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Response to Comment 2

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February 11, 2010

VIA UPS

Mr. F. Thomas Lubozynski, P.E.
Waste Program Administrator
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Re: Taft Recycling, Inc. TS/MRF-WPF
First Request for Additional Information
Modification of Permit No. SO48-0173968-007
Permit Application No. WT48-0173968-008
HSA Golden Project Number 06-404.010

On behalf of Taft Recycling, Inc. (TRI), HSA Golden is submitting for your review the following response to your November 17, 2009 request for additional information.

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.

Comment 1: *Confirm that the waste tire processing facility construction/operation would not violate the prohibitions contained in Rule 62-701.300, FAC., and specifically address the setbacks in Rule 62-701.300(2)(b) and Rule 62-701.300(2)(h), FAC.*

Response 1: The waste tire facility construction/operation will not violate the following prohibitions of Rule 62-701.300 of the Florida Administrative Code (F.A.C.):

- General Prohibition: No waste tires will be stored, processed or disposed of at the facility:
  - Except as authorized by a permit from FDEP [Rule 62-701.300(1)(a)] and
  - in a manner that would cause violation of air quality standards or water quality standards [Rule 62-701.300(1)(b)].
- Siting: As noted in the initial facility permit application and subsequent permit issued by the FDEP on April 7, 2006, the below siting prohibitions were met with regards to the solid waste transfer and recycling activities performed at the facility. Therefore, the siting prohibitions for storage and processing of waste tires is also met. Specifically, there are no potable water wells within 500 feet of the facility and no natural or artificial body of water within 200 feet of the facility. No waste tires will be stored or disposed of:

- in an area where geological formations or other subsurface features will not provide adequate support [Rule 62-701.300(2)(a)],
- within 500 feet of any existing or approved potable water well [Rule 62-701.300(2)(b)],
- in a dewatered pit [Rule 62-701.300(2)(c)],
- in an area subject to frequent and periodic flooding [Rule 62-701.300(2)(d],
- in a natural or artificial body of water [Rule 62-701.300(2)(e],
- within 200 feet of any natural or artificial body of water [Rule 62-701.300(2)(f],
- on the right of way of any public highway, road, or alley [Rule 62-701.300(2)(g], and
- within 1000 feet of an existing or approved potable water well serving a community water supply as defined in subsection 62-550.200(12), F.A.C. [Rule 62-701.300(2)(h].

Other prohibitions, as stated in Rules 62-701.300(3) through (6) and (8) through (11), F.A.C. are not applicable to waste tire processing facilities.

Comment2: 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.

Response 2: The facility does not require groundwater monitoring wells for operation and none exist on the property. The site plan has been revised; however, to include ground surface flow direction (requested by Orange County Environmental Protection Division (OCEPD), and to address comments from Orange County Fire Rescue Division (OCFRD). Additionally, no potable wells are located on the TRI site, or within 1,000 feet of the subject property. Surrounding properties are serviced by water supplied by OUC. Please see Response to Comment 2 (attached) for a copy of the revised site plan.

Comment 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.

Response 3: The maximum daily throughput of tires is 67.5 tons (limited by the maximum storage volume and converted tonnage). The planned daily throughput is 15 tons; while the planned annual throughput is 5,475 tons. See page 16 of the Operations Plan (Response to Comment 3, attached).

Comment 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.

Response 4: The facility's Emergency and Fire Preparedness Guidelines (Fire Fighting Agreement) has been revised to include tire storage and processing requirements of the Orange County Fire Rescue Department (OCFRD). The facility has been recently inspected by OCFRD and found to be in compliance as confirmed by the revised version, signed by OCFRD, thereby agreeing that the proposed waste tire storage and processing facility has adequate fire protection. The Fire Fighting Agreement has been incorporated as Appendix J of the Operation Plan (see Response to Comment 3, attached).

Comment 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)0), FAC.*
- *A statement of the on-site and off-site locations where the emergency preparedness manual will be maintained.*

Response 5: The Emergency and Fire Preparedness Guidelines have been revised to address each of the above listed comments and to address requirements of OCFRD. Please see Response to Comment 3 (attached).

Comment 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).

Response 6: HSA Golden notes that the maximum quantity of whole tire storage at the facility will be 67.5 tons. The summary of maximum storage volumes and weights provided in Section 4.1 of the Operation Plan is merely showing that the number of passenger tires weighing 67.5 tons is far more than the number of heavy truck tires. Since the maximum number of roll-off containers will be limited to 10 for whole tire storage, the maximum cubic yardage of whole tires stored will be 400 cy. The wording in Section 4.1 has been revised to show the maximum weight of 67.5 tons, exclusive of tire type. Please see revised Operations Plan, provided as Response to Comment 3 (attached).

Comment 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.

Response 7: 67.5 tons for the maximum amount of whole waste tires is correct; however, we have revised Table 1 to reflect the 10 tons for processed tire residuals. Additionally, the table was updated per OCEPD to reflect a 6 month closure period cost for maintenance. Please see Response to Comment 7 (attached). A copy of OCEPD's approval letter for the closure costs, and approval of waste tire processing is also provided in Response to Comment 7.

Comment 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.*

Response 8: TRI will renew the financial assurance instrument for the facility with the FDEP Financial Coordinator in Tallahassee, Florida once the closure cost estimate is approved. A copy of the approval letter will be submitted to FDEP Central District and the OCEPD.

We trust that these responses will allow approval of the subject permit modification. If you have any questions, please do not hesitate to call.

Sincerely,

HSA GOLDEN

William Jacobs
Project Manager

James E. Golden, P.G.
Vice President, Professional Hydrogeologist

cc: Mike Kaiser, WSI
David Bromfield, OCEPD

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Response to Comment 2

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Response to Comment 3

OPERATION PLAN

TAFT RECYCLING, INC.
CLASS I AND CLASS III
WASTE PROCESSING FACILITY AND
TRANSFER STATION
PERMITS TO OPERATE
#SO48-0173968; SW-022429-MRF/TS

Prepared for:

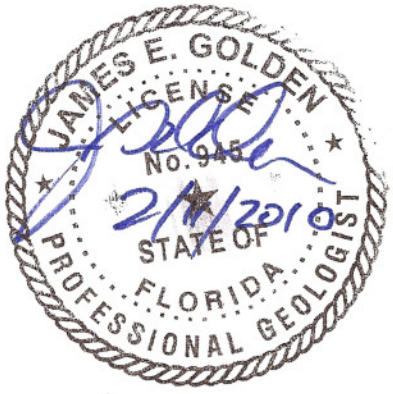
Taft Recycling, Inc.
375 W. 7th Street
Orlando, FL 32824

