



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

CLIFFORD D. WILSON III
INTERIM SECRETARY

SENT BY ELECTRONIC MAIL

In the Matter of an
Application for Permit by:

Garden Street Iron & Metal Inc. of S.W. Florida
Robert Weber, President
3350 Metro Parkway
Fort Myers, Florida 33916
rob@gsimrecycling.com

Lee County – Solid Waste
Garden Street Iron & Metal
Waste Tire Processing Facility
WACS# 98386
Permit Number 0296251-003-S0/08

NOTICE OF PERMIT ISSUANCE

Enclosed is Permit Number 0296251-003 to operate the Garden Street Iron & Metal Waste Tire Processing Facility. The waste tire processing facility is part of a larger recycling facility at the 3350 Metro Parkway, Fort Myers in Lee County. This permit is issued under 62-711, Florida Administrative Code and Chapter 403, Florida Statutes.

The Department of Environmental Protection's (Department's) proposed agency action shall become final unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, Florida Statutes, within fourteen days of receipt of notice. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received by the Clerk) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

Under Rule 62-110.106(4), Florida Administrative Code, a person may request an extension of the time for filing a petition for an administrative hearing. The request must be filed (received by the Clerk) in the Office of General Counsel before the end of the time period for filing a petition for an administrative hearing.

Petitions by the applicant or any of the persons listed below must be filed within fourteen days of receipt of this written notice. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), Florida Statutes, must be filed within fourteen days of publication of the notice or within fourteen days of receipt of the written notice, whichever occurs first. Section 120.60(3), Florida Statutes, however, also allows that any person who has asked the Department in writing for notice of agency action may file a petition within fourteen days of receipt of such notice, regardless of the date of publication.

The petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition or request for an extension of time within fourteen days of receipt of notice shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, Florida Statutes. Any subsequent intervention (in a proceeding initiated by another party) will be only at the discretion of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information, as indicated in Rule 28-106.201, Florida Administrative Code:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, any e-mail address, any facsimile number, and telephone number of the petitioner, if the petitioner is not represented by an attorney or a qualified representative; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the determination;
- (c) A statement of when and how the petitioner received notice of the Department's decision;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the Department's proposed action;
- (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the Department's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Department's proposed action.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under Section 120.573, Florida Statutes, is not available for this proceeding.

This permit action is final and effective on the date filed with the Clerk of the Department unless a petition (or request for an extension of time) is filed in accordance with the above. Upon the timely filing of a petition (or request for an extension of time), this permit will not be effective until further order of the Department.

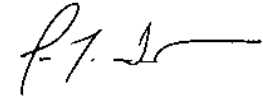
Any party to the permit has the right to seek judicial review of the permit action under Section 120.68, Florida Statutes, by the filing of a notice of appeal under Rules 9.110 and 9.190, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, 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

Notice of Permit Issuance
Garden Street Iron & Metal Waste Tire Processing Facility
0296251-003-SO/08

appeal. The notice of appeal must be filed within 30 days from the date when this permit action is filed with the Clerk of the Department.

Executed in Fort Myers, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Jon M. Iglehart
Director of District Management

FILING AND ACKNOWLEDGMENT

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



[Clerk]

December 17, 2014
[Date]

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed or emailed before the close of business on December 17, 2014, to the listed persons.



Name

December 17, 2014
Date

Enclosed: Permit and 3 Appendices

Copies furnished to:

William T. Keene, P.E. tim@keenefl.com
Tor Bejnar
Nolin W. Moon, P.E.
Narrisa Pannell



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

South District Office
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RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

CLIFFORD D. WILSON III
INTERIM SECRETARY

Permit Issued to:

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

Facility WACS ID No.: 98386
Facility Name: Garden Street Iron & Metal Waste Tire Processing Facility
Facility Address: 3350 Metro Parkway
Fort Myers, Lee County, Florida

Contact Person:
Robert Weber
rob@gsimrecycling.com

Solid Waste Operation Permit – Waste Tire Processing Facility

Permit No.: 0296251-003

Permit Issued: December 17, 2014
Permit Expires: December 16, 2019

Permitting Authority
Florida Department of Environmental Protection
South District
2295 Victoria Avenue, Suite 364
Fort Myers, Florida 33901
(239) 344-5600

SECTION 1 - SUMMARY INFORMATION

A. Authorization

The permittee is hereby authorized to operate a waste tire processing facility in accordance with the specific and general conditions of this permit and any documents attached to this permit or specifically referenced in this permit and made a part of this permit.

