDEP.

II. Description of facility's operation, process and products including how waste tires will be received and stored. (Application Part III.B.1.)

The shredder plant is located on the northwest quadrant of the property. Sheet 2A and Sheet 3 depict the location of the facility within the overall property boundaries. Sheet 3D of the accompanying plan set depicts the flow of waste tires through the facility.

The facility is design primarily for the disassembly of scrap metal item such as automobiles, light and heavy trucks and trailers, appliances, machinery, and other items which contain metal. This facility is capable of efficiently removing nearly all of the metallic components from these waste items and reintroducing these metals into the raw material stream for manufacturers. The primary products created from this process are ferrous shred and non-ferrous mixed metal shred consisting primarily of aluminum. The rest of the component material from the recycled items is deposited in the final waste bunker. This material is generally referred to as fluff or ASR (Automotive Shredder Residue). It consists of rubber, plastic, foam, fabric, glass and soil. Currently, the waste tires are being received and processed along with the normal recycling operation. The steel is removed for recycling and the rubber is included in the fluff waste. This application, if approved, will allow the facility to store the tires incoming for a period of 4 to 7

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days, at which point the waste tires would be processed independent of the normal recycling operation.

The time period of storage is dependent upon the maintenance of the shredder. The shredder blades are changed and the fluff bunker is removed every few days depending on the quantity of material processed. The waste tires will be processed through the clean machine, providing a rubber material free of fluff. This would produce clean tire shred suitable for recycling or other repurposing uses.

Scrapped automobile being placed onto the in-feed conveyor.

Scrap material being handled at the feed stock blending area, near the in-feed conveyor. Harris Shredder is in the background.

Please note that tires which are attached to a scrapped vehicle, truck or trailer are not accounted for separately from the scrap metal and will not be reported on quarterly reports.

The vehicles carrying the bulk waste tire deliveries will be weighed on the incoming and outgoing truck scales. The quantity of waste tires will be determined by the net difference in vehicle weight. All customer data is recorded in the facility's "point of sale" (POS) system. The POS system is a software program called Scrap Dragon. This system provides centralized data collection, storage, and recording of financial transactions including the weight of any scrap or waste tires received by the facility. The tonnage of bulk waste tires received will be listed on the quarterly reporting to FDEP.

Once weighed, customers are directed to the designated waste tire storage area on the sheet 3B of the plans. This designated storage area is to be clearly marked on site with a painted yellow line. At this location, waste tires are stacked until processing.

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When waste tire processing is started, the waste tires are placed onto the in-feed conveyor and shredded into sufficiently small pieces suitable for recycling. See photos below for close-up views of the final waste material. It is expected that all bulk waste tire deliveries accepted will be shredded in this fashion.

All bulk waste tire deliveries accepted will be shredded in this fashion. The only waste tires that will be stored in the designated area on the sheet 3B of the plans set will be take-offs from the semi-trailers that are received for disposal and enclosed trailers or roll-off dumpsters loaded with mixed waste tires. This designated storage area is to be clearly marked on site with a painted yellow line.

The waste tire storage areas will be able to hold 16,000 tires, including approximately 1,500 over the road (OTR). The OTR take offs will be stored on edge in a single layer as shown in the photo. It is estimated that the maximum number of waste tires stored in this fashion is about 1,500 OTR tires. Please note that some of these tires remain mounted on rims preventing any chance of collecting water inside the tire. The maximum number of waste tires potentially placed in this storage area, however, is 3,000 tires.

Existing used truck tires taken off of box trailers that have been scrapped. These are located in the Used Tire Storage Area.

In the case of a prolonged breakdown of equipment, major bulk tire accounts will be asked to temporarily suspend deliveries until the shredding equipment has been restored.

Note, the entire processing area is paved with and 8" thick 5000 psi concrete slab. This prevents scrap material from being mixed into the underlying soils. Also note that no products are anticipated to be produced from the waste tires process at this facility.

III. A description of the equipment used for processing tires. This description shall include the make, model, and hourly capacity of each piece of equipment. (Application Part III.B.2.)

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The main mechanical component for this facility is a 98 inch steel shredding rotary hammer mill manufactured by Harris Equipment. The model number is HS98115. This machine is capable of shredding entire automobiles into pieces small enough to be picked up by hand. The shredder has an operating capacity in excess of 100 tons per hour. The facility also has additional equipment that further sorts the shredded material into its main metallic, non-metallic, and waste components.

IV. Description of waste from the process, the amount expected and how and where this waste will be disposed of. (Application Part III.B.3.)

It is expected the 100% of the waste tires received under the waste tire permit will be shredded and turned into a waste material. It is anticipated that the waste tire will be process separately as the incoming stream of waste tire collector customers is expected to be consistent and sufficiently large enough. Waste tires will have to be stored for a period of 4 to 7 days. This will not interfere with the existing and ongoing metal recycling operation. All of the waste material will be recycled.

Close-up view of material in the final waste bunker (Fluff).

Processed tire pieces from final waste bunker.

V. Statement of the maximum daily throughput and the planned daily and annual throughput. (Application Part III.B.4.)

As stated above, this shredder has an hourly feed rate in excess of 100 tons/hour of blended material. An estimate of the maximum capacity of this shredder is as follows:

Hourly blended feed rate into the shredder	100 tons/hour+
Conservatively high percentage of waste tires	10%
Hourly rate of waste tires	10 tons/hour
Conversion factor for passenger tires	20 lbs/tire

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Estimated rate of waste tire feed is as follows:

$$\frac{10 \text{ tons}}{\text{hour}} \times \frac{2{,}000 \text{ lbs}}{\text{ton}} \times \frac{1 \text{ tire}}{20 \text{ lbs.}} = \frac{1{,}000 \text{ tires}}{\text{hour}}$$

Presently, the shredder operates 5 to 6 hours per day, 6 days a week. This gives a processing capacity of 5,000 to 6,000 processed waste tires per day or 30,000 to 36,000 processed waste tires per week. Annually, the capacity would be 1,560,000 to 1,872,000 tires per year. This equates to approximately 15,600 to 18,720 tons at a conservatively high 10% blend rate.

Currently, the average daily throughput is 1,400 tires (14 tons +/-). The annual quantity of waste tires processed is estimate to be 420,000 tires (4,200 tons, +/-).

VI. Description of how the operator will maintain compliance with each of the storage requirements of rule FAC 62-711.540. (Application Part III.B.5.)

Different from other tire processing facilities, the equipment necessary to shred the waste tires is permanently installed at this facility. And given the shredding capacity of the Harris mill, it is expected that the storage of tires will not be a major problem. Relatively speaking, the bulk waste tire component of the total facility operation is very small. The enclosed plans designate the areas in which tires will be stored and blended. These areas, though, will not be completely covered with waste tires at all times. The waste and used tire storage area will be clearly marked as described as described in Section II.

In the case of a fire in the blending and tire storage areas, there are typically two types of large equipment in this vicinity, a large grapple crane and a large solid tire front end loader. These two pieces of equipment are capable of being used in the initial moments of a fire to pull smoldering or flamed portions of stored material away from the remainder of the pile. This helps to minimize the potential of the fire to escalate into a larger event. The fire department will provide response to a fire in these areas as well.

Additionally, each of the requirements of FAC 62-711.540 is being addressed below for clarification:

FAC 62-711.540(1)(a), Entrance Sign – This facility will receive waste tires from the general public. A sign will be posted at the entrance of the in-bound truck scales stating the operating hours, cost of disposal, and site rules. See Sheet 3D of the plan set for the sign location.

FAC 62-711.540(1)(b), Open Flames - No open flame are allowed within 25 feet of any waste tire storage piles.