Prepared by:

HSA Golden
100 East Pine Street, Suite 605
Orlando, Florida 32801

Project No. 06-404.001

~~**September 2008**~~
~~**Revised October 2009**~~
February 2010



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SECTION 1
INTRODUCTION

1.1 Site Description and Background

The Taft Recycling, Inc. (TRI) waste processing facility (facility) property currently consists of approximately 12 acres in a roughly rectangular shape with an existing office building, vehicle maintenance building, 18,600 s.f. waste processing building, and sorting areas. Topography at the southern limits of the site generally slopes toward a drainage ditch along the southern property boundary that flows west to the Boggy Creek Canal. Topography of the northern limits slopes towards a sediment pond that discharges to Boggy Creek Canal. The property is relatively flat with an elevation of approximately 95 feet NGVD. Access is off of 7th Street along the southern portion of the property. A site location map is provided as Figure 1.

The western ±4 acres of the site is zoned I-2/I-3 and the eastern ±8 acres of the site is zoned I-4 based on Orange County records. All adjacent properties within 1000 feet of the site are also zoned industrial. An aerial photograph/zoning map showing a one mile radius surrounding the facility is provided as Figure 2, and in Appendix H.

The TRI facility was initially permitted as a material recovery facility by the Florida Department of Environmental Protection (FDEP) in January 2001, under Rule 62-701.700 Florida Administrative Code (F.A.C.). This permit authorized the processing of Class III and Construction and Demolition (C&D) debris solid wastes in a 12,000 s.f. building with sorting, ancillary screening and recycling facilities. In January 2005, TRI received a modified permit from the FDEP to accept Class I wastes within a proposed 6,600 s.f. building expansion. Then, in March 2005, TRI received an additional permit modification from the FDEP to accept Class I wastes within areas of the 12,000 s.f. existing MRF building. An Orange County Solid Waste facility permit was issued in May 2006. Construction of the 6,600 s.f. building expansion was completed in August 2007 along with several other facility improvements.

SECTION 2
OPERATION PLAN

2.1 Purpose

The purpose of this manual is to describe the operation and maintenance procedures for the TRI facility located at 375 7th Street in Taft, Florida. The facility currently includes processing and storage areas for Class I and III materials. Materials accepted at the site include municipal solid waste, yard trash, concrete, asphaltic concrete, wood wastes, building debris, cardboard, carpet, cloth, paper, glass, metal, plastic, waste tires, and furniture as described in Chapter 62-701, FAC. A building expansion to process and transfer Class I municipal solid waste (MSW), was completed in August 2007.

2.2 Process Overview

All waste entering the facility will follow a process at the scalehouse of identification and sorting immediately upon arrival at the site. If the material is unauthorized, the driver will be directed to a solid waste management facility which is permitted to handle the type of material rejected. Appendix A contains a list of typical authorized and unauthorized materials for the facility (no change to Appendix A made - not included in this revision).

Upon acceptance, the truck will be weighed and directed to the appropriate area where the waste will be placed on an indoor tipping floor. Customers with wood waste or waste tires will be directed to the appropriate offloading area and monitored during offloading by a facility spotter. Class I waste will be placed by collection trucks in the Class I area located in the building, and loaded onto transfer trailers for Class I Landfill disposal. The Class III waste and C&D materials will also be placed in the building to undergo sorting operations in the form of placing the waste into a sorter with a conveyor belt where the material will be downsized and hand sorted. Unsuitable materials (i.e. paint containers, oil containers, etc.) will be temporarily stored inside the building and transported off-site for proper disposal. Recoverable (paper, plastic, cardboard, metal, etc.) and recyclable (wood and concrete) materials will be removed for recycling. The cardboard will be placed into a baler, and the wood will be placed into a chipper. Recovered screen materials (RSM) are stored in a covered concrete bin for transport to a Class I landfill for use as daily cover material or disposal.

The Class I waste tipping floor will be enclosed within bays 3, 4 and 5 of the facility building. Class III / C&D tipping floors (bays 1 and 2) will be separated by an 8 ft. concrete bin block wall, see Figure 3 (Not Included). Ventilation, lighting and leachate control upgrades have been added to the existing and expansion building to allow Class I waste acceptance, see following details in Sections 2.10, 3.3.1, and 3.4.1, and Appendix H (only Sheet 1 has been revised and included in Appendix H).

Once the waste has been sorted, unacceptable waste or rejected wastes will be transported to the appropriate disposal facilities.

Facility Operations Flow Charts are included in Appendix C, and site plans in Appendix H. (No change made to Appendix C - not included. Only Sheet 1 included in Appendix H.)

2.2.1 Waste Quantity Projections

The future demand for recycled and properly disposed Class I and Class III waste material is expected to increase. This is based on the 4 to 5 percent population growth rates for Orange, Osceola, and Seminole Counties per the Florida Statistical Abstract. Material types will be limited to the processing capabilities of this site. Solid waste quantities are projected to also grow at a rate of four to five percent per year. The three primary operations will be sorting, compacting, and chipping. Estimated demands may require managing approximately 3,000 cyds (1,000 tons) per average operating day of Class I and Class III waste, with a maximum of 4,242 (1,500 tons) per day. This production rate of 77 to 108 tons per hour is well within the stated equipment capacities. All equipment specified for this site exceeds this initial anticipated average production rate. The equipment production capacities are 50 tons per hour for the sorter, 20 tons per hour for the cardboard compactor, and a minimum of 32 to 45 tons per hour for the wood chipper, depending on the type of material.

2.3 Management and Operations Personnel

Personnel trained for handling and processing of Class I, Class III and C&D material will be designated to operate the facility. TRI will have certified operators on staff. The certifications for the current facility employees are provided in Appendix D (no change made to Appendix D - not included in this revision). The Regional Manager is responsible for overseeing operators of TRI facilities within the region. Overall management of the facility and general direction of the facility operations will be the responsibility of the Facility Manager, whose office will be located on-site. The Facility Manager's responsibilities include:

- Managing environmental compliance for the facility;
- Managing personnel requirements for the facility, including hiring of supervisory and operating personnel, and providing for their training and orientation;
- Ascertaining the operation and maintenance needs for the facility;
- Implementation of the Operation Plan for the facility; and
- Implementation of Equipment Maintenance Plans.

In the absence of the Facility Manager, duties and responsibilities of the facility will be performed by the Yard Supervisor. The Yard Supervisor's additional responsibilities include:

- Supervising the tipping floor;
- Supervising the placement of materials;
- Supervising heavy equipment operations; and
- Spotting loads.

