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Regulatory and Economic Resources

Environmental Resources Management

701 NW 1st Court • 7th Floor

Miami, Florida 33136-3912

T 305-372-6600 F 305-372-6893

September 16, 2016

Alfredo Reviati, President
American Tire Recycling Group, LLC
3551 NW 116th Street
Miami, FL 33167

CERTIFIED MAIL NO. 7014 1200 0002 0827 0936
RETURN RECEIPT REQUESTED

Re: Waste Tire Processing Facility Permit Application for a minor modification dated July 29, 2016 for the American Tire Recycling Group, LLC facility (FDEP Project No. 0303329-003-WT / WACS No. 99254 / DERM File No. SW-1731) located at, near, or in the vicinity of 3551 NW 116th Street, Miami, Miami-Dade County, Florida.

Dear Mr. Reviati:

The Environmental Permitting Section (EPS) of the Department of Regulatory and Economic Resources (DER)-Division of Environmental Resources Management (DERM), under delegation by the Florida Department of Environmental Protection (hereafter jointly referred to as the Department), hereby acknowledges receipt of the referenced application on August 19, 2016. Please see the item checked below for the status of your application.

- ☐ This letter constitutes notice that a permit will be required for your project pursuant to Chapter(s), Florida Statutes.
- ☐ Your application for permit is complete as of xx-xx-xxxx and processing has begun. You are advised that the Department under Chapter 120, Florida Statutes, must take final action on your application within ninety (90) days unless the time is tolled by administrative hearing.
- ☒ Your application for permit remains incomplete. Please provide the information requested on the attached sheet within forty-five (45) days of receipt of this letter. Evaluation of your proposed project will be delayed until all requested information has been received.
- ☐ The submittal to the referenced RAI was reviewed and deemed incomplete. Therefore, the additional information requested in the (attached) shall be submitted within forty five (45) days from the date of this letter. Further evaluation of the permit modification will be delayed until the outstanding RAI items have been addressed.
- ☐ At this time, no permit is required for your project by the Solid Waste Section. Any modifications in your plans should be submitted for review, as changes may result in permits being required. This letter does not relieve you from the need to obtain any other permits (local, state or federal) that may be required.

If you have any questions regarding the above, please contact Susana Palomino, P.E. or Johnny Vega, P.E. with the DERM Environmental Permitting Section at telephone number (305)372-6600 or via email respectively at paloms@miamidade.gov and vegajo@miamidade.gov.

Sincerely,

Rashid Z. Istambouli P.E., Chief
Pollution Regulation Division

cc: Patti Emad, Johnny Vega, P.E., Susana Palomino, P.E. – DERM
Alfredo Reviati – American Tire Recycling Group, LLC (via e-mail: areviati@gmail.com)
Ricardo Fraxedas, P.E. – Amec Foster Wheeler E&I, Inc. (via e-mail: Ricardo.fraxedas@amecfw.com)

DERM File No. SW-1731

**WASTE TIRE PROCESSING FACILITY PERMIT APPLICATION
REQUEST FOR ADDITIONAL INFORMATION No.1 (RAI #1)**

In order to complete the review of the referenced application pursuant to Section 403.087(4), Florida Statutes (FS), Chapter 62-701 and 62-711, Florida Administrative Code (F.A.C.), please address the following Request for Additional Information (RAI) comments noted below. Note that said comments follow the sequence of the items outlined in the FDEP Waste Tire Processing Facility Permit Application form #62-701.900(23).

Part III – Attachments

1. Pursuant to the requirements of Section B of this part, the information below shall be provided in order to substantiate the proposed processing capacity increase from 12,000 to 28,000 tires per day:
 - a) An updated list of equipment, similar to the one attached (i.e., titled "Reviati's Plant"), that reflects the correct models and processing capacities of the replacement and remaining equipment.
 - b) An updated tabulation describing the annual production, similar to the attached one, that addresses the proposed production rate. Please be advised that the information to be provided in response to this comment shall include the productivity of each production line, as well as the overall plant capacity that meets or exceeds the proposed daily output. The response shall be consistent with the information to be submitted in response to comment 1(c) below.
 - c) An updated Flow Plan, similar to the one attached (i.e., titled "Tire Recycling"), which is consistent with the current production activities/sequence.

Be advised that any changes and/or corrections submitted in response to the above comments, which may affect the maximum quantity of tires to be stored on-site, shall also be appropriately reflected in other applicable sections of the permit application form and supporting information.

