



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

By E-Mail
mkaiser@wasteservicesinc.com

Mr. Mike Kaiser
Taft Recycling, Inc.
2893 Executive Park Drive, Suite 305
Weston, FL 33331

OCD-SW-09-0347

Orange County – SW
Taft Recycling, Inc., TS/MRF-WPF
Waste Tire Processing Facility
First Request for Additional Information
Modification of Permit No. SO48-0173968-007
Permit Application No. WT48-0173968-008

Dear Mr. Kaiser:

HSA Golden submitted on your behalf, "Waste Tire Processing Facility Permit Application" For Taft Recycling, Inc. It was dated October 28, 2009 and received October 30, 2009. We have assigned Permit number WT48-0173968-008 to the application. The application is incomplete. Please provide the information listed on the attached sheet promptly. Evaluation of your application will be delayed until all the requested information has been received.

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. Accordingly, please provide the additional information within 30 days of the date you receive this letter. Submit three copies of the requested information to the Department and reference the above permit application number in your correspondence.

If you have any questions, please contact me at (407) 893-3328.

Sincerely,

F. Thomas Lubozynski, P.E.
Waste Program Administrator

Date: November 17, 2009

FTL/gc/ew

Enclosure

cc: James E. Golden, P.G. – HSA Golden, Inc. jgolden@hsagolden.com
Jeff Wild, P.E. – HSA Golden, Inc. jwild@hsagolden.com

Note that all references to "Report" in the following text refers to the document entitled "Waste Tire Processing Facility Permit Application, Taft Recycling, Orlando, Florida," Prepared By: HSA Golden, dated October 28, 2009.

1. Confirm that the waste tire processing facility construction/operation would not violate the prohibitions contained in Rule 62-701.300, F.A.C., and specifically address the setbacks in Rule 62-701.300(2)(b) and Rule 62-701.300(2)(h), F.A.C.
2. The site plan Sheet 1 submitted for Part III-A-2, Page 3 of 4, DEP Form 62-701.900(23), does not identify the location of all wells, operating and abandoned. Revise the site plan to include this additional information or provide a written explanation if this is not applicable.
3. On Page 3 of 4, DEP Form 62-701.900(23), Part III-B-4, provide a statement of the maximum daily throughput and the planned daily and annual throughput.
4. On Page 3 of 4, DEP Form 62-701.900(23), for Part III-B-7, provide a copy of the fire safety survey. A recent fire safety survey from the local fire department is required to indicate that the Waste Tire Processing Facility has adequate protection from fire for the storage and processing of tires. A copy of the Fire Fighting Agreement dated August 17, 2005, submitted in Section 3 of the Report does not satisfy the requirements for a recent fire safety survey. The fire safety survey needs to include the proposed Waste Tire Processing Facility.
5. On Page 3 of 4, DEP Form 62-701.900(23), for Part-B-6 include in the required emergency preparedness manual shown in Section 3 of the Report the following:
 - On Page 1 under Notification in Case of an Emergency or Fire, in addition to Florida Department of Environmental Protection (FDEP), main receptionist telephone no. 407-894-7555, include the Solid Waste Section telephone no. 407-893-3328.
 - A description of the procedures to be followed in the event of a fire, including procedures to contain and dispose of the oily materials generated by the combustion of large number of waste tires, Rule 62-711.5401(j), F.A.C.
 - A statement of the on-site and off-site locations where the emergency preparedness manual will be maintained.
6. Operations Plan, Section 4 – Waste Tire Processing Facility Operations, Page 15, Maximum Storage Limits Sec. 4.1: Please clarify. The description indicates there will be no more than 67.5 tons of the stored Whole Waste Tires, that is, not more than ten 40-cy containers total. But the description could also be interpreted to mean there will be not more than 135 tons of stored Whole Waste Tires, that is, not more than ten 40-cy containers for Whole Waste Passenger Tires plus not more than ten 40-cy containers for Whole Waste Heavy Truck Tires. This impacts the closure cost estimate. Part II.C on DEP Form 62-701.900(23) shows total storage of whole waste tires of 67.5 tons not 135 tons. If necessary, change this page or Part II.C, DEP Form 62-701.900(23).
7. The cost estimate in Section 4 – Table 1 is not approved. It uses 67.5 tons for max amount of whole waste tires. (See Item 6 above.) Also, it uses 5 tons for processed tire residuals, but Part II.C of the application says 10 tons and Page 15 of Op Plan says 10 tons. Provide clarification for the terms – Processed Tire Residuals and Recycling Residuals used in Section 4 – Table 1.

8. A financial mechanism must be funded after the cost estimate is approved and accepted by the Department's Financial Coordinator before this application can be deemed complete. Financial responsibility arrangements for the facility for the approved amounts are to be made with the Financial Coordinator, Solid Waste Section, MS-4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and a copy of the approval letter submitted to: Department of Environmental Protection, Central District, Solid Waste Section, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767.