This solid waste operation permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4, 62-701, and 62-711.

This permit does not relieve the permittee from complying with any other appropriate local zoning or land use ordinances or with any other laws, rules or ordinances. Receipt of any permit from the Department does not relieve the applicant from obtaining other federal, state, and local permits and/or modifications required by law, including those from other sections within the Department or of the Water Management District.

B. Facility Location

The facility is located at 3350 Metro Parkway, Fort Myers, in Section 30, Township 44S, Range 25E, in Lee County, Florida (Latitude 26°37'04"N and Longitude 81°51'14" W).

C. Facility Description

This waste tire processing facility shreds waste tires to produce clean tire shred suitable for recycling and to allow the tires to be disposed in landfills. The facility receives tires from the public and waste tire collectors. Also, tires are received from the scrap metal recycling operations at the site. Tires that remain on the automobiles to scrap are not counted as waste tires. The anticipated average waste tire processing rate for this facility is 14 tons per day. Actual operating rates will vary depending on business conditions.

The above named permittee is hereby authorized for the following operations:

- To operate a waste tire processing facility.
- Processing involves shedding and storage of whole waste tires.
- All storage and operations are performed outdoors.
- On-site waste tire storage capacity is 16,000 tires and includes whole waste tires, used tires for resale and processed tires.

D. Appendices Made Part of This Permit

APPENDIX 1 - General Conditions
APPENDIX 2 - Operation Plan
APPENDIX 3 - Emergency Preparedness Manual

SECTION 2 - SPECIFIC CONDITIONS

A. Administrative Requirements

1. Documents Part of This Permit. The documents in the appendices are attached to and are a part of this permit. Where there are conflicts with the permit and the attached documents, the specific conditions of this permit supersede any procedure or requirement given in the appendices.
2. Permit Modification. The permittee shall apply to modify the permit before any changes, other than minor deviations, to the approved documents in it are implemented. [62-701.320(4), F.A.C.]
3. Permit Renewal.
 - a) The permittee shall submit an application to renew this permit at least 61 days prior to the expiration of this permit.
 - b) The application shall be submitted on [Form 62-701.900\(23\)](#), Waste Tire Processing Facility Permit Application. [62-701.320(10), F.A.C.]
4. Transfer of Permit or Name Change.
 - a) The Department shall be notified in writing within 30 days of any sale or conveyance of the facility; if a new or different person takes ownership or control of the facility; or if the facility name is changed.
 - b) The notice shall be submitted on [Form 62-701.900\(8\)](#), Application for Transfer of Permit or Notification of Name Change. [62-701.320(11), F.A.C.]

B. Operation Requirements

1. General Operating Requirements. The Permittee shall operate the facility in accordance with the approved Operation Plan. [62-701.300(1)(a), F.A.C.]
2. Authorized Waste and Material Types. The facility is authorized to manage only whole waste tires as defined in Rule 62-701.200, F.A.C.
3. Unauthorized Waste Types. The facility is not authorized to accept or manage any waste types not listed in B.2. above. Any unauthorized waste inadvertently received by the facility shall be disposed to an appropriate waste management facility. This prohibition does not include or affect the recycled materials or operations. [62-701.300(1)(a), F.A.C.]
4. Maximum Storage Quantities.
 - a) The maximum storage at the facility for passenger whole waste tires, including used tires for re-sale shall be 14,000 passenger car tires.
 - b) The maximum storage at the facility for truck whole waste tires, including used tires for re-sale and processed tires shall be 2,000 truck tires.
 - c) The tonnage of waste tires, used tires and processed tires shall not exceed 240 tons. [62-711.530(2), F.A.C.]

