



November 6, 2009

Mr. Ghous Minhaj, Solid Waste permitting Engineer
Florida Department of Environmental Protection
PO Box 2549
Fort Myers, Florida 33902-2549

Re: Garden Street Iron & Metal
Tire Processing Facility Permit Application
Application No. 0296251-001-WT/02, WACS ID No. 00098386
Additional Information

Dear Mr. Minhaj:

Please find enclosed three copies of the following:

1. Revised sheet ⁸ of 11, Facility Operation Plan
2. Revised Facility Operation Narrative, all sheets

Please let me know if there is anything additional that you may need.

Sincerely,
KEENE ENGINEERING, INC.

A handwritten signature in blue ink, appearing to read 'William T. Keene'.

William T. Keene, PE
President
45915

Enclosures

Cc: Garden Street Iron and Metal, applicant

PO Box 2770, Fort Myers, Florida 33902
(239) 939-0524 (239) 939-1968 fax

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Please note that FDEP is required to be immediately be notified in the event of a fire or other emergency which poses an unanticipated threat to the public health or environment. Within two weeks of the event, a written report must be submitted to FDEP noting the origins of the emergency, actions taken to deal with the emergency, results of actions taken, and an analysis of the success of failure of the actions [FAC 62-711.540(1)(f)].

A copy of this manual will to be kept in the main office of Garden Street Iron and Metal, Inc., two story building located on north side of the facility, near the Tara Lee Entrance. The street address of this building is 3265 Metro Parkway. A second copy of this manual is to be kept in the office of Keene Engineering, Inc., 9101 West College Pointe Drive, Ste 1, Fort Myers, FL 33919.

VIII. Fire Safety Survey (Application Part III.B.7.)

The Fire Safety Survey is included in this manual. This survey is to be updated annually by the Fort Myers Fire Department. The Fort Myers Fire Department may be contacted at 321-7350. Updates to the fire safety survey should be inserted into this manual for future reference [FAC 62-711.540(1)(d)].

IX. Description of how 75% of the annual accumulation of waste tires will be removed for disposal or recycling. (Application Part III.B.8.)

"FAC 62-711.530(3) - At least 75 percent of the whole tires, used tires, and processed tires that are delivered to or are contained on the site of the waste tire processing facility at the beginning of each calendar year shall be processed and removed for disposal or recycling from the facility during the year, or disposed of on the site at a permitted solid waste management facility..."

All waste tires are processed by shredding into sufficiently small pieces appropriate for disposal in a landfill. The processed waste tires are mixed amongst other shredder waste (fluff). The fluff is removed on a daily basis from the facility and taken to the Okeechobee landfill. It is expected that virtually 100% of all processed waste tires, on an annual basis, will be removed from the site during each year. It is not expected that there will be an accumulation of waste other than the daily amount generated.

X. Facility Plan Set – Storage Areas

The operator of the waste tire processing facility should familiarize himself with the enclosed facility site plans. These plans depict the designated areas to be used for the storage of used and other waste tires. This plan also depicts the general flow of bulk waste tires received at the facility. Sheets 3, 3A, 3B, 3C and 3D are the most relevant to the operation of the facility. The used and waste tire storage area will be designated with a yellow strip as shown in the plan set.

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Operation Plan
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FACILITY OPERATION NARRATIVE

GARDEN STREET IRON & METAL (Waste Tire Processing Center)

Tire Processing Permit Application
Part III –B.1. thru B.8.

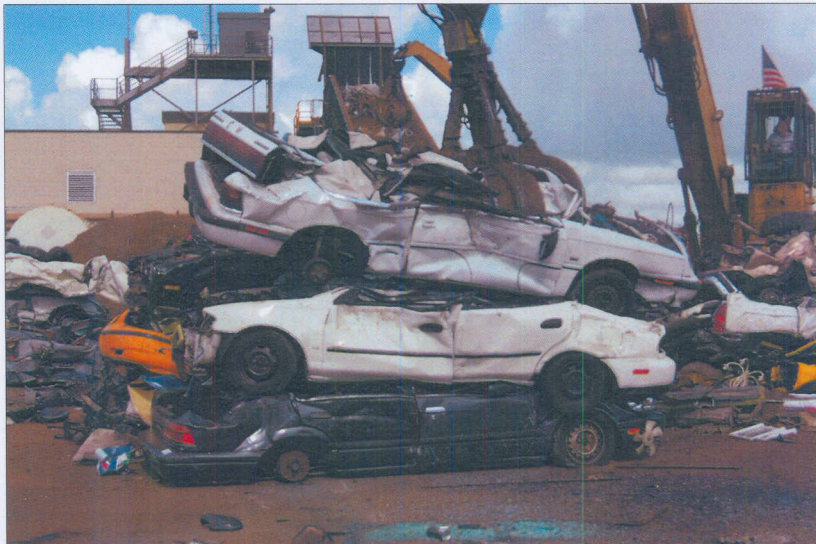


1. Description of facility's operation, process and products including how waste tires will be received and stored. (Application Part III.B.1.)

