Florida Department of

Memorandum

Environmental Protection

TO:

Solid Waste Financial Coordinator, DEP

(Solid.Waste.Financial.Coordinator@dep.state.fl.us)

THROUGH:

Richard S. Rachal III, P.G.

Program Administrator
Waste & Air Resource Management

FROM:

Michael Bogin, Engineering Specialist IV

Solid Waste Section A

DATE:

January 7, 2013

SUBJECT:

Advanced Tire Recycling, Inc.

Waste Tire Processing Facility

Facility WACS I.D. Number: 101060

DEP File Number: 321853-001

2014 Financial Assurance Cost Estimates Gilchrist County - Solid Waste Permitting

The Northeast District has completed review of the above-referenced facility's cost estimate (copy enclosed for your files) dated December 18 and received December 30, 2013. It was submitted with the permit application and in accordance with the requirements of Florida Administrative Code Rule 62-701.630. The following cost estimate has been approved for 2014:

Closing Cost Estimate - \$76,524.00

The following is for your information:

Applicant: Advanced Tire Recycling, Inc.

Contact: Jon E. Bischoff Title: President/Owner

Phone Number: 352.463.8448

Email address: <u>trentontiremanl@aol.com</u>

Enclosure

ec. Jon E. Bischoff, Advanced Tire Recycling, Inc., trentontiremanl@aol.com
James F. Graves III, P.E., TRC Engineers, LLC, JGraves@trcsolutions.com
Anna Claveria, Advanced Tire Recycling, Inc, aclaveria@advancedtirerecycling.com
Brian Durden, FDEP, brian.durden@dep.state.fl.us



30 Patewood Drive, Suite 300 Patewood Plaza One Greenville, SC 29615

864.281.0030 PHONE 864.281.0288 FAX

www.TRCsolutions.com

December 18, 2013

Ms. Anna Claveria Advanced Tire Recycling, Inc. PO Box 197/8369 SW CR 313 Trenton, Florida 32693

Subject: Permitting Assistance at Advanced Tire Recycling, Inc.

Dear Ms. Claveria:

The attached revised calculations (3rd version) have been developed to satisfy the requested engineering aspects of environmental permitting required by the Division of Waste Management. TRC Engineers, LLC has calculated closure costs for the site that would be expended by a third-party to remove, process, and dispose of waste tires and close the site.

Pursuant to the Florida Department of Environmental Protection's letter dated October 18, 2013, three review comments were issued regarding the calculations. Responses to those comments are provided in Attachment 4 of this submittal.

If you have questions, please call me at 864.234.9461.

Sincerely,

TRC Engineers, LLC

Michelle Hays

Project Manager

Attachments

cc: Joyce Peterson, TRC Jimmy Graves, P.E., TRC

Attachment 1 Revised Calculations



30 Patewood Drive, Suite 300 Greenville, South Carolina 29615 • www.TRCsolutions.com

Project/Proposal/Location Name:		Advanced Tire Recycling 8369 SW CR313, Trenton, FL 32693	Project/Proposal Number:	
Subject:	Tire Count and C	ost Estimate	203802,0000,0000	
Prepared By:	JEP	Date;	12/17/2013 FINAL:	
Checked By:	JFG	Date:	12/18/2013 REVISION: 区	

TIRE COUNT FOR PERMIT APPLICATION

INFORMTION FROM ADVANCED TIRE		INTERPOLATED)
Trailer size	<u>Tires/Trailer</u>	Trailer size	Tires/Trailer
40 ft	800	20 ft	400
45 ft	1000	28 ft	560
53 ft	1200	30 ft	600
		43 ft	950

FROM 5/15/13 SITE VISIT Plot Plan (aerial photo)

OUTDOOR TIRES (See Figure-1 Plot Plan)

Note: All outdoor tires are in trailers or drop containers.