5. Facility Capacity. If the facility has reached its permitted capacity for storage of waste tires, the permittee shall not accept additional waste tires until sufficient capacity has been restored. [62-711.530(11), F.A.C.]
6. Storage and Management. A tire pile shall mean a pile of whole tires or processed tires.
 - a) All waste tires shall be stored outdoors.
 - b) Each tire pile shall not be greater than 10,000 square feet in area.
 - c) Tire piles shall not be greater than 50 feet in width and 15 feet in height.
 - d) The permittee shall provide for control of mosquitos and rodents.[62-711.540(1) and (3)(b), F.A.C.]
7. Processing Requirements. At least 75% of the whole tires and used tires that are delivered to or are contained on the site at the beginning of each calendar year must be processed and removed for disposal or recycling from the facility during the year, or disposed in a permitted solid waste management facility. [62-711.530(3), F.A.C.]
8. Public Management.
 - a) A sign shall be posted at the entrance of the site stating operating hours, cost of disposal and site rules.
 - b) Access to the site shall be controlled through the use of doors, fences and gates.
 - c) An attendant shall be present when the site is open for business.[62-711.540(1), F.A.C.]
9. Quarterly Reports. The permittee shall complete and submit quarterly reports to the Department on Form [62-701.900\(21\)](#), Waste Tire Processing Facility Quarterly Report, on the 20th of the month following the close of each calendar quarter to the Department of Environmental Protection, South District – Solid Waste Section, P.O. Box 2549, Fort Myers, FL 33902 with a copy to the Department of Environmental Protection, Solid Waste Section, 2600 Blair Stone Road, Tallahassee, Florida 32399. [62-711.530(5), F.A.C.]
10. Record Keeping The permittee shall record and maintain the records to complete the Waste Tire Processing Facility Quarterly Report for three years and shall make them available for inspection by the Department during normal business hours. [62-711.530(4), F.A.C.]
11. Fire Prevention.
 - a) No operations involving the use of open flames shall be conducted within 25 feet of a waste tire pile.
 - b) The permittee shall maintain communication equipment to assure that the site operator can contact local fire protection authorities in case of a fire.
 - c) The approach and access road to the site shall be kept passable for any motor vehicle at all times.
 - d) A 50-foot fire lane shall be placed around the perimeter of each tire pile.
 - e) The perimeter fire lane must be unobstructed at all times.
 - f) The site shall be kept free of grass, underbrush, and other potentially flammable vegetation at all times.
 - g) The temperature of piles of processed tires above ten feet in height shall be monitored and kept below 300°F.
 - h) A fire safety survey shall be conducted at least annually.[62-711.540(1) F.A.C.]

12. Contingency Plan and Notification of Emergencies.

- a) The operator of the site shall keep at the site an emergency preparedness manual. The permittee shall keep a copy of the current manual at an off-site location.
- b) The manual shall be updated at least once a year and upon changes in operations at the site.
- c) The Permittee shall notify the Department in accordance with the approved Emergency Preparedness Manual. Notification shall be made to the Solid Waste Section of the Department's South District at (239) 344-5600. [62-711.540(1)(f), F.A.C.]

C. Financial Assurance and Cost Estimates

1. Financial Assurance Mechanism. The permittee shall maintain, in good standing, the financial assurance mechanism established to demonstrate proof of financial assurance. 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, MS 4548
Tallahassee, Florida 32399-2400

or: Solid.Waste.Financial.Coordinator@dep.state.fl.us.

2. Annual Cost Estimates.

- a) The permittee shall submit an estimate of the costs to remove, process, and dispose of waste tires on the site and to close the site.
- b) The costs shall be based on a third party, who is not a subsidiary or parent company, performing the work, reported on a per unit basis.
- c) Quantity estimates shall be certified by a Professional Engineer.
- d) The closing cost estimate shall be submitted annually by August 24.
- e) All submittals in response to this specific condition shall be sent to the South District Office and a copy to the address identified in Specific Condition C.1. [62-711.500(3), F.A.C.]