FAC 62-711.540(1)(c), Attendant – This facility will receive waste tires from the public. An attendant shall be present when the site is open for business.

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FAC 62-711.540(1)(d), Fire Safety Survey – See Division 4 of this manual for the fire safety survey.

FAC 62-711.540(1)(e), Emergency Preparedness Plan – See Division 3 of this manual for the Emergency Preparedness Plan.

FAC 62-711.540(1)(f), Department (FDEP) Notification – See Section VII of this plan.

FAC 62-711.540(1)(g), Record Keeping – See Section XII of this plan.

FAC 62-711.540(1)(h), Owner Authorization – The operator of this facility is the same as the land owner.

FAC 62-711.540(1)(i), Communication Equipment – Communication equipment shall be maintained at the facility at all times to assure that the site operator can contact local fire protection authorities in case of fire

FAC 62-711.540(1)(j), Pest Control – The operator shall provide for control of mosquitoes and rodents so as to protect the public health and welfare.

FAC 62-711.540(1)(k), Access to Facility – This facility has direct access to two paved streets, Metro Parkway and Tara Lee Street. These are publicly maintained roadways and will be kept passable at all times.

FAC 62-711.540(2)(a) thru (h) – Not applicable to this facility. There will be no inside storage of waste tires.

FAC 62-711.540(3)(a), Setback from water bodies, Stormwater BMP's – See plan set enclosed in the manual. The waste and used tire storage area is more than 200 feet from the dry detention south of the in-feed conveyor for the shredder. Additionally, the following Best Management Practices (BMP's) techniques are employed in the storm water treatment system:

- Oil Skimmer
- Stormceptor Chamber
- Grassed Outfall Swale
- Outfall Control Structure with additional skimmer

Inspection of these devices will be conducted on a monthly basis. Correction of any malfunctions will be done immediately.

FAC 62-711.540(3)(b), Maximum Storage Area Dimensions – See Sheets 3, 3A, 3B, and 3C of the plan set. The dimensions of the waste and used tire storage area are shown.

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FAC 62-711.540(3)(c), Fire Lanes – See Sheets 3, 3A, 3B, and 3C of the plan set. The fire lanes and 50 feet setback areas are shown.

FAC 62-711.540(3)(d), Access Control – See Sheet 2 of the plan set.

FAC 62-711.540(3)(e), Waste Tire Fire Runoff – See response to FAC 62-711.540(3)(a) above.

FAC 62-711.540(3)(f), Maintenance of Grass and Underbrush – See Sheet 2 of the plan set. The entire yard area is paved with 8" of concrete, preventing any growth of grass or underbrush beneath store waste and used tires.

FAC 62-711.540(4), Storage of Processed Waste Tires – Not applicable to this facility. Processed waste tires are removed daily to a landfill as part of the fluff waste.

FAC 62-711.540(5), Containment of Processing Residuals – See Sheet 2A of the plan set. The area beneath the shredder and processing equipment is graded so as to direct all surface runoff into the recovery tank system. These two tanks act as a sediment chamber and a holding area for process water. The process water is recycled into the shredder as cooling and wash water. The residuals from the processing area are captured in this system. The sediment in this system is removed periodically and transported to the landfill along with the fluff waste.

FAC 62-711.540(6)(a), Length of Storage of Waste Tires – Only whole waste tires suitable to be resold as a used tire are stored for periods longer that one month. See description of storage area in Section 2 of this plan.

FAC 62-711.540(6)(b), Fire Department Approval – See fire safety survey letter included in Division 4 of this manual as approval of the storage and blending areas of this facility.

Compliance with the storage requirements of FAC 62-711.540 is assured by the following facts:

1. The facility has controlled access, is gated, and fully attended day and night preventing unauthorized deliveries.
2. The throughput capacity of the Harris mill is substantially greater than the quantity of tires to be stored.
3. Waste tires are currently being processed incidental to the automobile recycling operation and tire storage is not presently a problem.
4. The magnitude of the waste tire facility operation is a very small part of the overall facility operation and is much less likely, economically, to be allowed to become an operational or regulatory problem. And,
5. Processed waste tire are removed shortly after processing and either repurposed or taken to the designated landfill.

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VII. A copy of the emergency preparedness manual for the facility with a statement of the on site and off site locations of where that manual will be maintained. (Application Part III.B.6.)

The Emergency Preparedness Manual for the Garden Street Waste Tire Processing Center is included in this manual. The operator should make his self familiar with the recommended steps to follow in the event of an emergency [FAC 62-711.540(1)(e)].

Please note that FDEP is required to be immediately be notified in the event of a fire or other emergency which poses an unanticipated threat to the public health or environment. Within two weeks of the event, a written report must be submitted to FDEP noting the origins of the emergency, actions taken to deal with the emergency, results of actions taken, and an analysis of the success of failure of the actions [FAC 62-711.540(1)(f)].

A copy of this manual will to be kept in the main office of Garden Street Iron and Metal, Inc., two story building located on north side of the facility, near the Tara Lee Entrance. The street address of this building is 3265 Metro Parkway. A second copy of this manual is to be kept in the office of Keene Engineering, Inc., 10 George Town, Fort Myers, Fl. 33919.

VIII. Fire Safety Survey (Application Part III.B.7.)

The Fire Safety Survey is included in this manual. This survey is to be updated annually by the Fort Myers Fire Department. The Fort Myers Fire Department may be contacted at 321-7350. Updates to the fire safety survey should be inserted into this manual for future reference [FAC 62-711.540(1)(d)].

IX. Description of how 75% of the annual accumulation of waste tires will be removed for disposal or recycling. (Application Part III.B.8.)

"FAC 62-711.530(3) - At least 75 percent of the whole tires, used tires, and processed tires that are delivered to or are contained on the site of the waste tire processing facility at the beginning of each calendar year shall be processed and removed for disposal or recycling from the facility during the year, or disposed of on the site at a permitted solid waste management facility..."

All waste tires are processed by shredding into sufficiently small pieces and remain unmixed with other material and are suitable for recycling. The waste is removed from the facility upon processing and recycled. It is expected that virtually 100% of all processed waste tires, on an annual basis, will be removed from the site during each year. It is not expected that there will be an accumulation of waste other than the daily amount generated.

X. Facility Plan Set – Storage Areas

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The operator of the waste tire processing facility should familiarize himself with the enclosed facility site plans. These plans depict the designated areas to be used for the storage of used and other waste tires. This plan also depicts the general flow of bulk waste tires received at the facility. Sheets 3, 3A, 3B, 3C and 3D are the most relevant to the operation of the facility. The used and waste tire storage area will be designated with a yellow strip as shown in the plan set.

Special attention should be given to the fire access lanes and clearance surrounding the blending, storage, and fluff areas. Theses areas have been reviewed and approved by the fire department as part of the fire safety survey. Deviation from these areas may increase the risks of a fire or other emergency. Deviation of the storage area is also a violation of the FDEP approval and may result in enforcement action by FDEP if not corrected. All storage area shall be maintained in accordance with the plan set and in accordance with FAC 62-711.540(3)(a) thru (f). See section VI of this Operation Plan.

Access to the waste tire storage areas shall be maintained free and clear and passable by a motor vehicle at all times [FAC 62-711.540(1)(k)].

XI. Limitations on Total Amount of Used and Waste Tires

This facility has a proposed limit of 16,000 used and waste tires on site. This limit includes used tires. Once this limit has been reached, receipt of waste tires must be halted until the waste tires already on site have been processed by the shredder. Please note that once a tire is removed from a car, truck, or trailer, it now also becomes a waste tire.

XII. Quarterly Reporting to FDEP

Quarterly reporting is required by FAC 62-711.530(5) and FAC 62-711.540(1)(g).