NORTH OF WAREHOUSE		Tires
3 @20-ft trailers	3 x 400 tires/trailer =	1200
14 @40-ft trailers	14 x 800 tires/trailer =	11200
1 @43-ft trailers	1 x 950 tires/trailer =	950
WEST OF WAREHOUSE		
1 @40-ft trailers	1 v 200 times (tunileu —	
2 @43-ft trailers	1 x 800 tires/trailer =	800
15 @45-ft trailers	2 x 950 tires/trailer =	1900
	15 x 1000 tires/trailer =	15000
4 @53-ft trailers	4 x 1200 tires/trailer =	4800
SOUTH OF WAREHOUSE		
3 @28-ft trailers	3 x 560 tires/trailer=	1680
1 @40-ft trailers	1 x 800 tires/trailer=	950
2 @43-ft trailers	2 x 950 tires/trailer=	1900
14 @45-ft trailers	14 x 1000 tires/trailer=	14000
2 @53-ft trailers	2 x 1200 tires/trailer=	-
Empty trailers -16 during photo - varies	2 x 1200 tiles/ ti dilet =	2400
	Total Outdoor Tires	56,780



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Project/Proposa	al/Location Name:	Advanced Tire Recycling 8369 SW CR313, Trenton, FL 32693	Project/Proposal Number:	
Subject: Tire Count and Cost Estimate			203802.0000.0000	
Prepared By:	JEP	Date:	12/17/2013 FINAL:	
Checked By:	JFG	Date:	12/18/2013 REVISION:	-

INDOOR TIRES (See Figure 2)

RETAIL WAREHOUSE

Assume: racks 4 high, 6 tires/rack

38 racks x 4 x 6 tires/rack =

912

Retall Warehouse

Racks

Racks

10 racks

Total Indoor Tires

6 racks

WHOLESALE WAREHOUSE

BINS - 13 feet high			-··
13 bins @ 25 ft x 25 ft	13 bins x 25 ft x 25 ft x 13 ft/27 ft ³ /cy x 10 tires/cy		<u>Tires</u>
2 bins @ 25 ft x 50 ft	25 birls x 25 ft x 25 ft x 15 ft/2/ π /cy x 10 tires/cy		39,120
	2 bins x 25 ft x 50 ft x 13 ft/27 ft ³ /cy x 10 tires/cy		12.037
1 bin @ 35 ft x 25 ft	1 bin x 35 ft x 25 ft x 13 ft/27 ft 3 /cy x 10 tires/cy		-,
	, , , , , , , , , , , , , , , , , , , ,		4,213
		Bin Total	55.370

STACKS - average 8 tires high - assume aver	rage tire diameter is 2.5 feet
---	--------------------------------

5 stack areas @ 25 ft x 25 ft 4 stack areas @ 25 ft x 50 ft 1 stack area @ 16 ft x 20 ft 1 stack areas @ 16 ft x 15 ft 1 stack area @ 12 ft x 50 ft	5 areas x 10 rows* x 10 rows x 8 tires/stack 4 areas x 10 rows x 20 rows x 8 tires/stack 1 area x 6 rows x 8 rows x 8 tires/stack 1 area x 6 rows x 6 rows x 8 tires/stack 1 area x 5 rows x 20 rows x 8 tires/stack	4000 6400 384 288 800
* 61	Stack Total	11.872

* Note: (example for all row calculations) -

25 feet/2.5 feet per row = 10 rows

16 feet/2.5 feet per row = 6.4 rows (use 6)

(number of rows is truncated at the whole number)

TOTAL SITE TIRES

124.934 Tire
68,154
56,780

68,154



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Project/Proposal/Location Name:		Advanced Tire Recycling 8369 SW CR313, Trenton, FL 32693	Project/Propos	Project/Proposal Number:	
Subject: Tire Court and Cout Full		203802.0000	203802.0000.0000		
Prepared By:	JEP	Date:	12/17/2013 FINAL:		
Checked By:	JFG	Date:	12/18/2013 REVISION:	×	

CLOSURE COST ESTIMATE

Estimate 1:

Keif's

passenger tires - \$1 ea. light truck tires - \$1.5 ea medium truck tires - \$5 ea	0.98* x 124,934 tires x \$1 0.02 x 0.75 x 124,934 tires x \$1.5 0.02 x 0.25 x 124,934 tires x \$5	Cost \$122,436 \$2,811 \$3,123
4 pr		\$128,370

*From Advanced Tire: 98% passenger tires

2% truck tires (75% light duty, 25% medium duty)

Estimate 2: T&S - \$50/ton + \$10,000 labor and transportation

passenger tires - average 25 pounds each truck tires - average 35 pounds each labor and transportation	\$50x0.98x124,934 tiresx25 lb/tire/2000 lb/ton \$50x0.02x124,934 tiresx35 lb/tire/2000 lb/ton	\$76,522 \$2,186 \$10,000
		\$88.709

Estimate 3:

Homosassa Tire

Cost

All tires - \$0.10 each

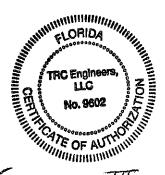
\$0.10 * 124,934 tires =

\$12,493

Average Closure Cost:

\$76,524





NAME:

James F. Graves III, P.E.