Executed in Fort Myers, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Jon M. Iglehart
Director of District Management

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to Section 120.52, F.S. with the designated Department Clerk, receipt of which is hereby acknowledged.



Clerk

December 17, 2014

Date

APPENDIX 1

General Conditions

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this

- permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (BACT)
 - b. Determination of Prevention of Significant Deterioration (PSD)
 - c. Certification of compliance with State Water Quality Standards (Section 401, PL 92-500)
 - d. Compliance with New Source Performance Standards

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 1. The date, exact place, and time of sampling or measurements;
 2. The person responsible for performing the sampling or measurements;
 3. The dates analyses were performed;
 4. The person responsible for performing the analyses;
 5. The analytical techniques or methods used;
 6. The results of such analyses.

When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

FACILITY OPERATION PLAN
GARDEN STREET IRON & METAL
(Waste Tire Processing Center)
November 25, 2014

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 _____.

The permit will expire on _____.

The application deadline for permit renewal is _____.

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

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.

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 an 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.)

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

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.

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.

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 than 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.

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

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. These 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.

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

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.

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**

Date: November 25, 2014

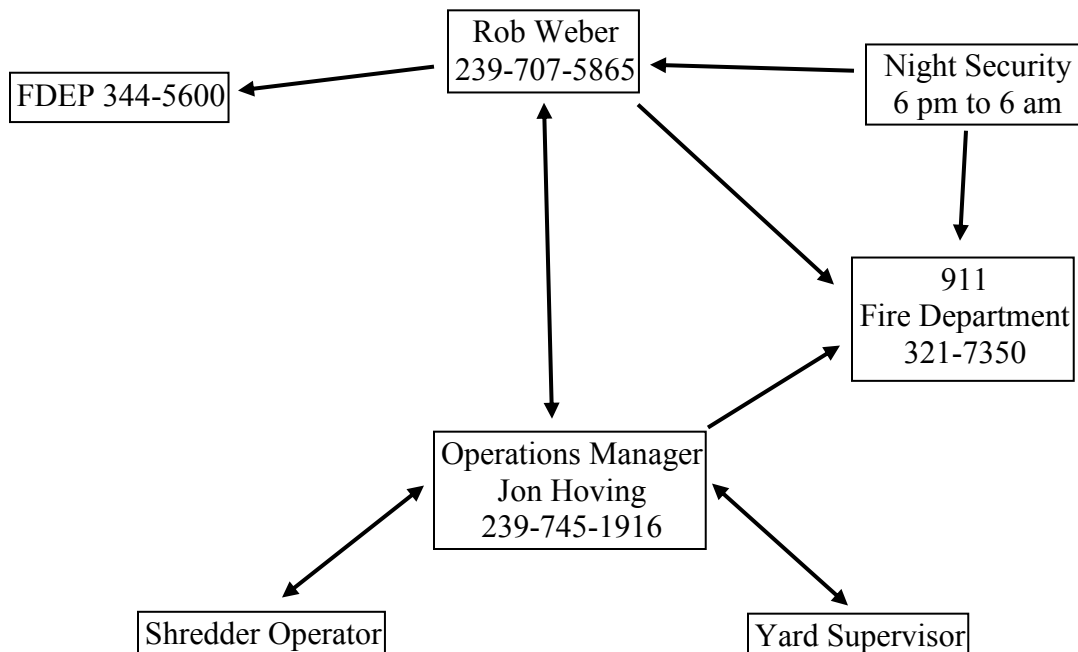
I. Purpose – this manual is intended to satisfy the requirements of FAC Chapter 62-711.540(1)(e) for emergency preparedness relative to the storage and processing of waste and used tire and their residuals.

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.