The shredder plant is located on the northwest quadrant of the property. Sheet 2A and Sheet 3 depict the location of the facility within the overall property boundaries. Sheet 3D of the accompanying plan set depicts the flow of waste tires through the facility.

The facility is design primarily for the disassembly of scrap metal item such as automobiles, light and heavy trucks and trailers, appliances, machinery, and other items which contain metal. This facility is capable of efficiently removing nearly all of the metallic components from these waste items and reintroducing these metals into the raw material stream for manufacturers. The primary products created from this process are ferrous shred and non-ferrous mixed metal shred consisting primarily of aluminum. The rest of the component material from the recycled items is deposited in the final waste bunker. This material is generally referred to as fluff. It consists of rubber, plastic, foam, fabric, glass and soil. All of the rubber from the processed waste tires will be included in the fluff waste. The waste tire processing approved under this permit application is an additional process to the present recycling operation. Currently, some waste tires are being received incidental to the automobile and truck recycling operation. This application, if approved, will allow the facility to receive waste tires in bulk from waste tire collectors. Please note that tires which are attached to a scrapped vehicle, truck or trailer are not accounted

for separately from the scrap metal and will not be reported on quarterly reports.



Scrapped automobile being placed onto the in-feed conveyor.

The vehicles carrying the bulk waste tire deliveries will be weighed on the incoming and outgoing truck scales. The quantity of waste tires will be determined by the net difference in vehicle weight. All customer data is recorded in the facility's "point of sale" (POS) system. The POS system is a software program called Scrap Dragon. This system provides centralized

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data collection, storage, and recording of financial transactions including the weight of any scrap or waste tires received by the facility. The tonnage of bulk waste tires received will be listed on the quarterly reporting to FDEP.

Once weighed, customers are directed to the unloading area near the in-feed conveyor. At this location, waste tires are placed in the "feed stock blending area". In this area, all material to be shredded is mixed to create a consistent material flow into the shredder.



Scrap material being handled at the feed stock blending area, near the in-feed conveyor. Harris Shredder is in the background.

The waste tires are placed onto the in-feed conveyor and shredded into sufficiently small pieces suitable for disposal in a landfill. See photos below for close-up views of the final waste material. The material in this bunker is generally referred to as fluff. This is because it contains all of the non metallic lighter weight components of a recycling material stream such as rubber, foam, fabric, glass, plastics and soil.

It is expected that all bulk waste tire deliveries accepted will be shredded in this fashion. The only waste tires that will be stored in the designated area on the sheet 3B of the plans set will be take-offs from the semi-trailers that are received for disposal and enclosed trailers or roll-off dumpsters loaded with mixed waste tires.



Existing used truck tires taken off of box trailers that have been scrapped. These are located in the Used Tire Storage Area.

The over the road (OTR) take offs will be stored on edge in a single layer as shown in the photo. It is estimated that the maximum number of waste tires stored in this fashion is about 1500 OTR tires. Please note that these tires remain mounted on rims preventing any chance of collecting water inside the tire. The maximum number of waste tires potentially placed in this storage area, however, is 4,500 tires.

In the case of a prolonged breakdown of equipment, major bulk

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tire accounts will be asked to temporarily suspend deliveries until the shredding equipment has been restored.

Note, the entire processing area is paved with and 8" thick 5000 psi concrete slab. This prevents scrap material from being mixed into the underlying soils. Also note that no products are anticipated to be produced from the waste tires process at this facility.

2. A description of the equipment used for processing tires. This description shall include the make, model, and hourly capacity of each piece of equipment. (Application Part III.B.2.)

The main mechanical component for this facility is a 98 inch steel shredding rotary hammer mill manufactured by Harris Equipment. The model number is HS98115. This machine is capable of shredding entire automobiles into pieces small enough to be picked up by hand. The shredder has an operating capacity in excess of 100 tons per hour. The facility also has additional equipment that further sorts the shredded material into its main metallic, non-metallic, and waste components.