COMPANY:

TRC Engineers, LLC

ADDRESS:

30 Patewood Drive

Suite 100

Greenville, SC 29615

PHONE:

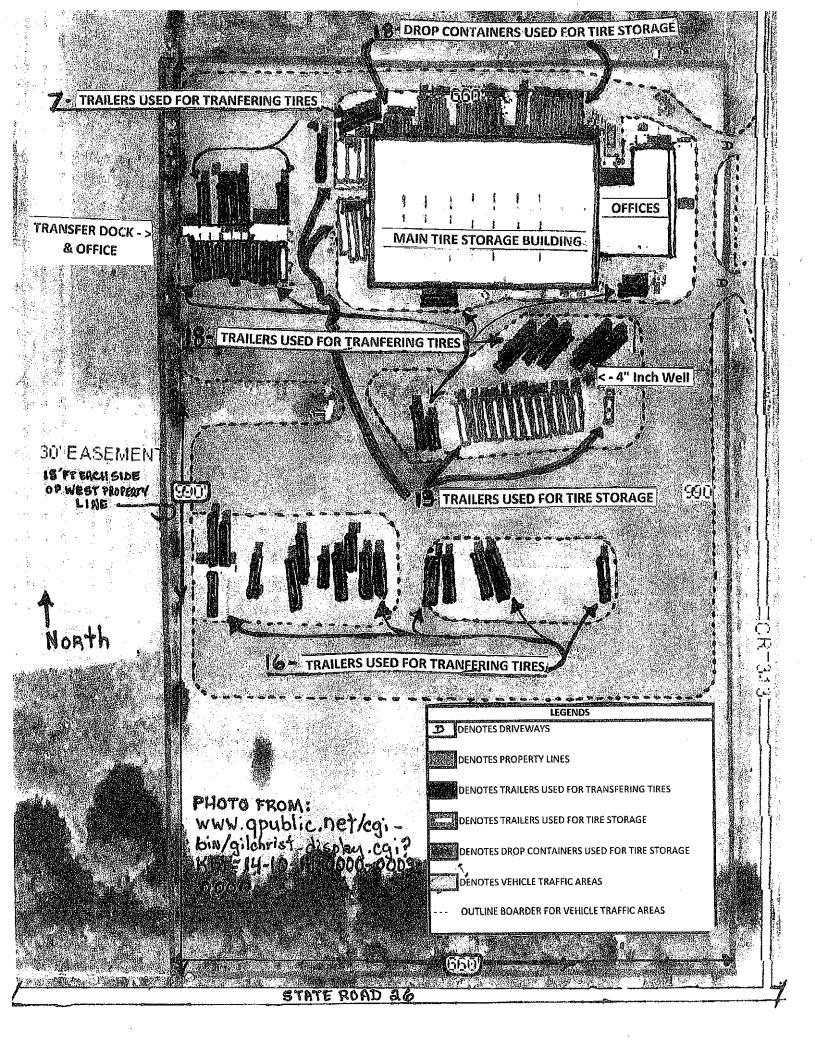
864-420-3850

TRC Environmental Solutions

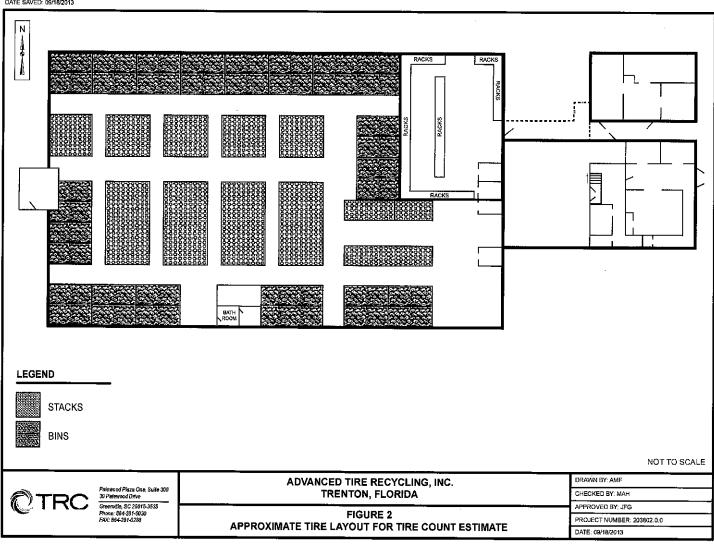
P:\Projects_Vision\203802 - Advanced Tire\Tire count (rev JFG 12-18-2013)

