Waste Tire Processing Facility
Permit Renewal 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

Date: November 13, 2014

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

Digitally signed by William T Keene
DN: C=US, O=IdenTrust ACES Unaffiliated Individual, CN=William T Keene, OID.0.9.2342.19200300.100.1.1=A01098000000149CA27CF4800008A27
Reason: I am the author of this document
Date: 2014-11-25 12:13:14

_____
Keene, PE 45915 Date

BOOK 1 OF 2

TABLE OF CONTENTS

WASTE TIRE PROCESSING FACILITY
APPLICATION FOR RENEWAL

Section 1

Tire Processing Facility Application Form

Department of Environmental Protection

DEP Form # 62-701.900(23)
Form Title Waste Tire Processing Facility Permit Application
Effective Date 3/22/00
DEP Application No. _____ (Filled in by DEP)

Waste Tire Processing Facility Permit Application

Permit No. 0296251-001-WT / 02

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

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: same
5. City: _____ County: _____ Zip: _____
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: 44 Range: 25
   Latitude: 26 Deg. 37' 4.4" N. Longitude: 81 Deg. 51' 13.8" W
8. Anticipated date for starting construction NA and for completion of construction NA
9. Anticipated date for receipt of tires upon approval and for start of processing upon approval

Mail completed form to
appropriate district office listed below

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

Northeast District
7825 Baymeadows Way, Ste. 200 B
Jacksonville, FL 32256-7590
904-448-4300

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

Southwest District
3804 Coconut Palm Dr.
Tampa, FL 33619
813-744-6100

South District
2295 Victoria Ave., Ste. 364
Fort Myers, FL 33902-2549
941-332-6975

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

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(Filled in by DEP)

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, PE, Keene Engineering, Inc.
2. Mailing address: PO 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. See Attachment _____

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

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

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 tires 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 Okeechobee Landfill
2. Street address: 10800 NE 128th Ave.
3. City: Okeechobee County: Okeechobee Zip: 34972

F. Facilities that will be delivering processed tires to consuming facilities must describe the existing or proposed markets for those processed tires.

none at this time

Part III-Attachments:

A. Facility design

NOTE: All maps, plan sheets, drawings, isometrics, cross sections, 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 facility; 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 processing 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 facility 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 processing facility.

F. If waste tires will be consumed 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. Florida Is aware that statements made in this form and attached information are an application for a Tire Processing Facility 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 Chapter 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

11-24-14
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 facilities. 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.

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

Signature 11-21-14

William T. Keene, PE, Keeneng, Inc.
Name and Title

45915
Florida Registration Number

PO Box 2770
Mailing Address

Fort Myers, Florida 33902
City, State, Zip

239-939-0524
Telephone number

(please affix seal)

Date

Section 2

Application Narrative

APPLICATION NARRATIVE

GARDEN STREET IRON & METAL
(Waste Tire Processing Center)

The following narrative is intended to accompany the Waste Tire Processing Facility Permit Renewal 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 renewal to the existing 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

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 updated/renewed 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. A check payable to Florida DEP is enclosed along with this application.

Part IV – Certification

A. Applicant:
Please see the application form.

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

Section 3

Facility Design Narrative

FACILITY DESIGN NARRATIVE

GARDEN STREET IRON & METAL
(Waste Tire Processing Center)

Tire Processing Permit Renewal 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 permit application and have not been modified.

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.

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 Nov. 17, 2014. Their approval letter dated Nov. 18, 2014, 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

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.

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.

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

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.

Section 4

Facility Operation Narrative

FACILITY OPERATION NARRATIVE

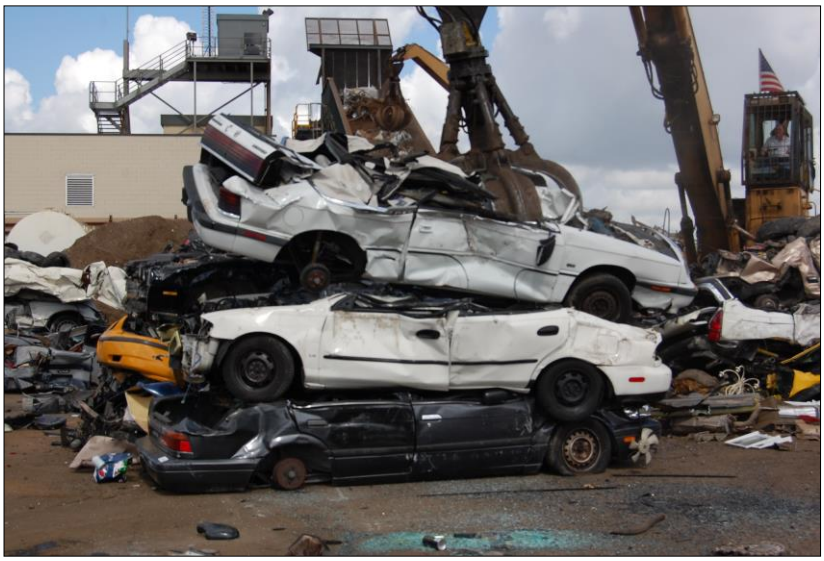
GARDEN STREET IRON & METAL
(Waste Tire Processing Center)