3. Description of waste from the process, the amount expected and how and where this waste will be disposed of. (Application Part III.B.3.)

It is expected the 100% of the waste tires received under the waste tire permit will be shredded and turned into a waste material. This is due to the fact that the waste tires will be fed into the current recycling material stream. It is not anticipated that the waste tire will be process separately as the incoming stream of waste tire collector customers is not expected to be consistent or sufficiently large enough. Waste tires would have to be stored for an excessively long period of time. This would interfere with the existing and ongoing metal recycling operation. All of the waste material will be trucked to and placed in the Okeechobee landfill.



Close-up view of material in the final waste bunker (Fluff).



Processed tire pieces from final waste bunker.

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4. Statement of the maximum daily throughput and the planned daily and annual throughput. (Application Part III.B.4.)

As stated above, this shredder has an hourly feed rate in excess of 100 tons/hour of blended material. An estimate of the maximum capacity of this shredder is as follows:

Hourly blended feed rate into the shredder	100 tons/hour+
Conservative percentage of waste tires	10%
Hourly rate of waste tires	10 tons/hour
Conversion factor for passenger tires	20 lbs/tire

Estimated rate of waste tire feed is as follows:

$$\frac{10 \text{ tons}}{\text{hour}} \times \frac{2,000 \text{ lbs}}{\text{ton}} \times \frac{1 \text{ tire}}{20 \text{ lbs.}} = \frac{1,000 \text{ tires}}{\text{hour}}$$

Presently, the shredder operates 5 to 6 hours per day, 6 days a week. This gives a processing capacity of 5,000 to 6,000 processed waste tires per day or 30,000 to 36,000 processed waste tires per week. Annually, the capacity would be 1,560,000 to 1,872,000 tires per year. This equates to approximately 15,600 to 18,720 tons at a conservative 10% blend rate.

The ordinary planned daily throughput will be 1000 tires or less (10 tons +/-). The annual quantity of waste tires processed is estimate to be 300,000 tires (3,000 tons, +/-).

5. Description of how the operator will maintain compliance with each of the storage requirements of rule FAC 62-711.540. (Application Part III.B.5.)

Different from other tire processing facilities, the equipment necessary to shred the waste tires is permanently installed at this facility. And given the shredding capacity of the Harris mill, it is expected that the storage of tires will not be a major problem. Relatively speaking, the bulk waste tire component of the total facility operation is very small. The enclosed plans designate the areas in which tires will be stored and blended. These areas, though, will not be completely covered with waste tires at all times.

Compliance with the storage requirements of FAC 62-711.540 is assured by the following facts:

1. The facility is fenced, gated, and fully attended day and night preventing unauthorized deliveries.
2. The throughput capacity of the Harris mill is substantially greater than the quantity of tires to be stored.
3. Waste tires are currently being processed incidental to the automobile recycling operation and tire storage is not presently a problem.
4. The magnitude of the waste tire facility operation is a very small part of the overall facility operation and is much less likely, economically, to be allowed to become an operational or regulatory problem.
- And 5. Processed waste tire are removed daily as part of the shredder fluff material and taken to the Okeechobee landfill preventing accumulation of waste on the site.

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6. A copy of the emergency preparedness manual for the facility with a statement of the on site and off site locations of where that manual will be maintained. (Application Part III.B.6.)

The Emergency Preparedness Manual for the Garden Street Waste Tire Processing Center is included in Appendix A of this application. The operator should make his self familiar with the recommended steps to follow in the event of an emergency [FAC 62-711.540(1)(e)].

Please note that FDEP is required to be immediately be notified in the event of a fire or other emergency which poses an unanticipated threat to the public health or environment. Within two weeks of the event, a written report must be submitted to FDEP noting the origins of the emergency, actions taken to deal with the emergency, results of actions taken, and an analysis of the success of failure of the actions [FAC 62-711.540(1)(f)].

7. Fire Safety Survey (Application Part III.B.7.)

The Fire Safety Survey is included in Appendix A, Operations Manual, Division 4. This survey is to be updated annually by the Fort Myers Fire Department. The Fort Myers Fire Department may be contacted at 321-7350. Updates to the fire safety survey should be inserted into this manual for future reference [FAC 62-711.540(1)(d)].

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