3 of 3 12/18/2013

Attachment 2 Figures



PATH: P:_Vision\203802 - Advanced Tire\A\\Fig2_TireLayout.a\ DATE SAVED: 09/18/2013



Attachment 3 Disposal Quotes

Anna Claveria

From:

Sent:

To: Subject: Keifwade [keifwade@aol.com]

Thursday, September 12, 2013 7:36 PM aclaveria@advancedtirerecycling.com

tire disposal bid

Keif's Tires, Inc. 2250 NW 42nd St. Ocala, Fl. 34475 863-701-3691

September 12, 2013

Advanced Tire Recycling Trenton,Fl

Tire Disposal Bid:

Passenger Tires \$1 each Light Truck Tires up to size 19.5 \$1.50 Medium Truck Tires sizes 19.5- 31580R22.5 \$5 each Prices are valid through this year.

Thank You,

S. Keif Wade President Keif's Tires, Inc. per phone callasts include labor + transportation

> -Mizhelle Hays TRC Enginees



T & S Tire New & Used Tires



948 West Broad Ave Albany, GA 31701 (229) 438-0704 - Office (229) 438-0603 - Fax

December 17, 2013

Advanced Tire Recycling, Inc. 8369 SW CR 313 Trenton, FL 32693

Brian Bivins

Dear Jon:

Per your request, the following proposal for waste tire disposal in the event of site closure at your facility in Trenton, FL.

- Whole tires will be accepted for a disposal of \$50.00 per ton.
- Labor and Transportation will be in the amount of \$10,000.

If you need any additional information, please feel free to call.

Sincerely,

Brian Bivins

(229) 854-1080

3524638483

ADVANCED TIRE

p.1

PAGE 01/01

12/05/13

Re: Bid on Site Closure

Mr. Bischoff,

Upon visit of your facility my company, Homosassa Tire Inc, is able to remove the tires from your facility, Advanced Tire Recycling, Inc. at \$0.10 per tire. The profit from the tires that could be resold would offset the price difference of the disposals of the waste tires. This amount includes removal, labor, and transportation. This offer is good for others and DEP with the same conditions.

Please call if you have any questions or need anything else.

Sincerely,

Ron Williams Homosassa Tire, Inc. 5440 South Oak Ridge Drive Homosassa, Fl. 34446 (352) 697-0735

Attachment 4 Response to Comments



FLORIDA DEPARTMENT OF **ENVIRONMENTAL PROTECTION**

RICK SCOTT **GOVERNOR**

HERSCHEL T. VINYARD JR. SECRETARY

NORTHEAST DISTRICT 8800 BAYMEADOWS WAY WEST, SUITE 100 JACKSONVILLE, FLORIDA 32256

October 18, 2013

Transmitted via email to: trentontireman1@aol.com

Mr. Jon E. Bischoff, President/Owner Advanced Tire Recycling, Inc. 8369 SW County Road 313 Trenton, Florida 32693

Re:

Advanced Tire Recycling, Inc. Waste Tire Processing Facility

Facility WACS I.D. Number: 101060

Operation Permit Application DEP File Number: 321853-001

First Request for Additional Information Gilchrist County - Solid Waste Permitting

Dear Ms. Bischoff:

The Florida Department of Environmental Protection (Department) has completed a review of the abovereferenced submittal, dated October 7 and received October 10, 2013. The following is the review of that submittal:

Attachment 1, Review Memorandum dated October 18, 2013, prepared by Michael Bogin.

Please provide the requested information by November 18, 2013, and note that it is necessary for the Department to continue processing your submittal. Action on the submittal may therefore be delayed until the requested information is received in this office. Finally, please reference the associated Facility WACS I.D. Number in all written correspondence concerning this project. As part of the response request, we strongly encourage a teleconference or meeting to assist you in answering or clarifying any questions. Please contact Michael Bogin by mail at the letterhead address, by email at Michael Bogin@dep.state.fl.us, or by telephone at 904.256.1579.

