Encon Consulting, LLC
9298 Castlebar Glen Dr.
Jacksonville, FL 32256
(904) 710-2888

February 18, 2020

Mr. Michael Bogin
Florida Department of Environmental Protection
Northeast District Permitting Program
8800 Baymeadows Way West, Suite 100
Jacksonville, FL 32256

Subject: Advanced Tire Recycling, LLC Waste Tire Processing Facility Permit Application
1st RAI Response (01/28/20)

Mr. Bogin,

On behalf of Advanced Tire Recycling, Inc., Encon Consulting respectfully submits the following response to the First Request for Additional Information (RAI) dated January 28th, 2020. In addition to directly responding to the "List of Requested Information" contained in the 1st RAI in **RED** below, Encon also submits with this letter response the revised documents as necessary to satisfy the Department's requests.

FLDEP List of Requested Information:

1. The DEP Form No. 62-701.900(23), F.A.C. was signed by Cyn DeLee Dalton. The Application Form No. 62-701.900(23) should be either signed by Jon E. Bischoff or a letter, signed by Jon E. Bischoff, should be provided authorizing Cyn DeLee Dalton to sign the Application on his behalf. Please properly sign the Application Form, then resubmit it to the Department.

   DEP Form No. 62-701.900(23), F.A.C. was revised to include Mr. Bischoff's name and electronic signature. The permit application documentation attached includes the revised form.

2. The Facility is incorrectly identified as being located at, "2203 HAMILTON STREET JACKONVILLE. FL 32210" on the Land Use Map. Please revise the Land Use Map reflecting the correct address and resubmit.

   This information has been updated as necessary. The permit application documentation attached includes the revised form.

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3. Please revise the site plans and operations plan to include a reference and clarification for a berm to be located around the 13,570 sq ft trailer storage area referenced in section C., your application. According to Rule 62-711.540(3)(e), F.A.C., all outdoor waste tires storage, including the tires in 53' trailers, shall be bermed or given other adequate protection if necessary to keep liquid runoff from a potential waste tire fire from entering water bodies.

   Rule 62-711.540, (3), (e) states: "The site shall be bermed or given other adequate protection if necessary to keep liquid runoff from a potential waste tire fire from entering water bodies." The response to this rule has been revised as follows:

   Waste tires that are held in inventory for resale shall be contained within 53' trailers in an "Inventory Storage Area" on site. This area is located South of Advanced Tire Recycling facility (see "Waste Tire Processing Facility Design"). This area is not located near recognized bodies of water and is slightly lower in elevation than the surrounding area to prevent runoff liquid from a tire fire from spreading outside of this localized area. Waste tire trailers shall be placed in the Inventory Storage Area such that a minimum of 50' is maintained from the property line to the trailers. Trailers shall be organized such that rows of successive trailers will maintain a 50' fire lane between rows. Rows shall be no longer than 200' in length.

Should you have any further questions or comments regarding this matter, please do not hesitate to contact me at your convenience.

Sincerely,

Paul W. Porter, P.E.

Encon Consulting, LLC
9298 Castlebar Glen Dr.
Jacksonville, FL 32256
C: (904) 710-2888
paul.porter@enconbridges.com