Tire Processing Permit Renewal
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.

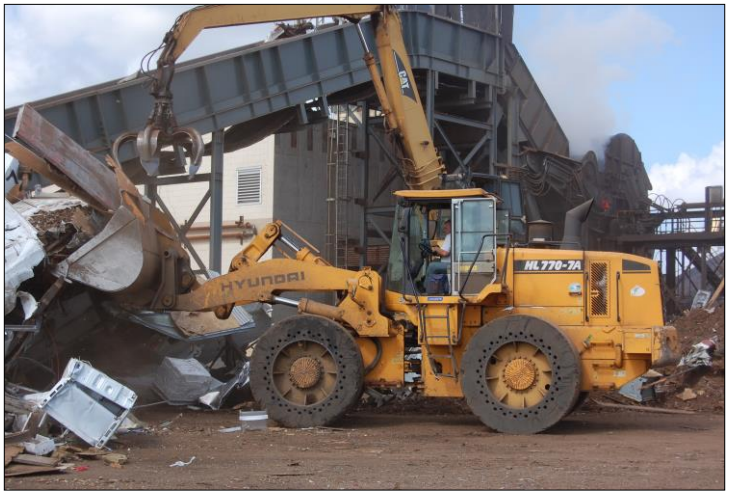


Scrapped automobile being placed onto the in-feed conveyor.

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.

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.

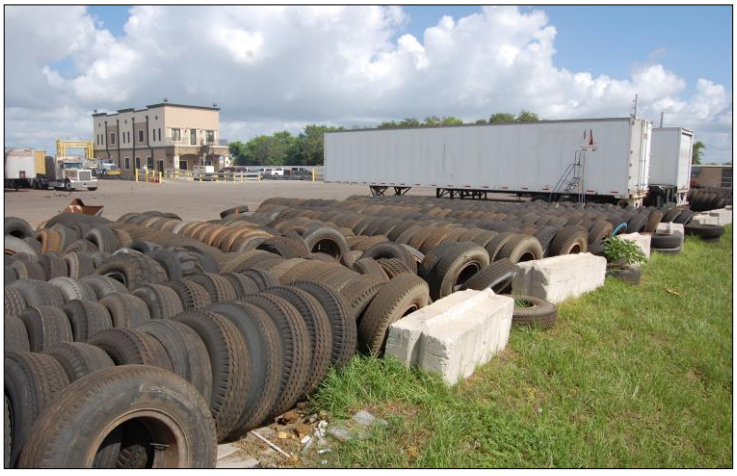
The vehicles carrying the bulk waste tire deliveries are weighed on the incoming and outgoing truck scales. The quantity of waste tires is determined by the net difference in vehicle weight. All customer data is recorded in the facility's "point of sale" (POS) system. The POS system is a software program 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.

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.

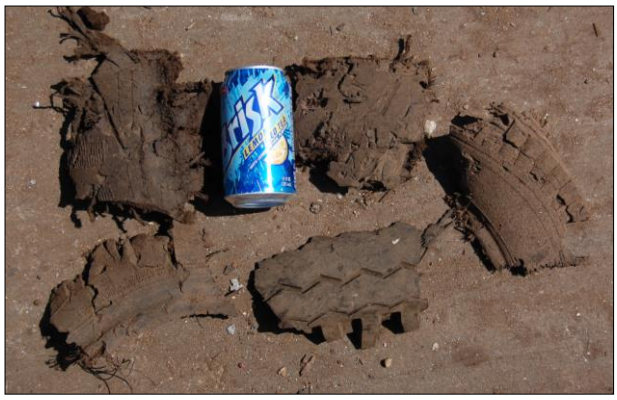
2. A description of the equipment used for processing tires. This description shall include the make, model, and hourly capacity of each piece of equipment. (Application Part III.B.2.)

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.

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.

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.

Section 5

Facility Plan Set 11” x 17”

See separate document for plan set.