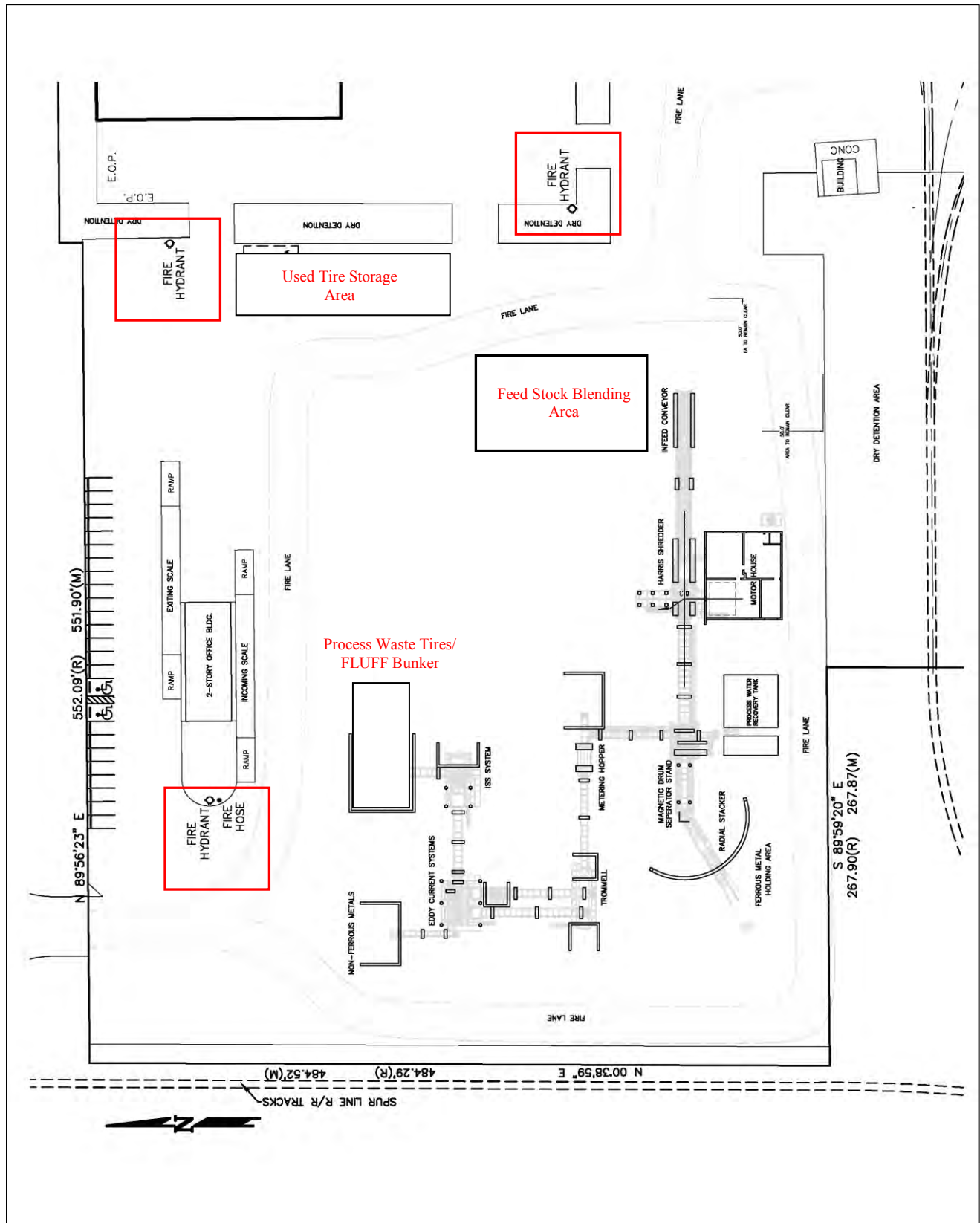
V. Clean-up procedure [FAC 62.711-540(1)(e)3.] – Fluff Bunker – In the case of a fire in the fluff bunker, there will likely be little material to clean up. Typically the burning or burnt material is spread on the existing concrete yard area immediately in front of the bunker to completely douse the 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 waste tire materials are to be processed 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.