Additionally, be advised of the following:

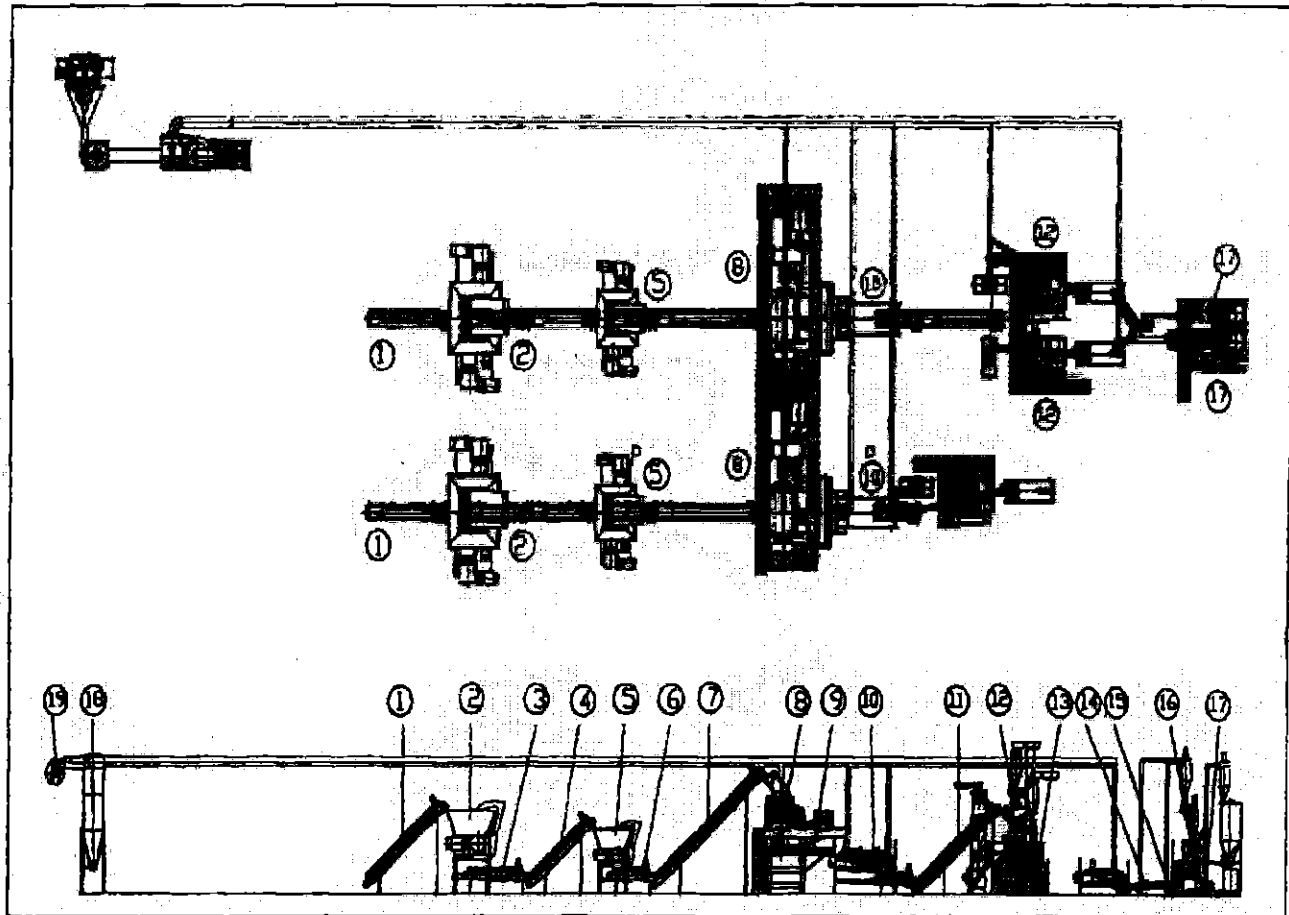
- If necessary, a meeting may be scheduled with DERM to discuss the comments of this letter. Said meeting shall be requested within seven (7) days of receipt of this letter. Please contact the reviewer listed at the end of page #1 to make the appropriate arrangements.
- All application content, format, and sequence shall be in accordance with Rule 62-701.320(7), F.A.C.

A minimum of two (2) original sets each of any plans, reports, and supporting information for the proposed construction, operation or closure of the facility shall be provided to RER.