Included in this manual is the quarterly reporting form required by FDEP. See the form for the specific items which are required to be reported. The reporting is to be measured in tons. Tires that are received by the facility which are still attached to a car, truck, or trailer are not yet waste tires. A tire only becomes a waste tire once it has been removed from whatever it was attached to. Used tires that are being held for resale are also considered waste tires.

For the column "Consumed", the entries should all be zero. No waste tires are consumed on this site. All tires are either processed or removed. For this facility, tires are considered processed once they have been placed into the shredder. Used tires that are being sold are being removed from the site. Used tires sold must be weighed before leaving the site for these reporting purposes.

For estimating the ending inventory of tires in tons, use the following equivalents: one passenger car tire equals 20 pounds in weight and one truck tire equals 100 pounds of weight. Rims are not included in the weights.

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For the line "Processed Tires", this applies to tires that have been process by some means into a shape or size for resale. For the tires that pass through the shredder, they are essentially 100% "processing waste". In the case of this facility, this waste is indiscernible from the other fluff material and cannot be measured.

XIII. Additional Record Keeping Requirements

In addition to the quarterly reporting requirement above, further record keeping is required by FAC 62-711.530(4). The owner or operator of a waste tire processing facility shall record and maintain for three years the following information regarding their activities, which records shall be available for inspection by Department personnel during normal business hours:

(a) For all waste tires shipped from the facility, the name and waste tire collector registration number of the waste tire collector who accepted the waste tires for transport, and the quantity of waste tires shipped with that collector; and if the waste tires were shipped with a person who is not a waste tire collector, the number of tires shipped, the person's name, address and telephone number; and the place where the waste tires were deposited;

(b) For all waste tires received at the facility, the name and waste tire collector registration number of the collector who delivered the waste tires to the facility, and the quantity of waste tires received from that collector; and if more than five waste tires were delivered by a person who is not a waste tire collector, the number of tires delivered and the person's name, address and telephone number; and

(c) For all waste tires removed for recapping, the quantity and type removed, and the name and location of the recapping facility receiving the tires.

XIV. Closing Plan

Included with in Division 6 of this operations manual is the Closing Plan. There are specific steps which are to be followed once the decision has been made to close the waste tire facility (i.e. stop receiving bulk waste tire shipments). Garden Street Iron & Metal Inc. of S.W. Florida has posted financial assurance with the State of Florida (FDEP) to guarantee completion of the closing steps. A copy of this financial assurance document is included in this manual. If the steps in the closing plan are not followed, the bond may not be released by FDEP.

XV. Financial Assurance and Closing Cost Estimate

Refer to the financial assurance document in Division 6 of this manual for any annual modifications or trust reporting that may be required to maintain the financial assurance with the

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Florida Department of Environmental Protection. The amount of the assurance is based on the closing cost estimate prepared by a professional engineer. It is required by rule that the closing cost estimate be updated annually. The revised estimate is required to be submitted 60 days prior to the anniversary date of the instrument. [FAC 62-711.500(3)]. The closing cost estimate will likely change each year necessitating a change in the financial assurance document.

XVI. Applicable State Rules

A copy of the State of Florida Administrative (FAC) rules for waste tire processing facilities can be obtained at the FDEP website - http://www.dep.state.fl.us/waste/. FAC Section 62-701 contains fees, definitions and other rules applicable to all solid waste facilities (including waste tire processing facilities). FAC Section 62-711 is the waste tire rule. Forms may also be obtained at this web address.

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FDEP permit for the Waste Tire Processing Facility is to be inserted into this section once it has been issued.

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SOUTH DISTRICT

EMERGENCY PREPAREDNESS MANUAL
For Waste Tire Processing and Storage

Facility: GARDEN STREET IRON & METAL
(WASTE TIRE PROCESSING CENTER)
WACS ID NO. 000098386

Location: 3350 METRO PARKWAY
FORT MYERS, FLORIDA 33916

Applicant: GARDEN STREET IRON & METAL INC. OF S.W. FLORIDA
ROB WEBER, PRESIDENT

Submitted to: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
PO BOX 2549
FORT MYERS, FLORIDA 33902-2549

Prepared by: KEENE ENGINEERING, INC.
PO BOX 2770
FORT MYERS, FLORIDA 33902

DEPARTMENT OF ENVIRONMENTAL PROTECTION
029625-1
002-WT/02
PERMIT
Sept. 22, 2011
ADM
STATE OF FLORIDA

Date: August 12, 2011

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AUG 15 2011
SOUTH DISTRICT

WILLIAM TIMOTHY KEENE
LICENSE
No. 45915
STATE OF
FLORIDA
PROFESSIONAL ENGINEER

8-12-11

William T. Keene, PE 45915 Date

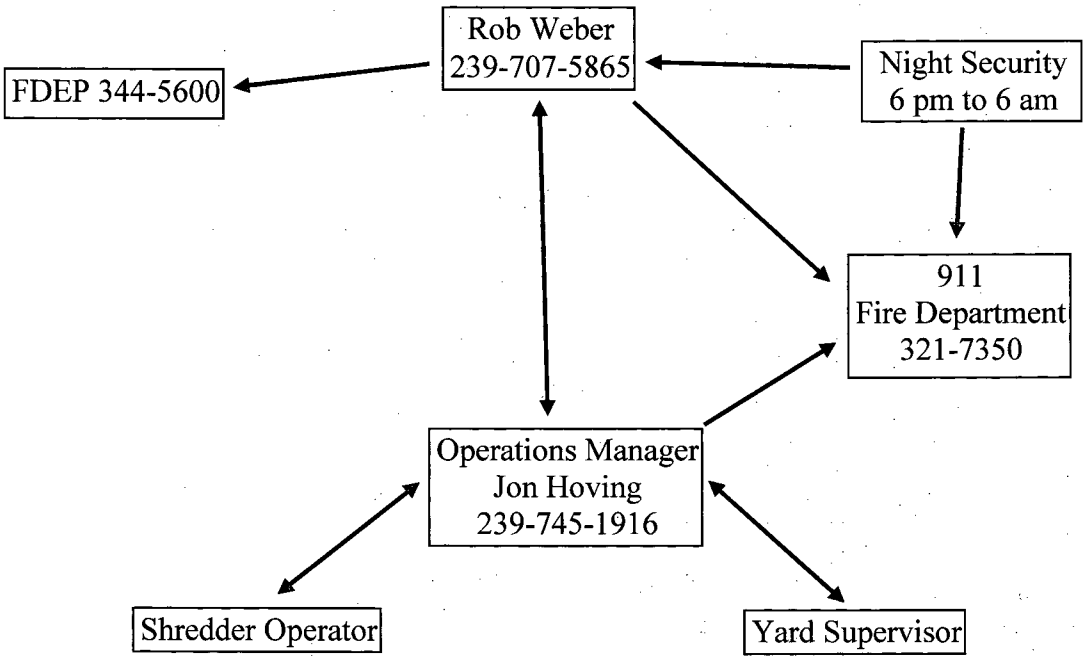
I. Purpose – this manual is intended to satisfy the requirements of FAC Chapter 62-711.540(1)(e) for emergency preparedness relative to the storage and processing of waste and used tire and their residuals.

