



Florida Department of Environmental Protection

South District
P.O. Box 2549
Fort Myers, Florida 33902-2549

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

October 2, 2009



VIA ELECTRONIC MAIL

Garden Street Iron & Metal, Inc. of SW Florida
c/o Mr. Rob Weber
E-mail: junkitrob@aol.com
3350 Metro Parkway
Fort Myers, Florida 33902

Re: Lee County – SW
Garden Street Iron & Metal
Waste Tire Processing Facility
Application No. 0296251-001-WT/02, WACS ID No. 00098386
Request for Additional Information (RAI) No. 3

Dear Mr. Weber:

The Department has reviewed the response to the Department's RAI No. 2, dated August 31, 2009, prepared by Keene Engineering, Inc. and received September 8, 2009. The submitted information is not complete and additional information in response to the following comments is required to complete the application.

APPLICATION FORM

PART II, C: Storage: Please clarify storage of "Processed tires" with an asterisk (*) and a footnote, "Included with other shredded material (fluff) in the bunker [Florida Administrative Code (F.A.C.), Rule 62-711.500(2)].

PART III: Attachments:

A. Facility design (Facility Design Narrative)

General Comment:

The drawings referenced for this section are being addressed under "Drawings" review of this request for additional information (RAI).

- A.2. a: Please reference Page 2 of 3, third paragraph. Please describe the date of fire safety survey and provide the reference to Section 4 of the Operation Plan in this paragraph concerning the fire survey conducted by the Fort Myers Fire Department. It notes that the "locations of both storage areas have been deemed acceptable by the Department". Three areas are shown on the drawings for storage/staging/blending of waste tires. Please clarify.

Please address F.A.C. Rule 62-711.540(1)(a) and its compliance with a sign at the entrance.

- A.2. b: Please correct the sentence [F.A.C. Rule 62-711.540(3)(a)].
- A.2. c: Please show the stormwater flow pattern in the Waste Tire Facility Area on Sheet 3. Please note the description that the stormwater drainage in this area is directed to a sludge and process water recovery tank (located just west of the motor house), which drives the shredder. Please include "sludge" in the label of the tank. Please note that the Waste Tire Staging Area is about 150 feet from this tank, which is not in compliance with F.A.C. Rule 62-711.540(3)(a). Please address and also modify the location of the Staging Area.
- A.2. d: Please identify the boundaries of the waste tire facility and legal boundaries of the land containing the facility with symbolized lines and labels on Sheet 2 of 5, as required by this item of the application form [F.A.C. Rule 62-701.530(6)].
- A.2. e: Please provide a legend on the referenced Sheet 2 with a symbol for wells and identify them on the plan with numbers. Please provide notes for the type and purpose of the wells on the drawing, Sheet 2, as required by this item of the application form [F.A.C. Rule 62-711.500(6)].
- A.2. f: Please identify the existing buildings, structures, and areas, etc., with the word "Existing" in the labels [F.A.C. Rule 62-711.500(60)].
- A.2. g: Please confirm that the copy of drawing (8 ½" x 11"), attached to the letter from Fort Myers Fire Department, was submitted to the Fire Department. Please note that the drawing does not have any scale and the dimensions of the areas and fire lanes marked. Please note that the proposed "FEED

STOCK BLENDING AREA" and "WASTE TIRE STAGING AREA" were not shown on the attached drawing.

Please provide a new fire safety survey (conducted after submitting a copy of the Site Plan, Sheet 3 of 5) showing relevant information, along with the letter to the Fire Department requesting a fire safety survey [F.A.C. Rule 62-701.500(6)].

- A.2. h: Fire lanes are not properly marked on the referenced drawings. Please also see the comment on A.2.g above and provide information as required by this item of the application form [F.A.C. Rule 62-711.500(6)].
- A.2. i: Please clarify whether the property and the waste tire processing facility have fencing around and access control. Please show the fencing with a symbolized line on Sheet 2 of 5 [F.A.C. Rule 62-711.500(6)].

B. Facility Operation (Facility Operation Plan)

General Comments:

- 1) The Operation Plan is to be a stand-alone document so that the operator and the personnel responsible for the day-to-day operation can easily perform the required activities of waste receiving, processing, disposal, and recording, etc. [F.A.C. Rules 62-711.530 and 62-711.540].
- 2) The narrative of the facility's Operation Plan should reflect the sequence of the application items. The narrative should include the regulatory items that are required under F.A.C. Rules 62-711.530 and 62-711.540 that pertain to the operations of the facility, along with references to a Site Plan in the Operation Plan. Please submit a revised Operation Plan, addressing each item B.1 through B.8, and incorporating responses to the following comments:

General: Please do not use "Garden Street" for the facility, but use the word "Facility" or use an abbreviation "WTPC" after providing the full words where it appears first.

B.II: Please note that the statement "this facility has a permitted limit of 8,000 used and waste tires on site" is not correct, because the permit

is not yet issued. The number of tires (8,000) indicates the proposed storage.

Please clarify that the existing shredder shreds very large quantities of cars, metals and other scrap materials, compared to the quantity of tires that will be shredded; therefore, the storage limit of 60 times the daily through-put of the processing cannot be applicable to this facility regarding the aggregate of whole waste tires, processed waste tires, and residuals. Similarly, the storage limit for whole waste tires cannot be applicable [F.A.C. Rule 62-711.530(2)(a)].