Spotters will be employed on the tipping floor and as loader operators to pre-check each incoming load for concealed drums and other suspect waste and to handle sorting operations.

Support staff, such as sorters, gate attendant and equipment operators will be employed to facilitate operations at the facility.

2.4 Hiring and Training Program

In-house and publicly available training will be obtained to ensure that operators and spotters are properly trained to operate the facility and to identify and manage unacceptable materials entering the facility. This plan is designed to fulfill the requirements of F.A.C. 62-701.320(15).

In-house training will be provided on an as-needed basis, generally when new operators and spotters are hired until the required publicly available training is feasible. Any in-house operator training, which includes an examination required by Section 403.716 F.S., will be administered by an independent third party. Publicly available training will be provided on a schedule, which complies with F.A.C. 62-701.320(15). This will include 16 hours of initial operator training and 8 hours of spotter training in the proper operation of the facility and to provide instruction in identifying unacceptable materials, especially materials that qualify as a hazardous waste.

Once every three years, each operator will complete 8 hours of additional course work as a refresher to the initial training and to learn new operation procedures and information related to waste identification. Spotters will receive 4 hours of course work every three years as a refresher. The course work will be selected from courses available through the University of Florida TREEO Center that meet the needs of the facility. Records documenting the above training will be made available for inspection by the Department Staff at the facility and the office of the Facility Manager. A copy of the training log, training schedule, and a list of approved classes are provided in Appendix D (no change made to Appendix D - not included in this revision).

2.5 Emergency Telephone Numbers

Emergency telephone numbers are included in Appendix E, the Hurricane Preparedness Plan (no change made to Appendix E - not included in this revision).

2.6 Emergency and Contingency Plan

In the event of inclement weather, accidents, fires, and equipment breakdowns, the appropriate provision of the contingency plan will be implemented immediately. Amendments will be made to this plan if the facility design, operations or maintenance procedures change.

Incidents, which might require the assistance of outside emergency response agencies, will be handled by conventional means. In the event of a natural disaster, all waste will be transferred off-site, operations at the facility shall cease, and the facility shall be evacuated until the Facility Manager has deemed the area safe for contingency operations. The evacuation plan includes gathering all personnel on the site at the main office to account for everyone's whereabouts before dismissing the employees and directing them to leave the property. If time allows, operations will be maintained on a limited basis (no incoming waste), dependent upon the Facility Manager's determination, to allow continued removal of waste and materials off the property. Appendix E presents the Hurricane Preparedness Plan for the Taft Facility prepared by TRI (no change made to Appendix E - not included in this revision).

2.6.1 Inclement Weather Operations

Litter control at the facility will occur on a continuous basis during operating hours as a component of the site maintenance program. Loose, stock piled materials will be secured to prevent litter during windy events. Litter fences will be installed around material storage areas and processing points, see Section 2.12, Litter, for further details.

2.6.2 Personal Injury Accidents

In the event of a personal injury at the facility, the nature and extent of the injury will be assessed to the extent possible by the on-site personnel and emergency first aid techniques administered by appropriately trained personnel as necessary. If the injury appears to require professional medical attention, emergency assistance will be obtained. If the injury requires non-emergency medical attention, the injured party will be transported by conventional means to a place of professional medical care, i.e., hospital, emergency room, doctor's office, or clinic. In all cases, the Facility Manager will be notified.

2.6.3 Vehicular Accidents

In the event of a vehicular accident at the site, a determination will be made regarding the feasibility of safely moving the vehicle(s) under their own power. If possible, the vehicles will be moved out of the way of normal traffic flow. If the vehicles cannot move under their own power and the vehicles are interrupting traffic flow, the vehicles will be pushed out of the way using on-site equipment. The Facility Manager will be notified and arrangements to have the disabled vehicles removed will be made in accordance with the directions of the Facility Manager.

2.6.4 Fire

In case of a fire, fire hydrants are located near the processing area (as shown on the Site Plan, Sheet 1, Appendix H). Hose reels with 500 feet of fire hose, wrenches, and nozzles are located adjacent to each hydrant ~~and fire hose bibs are within the building.~~ (no change to C-5, Appendix H - not included in this revision). Water service on the site is supplied by the City of Taft. Fire extinguishers will also be located within the processing area, ~~and~~ on all equipment, near the waste tires storage area, and within all buildings. A stand alone document titled Emergency and Fire Preparedness Guidelines has been prepared for the facility and ~~Fire security will be~~ approved by the Orange County Fire and Rescue Division (see Appendix J). ~~(see attached Fire Fighting Agreement~~). This document describes in detail the measures taken to prepare for possible fires at the facility and the appropriate response.

Larger fires located anywhere on the site will be sprayed with water. The primary emergency phone number (911) and the Fire Department will be called immediately to respond to all fires.

During a fire, all placement of combustible waste in the immediate area of the fire will be suspended. Placement of combustible waste in the area of the fire can only resume after a thorough inspection by the Facility Manager.

In the event of a fire in or on facility equipment, the following procedures will be followed by the equipment operator or other nearby facility personnel:

- Activate the on-board fire suppression equipment;
- If possible, safely move the equipment away from the fire immediately, shut off the engine, and drop blade;
- Signal other operators in the immediate area of the fire via radio or by hand signals;
- Evacuate the vehicle; and,
- Extinguish any reoccurring fires with the fire suppression equipment on the facility vehicles.

Charged and tested fire extinguishers will be located throughout the facility, including the tipping floor, maintenance building, office and in some cases, the equipment (i.e., sorter, loaders and trucks) carry them.

There will be no open burning at the facility. Any accidental fires that take more than one hour to extinguish shall be promptly reported to the County and FDEP.

2.6.5 Hot Loads

Any hot load (of authorized material) identified will be dumped in an area away from the active processing area, east side of the building on the concrete pad, see Site Plan. The load will immediately be covered with soil or sprayed with water if a fire is imminent. All run off from hot loads will be directed to the leachate collection trenches. The waste will not be processed until it has cooled completely, and the fire hazard has been mitigated.

2.6.6 Hazardous Waste and Spills

No hazardous wastes are to be accepted at the facility. The Yard Supervisor, spotters, and equipment operator will be responsible for spotting concealed drums or other suspect wastes. In the event waste materials of questionable nature are unloaded before they are spotted by facility personnel, the source of the waste will be recorded, and the Facility Manager shall be immediately notified to determine the appropriate action. Typical actions will include: 1) isolation of the waste; 2) temporary storage of small containers in 55-gallon FDOT drums; and 3) uncontainerized wastes shall be isolated in the building and the Department and a contractor, such as Safety Kleen, will be called to manage proper waste disposal. All suspect hazardous wastes will be removed from the facility within 5 days.