II. Emergency Contacts [FAC 62-711.540(1)(e)1.] – the following entities are to be contacted in the case of a fire or other hazardous emergency relative to the waste tire storage facility:

Emergency Dispatchers	Dial 911
City of Fort Myers Fire Department	239-321-7350
Florida Department of Environmental Protection	239-344-5600
Robert Weber	239-707-5865
Jon Hoving	239-745-1916

III. Emergency Response Team [FAC 62.711-540(1)(e)3.] – The following flow chart shall be followed for emergency response. The response team will first determine the extent of the emergency, fire or medical, and make contact with the appropriate agency. The first responders on the site are generally the shredder operator due to his location in the control booth or the yard supervisor. Generally, all moving conveyors are equipped with emergency pull cords or push buttons (E-Stops). If an E-Stop is activated, the computer operating the shredder follows a pre-programmed shut down routine. The shredder operator's display indicates which E-Stop has been pulled. This will facilitate a quick response to the emergency.

Also note that this facility has night time security and video surveillance.



IV. Emergency Response Equipment [FAC 62-711.540(1)(e) 2.] – In the case of fire, CALL 911. The enclosed site plan depicted the locations of the existing fire hydrants within the Garden Street facility. In addition to on-site fire hydrants, there is a fire stand pipe and hose located near the southwest corner of the main two story office building on the north side of the facility. This is near the west end of the incoming scale ramp. This fire hose is useful in the initial response to a fire in the final waste (fluff) bunker.

In the case of the blending and tire storage areas, there are typically two types of large equipment in this vicinity, a large grapple crane and a large solid tire front end loader. These two pieces of equipment are capable of being used in the initial moments of a fire to pull smoldering or flamed portions of stored material away from the remainder of the pile. This helps to minimize the potential of the fire to escalate into a larger event. The fire department will provide response to a fire in these areas as well.

V. Clean-up procedure [FAC 62.711-540(1)(e)3.] – Fluff Bunker – In the case of a fire in the fluff bunker, there will likely be little material to clean up. Typically the burning or burnt material is spread on the existing concrete yard area immediately in front of the bunker to completely douse the fire. Once extinguished and cooled, the material is put back into the bunker to await disposal. The typical equipment used in this process is a front end loader and bobcat type skid steer loader. There is no expected clean-up from a flood of the fluff bunker as is presently at or above the 100 year flood elevation.

VI. Clean-up procedure [FAC 62.711-540(1)(e)3.] – Waste tire storage areas – In the case of fire in the waste tire storage and staging areas, the first order of business is to surround the tire pile with processed ferrous material along its southerly side, essentially building a dam around the pile. See section X for an illustration of this arrangement. This will prevent the burnt material from flowing into the storm water dry detention area. Once extinguished and cooled, the burnt water tire materials are to be process through the shredder facility mixed with other waste material ordinarily shredded. The residuals of the waste tire will be deposited into the fluff bunker for final disposal.

VII. Copies of this manual [FAC 62.711-540(1)(e)] – A copy of this manual is to be kept in the main office of Garden Street Iron and Metal, Inc., two story building located on north side of the facility, near the Tara Lee Entrance. The street address of this building is 3265 Metro Parkway. A second copy of this manual is to be kept in the office of Keene Engineering, Inc., 10 George Town, Fort Myers, Fl. 33919.

VIII. Manual Updates [FAC 62.711.540(1)(e)] – This manual must be updated once a year and upon any changes in operations at the facility.

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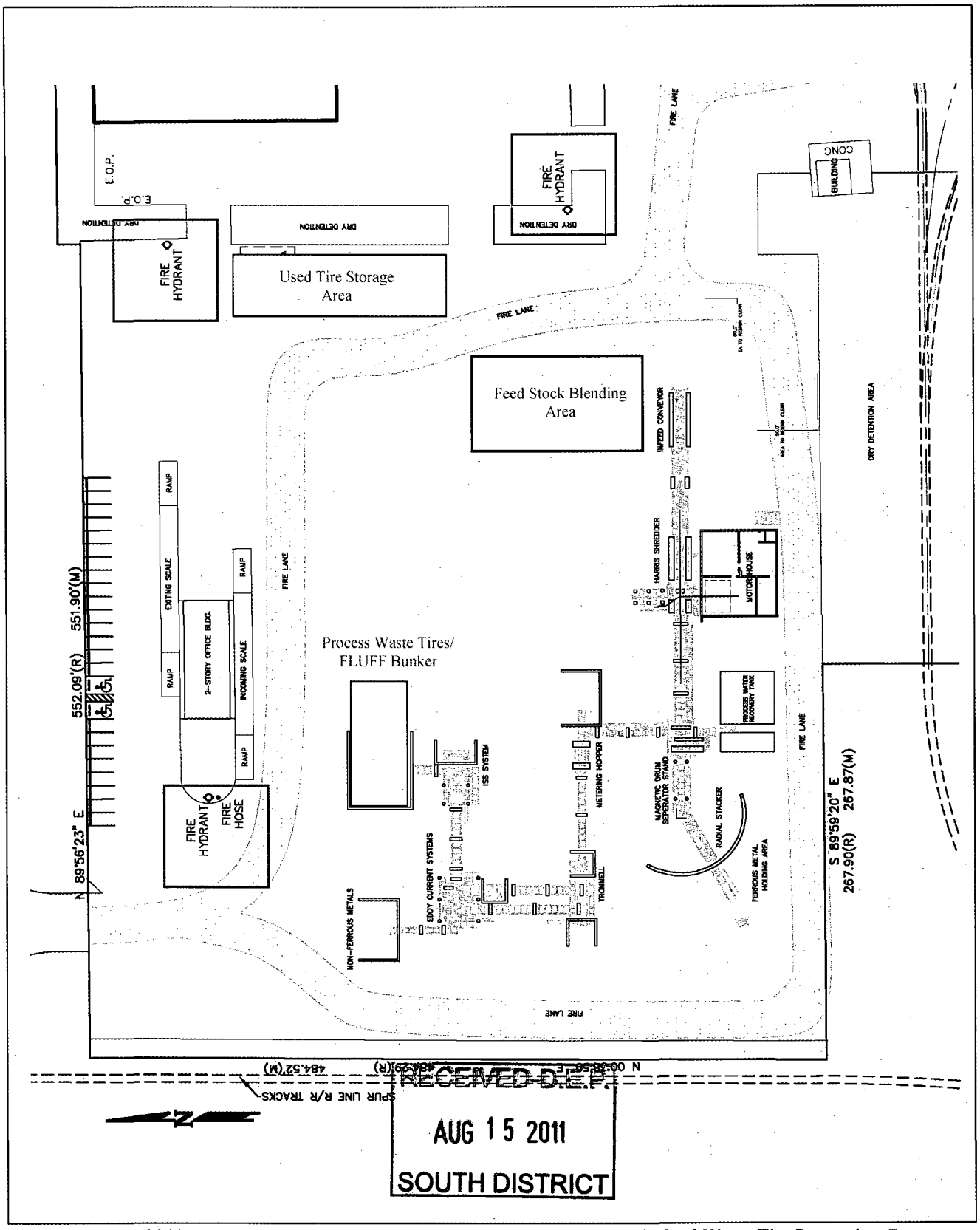
SOUTH DISTRICT