- **When responding to this Request for Additional information (RAI), if a response modifies a section of the documents, the respective section(s) should be updated accordingly. A revised, complete version of the documents that includes all revisions made in responding to this RAI should be attached. To enable the Department to view changes to the documents, all additions should be underlined (e.g., added) and all deletions should be struck through (e.g., ~~deleted~~). Additionally, the submittal should make a positive statement that all revisions have been tracked in the aforementioned way. By this method, the Department hopes to have one final version of the respective documents that includes all revisions made during this permitting process.**
- All revisions to the drawings shall be clearly indicated by clouding the affected area and placing an adjacent triangular flag circumscribing the appropriate revision number on the drawing. A brief description of the revision made shall also be noted in the revision block on the drawing.
- If your responses involve the practice of engineering or geology, as defined in Chapters 471 or 492, Florida Statutes respectively, please have that work signed and sealed by a professional engineer or professional geologist as appropriate.
- If the applicant intends to request the issuance of a permit with duration of more than five (5) years (i.e., 10 or 20 year permit) with the permit application, it shall be demonstrated that the facility is in compliance with the provisions of Rule 62-701.320(9)(d), F.A.C and the applicant shall clearly state said intent in writing. In the event that the issuance of a permit with duration exceeding five (5) years is authorized by rule, the applicant shall indicate how it intends to pay the permit fee as allowed under Rules 62-701.315(13) and (14), F.A.C.

- Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time.

REVIATI'S PLANT



Equipment:

1. Conveyor, 7.5 kW.
Carries whole tires and delivers them to the Eco-182 shredder.
2. ECO-182 Shredder, 110 kW.
Cuts tires into three-inch rough shredded strips.
3. Discharge Conveyor, 7.5 kW.
Catches the shredded strips from first shredder and carries them to the next conveyor.
4. Conveyor, 7.5 kW.
Carries the shredded strips and delivers them to the Eco-137 shredder.
5. ECO-137 Shredder, 74 kW.
Cuts rough shredded strips down to two-inch chips.

6. Discharge Conveyor, 7.5 kW.
Catches the shredded strips from first shredder and carries them to the next conveyor.
7. Conveyor, 7.5 kW.
Carries the shredded strips and delivers them to the Eco-Grater.
8. ECO-Grater, 315 kW.
Crushes the shredded tire into 12-15 mm pieces and separates steel from rubber.
9. Magnetic Conveyor Belt, 2.2 KW.
Extracts steel wire from the rubber as the material passes under the magnets.
10. Vibrating Screen, 4.4 kW.
Separates up to three sizes of rubber particles through its screens and vibrating movement.
11. Screw Loader, 4 kW.
Carries material from vibrating screen to the Eco-G1 Granulator through rotating spiral shaft conveyor.
12. ECO-G1 Granulator, 90 kW.
Material is crushed into small rubber granules.
13. Vibrating Screen 3 kW.
Removes the remaining fiber from the rubber and separates the granules into three sizes.
14. Blower, 5.5 kW.
Pneumatic conveyor that transports granulates to the bagging station.
15. Blower, 5.5 kW.
Pneumatic conveyor that transports granulates to the bagging station.
16. Blower, 5.5 kW.
Pneumatic conveyor that transports granulates to the bagging station.
17. Blower, 5.5 kW.
Pneumatic conveyor that transports granulates to the bagging station.
18. Central Dust Remover System, 18.5 kW.
Removes fiber and dust from the rubber.
19. High Pressure Blower, 7.5 kW.
Creates the necessary vacuum that separates the dust and fiber from the rubber.

Annual Production in Tons (Revised 9-15-14)

City MIAMI

Facility Name American Tire Recycling

Capacity 4 TON /Hour

Component	Weight %	Hour	Weight	Volume
Rubber	79.6%	3.18	47.7	954.0
Steel	19.0%	0.76	11.4	228.0
Nylon Fiber	1.35%	0.05	0.8	16.2
Dust	0.15%	0.01	0.1	1.8
Subtotal for one small Shredder (Tons)		4	60.0	1200
Subtotal for two small shredders (Tons)		8	120	2400
				14400
				28800

Small Shredders: Operating 16 hrs/day (estimated uptime 15 hrs/day)
Based on 16 hour day (Estimated uptime 15 hours per day) and 20 days per month

TIRE RECYCLING