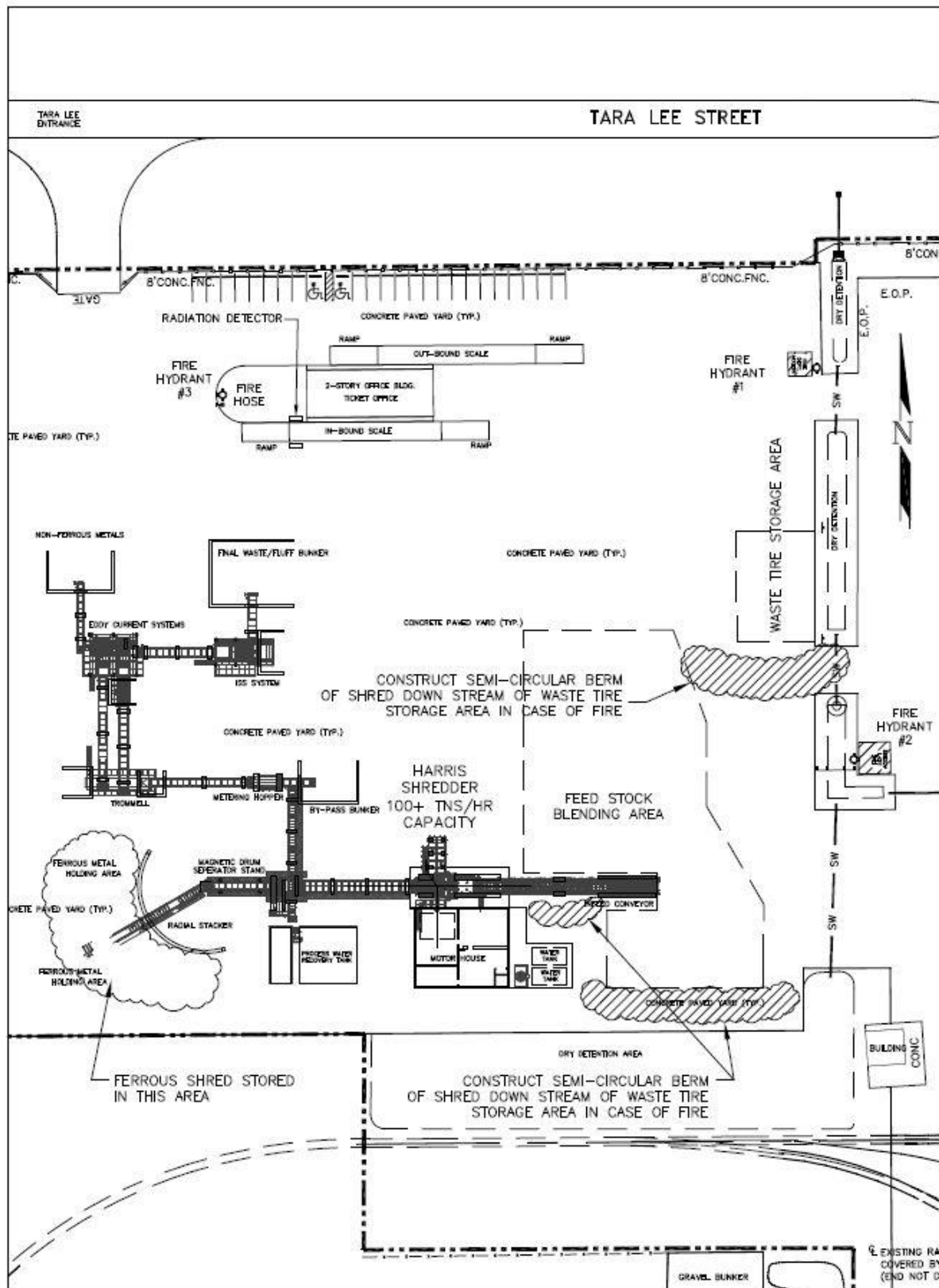
VIII. Manual Updates [FAC 62.711.540(1)(e)] – This manual must be updated once a year and upon any changes in operations at the facility.

IX. Waste Tire Processing Facility Site Plan



November 25, 2014

X. Illustration for Fire Runoff Containment



November 25, 2014