IX. Waste Tire Processing Facility Site Plan



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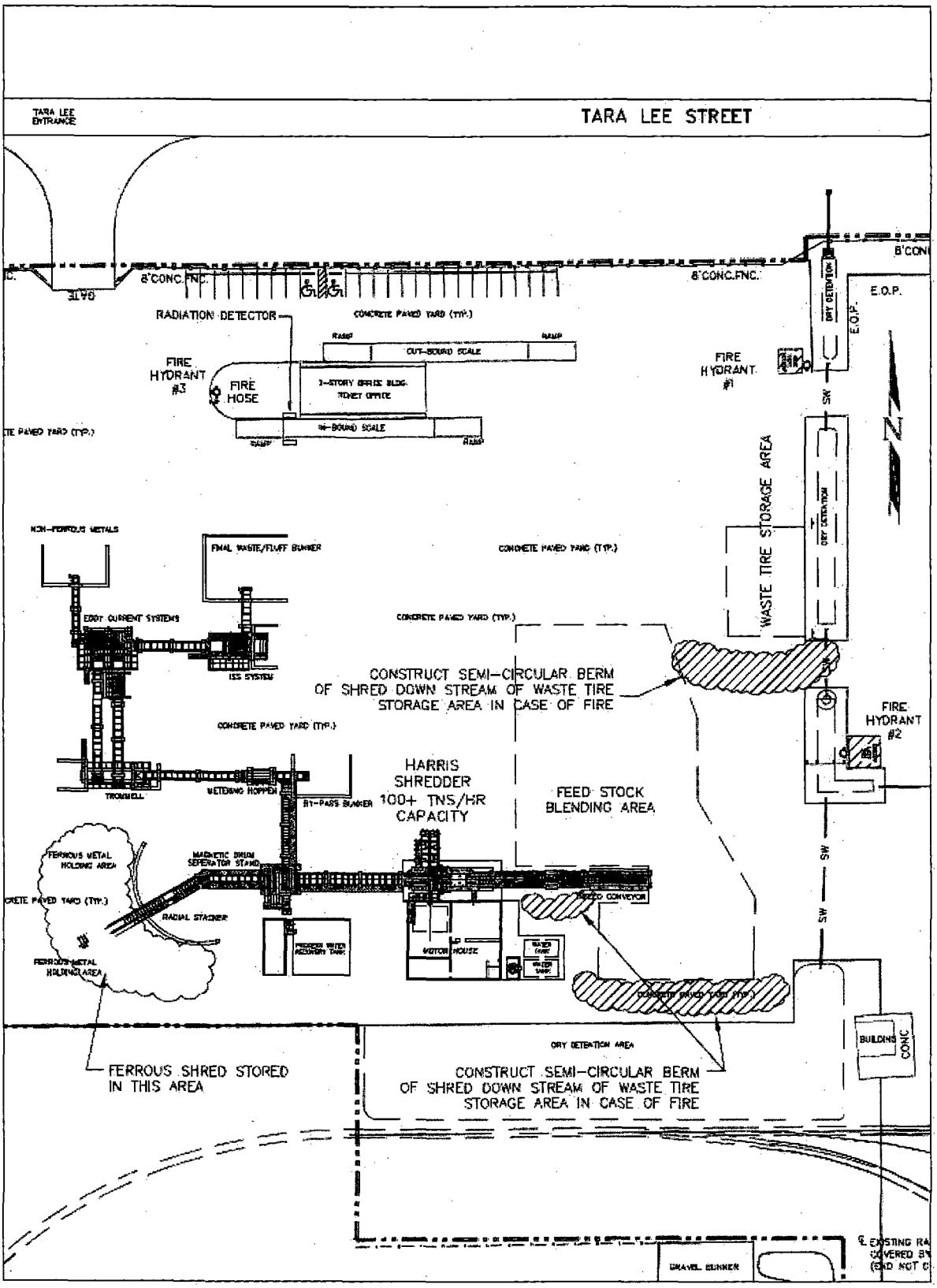
SOUTH DISTRICT

X. Illustration for Fire Runoff Containment



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SOUTH DISTRICT

FORT MYERS FIRE DEPARTMENT
FIRE PREVENTION BUREAU
1825 Hendry Street Suite 101
Fort Myers FL 33901
239.321.7350
239.344.5913 fax

June 13, 2011

Mr. Bill Krumbholz
Florida Department of Environmental Protection
PO Box 2549
Fort Myers, Florida 33902-2549

Re: Updated Fire Safety Survey
Garden Street Tire Processing Facility
Application No 0296251-001-WT/02

Dear Mr. Krumbholz:

On June 8, 2011, an update to the fire safety survey was conducted on the above referenced site with respect to the tire processing facility permit. Specifically, the locations of the existing fire hydrants, fire-fighting hoses, and the fire access pathways were observed.

We hereby find that the fire suppression system is satisfactory.

Please feel free to contact our office should there be any questions.

Sincerely,

Don Ward
Fire Marshal
City of Fort Myers Fire Prevention Bureau

Cc: Robert Weber, 3350 Metro Parkway, Fort Myers, Florida 33916
Tim Keene, PO Box 2770, Fort Myers, Florida 33902

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AUG 15 2011
SOUTH DISTRICT

Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEP Form # 62-701.900(21)
Form Title: Waste Tire Processing Facility Quarterly Report
Effective Date: January 6, 2010
DEP Application No. _____ (Completed by DEP)

COPY

WASTE TIRE PROCESSING FACILITY QUARTERLY REPORT

Pursuant to Rule 62-711.530, Florida Administrative Code, the owner or operator of a waste tire processing facility shall submit the following information to the Department quarterly.

Quarter covered by this report 4th quarter 2009 (First quarter begins on January 1 of any given year)

1. Facility name: Garden Street Iron + Metal of S.W. Florida
2. Facility mailing address: 3350 Metro Pkwy
   City: Ft Myers County: Lee Zip: 33916
3. Facility permit number: 0296251-001-WT/02
4. Facility telephone number (239) 337-5865
5. Authorized person preparing report: John Hoving
6. Affiliation with facility: Op. manager
7. Telephone number (if different from above): ( )
8. Activity: Report in tons

	Beginning Inventory	Received	Processed	Consumed	Removed	Adjustments	Ending Inventory
Used Tires		30.53	30.53				-0-
Other whole Tires							
Processed tires							
Processing Waste							
Other							
Total							

a. Explain all inventory adjustments.

b. List any period in which one or more category of inventory exceeded the permitted maximum for that category. How was that condition relieved?

For any excess inventory at the end of the quarter, state how and when this condition will be relieved. Attach Additional sheets, if necessary.

9. Certification:

To the best of my knowledge and belief, I certify the information provided in this report is true, accurate, and complete.

John Hoving — Print Name of Authorized Agent

John Hoving — Signature of Authorized Agent — 3-5-10 Date

RECEIVED D.E.P.
AUG 15 2011
SOUTH DISTRICT

Mail completed form to the appropriate District office listed below

Northwest District	Northeast District	Central District	Southwest District	South District	Southeast District
160 Government Center	7825 Baymeadows Way, Ste. 200 B	3319 Maguire Blvd., Ste. 232	13051 N. Telecom Pky.	2295 Victoria Ave., Ste. 364	400 North Congress Ave.
Pensacola, FL 32501-5794	Jacksonville, FL 32256-7590	Orlando, FL 32803-3767	Temple Terrace, FL	Fort Myers, FL 33902-2549	West Palm Beach, FL 33401
850-595-8360	904-807-3300	407-894-7555	813-632-7600	239-332-6975	561-681-6600

Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEP Form # 62-701.900(21)
Form Title: Waste Tire Processing Facility Quarterly Report
Effective Date: January 6, 2010
DEP Application No._____ (Completed by DEP)

WASTE TIRE PROCESSING FACILITY QUARTERLY REPORT

Pursuant to Rule 62-711.530, Florida Administrative Code, the owner or operator of a waste tire processing facility shall submit the following information to the Department quarterly.

Quarter covered by this report 1-1-10 to 3-31-10 (First quarter begins on January 1 of any given year)

1. Facility name: Garden Street Iron + Metal Inc
2. Facility mailing address: 3350 Metro Pkwy
   City: Fort Myers County: Lee Zip: FL
3. Facility permit number: WACS # 00098386
4. Facility telephone number (239) 337-5865
5. Authorized person preparing report: John Hoving
6. Affiliation with facility: manager
7. Telephone number (if different from above): ( )
8. Activity: Report in tons

	Beginning Inventory	Received	Processed	Consumed	Removed	Adjustments	Ending Inventory
Used Tires	0	267	267				-0-
Other whole Tires							
Processed tires							
Processing Waste							
Other							
Total							

a. Explain all inventory adjustments.

b. List any period in which one or more category of inventory exceeded the permitted maximum for that category. How was that condition relieved?

