

LTA Distributors LLC
New Life Tires & Auto Repair
3710 NW 79 Street, Miami FL 33147
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Received
SOLID WASTE SECTION AUG 23 2012
AUG 23 2012
BSHW

SWVA-12-3

August 13, 2012

MR. RICHARD TEDDER
Solid Waste Administrator
Florida Dept. of Environmental Protection
2600 Blair Stone Road MS 4565
Tallahassee, FL 32399-2400

Re: **VARIANCE REQUEST FOR RULE 62-701.310(5)**
WACS Facility ID/ Name: 100381 / LTA DISTRIBUTORS, LLC D/B/A NEW LIFE TIRES &
AUTO REPAIRS; Permit File Number: 0309599-001-WT

Dear Mr. Tedder:

Thank you very much for the opportunity to submit this request for a variance to the rules financial assurance requirement. Please understand that our primary business is to simply purchase and re-sell used tires; we are in no means a "Waste Management Facility".

We have been working with both the PERA Department of Miami-Dade County and Mr. Tor Benjar in order to finalize the license application for my shop in Miami, FL. At this time we are in the final stages where it requires "Financial Assurance" to secure the payment for the cost of having my "used" tires taken to a disposal facility in the event that I go out of business. As aforementioned, I have a small tire shop that has an inventory of more than 1500 tires. We are not or will never be a "Recycling Company nor a Solid Waste Processing Plant."

The estimated cost for my business is \$ 2,000. I have attempted to ask banks and other financial institutions to find an instrument that will be cost effective for this small amount. However, we have been unable to obtain anything that will fit under the required rules, and take into consideration that:

- a. High maintenance cost to have it with a financial institution, compared to a small amount of assurance required;
- b. We are not a "Recycling or Processing facility";
- c. We do not carry or collect JUNK TIRES
- d. All our inventory is made out of new and used tires
- e. We take ALL generated junk tires to a licensed recycle facility.

We would like to request that the financial assurance be waived, or if necessary, I would like to offer the \$ 2,000 be deposited into a savings account. This money would be readily available for verification from your department at your convenience.

We appreciate and value your time considering our application and we look forward toward a favorable decision business environment. Should you have any further questions, comments and/or concerns, please feel free to contact me at (305) 381-0425. Once again, thank you for your time.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Antonio Glustak', with a large, sweeping flourish above the name.

Antonio Glustak
Proprietor

Cc: Files