Despite these precautions, if hazardous waste, fuel, or oil is spilled at the site, absorbent material will be placed to contain the spill. The Facility Manager will be notified immediately in the event a spill occurs. During the operational hours of the facility, at least one person who is trained in the spill plan procedures will be on-site. In case of a spill, the following spill contingency plan will be implemented.

1. In case of, or as soon as any spill is observed, the source of the spill will be located and actions taken to prevent further spillage, if possible;

2. Valves, pumps, and electrical equipment will be shut off as appropriate;

3. Potential ignition sources will be removed from and restricted from entering the area of the spill;

4. Existing floor drains, sumps, and storm drains will be covered or a temporary dike constructed;

5. Absorbent socks/booms will be used where appropriate. A spill response firm will be contacted, if necessary, to assist in these activities. The spill response firm will provide sampling and analysis for spill cleanup materials;

6. All absorbed material or contained liquid will be removed and packaged in Florida Department of Transportation (FDOT) approved containers (55-gallon drums). Used absorbent materials should be packaged separately from liquids; and,

7. All containers used for the disposal of petroleum spill response debris will be labeled with type of waste determined by visual inspection and laboratory testing, and the start date of accumulation, and disposed in accordance with Federal and State environmental regulations. Debris from large spills will be removed immediately by the spill response firm. Debris from small spills will be kept in one 55-gallon drum, in the processing area, for no longer than 30 days.

The following spill clean up equipment will be maintained at the facility:

- Spill response kit capable of containing a spill of at least 25 gallons will be located in the processing area. This kit includes absorbent spill pads, socks, and/or booms;

- An adequate amount of nitrile gloves, nitrile or rubber boots and other personal protective equipment;

- First aid kit and eye wash; and,

- Fire extinguishers.

2.6.7 Equipment Failure

Sufficient backup equipment will be available for equipment breakdowns and downtime for normal routine equipment maintenance. In case of major equipment failure (both primary and backup equipment fail) the following procedures will be followed:

1. Arrangements with contractors and rental equipment dealers will be made to furnish equipment on a short-term basis. Equipment will be available within one to two hours; and,

2. Applicable facility operations will cease until equipment capacity is retained by renting the necessary equipment.

3. Electrical power loss will require the use of on−site 8000 kw generators to operate lighting and leachate pump systems.

2.7 Waste−Type Control Plan

Emphasis will be placed on controlling the types of waste unloaded within the facility. Each load will be visually screened, to the maximum extent practical, by the Yard Supervisor for unauthorized wastes (batteries, drums, gas cans, oil cans, paint cans, etc.) before unloading.

A 4-foot by 8-foot painted sign is constructed at the entrance to the facility, which indicates the types of waste allowed. The sign includes a notice that attempting to unload unauthorized waste will result in the delivery personnel having to reload the waste and remove the waste from the site.

TRI will have two full-time spotters/equipment operators, one on each tipping floor, when waste is received and processed, who will be trained in identifying hazardous waste and wastes unsuitable for acceptance at the facility.

In the event waste not suitable for processing within the facility is observed by any spotter, sorter, or equipment operator, the spotter, sorter, or equipment operator will be responsible for isolating the suspect waste. The rejected waste will be loaded into the proper transport vehicle for disposal off-site and recorded in a log, see Log Form in Appendix F (no change made to Appendix F - not included in this revision).

Reasonable effort will be made to prevent the delivery of unauthorized waste to the facility. In the event unauthorized waste is delivered to the facility, it will be handled in accordance with applicable laws. Unauthorized waste will not be processed at the facility.

Pressure-treated lumber (i.e. treated with chromated copper arsenate (CCA) will be recovered from the waste stream but not for chipping or mulching; it will instead be transported for proper disposal. The CCA treated wood will be either identified by waste type (fencing or decking) or by the distinctive greenish color.

2.8 Weighing and Measuring Incoming Waste

All incoming and outgoing waste will be weighed on a calibrated scale prior to processing at the facility. TRI will retain all records at the Regional facility's administrative office for a minimum of three (3) years.

The records will be available to the County and FDEP personnel upon request. Report outputs can include daily, month-to-date and year-to-date totals of waste received.

2.9 Signs and Vehicles Traffic Control

Ingress and egress to the facility will be limited to 7th Street. A sign will be located at the entrance gate stating facility name, hours of operation, acceptable/unacceptable wastes, and emergency phone numbers. Additional interior signs will be used to direct traffic to the appropriate tipping areas. The entrance road exists from the facility entrance gate located near the southeast property corner and extends through the scale to the building and around to the exit located at the southeast corner. Transfer trailers will enter near the southeast corner, load at the building and exit at the southeast corner of the site, crossing the scale and picking up bills of lading. The entrance and exit roads will be accessible in all weather conditions. Lockable gates will control access to the site. Vehicle traffic flow is depicted on Figure 3 (no change made to Figure 3 - not included in this revision).

TRI personnel will direct incoming truck traffic to expedite safe movement of vehicles within the facility. Traffic will be directed as necessary to prevent dangerous traffic conditions and to assure that any back up of in-bound vehicles is kept off of the public right−of−way.

2.10 Odor and Ventilation

Action shall be taken to prevent fugitive odors and particulates from creating off-site nuisance conditions in compliance with Orange County Code 38-1452. These steps include the following:

1. Rejection of unacceptable waste that would create odors;

2. Removal from the site of putrescible or other rejected waste that could cause odor problems within 48 hours;

3. Cleaning of the MSW tipping floor daily;

4. Active management of recycled materials;

5. Use of odor masking agents will be applied by misters at all facility building openings and roof line (see Appendix G - no change - not included in this revision).

6. Wall mounted 3 hp ventilation fans are to be installed in the existing facility building to insure interior ventilation, see Appendix G for fan specifications and drawings M-1 and M-2, Appendix H (no change - not included in this revision).

2.11 Dust

The following steps will be taken to minimize fugitive dust emissions at the facility:

- The Taft facility will comply with Orange County Code Section 38-1452 that prohibits dust levels in excess of code limits. Fugitive dust emission will not be allowed off-site from transport, loading, unloading, or processing operations. All primary roadways and loading areas are to be paved.

- Sprinkling unpaved roadways, stockpile areas, and processing areas with water as necessary.