For any excess inventory at the end of the quarter, state how and when this condition will be relieved. Attach Additional sheets, if necessary.

9. Certification:

To the best of my knowledge and belief, I certify the information provided in this report is true, accurate, and complete.

John Hoving — Print Name of Authorized Agent
John Hoving — Signature of Authorized Agent
4-19-10 — Date

Mail completed form to the appropriate District office listed below

RECEIVED-D.E.P.
AUG 15 2011
SOUTH DISTRICT

Northwest District	Northeast District	Central District	Southwest District	South District	Southeast District
160 Government Center	7825 Baymeadows Way, Ste. 200 B	3319 Maguire Blvd., Ste. 232	13051 N. Telecom Pky.	2295 Victoria Ave., Ste. 364	400 North Congress Ave.
Pensacola, FL 32501-5794	Jacksonville, FL 32256-7590	Orlando, FL 32803-3767	Temple Terrace, FL	Fort Myers, FL 33902-2549	West Palm Beach, FL 33401
850-595-8360	904-807-3300	407-894-7555	813-632-7600	239-332-6975	561-681-6600

Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEP Form # 62-701.900(21)
Form Title: Waste Tire Processing Facility Quarterly Report
Effective Date: January 6, 2010
DEP Application No. _____ (Completed by DEP)

WASTE TIRE PROCESSING FACILITY QUARTERLY REPORT

Pursuant to Rule 62-711.530, Florida Administrative Code, the owner or operator of a waste tire processing facility shall submit the following information to the Department quarterly.

Quarter covered by this report 2nd quarter 4-1-→6-3-2010 (First quarter begins on January 1 of any given year)

1. Facility name: Garden Street Iron + Metal, Inc.
2. Facility mailing address: 3350 Metro Pkwy
   City: Ft Myers County: Lee Zip: 33916
3. Facility permit number: WACS # 00098386
4. Facility telephone number (239) 337-5865
5. Authorized person preparing report: John Hoving
6. Affiliation with facility: manager
7. Telephone number (if different from above): ( )
8. Activity: Report in tons

	Beginning Inventory	Received	Processed	Consumed	Removed	Adjustments	Ending Inventory
Used Tires							
Other whole Tires	0	630	630				-0-
Processed tires							
Processing Waste							
Other							
Total		630	630				-0-

a. Explain all inventory adjustments.

b. List any period in which one or more category of inventory exceeded the permitted maximum for that category. How was that condition relieved?

For any excess inventory at the end of the quarter, state how and when this condition will be relieved. Attach Additional sheets, if necessary.

9. Certification:

To the best of my knowledge and belief, I certify the information provided in this report is true, accurate, and complete.

John Hoving — Print Name of Authorized Agent
John Hoving — Signature of Authorized Agent
10-21-10 — Date

RECEIVED-D.E.P.
AUG 15 2011
SOUTH DISTRICT

Mail completed form to the appropriate District office listed below

Northwest District	Northeast District	Central District	Southwest District	South District	Southeast District
160 Government Center	7825 Baymeadows Way, Ste. 200 B	3319 Maguire Blvd., Ste. 232	13051 N. Telecom Pky.	2295 Victoria Ave., Ste. 364	400 North Congress Ave.
Pensacola, FL 32501-5794	Jacksonville, FL 32256-7590	Orlando, FL 32803-3767	Temple Terrace, FL	Fort Myers, FL 33902-2549	West Palm Beach, FL 33401
850-595-8360	904-807-3300	407-894-7555	813-632-7600	239-332-6975	561-681-6600

Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEP Form # 62-701.900(21)
Form Title: Waste Tire Processing Facility Quarterly Report
Effective Date: January 6, 2010
DEP Application No. _____ (Completed by DEP)

WASTE TIRE PROCESSING FACILITY QUARTERLY REPORT

Pursuant to Rule 62-711.530, Florida Administrative Code, the owner or operator of a waste tire processing facility shall submit the following information to the Department quarterly.

Quarter covered by this report 3rd (7→9)-2010 (First quarter begins on January 1 of any given year)

1. Facility name: Garden Street Iron + Metal, Inc.
2. Facility mailing address: 3350 Metro Pkwy
   City: Ft Myer County: Lee Zip: 33916
3. Facility permit number: WACS # 00098386
4. Facility telephone number (239) 337-5865
5. Authorized person preparing report: John Hoving
6. Affiliation with facility: manager
7. Telephone number (if different from above): ( )
8. Activity: Report in tons

	Beginning Inventory	Received	Processed	Consumed	Removed	Adjustments	Ending Inventory
Used Tires							
Other whole Tires	0	932	932				0
Processed tires							
Processing Waste							
Other							
Total		932	932				0

a. Explain all inventory adjustments.

b. List any period in which one or more category of inventory exceeded the permitted maximum for that category. How was that condition relieved?

For any excess inventory at the end of the quarter, state how and when this condition will be relieved. Attach Additional sheets, if necessary.

9. Certification:

To the best of my knowledge and belief, I certify the information provided in this report is true, accurate, and complete.

John Hoving — Print Name of Authorized Agent
John Hoving — Signature of Authorized Agent
10-21-10 — Date

Mail completed form to the appropriate District office listed below

RECEIVED-D.E.P.
AUG 15 2011
SOUTH DISTRICT

Northwest District
160 Government Center
Pensacola, FL 32501-5794
850-595-8300

Northeast District
7825 Baymeadows Way, Ste. 200 B
Jacksonville, FL 32256-7590
904-807-3300

Central District
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803-3767
407-894-7555

Southwest District
13051 N. Telecom Pky.
Temple Terrace, FL
813-632-7600

South District
2295 Victoria Ave., Ste. 364
Fort Myers, FL 33902-2549
239-332-6975

Southeast District
400 North Congress Ave.
West Palm Beach, FL 33401
561-681-6600

Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEP Form # 62-701.900(31)
Form Title: Waste Tire Processing Facility Quarterly Report
Effective Date: January 6, 2010
DEP Application No. _____ (Completed by DEP)

WASTE TIRE PROCESSING FACILITY QUARTERLY REPORT

Pursuant to Rule 62-711.530, Florida Administrative Code, the owner or operator of a waste tire processing facility shall submit the following information to the Department quarterly.

Quarter covered by this report 4th Q - Nov - Dec 2010 (First quarter begins on January 1 of any given year)

1. Facility name: Garden Street Iron + Metal Inc.
2. Facility mailing address: 3350 Metro Pkwy
   City: Fort Myers County: FL - Lee - Zip: 33916
3. Facility permit number: WACS 00098386
4. Facility telephone number (239) 337-5865
5. Authorized person preparing report: John Having
6. Affiliation with facility:
7. Telephone number (if different from above): ( )
8. Activity: Report in tons

	Beginning Inventory	Received	Processed	Consumed	Removed	Adjustments	Ending Inventory
Used Tires							
Other whole Tires	0	1,306.18	1,306.18				0
Processed tires							
Processing Waste							
Other							
Total		1,306.18	1,306.18				0

a. Explain all inventory adjustments.

b. List any period in which one or more category of inventory exceeded the permitted maximum for that category. How was that condition relieved?

For any excess inventory at the end of the quarter, state how and when this condition will be relieved. Attach Additional sheets, if necessary.