Sincerely,

Richard S. Rachal III. P.G. Acting Program Administrator

Waste & Air Resource Management

Enclosure

ec: James F. Graves III, P.E., TRC Engineers, LLC, JGraves@trcsolutions.com

Anna Claveria, Advanced Tire Recycling, Inc, aclaveria@advancedtirerecycling.com

Emerson Raulerson, P.E., FDEP, Emerson.Raulerson@dep.state.fl.us

Solid Waste Financial Coordinator, DEP, Solid.waste.financial.coordinator@dep.state.fl.us

Florida Department of

Environmental Protection

Memorandum

TO:

Files

THROUGH: Richard S. Rachal III, P.G.

Acting Program Administrator

Waste & Air Resource Management

FROM:

Michael Bogin, Engineering Specialist IV

Solid Waste Section M3

DATE:

October 18, 2013

SUBJECT:

Advanced Tire Recycling, Inc.

Waste Tire Processing Facility

Facility WACS I.D. Number: 101060

Operation Permit Application DEP File Number: 321853-001

First Request for Additional Information Gilchrist County - Solid Waste Permitting

The Florida Department of Environmental Protection (Department) has completed a review of the above-referenced submittal, dated October 7 and received October 10, 2013. Below are comments and/or additional information that are needed in a permit application.

- 1. Please provide Applicant information in accordance with Rule 62-701.320(3), F.A.C. The information should specify the history of the Applicant's interactions and issues with the Department. For the purpose of Rule 62-701.320(3)(a), F.A.C. "Applicant" means the owner or operator of the solid waste management facility in this state, and includes a business entity, a parent of a subsidiary corporation, a partner, a corporate officer or director, or a stockholder holding more than 50 percent of the corporate stock. When providing the required information, please note that the aforementioned Rule does not only address the facility for which an application has been submitted.
- 2. Please provide proof of publication of your public notice of application in the newspaper in accordance with Rule 62-701.320(8)(a), F.A.C. Below is the language of the Notice of Application. Please fill in the required information, publish within 14 days, and provide the Department with proof of its publication.

Public Notice of Receipt of Application

State of Florida Department of Environmental Protection Notice of Application

Advanced Tire Recycling, Inc. October 18, 2013 Page 2 of 3

The Department announces receipt of an application for a permit from [NAME OF APPLICANT], to [CONSTRUCT/OPERATE] the [NAME OF FACILITY]. Included in the application are proposals to [DESCRIBE PROPOSAL] The facility is located at [STREET ADDRESS], [CITY], [COUNTY], Florida. The Department file number for the project is 321853-001.

This application is being processed 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 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida. Any comments or objections should be filed in writing with the Department at this address. Comments or objections should be submitted as soon as possible to insure that there is adequate time for them to be considered in the Department's decision on the application.

- 3. As part of the application form, the "Waste Tire Processing Facility Permit Application", please provide a description how the facility will be in compliance with the requirement of Rule 62-711.530(4), F.A.C., which states, "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."
- 4. As part of the application form, the "Waste Tire Processing Facility Permit Application", please provide a description how the facility will be in compliance with the requirement of Rule 62-711.530(5), F.A.C., which states, "Owners and operators of waste tire processing facilities shall submit quarterly reports to the Department that summarize the information collected under subsection (4) above. These reports shall be submitted by the 20th of the month following the close of each calendar quarter. The report shall be submitted to the Department on Form 62-701.900(21)."
- 5. Application on page 2 of Appendix states in 2.(a-f) that "Our facility will meet all requirements for indoor storage". Such general statement is not adequate. Please describe what measures were accomplished in order to meet the requirements of Rule 62-711.540(2)(a)-(h), F.A.C. Please identify how the facility will be in compliance with these indoor storage requirements during future operations.
- 6. Application on page 2 of Appendix states in 3.(a-f) that "Our facility will meet all requirements for outdoor storage". Such general statement is not adequate. Please describe what measures were accomplished in order to meet the requirements of Rule 62-711.540(3)(a)-(f), F.A.C.

Advanced Tire Recycling, Inc. October 18, 2013 Page 3 of 3

Please identify how the facility will be in compliance with these outdoor storage requirements during future operations.