B.III: Please provide a description of how 75 percent of the annual accumulation of waste tires will be removed for disposal or recycling [F.A.C. Rule 62-711.530(3)].

Please reference the second paragraph on Page 2 of 5. Please clarify what is meant by "Initial cover shall not be required for stored...." Please clarify that the facility does not plan to process waste tires for initial cover at a landfill or to cut waste tires into small parts for disposal at a landfill, but plans to shred (along with other materials as fluff) for disposal at a landfill. Your attention is directed to F.A.C. Rule 62-711.400(3)(b), which requires initial cover if the storage is not less than a week. Please modify the narrative [F.A.C. Rule 62-711.530(2)(a)].

B. IV: Please reference Emergency Preparedness Manual, Page 2 of 4 and incorporate the following in this item:

"The manual shall be updated at least once a year and upon changes in operations at the site" [F.A.C. Rule 62-711.540(1)(e)].

Please reference B.III, Emergency Response Team. Please identify the responsible person or persons for observing conditions in the yard for any incidences that may occur outside the visibility of the shredder operator [F.A.C. Rule 62-711.540(1)(e)].

Please reference B.IV, Emergency Response Equipment. Please provide whether there are similar measures available for initial response to a fire

for the waste storage/staging/blending areas as described for the fluff storage area [F.A.C. rule 62-711.540(1)(e)2].

Please reference B.VI, Clean-up Procedure. Please provide a sketch on how this is to be implemented, providing reference to where the processed ferrous material is to be taken from. Please note whether the water from the fire fighting process (that is contaminated) will reasonably be prevented from flowing into the stormwater dry detention area [F.A.C. Rule 62-711.540(1)(e)3].

B.V, B.VII, and B.VIII: Please place these sections at the end of the Operation Plan.

B.VII: Please reference the first paragraph on Page 3 of 5. Please be specific as to how used tires will be accounted for when leaving the site [F.A.C. Rules 62-711.530(4) and 62-711.540(1)(g)].

B.IX: The Closing Plan can be maintained as a separate document that can be utilized at the time of closing the waste tire processing facility and describe it under Part III C of the application form [F.A.C. Rule 62-701.900(23)].

B.X: A description of the Applicable State Rules is appropriate for the Application Narrative. Please incorporate there [F.A.C. Rule 62-701.320(7)(d)].

B.XI: Please refer to the section on DRAWINGS for comments related to the Facility Plan Set [F.A.C. Rule 62-711.540(1)(h)].

B.XII: Please place these items at the front of the Operation Plan. Please be specific as to whether the facility will be receiving waste tires from the public and, if so, please provide the signage required by the regulation [F.A.C. Rule 62-711.540(1)(a)].

DRAWINGS

General: Please do not use the word "Tire" for "waste tire" in the title and title blocks of the drawings [F.A.C. Rule 62-711].

Sheet 1 of 5: Please correct the main title and the title block to be consistent with PART I.B.1 of the application form. Please correct all the drawings [F.A.C. Rule 62-701.320(7)(f)6].

Sheet 2 of 5: GENERAL SITE PLAN: Please provide a legend with symbols to identify the items being referenced in the narrative for this sheet (e.g., site boundary line, topographic symbol for existing or proposed elevations, restrictive access fence, access gates, exit gates, recovery wells, irrigation wells, fire hydrants, groundwater monitoring wells, etc. Please add "Existing" to labels for the existing structures, etc. [F.A.C. Rules 62-701.900(23) and 62-701.320(7)(f)6].

Sheet 3 of 5: PROCESSING AREA PLAN: Please describe the criteria used for estimating storage areas and volumes of waste tires and used tires [F.A.C. Rules 62-701.900(23) and 62-701.320(7)(f)6].

The "NOTE" in the center includes, "Overflow Staging Area", which is not identified on the sheet. Please show it with clarification of overflow.

Please provide a label describing the floor type, "concrete" and show its limits.

Sheet 3A of 5: TIRE STAGING AREA PLAN: The title of this Plan is confusing in that the drawing shows, "FEED STOCK BLENDING AREA", also. Please clarify and modify the title block accordingly [F.A.C. Rules 62-701.900(23) and 62-701.320(7)(f)6].

Sheet 3B of 5: Please correct the title block according to the storage area shown on the drawing [F.A.C. Rules 62-701.900(23) and 62-701.320(7)(f)6].

Sheet 3C of 5: Please use, "Waste Tires" instead of "Tire". Please provide the flow of the processed waste tires (shredded) that are a part of the fluff, as described in the narrative. The flow of fluff from the bunker is not shown. Please show it, as it passes through the scale when it leaves the facility [F.A.C. Rules 62-701.900(23) and 62-701.320(7)(f)6].

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Sheets 4 and 5: Please correct the title block, including the full name of the facility.
Please identify the site boundary with the name or a symbol on Sheet 4
[F.A.C. Rules 62-701.900(23) and 62-701.320(7)(f)6].

Please note that all the reduced size (11" x 14") copies should reflect the
revised drawings.

Should you need further assistance, please call Ghous Minhaj, Solid Waste Permitting
Engineer, at (239) 332-6975, extension 185. Your cooperation in this matter is appreciated.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles Emery III", followed by the word "(for)" in parentheses.

Charles Emery III
Environmental Administrator

CE/GAM/se

cc: William T. Keene, P.E., e-mailed to tim@keenefl.com
Bill Krumbholz, DEP
Mel Reinhart, DEP