9. Certification:

To the best of my knowledge and belief, I certify the information provided in this report is true, accurate, and complete.

John Having — Print Name of Authorized Agent

John Having — Signature of Authorized Agent

2-3-11 — Date

RECEIVED-D.E.P.
AUG 15 2011
SOUTH DISTRICT

Mail completed form to the appropriate District office listed below

Northwest District	Northeast District	Central District	Southwest District	South District	Southeast District
160 Government Center Pensacola, FL 32501-5794 850-595-8360	7825 Baymeadows Way, Ste. 200 B Jacksonville, FL 32256-7590 904-807-3300	3319 Maguire Blvd., Ste. 232 Orlando, FL 32803-3767 407-894-7555	13051 N. Telecom Pky. Temple Terrace, FL 813-632-7000	2295 Victoria Ave., Ste. 364 Fort Myers, FL 33902-2549 239-332-6975	400 North Congress Ave. West Palm Beach, FL 33401 561-681-6600

Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEP Form # 62-701.900(31)
Form Title: Waste Tire Processing Facility Quarterly Report
Effective Date: January 6, 2010
DEP Application No. _____ (Completed by DEP)

WASTE TIRE PROCESSING FACILITY QUARTERLY REPORT

Pursuant to Rule 62-711.530, Florida Administrative Code, the owner or operator of a waste tire processing facility shall submit the following information to the Department quarterly.

Quarter covered by this report 1st - 2011 (First quarter begins on January 1 of any given year)

1. Facility name: Garden Street Iron + Metal, Inc.
2. Facility mailing address: 3350 Metro Pkwy
   City: Fort Myers County: Lee Zip: 33916
3. Facility permit number: WACS 00098386
4. Facility telephone number (239) 337-5865
5. Authorized person preparing report: John Horving
6. Affiliation with facility: mang.
7. Telephone number (if different from above): ( )
8. Activity: Report in tons

	Beginning Inventory	Received	Processed	Consumed	Removed	Adjustments	Ending Inventory
Used Tires							
Other whole Tires	0	850.71	850.71				0
Processed tires							
Processing Waste							
Other							
Total		850.71	850.71				0

a. Explain all inventory adjustments.

b. List any period in which one or more category of inventory exceeded the permitted maximum for that category. How was that condition relieved?

For any excess inventory at the end of the quarter, state how and when this condition will be relieved. Attach Additional sheets. If necessary.

9. Certification:

To the best of my knowledge and belief, I certify the information provided in this report is true, accurate, and complete.

John Horving
Print Name of Authorized Agent

John Horving
Signature of Authorized Agent

Date 8/15/11

RECEIVED-D.E.P.
AUG 15 2011
SOUTH DISTRICT

Mail completed form to the appropriate District office listed below

Northwest District
160 Government Center
Pensacola, FL 32501-5794
850-595-8360

Northeast District
7825 Baymeadows Way, Ste. 200 B
Jacksonville, FL 32256-7590
904-807-3300

Central District
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803-3767
407-894-7555

Southwest District
13051 N. Telecom Pky.
Tampa Terrace, FL
813-632-7600

South District
2295 Victoria Ave., Ste. 364
Fort Myers, FL 33902-2549
239-332-6975

Southeast District
400 North Congress Ave.
West Palm Beach, FL 33401
561-681-6600

mailed + E-mailed / Faxed James Standiford

Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DEP Form # 62-701.900(21)
Form Title: Waste Tire Processing Facility Quarterly Report
Effective Date: January 6, 2010
DEP Application No. _____ (Completed by DEP)

WASTE TIRE PROCESSING FACILITY QUARTERLY REPORT

Pursuant to Rule 62-711.530, Florida Administrative Code, the owner or operator of a waste tire processing facility shall submit the following information to the Department quarterly.

Quarter covered by this report 2nd Quarter 2011 (First quarter begins on January 1 of any given year)

1. Facility name: Garden Street Iron + Metal, Inc.
2. Facility mailing address: 3350 Metro Pkwy
   City: Fort Myers County: Lee Zip: 33916
3. Facility permit number: WACS 00098386
4. Facility telephone number (239) 337-5865
5. Authorized person preparing report: John Hoving
6. Affiliation with facility: mang
7. Telephone number (if different from above): ( )
8. Activity: Report in tons

	Beginning Inventory	Received	Processed	Consumed	Removed	Adjustments	Ending Inventory
Used Tires							
Other whole Tires	0	1,088.59	1,088.59				0
Processed tires							
Processing Waste							
Other							
Total		1088.59	1,088.59				0

a. Explain all inventory adjustments.

b. List any period in which one or more category of inventory exceeded the permitted maximum for that category. How was that condition relieved?

For any excess inventory at the end of the quarter, state how and when this condition will be relieved. Attach Additional sheets, if necessary.

9. Certification:

To the best of my knowledge and belief, I certify the information provided in this report is true, accurate, and complete.

John Hoving — Print Name of Authorized Agent
John Hoving — Signature of Authorized Agent
7-30-11 — Date

Mail completed form to the appropriate District office listed below

RECEIVED-D.E.P.
AUG 15 2011
SOUTH DISTRICT

Northwest District
160 Government Center
Pensacola, FL 32501-5794
850-595-8360

Northeast District
7825 Baymeadows Way, Ste. 200 B
Jacksonville, FL 32256-7590
904-807-3300

Central District
3319 Maguire Blvd., Ste. 232
Orlando, FL 32803-3767
407-894-7555

Southwest District
13051 N. Telecom Pky.
Tampa Terrace, FL
813-632-7600

South District
2295 Victoria Ave., Ste. 364
Fort Myers, FL 33902-2549
239-332-6975

Southeast District
400 North Congress Ave.
West Palm Beach, FL 33401
561-681-6600

CLOSING PLAN
For Waste Tire Processing and Storage

Facility: GARDEN STREET IRON & METAL
(WASTE TIRE PROCESSING CENTER)
WACS ID NO. 000098386

Location: 3350 METRO PARKWAY
FORT MYERS, FLORIDA 33916

Applicant: GARDEN STREET IRON & METAL INC. OF S.W. FLORIDA
ROB WEBER, PRESIDENT

Submitted to: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
PO BOX 2549
FORT MYERS, FLORIDA 33902-2549

Prepared by: KEENE ENGINEERING, INC.
PO BOX 2770
FORT MYERS, FLORIDA 33902

RECEIVED-D.E.P.
AUG 15 2011
SOUTH DISTRICT

Date: August 12, 2011

DEPARTMENT OF ENVIRONMENTAL PROTECTION
029627
002-WT/02
PERMIT
SEPT. 22, 2011
ATN
STATE OF FLORIDA

WILLIAM TIMOTHY KEENE
LICENSE
No. 45915
STATE OF FLORIDA
PROFESSIONAL ENGINEER

8-12-11

William T. Keene, PE 45915 Date

I. The purpose of this plan is to meet the requirements of FAC 62-711.700, Closing of Waste Tire Sites. The following steps are to be followed in closing this facility. Note, if the operation of this facility does not continue to meet the requirements of the Waste Tire Rule [FAC 62-711], it shall not receive any waste tires and shall follow the closing procedures until the site is in compliance with the conditions of its waste tire permit.

II. Closing Procedures [FAC 62-711.700(3)(a)]

In closing the waste tire processing aspect of the Garden Street Iron & Metal operation, the following steps are to be followed:

Step 1 - Discontinue the receipt of waste tires from waste tire haulers and other private individuals [FAC 62-711.700(2)(a)].

Step 2 – Post a notice at the Tara Lee entrance to the facility to bulk waste tire are no longer being accepted. This sign shall also include the phone number of the Lee County solid waste authority [FAC 62-711.700(2)(b)].