2.12 Litter

The site will be inspected daily for litter. Litter will not be allowed to accumulate and will be picked up daily (or as often as necessary) and put into appropriate containers for proper disposal. Litter fencing will be constructed to control blowing litter around the material storage areas and building, wherever feasible. TRI will collect litter weekly along 7th Street access road. Screen cages are proposed to be added to conveyor transfer points. The wood mulch storage area will be inspected daily to ensure that mulch product is maintained within designated areas of the property.

2.13 Vector Control

The following steps will be taken to minimize vectors at the site:

- Unacceptable wastes will not be accepted at the recycling facility;
- Rejected wastes will be promptly removed and disposed of at an appropriate disposal facility. Rejected waste will be removed within one week;
- Class I waste will be disposed off-site within 48 hours;
- Non-active portions of the site will be kept mowed and free from debris accumulation; and,
- If needed, pesticides will be used in accordance with Florida Department of Agriculture rules and standards.
- Waste tire storage and processing area will be monitored for the presence of vectors including mosquito control and eradication as necessary.

2.14 Hours of Operation

The facility is presently open for operation 24 hours per day (Monday-Friday), midnight - 7:00 p.m. (Saturday), and 7:00 a.m. to 7:00 p.m. and 9:00 p.m. to midnight (Sunday). Receipt or shipment of waste, and waste processing, are limited to within the Hours of Operation. Activities such as maintenance and cleaning are not considered operation and may be scheduled at the facility's discretion. Hours of operation may be extended by special order to address storm debris processing. During non-day light hours, lighting will be provided by 400-watt building and yard lights in the processing area, see Plan Sheet E-1 to E-3, Appendix H (no change - not included in this revision).

2.15 Access Control and Site Security

Access to the facility will be controlled by ~~a (5-foot to 7-foot)~~ an 8-foot tall chain link fence with approximately two feet of barbed wire strands on the top. ~~and concrete block wall.~~ Security will be maintained by locking the entrance and exit gates during any times the facility is not operating. Semi-annual inspections of the wall and fence will be conducted to identify locations in need of repair.

2.16 Equipment and Operation Procedures

The facility tipping floor operation is expected to operate with the following equipment:

- Front-End Loader (2)
- Excavator with Grapple (3)

The recycling operation is expected to operate with the following equipment:

- Fork Lift - Primary (~~1~~ 2);
- Front-End Loader - Primary (1);
- ~~Front-End Loader - Back-up (2);~~
- Excavator - Primary (1);
- Tromell Screen - Primary (1);
- Sorting Line - Primary (1);
- Compactor - Primary (1);
- Horizontal Portable Wood Grinder - Primary (1);
- Transfer Trucks - Primary (1);
- Misc. Roll–Off Containers/Bins (32);
- Portable Waste Tire Shredder (1).

All of the equipment on the site will be owned by TRI. Details on the loaders, excavator, compactor, tub grinder (chipper), and tire shredder are provided in Appendix G (only details provided for the portable waste tire shredder, no change to other equipment).

Where appropriate, equipment will be fitted with safety cabs, fire extinguishers, and radio communication equipment. The radio equipment will also be stationed in the administrative offices located on-site, along with telephone service.

The on-site administrative offices will include potable water, sanitary facilities, emergency first aid supplies, telephone, fax, and electricity. The building also will provide shelter for employees during inclement weather conditions.

Maintenance to the equipment will be performed by an off–site mobile contractor.

2.17 Notice of Violation

The Facility Manager will provide immediate notice to the Regional Manager, in the event TRI is notified by Federal, State or local governmental agencies or officials regarding violations of any permits or approvals held by TRI relating to the operation and use of this facility. The

Regional Manager will respond appropriately to the various agencies, and immediately correct the non-compliance item.

SECTION 3
CLASS I AND III OPERATIONS

3.1 Purpose

The facility processes the incoming material to remove that portion of the waste that has an end−use market. Residuals from the recycling facility are disposed of at appropriate disposal facilities.

3.2 Start Up and Shut Down Procedures

Start-up procedures will consist of the Facilities Manager inspecting the processing and storage areas for safety purposes. Equipment will be turned on and allowed to warm up if necessary. Storage bins will be inspected to verify ample storage capacity for the day's activities. In the event that the storage capacity is inadequate, additional sorting will cease until the existing stored materials have been removed for resale.

The facility plans to clear the tipping floor of Class I wastes each day, to the extent possible. However, the facility anticipates receipt of Class I waste from evening pick-up routes and therefore may have Class I waste on the tipping floor at any given time. Under no circumstances will any Class I wastes remain on the tipping floor for more than 48 hours. Odor control, such as odor masking agents will be used if deemed necessary. Any unprocessed Class III material will be left on the tipping floor for next day's processing. The processed material will be contained within the confines of the designated storage bins.

3.3 Sorting Operations

Class I waste will only be accepted in the tipping area designated for Class I wastes. Class III and C&D wastes will be accepted only in the designated bays in the facility building, see Figure 3 (no change made to Figure 3 - not included in this revision). Care will be taken not to commingle wastes. If wastes are mixed, the waste must be disposed of as the highest category of wastes, i.e., Class III mixed with Class I, will be disposed of at a Class I landfill.

Within the Class III processing area, an excavator and front-end loaders equipped with buckets or clamps will place the material into a sorting machine. Personnel will be available to hand sort the materials once the machine has removed the fines and reduced the material size. Sorted material will be placed in appropriate bins for recycling or transport vehicles for disposal off-site. Bins will be used in the sorting process (glass, paper, plastic, metal, wood, concrete, cardboard, and RSM (fines)). RSM will be sampled in accordance with the FDEP's guidelines for reuse, or disposed of at a Class I landfill. It will be kept in a covered bin, as shown on the Site Plan.

Personnel will operate on an 8 to 10 hour shift with a lunch break in between and will be on the tipping floor at all times when waste is received or processed.

3.4 Leachate Collection and Disposal

The Class I tipping floor of the building has a minimum 6–inch impervious concrete floor and leachate collection system and will be washed daily, or as necessary. The leachate collection clean-out covers will be opened during washing. Water shall be directed into the building from the open wall area (east side) to ensure that none of the water leaves the building. Leachate will be collected from this area and the transfer truck scale tunnel through drains and will be discharged to a lift station and storage tank. The trench drains or catch basins will be cleaned daily to prevent clogging. The Class III concrete tipping floor is enclosed within a 150-foot by 75-foot portion of the building. No water will be involved in the processing of the material. Leachate collection is proposed in this area to collect any stormwater that may enter due to the open door on the east side and liquids that may leak from the vehicles. To keep this area clean and free of excess debris, all open floor areas in this portion of the building will be swept weekly. The leachate storage tank will have a high level alarm and will be pumped out by a permitted industrial waste hauler, as needed. Leachate disposal will be at a State permitted wastewater disposal facility, such as IWS, Jacksonville, FL. Leachate generation rate estimate is in Appendix G (no change made - not included in this revision), and see Clyde Earls & Associates sheets for details, Appendix H (no change made - not included in this revision).