- 7. According to the October 1, 2013 pre-fire plan, the Fanning Springs Fire Rescue recommended that "the storage trailers be repositioned and clearly marked whether they are full or empty." Please confirm that the recommended relocation and labeling were performed and Fire Rescue is satisfied.
- 8. Please note, an applicant as part of a waste tire processing facility permit application may request exceptions to the preceding technical and operational standards. For example, the requirements of Rule 62-711.540(2)(e)-(g), F.A.C. The Department will approve exceptions if:

 no waste tires are stored at the facility for more than one month; and

 the local fire authority is satisfied that the facility has sufficient fire suppression equipment or materials on site to extinguish any potential waste tire fire within an acceptable length of time. If this approach is desired, please provide a letter from the local fire authority stating that they are satisfied with the fire suppression equipment or materials onsite to extinguish any potential tire fires.
- 9. In accordance with Rule 62-711.500(3)(a) F.A.C., "Owners or operators of waste tire sites shall provide the Department with proof of financial assurance issued in favor of the State of Florida in the amount of the closing cost estimate for the facility. This proof, along with the closing cost estimate, shall be submitted to the Department as part of the permit application for the facility. Proof of financial assurance shall consist of one or more of the following financial instruments: surety bonds, including performance bonds or financial guarantee bonds; irrevocable letters of credit; insurance; and trust funds. Financial documents shall be submitted on forms provided by the Department in accordance with the requirements of paragraphs (c) and (d) of this subsection."

Please contact Susan Eldredge of the Department's Solid Waste Financial Assurance section in Tallahassee concerning the financial assurance requirements by phone at: (850)245-8740, by email at Susan.eldredge@dep.state.fl.us, or US mail at:

Florida Department of Environmental Protection Financial Coordinator - Solid Waste Section Twin Towers Office Building 2600 Blair Stone Road, MS 4565 Tallahassee, Florida, 32399-2400

- 10. According to Revised Calculations provided on page 1 of Attachment 1, the number of trash trailers located on south of warehouse is two but according to Figure 1, this number is eight. Please explain.
- 11. The number of trailers on the Plot Plan is different than the number of trailers provided on Figure 1. Please clarify.
- 12. It seems like only the bid from the Liberty Tire Recycling includes the cost to load and transport waste tires. Others have provided only disposal costs. Please clarify.

Response to Florida Department of Environmental Protection's Comments

Pursuant to the Florida Department of Environmental Protection's letter dated October 18, 2013, three review comments (numbers 10, 11, and 12) were issued regarding the calculations. Responses to those comments are provided below with the original comments bold italicized.

10: According to the Revised Calculations provided on page 1 of Attachment 1, the number of trash trailers located south of the warehouse is two, but according to Figure 1, this number is eight. Please explain.

During TRC's initial site visit, eight trash trailers were located south of the warehouse as depicted on Figure 1. However, the plot plan (aerial photograph) indicates two trailers; therefore a volume of two was used in the calculations. A note is referenced in the calculations indicating that the volumes were obtained from the plot plan and not the former Figure 1. The plot plan will be used as Figure 1 going forward.

11. The number of trailers on the Plot Plan is different than the number of trailers provided on Figure 1. Please clarify.

The volume of trailers on the property is constantly changing. The plot plan was created after the site visit conducted on May 15, 2013. Estimates used in the calculation are based on the plot plan, which will serve as the new Figure 1.

12. It seems like the only bid from the Liberty Tire Recycling includes the cost to load and transport waste tires. Others have provided only disposal costs. Please clarify.

Three bids were initially provided, including costs from Liberty Tire, Kief's Tire, and T&S Tire. Liberty Tire's bid included costs for loading, transporting, and disposing of the tires. Kief's Tire's bid included costs for transportation and disposal, which was confirmed via telephone. T&S Tire is not able to transport the tires; therefore, this bid was removed from the calculation estimate. Two other bids were solicited from Big Oak Tire and Homosassa Tire. Both Big Oak Tire and Homosassa Tire indicated the value of the tires would exceed the cost to load and transport, and would therefore not charge to load or transport. Written documentation indicating no charge for loading and transporting is included in both of these bids.

Please note when averaging the three bids for a closure cost, only Liberty Tire, Kief's Tire, and Big Oak Tire were used.