Step 3 – Notify the Florida Department of Environmental Protection and Lee County government of intent and act of closing the waste tire processing facility [FAC 62-711.700(2)(c)].

Step 4 - Processing all remaining onsite tires through the shredder or otherwise have them hauled to another waste tire processing facility. Remove any solid waste from the processing of waste tires to an approved solid waste facility [FAC 62-711.700(2)(d) and (e)].

Step 5 - File all final reports required by the FDEP as to final quantities of waste tire disposed of and location of disposal and notify FDEP when closing is complete [FAC 62-711.700(2)(f)].

III. Closing Schedule [FAC 62-711.700(3)(b)]

The following schedule is to be used when closing the facility for the processing of waste tires:

Day 1 – Complete Steps 1,2 and 3 listed above.
Days 2 thru 40 – Complete Step 4 above.
Days 41 thru 60 – Complete Step 5 above.

IV. Site Rehabilitation [FAC 62-711.700(3)(c)]

Since the Garden Street Iron & Metal facility will continue as a scrap processing yard, there will be no specific site rehabilitation associated with the waste tire facility.

V. Financial Assurance [FAC 62-711.700(3)(d)]

A closing cost estimate is attached to this plan. Garden Street Iron & Metal Inc. of S.W. Florida will provide a bond meeting the requirements of FAC 62-711.500(3)(c).

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WHERRY
TRUCK LINES, INC.
Walking Floor Bulk Transport

Green Waste Disposal
Horticultural Waste Removal

June 16, 2009

Rob Weber
Garden Street Iron & Metal Inc.
3350 Metro Pkwy
Fort Myers, FL 33916

Wherry Truck Lines will load, haul and dispose of used tires located at 3350 Metro Pkwy in Fort Myers for the following rates for approximately 8,000 car and truck tires:

- Mobilize loader in - $350
- Mobilize loader out - $350
- Loader - $85/hr
- Tires hauled to Lee County Waste to Energy (incinerator) located at 10550 Buckingham Rd, Fort Myers - $250 per 100 yard walking floor trailer load -- Freight only
- Disposal rate for passenger tires - $132.25 per ton
- Disposal rate for OTR tires - $172.50 per ton

All agreements are contingent upon accidents or delays beyond our control.

- Auto Liability Insurance of $1,000,000.00
- Full Workman's Compensation is carried on all employees
- General Liability Insurance of $2,000,000.00

Terms of Payment: Due upon receipt
Federal Tax ID# 650339512

ACCEPTANCE OF SERVICE AGREEMENT

The above prices, specifications and conditions are satisfactory and are hereby accepted. You are authorized to do the work as specified. This quote will be valid for 1 year.

Kendell T. Wherry
Wherry Truck Lines, Inc.

Rob Weber
Garden Street Iron & Metal Inc.

P.O. Box 61008 – Fort Myers, Florida 33906-1008
Phone 239-768-1293 Fax 239-768-6552

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keene
ENGINEERING, INC

Closing Cost Estimate
for
Garden Street Iron & Metal
Waste Tire Processing Center
WACS 00098386

Facilty: Garden Street Iron & Metal
3350 Metro Parkway
Fort Myers, Fl. 33916

Date: October 16, 2009

Description	Unit Cost	Units	Quant.	Total
Mobilization (in and out)	$ 350.00	Ea	2	$ 700.00
Load Tires				
Loader Machine Time	$ 85.00	Hr	16	$ 1,360.00
Walking Floor Trailer	$ 250.00	Load	12	$ 3,000.00
Tire Disposal (Lee County Resource Recovery Facility)				
Passenger Tires	$ 132.25	Ton	140	$ 18,515.00
OTR Tires	$ 172.50	Ton	100	$ 17,250.00
		Total Estimate		**$ 40,825.00**

Assumptions:
1 Based on unit cost quote from Wherry Truck Lines
2 Total Tires Assumed

Passenger Car Tires	14000	x	0.01	tons/tire	=	140
OTR Tires	2000	x	0.05	tons/tire	=	100
				Total Tons		240

Prepared by:

8-12-11
date

WILLIAM TIMOTHY KEENE
LICENSED
No. 45915
STATE OF FLORIDA
PROFESSIONAL ENGINEER

William T. Keene, PE
PE #45915, CA 7578
Keene Engineering, Inc.
PO Box 2770, Fort Myers, Fl 33902
(239) 939-0524 ph (239) 939-1968 fax

Owner

8-15-11
date

Robert Weber, President
Garden Street Iron & Metal Inc. of S.W. Florida
3350 Metro Parkway
Fort Myers, Fl 33916
(239) 337-5865

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DEP Form # 62-701.900(5)(a)
Form Title SWM Fac. Irrevocable Letter of Credit
Effective Date May 27, 2001
DEP Application No. _____

STATE OF FLORIDA
SOLID WASTE MANAGEMENT FACILITY IRREVOCABLE LETTER OF CREDIT TO DEMONSTRATE FINANCIAL ASSURANCE
FOR

☒ Closing ☐ Long-Term Care ☐ Corrective Action
[Check Appropriate Box(es)]

Director, Division of Waste Management
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road MS 4565
Tallahassee, Florida 32399-2400

Busey Bank
Name of Issuing Institution

100 W University, Champaign IL 61820
Address of Issuing Institution

Dear Sir or Madam:

We hereby establish our Irrevocable Standby Letter of Credit No. 700148705 in your favor, at the request and for the account of Garden Street Iron & Metal Inc. of S.W. Florida

3350 Metro Parkway, Ft Myers, FL 33916
Owner's or Operator's Name and Address

up to the aggregate amount of Twenty Four Thousand Four Hundred Thirteen and 75/100 (In Words) U.S. dollars $ 24,413.75, available upon presentation of

(1) your sight draft, bearing reference to this letter of credit No. 700148705, and

(2) your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to the requirements of Rule 62-701.630 or 62-711.500(3), F.A.C."

This letter of credit is effective as of October 23, 2009 (Date) and shall expire on October 23, 2010 (Date at Least One Year Later), but such expiration date shall be automatically extended for a period of one year (At Least One Year) on October 23, 2010 (Date) and on each successive expiration date, unless, at least 120 days before the current expiration date, we notify both you and Garden Street Iron & Metal Inc. of S.W. Florida (Owner's or Operator's Name) by certified mail that we have decided not to extend this letter of credit beyond the current expiration date. In the event you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft for 120 days after the date of receipt by both you and Garden Street Iron & Metal Inc. of S.W. Florida (Owner's or Operator's Name) as shown on the signed return receipts.

Whenever this letter of credit is drawn on under and in compliance with the terms of this credit, we shall duly honor such draft upon presentation to us, and we shall deposit the amount of the draft directly into the standby trust fund of Garden Street Iron & Metal Inc. of S.W. Florida (Owner's or Operator's Name), in accordance with your instructions.

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The persons whose signatures appear below hereby certify that the wording of this letter of credit is identical to the wording as adopted and incorporated by reference in Rule 62-701.900 F.A.C.

V.P.

Signature of Official of Issuing Institution

October 23, 2009

Date

Kent W. Poll

Type Name

Vice President

Title

239-689-7174

Telephone Number

This credit is subject to "The Uniform customs and Practice for Documentary Credits, 2007 Revision,

The International Chamber of Commerce Publication No. 600."

Insert "the most recent edition of the Uniform Customs and Practice for Documentary Credits, published and copyrighted by the International Chamber of Commerce," or "the Uniform Commercial Code."

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SOUTH DISTRICT

8 **OVERSIZED DRAWING(S) REMOVED**

(SEE OCULUS UNDER SAME INDEXING INFORMATION)

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