3.4.1 Class I Upgrades

The Class I tipping floor area (bays 3, 4 and 5) was upgraded with leachate controls by the addition of a catch basin with pump to the leachate storage tank on the west of the building. Concrete curbs will also be added to the bay door floors to contain any liquids. The Class I and III/C&D concrete tipping floors will be separated by an 8-foot concrete block wall within the existing facility. Bays 1 and 2 will be designated for Class III and C&D wastes only.

Manifests of all waste leachate removals will be maintained by TRI.

3.5 Processed/Unprocessed Material Disposal Plan

The processed (recycled/recovered) material is sold to a variety of different companies for many different uses. The most common uses are described below. After processing, wood waste will be chipped and sold for fill or mulch. Concrete will be crushed offsite and sold. Cardboard and paper will generally be sold to a paper mill. Metal will be sold to scrap metal dealers, and glass will be crushed offsite and sold for fill material. Plastic will be sold to companies capable of recycling mixed plastic and the recovered screened material will be sold for daily cover material. The quantity and maximum storage time for each material is listed in the table in Appendix B.

Rejected Class I waste will be placed into larger transport trailers for disposal at a Class I landfill. Unprocessed Class III materials will be placed in a waiting transport vehicle for later disposal at a Class III landfill. Each type of reject waste will be stored in separated bin areas at the north end of the facility building/loading area, see Figure 3 (no change made to Figure 3 - not included in this revision).

3.6 Equipment Operations and Maintenance Manual

Operations and maintenance for each piece of equipment will be in accordance to manufacturer's recommendations and manuals.

3.7 Safety Procedures for Vehicles

TRI personnel will direct incoming truck traffic to expedite safe movement of vehicles within the facility. Traffic will be directed as necessary to prevent dangerous traffic conditions and to assure that any back up of in-bound vehicles is kept off of the public right–of–way.

3.8 Stormwater Management

The site has a stormwater management system that controls the 25-year, 24-hour storm event prior to any discharge to Boggy Creek Canal.

The Facility Manager will perform weekly inspections of the stormwater management system. Any required maintenance or repairs will be made within seven days. The current FDEP stormwater permit number is ERP48-0179138-003.

3.8.1 Stormwater Monitoring

The TRI facility also has a Multi-Sector Generic Permit under the FDEP NPDES stormwater program under permit number FLR05F457. This permit requires the implementation of a stormwater pollution prevention plan, stormwater pond inspections and records, annual submittal of discharge monitoring reports (DMR) by March 31st to the FDEP for the previous year, and routine stormwater monitoring at two year intervals.

3.9 Record Keeping/Submittals

Record submittal requirements for the recycling facility will be in compliance with the County and the FDEP requirements for these facilities.

Operational records shall include a daily log of: 1) quantities and types of solid waste received; 2) quantity of solid waste processed; 3) quantity of solid waste stored; and 4) quantity of solid waste removed from site for recycling or disposal. These records/logs will be compiled monthly and made available for County and Department inspection at the facility.

The reporting requirements include submitting a report annually (by April 1) which summarizes the amounts and types of waste received and the amounts and types of wastes disposed of or recycled. The annual report will be submitted on the FDEP Form 62-701.900(7), per F.A.C. 62-701.710(9), see Appendix F. In addition, recovered materials reporting shall be done on Form 62-701.900(27) and submitted to the FDEP by April 1st each year. A quarterly report will be submitted to the County to record the solid waste type and quantity managed at the facility, including recycled, recovered and disposed materials. The NPDES permit requires an annual DMR to be submitted to the FDEP, see Appendix F (no change made to Appendix F - not included in this revision).

SECTION 4
WASTE TIRE PROCESSING FACILITY OPERATIONS

4.0 Waste Tire Site and Processing Facility Operations

In October 2009 TRI submitted an application to accept, store, and process waste tires at the facility, as authorized by under Chapter 62-711, Waste Tire Rule, F.A.C. Waste tires accepted, stored, and processed at the facility will be transported to Waste Service, Inc.'s (WSI's) JED Solid Waste Management Facility, St. Cloud, Florida, for disposal and/or use as initial cover. Rule 62-711.400(3), F.A.C allows waste tires that have been cut into sufficiently small parts, to be disposed of or used as initial cover in a permitted Class I landfill. For use as initial cover, a sufficiently small part means 70 percent of the waste tire material is cut into pieces of four square inches or less and 100 percent of the waste tire material is 32 square inches or less. For purposes of disposal, a sufficiently small part means that the tire has been cut into at least eight substantially equal pieces. Based on market conditions, TRI may transport the processed tires to other authorized end users for alternative recycling uses or disposal at other permitted solid waste management facilities.

4.1 Maximum Storage limits

Based on the data presented in Appendix I, the maximum storage limits of whole waste tires, processed tires, and residuals are established for the facility in the following summary:

Summary of Maximum Storage Volumes and Weights

10 - 40 cy Roll-off Containers for Whole Waste Tire Storage

Whole Waste Passenger ~~Tires~~	6,000 Tires	400 cy	67.5 tons
~~Whole Waste~~ Heavy Truck Tires	6,000/1,225 Tires	400 cy	67.5 tons

The maximum storage weight is 67.5 tons regardless of tire type.

6 - 40 cy Roll-off Containers for Processed Tire Storage

Processed Tires	N/A	225 cy	67.5 tons

1 - 40 cy Roll-off Container for Tire Residual Storage

Residuals	N/A	40 cy	10 tons

TRI plans to store whole waste tires in 40-cubic yard (cy) roll-off containers stationed north of the wood recycling area as shown on the attached Site Plan (Sheet 1, Appendix H). The number of whole waste tires stored at the facility at any one time will depend on the type of tire (passenger or heavy truck) and the number of 40 cy roll-off containers that are stationed in the designated storage locations. The dimensions of a 40 cy roll-off container are approximately 20'L x 8'W x 6'T. As shown on Sheet 1, approximately 17 containers can be neatly stationed in

the area shown, while maintaining a minimum 25-foot fire lane. This will allow for 10 containers to store whole tires, 6 containers for processed tires and 1 container for residuals. Waste Tire Processing Calculations and background information is provided in Appendix I.

The waste tire processing equipment used by TRI will be a portable Saturn Model 72-44BGHT-300HP Shredder or similar equipment. Information for this shredder is provided in Attachment G. The shredder's reported single pass through-put capacity is 20 tons per hour. TRI plans to process the waste tires in the general location shown on Sheet 1. The shredder equipment is equipped with conveyors that will allow the processed materials to be loaded directly into the designated containers or a transfer truck trailer. Processed tires and any residuals produced during processing will be directly loaded into 110 cy transfer truck trailers or 40 cy roll-off containers. Processed tires shall meet the minimum size requirements of Rule Section 62-711.400(3)(b), F.A.C. Once a container is fully loaded it will be immediately transported to the designated end use location or will be removed from the facility within 48 hours. It is anticipated that shredder mobilization, processing, cleanup, and demobilization can be completed in one day for the maximum storage volume of whole tires. Site equipment will be used to load any processed or residual materials that may fall onto the asphalt during processing operations.

At least 75 percent of the whole tires, used tires, and processed tires that are delivered to, or are contained on, the TRI 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.

4.2 Storage Requirements

As shown on the Site Plan (Sheet 1, Appendix H), TRI will store whole waste tires and processed tires in roll-off containers on the asphalt area located north of the wood recycling area. TRI will mobilize the portable shredding equipment when a sufficient supply of whole tires is collected and perform shredding operations in that location. The TRI on-site stormwater retention pond is located along the northwestern boundary of the facility which discharges in the design 25-year storm to Boggy Creek Canal. To satisfy the outdoor storage requirements of Rule 62-711.540(3), TRI proposes to store whole waste tires in 40 cy roll-off containers. Storage in roll-off containers will ensure water quality standards are maintained at the facility. The roll-off containers will be staged as shown on Sheet 1 to allow unobstructed access for emergency vehicles. Fire prevention and preparedness measures will be established in accordance with the Emergency and Fire Preparedness Guidelines provided in Appendix J. The guidelines have been reviewed and approved by the Orange County Fire Rescue Division. Additionally, the facility will implement Best Management Practices (BMPs) at the waste tire storage and process area in accordance with the facility's Stormwater Pollution Prevention Plan and described in the following section.

4.3 Best Management Practices

Typical BMPs will include the following:

- Cleanup and sweeping of the asphalt pavement after processing is completed;
- Installing silt infiltration devices and oil absorbent socks around nearby stormwater inlets;

- Monitoring the surrounding asphalt surface area and the stormwater retention pond for the presence of oil sheens that could be attributable to the tire storage and processing operations; and
- Monitoring stormwater discharge at the retention pond outfall for evidence of non-authorized discharges.

In addition to the above-referenced storage and BMPs, additional monitoring and inspections required by the facility's NPDES permit will ensure water quality standards are maintained at the facility.

4.4 Mosquito Control Plan

The waste tire storage and processing area will be monitored for the presence of vectors including mosquito control and eradication as necessary. TRI will monitor the tire storage area on a daily basis for mosquito development. Insecticide applications will be performed by a local pest control company as necessary. In accordance with Orange County Code, any storage of waste tires for longer than 15 days will require implementation of a mosquito control program if there is the possibility that standing water will accumulate inside the tires.

4.5 Transportation of Waste and Processed Tires

Rule 62-711.520 requires any waste tire collector engaged in collecting or transporting waste tires for the purpose of storage, sale, recycling, reuse, disposal, or processing to be properly registered with FDEP. Additionally, Rule 62-711.400(5) requires anyone that contracts the services of a waste tire collector for the transportation, disposal, or processing of waste tires to ensure that the collector is registered with the FDEP or exempt from registration requirements. TRI plans to contract the services of a registered waste tire collector to transport processed tires to the designated recycling or disposal entity. TRI will maintain records of waste tire collectors and volumes as described below.

4.6 Record Keeping and Reporting

In accordance with Rule 62-711.530(4) F.A.C., TRI will record and maintain for three years the following information regarding waste tire acceptance, storage, and processing. Records will be made available at the facility for inspection by the FDEP during normal business hours.

a) For all waste tires shipped from the facility:
   the name and waste tire collection registration number of the waste tire collector who accepted the waste tires for transport
   the quantity of waste tires shipped with that collector
   if the waste tires were shipped with a person who is not a waste tire collector:
   the number of tires shipped
   the person's name, address, and telephone number
   the place where the waste tires were deposited;

b) For all waste tires received at the facility:
the name and waste tire collector registration number of the collector who delivered the waste tires to the facility
and the quantity of waste tires received from that collector
if more than five waste tires were delivered by a person who is not a waste tire collector
the number of tires delivered
the person's name, address, and telephone number; and,

c) For all waste tires removed from recapping:
the quantity and type removed
the name and location of the recapping facility receiving the tires.

In accordance with Rule 62-711.530(5) TRI will submit quarterly reports to the FDEP and Orange County that summarize the information above. The reports will be submitted by the 20th of the month following the close of each calendar quarter. The reports will be submitted on Form 62-701.900(21) and will also include the information listed below:

a) The facility name, address, and permit number;
b) The quarter covered by the report;
c) The total quantity , by category, of waste tires received at the facility during the quarter covered by the report;
d) The total quantity, by category, of waste tires shipped from the facility during the quarter covered by the report;
e) The total quantity of waste tires processed during the quarter;
f) The total quantity, by category, of waste tires located at the facility on the last day of the quarter; and
g) A list of all dates on which one or more category of waste tires exceeded the storage limit, which category was in excess, and how this condition was relieved or will be relieved.

SECTION 5
CLOSURE PLAN

The closure of the facility will include removal of the operational equipment, which is completely mobile by design. Any remaining waste or recovered materials will be removed and hauled to an appropriate processing site or landfill. To protect the County and State from bearing the cost of potential cleanup activities, a surety bond, or similar financial assurance mechanism, will be posted at the time of permitting, and updated annually, by March 1st. The purpose of the bond is to provide for closure of the site, if the permitee does not perform.

The approved closure steps include notifying the County and the Florida Department of Environmental Protection (FDEP) at least 180 days prior to closure. The cleanup is to be completed within 30 days of the final closure date. Closure will be completed within 180 days after the final waste load is received. At that time, a closure report is to be issued to the County and FDEP to allow time for a site inspection and closure certification.

APPENDIX J
EMERGENCY AND FIRE PREPAREDNESS GUIDELINES

EMERGENCY AND FIRE PREPAREDNESS GUIDELINES

Taft Recycling, Inc.
Waste Processing Facility and Transfer Station
375 W. 7th Street, Orlando, Florida 32824

Prepared for:

TAFT RECYCLING, INC.
375 W. 7th Street
Orlando, Florida 32824

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Prepared January 2004
Revised January 2010

HSA Golden Project No. 06-404.010

EMERGENCY AND FIRE PREPAREDNESS GUIDELINES
Taft Recycling, Inc.

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Figures

Attachments

Note: The majority of the procedures and text herein are supplied by the Orange County Fire Rescue Division

EMERGENCY AND FIRE PREPAREDNESS GUIDELINES
Taft Recycling, Inc.

1.0 Purpose

This document is to be used as a guideline for procedures and preparedness in the event that a major fire and/or emergency were to take place within the Taft Recycling, Inc. (TRI) waste processing facility (WPF/Transfer Station (TS). Copies of this report will be kept in the Administrative and Scalehouse Offices. The procedures outlined in the Emergency and Contingency Plan provided in Section 2 of the facility's Operation Plan (Attachment 2) will be followed in conjunction with the guidelines presented herein. Additionally, site personnel will participate in developing a pre-incident plan with the Orange County Fire Rescue Division as requested.

1.1 Site Location and Access

The TRI waste processing facility and transfer station is authorized to accept construction and demolition debris; Class III; and Class I (municipal solid waste). TRI currently processes the wastes for recoverable materials such as clean wood, concrete, paper, cardboard, metals, glass, and waste tires. Non-recyclable wastes are transferred to a Class I disposal facility. TRI is located at 375 West 7th Street, which is one-half mile west of Sidney Hayes Road, Orlando, Florida (see Figure 1). Primary access to the site is from U.S. 441; or Orange Avenue, to East Landstreet Road, to Sidney Hayes Road, then south to 7th Street. The site may also be accessed from Taft-Vineland Road, to Recycle Center Road, then north to 7th Street.

The permitted site operating hours are:

Monday – Friday:	24 hours
Saturday:	Midnight – 7:00 p.m.
Sunday:	7:00 a.m. – 7:00 p.m.; 9:00 p.m. – Midnight

The site is manned by TRI employees during all operating hours and the site's access gate is locked at all other times. Although not required by facility permits, a guard is presently stationed at the locked entrance gate during non operating hours for further security. If needed, TRI may evaluate the future need for this service. A Fire Department lockbox will be located at the gate for those hours when an attendant is not on site. The location of the lockbox will be determined by the OCFRD. The names and 24-hour contact numbers of facility personnel who can respond and operate equipment within 30 minutes are posted on the facility entrance gate.

1.2 Notification in Case of an Emergency or Fire

Orange County Fire and Rescue Department (OCFRD) Communications Center must be contacted immediately upon all fires on the property. The Florida Fire Prevention Code requires the following: In the event that a fire occurs on any property, the owner or occupant shall immediately report such fire to the Fire Department (911).

Emergency contact numbers are provided below:

Orange County Fire/Rescue	911
Mike Kaiser, VP Engineering - Mobile	(904) 673-0446
TRI Scalehouse	(407) 851-0074
Dennis Pantano, VP Operations - Mobile	(917) 359-5174
Wilson Estevez, Site Manager - Mobile	(321) 436-2652
Sean Glowa, Regional Safety Manager - Mobile	(321) 202-9907
FDEP Main Receptionist	(407) 894-7555
FDEP Solid Waste	(407) 893-3328

The Operator of the site will first and immediately notify **OCFRD (911).** The Operator shall then notify Florida Department of Environmental Protection (FDEP) (407-894-7555 & 407-893-3328) and Orange County Environmental Protection Division (OCEPD) (407-836-1400) in case of a fire or other emergency that poses an unanticipated threat to the public health or the environment. Within two weeks of any emergency, the Operator of the site will submit to the FDEP and OCEPD a written report on the emergency. This report will describe the origins of the emergency, the actions taken to control the emergency, the results of the action taken, and an evaluation of the success or failure of the actions.

1.3 Fire Protection and Fire Fighting Facilities

The TRI WPF/TS has sufficient fire protection and fire fighting facilities. Three (3) fire hydrants exist to serve the 19,000 sf. waste transfer building, 2,400 sf. material sorting building, 560 sf. administration and scalehouse building, and outside material storage areas (see Figure 2, Site Plan). Fire flow calculations are also noted on Figure 2.

Supplemental fire protection is to be furnished by the OCFRD. Further details of fire fighting procedures **(containment and extinguishment)** follow. **Methods of fire suppression will ultimately be determined by OCFRD command for the different types of fires that may be encountered (structure, vehicle, solid waste). The various methods of suppression are as follows:**

- **Separation**
- **Soil suppression**
- **Foam**
- **Copious amounts of water**

Specialized fire fighting equipment and materials, required by OCFRD Command, will be provided solely at the owner's expense to protect the public health and environmental issues.

1.4 Equipment Inventory

Figure 2 depicts the location of existing fire hydrants and hose reels on the TRI facility. One hydrant is located at the southeast area of the site (adjacent to the wood mulching operations), a second hydrant is located at the mid area of the site (west of the sorting building trommel screen), and a third hydrant is located northeast of the scalehouse (at the north end of the visitor parking area). Hose reels with 500 feet of fire hose, wrenches and nozzles are located adjacent to each hydrant. Each hydrant is inspected and flow tested on an annual basis by a licensed contractor.

Heavy equipment used at the facility includes the following, or its' equivalent:

- Four (4) Front End Loaders
- Three (3) Track Excavators with Grapples
- Two (2) Fork Lifts

Fire extinguishers in accordance with Chapter 10 of the NFPA are provided on each piece of heavy equipment operating at the facility and within all facility buildings.

In accordance with Chapter 33, Section 33.4.1, of the NFPA Uniform Fire Code, the following manual firefighting equipment is located at the facility in support of the waste tire storage and processing operations:

Each piece of fuel-powered equipment used to handle scrap tires will have one dry chemical fire extinguisher with a minimum rating of 4A:40BC.

At a minimum, the following items will be maintained on site and in working order near the waste tire storage area:

1. **One 2A:10BC fire extinguisher**
2. **One 2.5 gallon (10L) water extinguisher**
3. **One 10 foot long pike pole**
4. **One rigid rake**
5. **One round point shovel**
6. **One square point shovel**

All fire fighting equipment stored at the facility is inspected on a weekly basis. All fire extinguishers are serviced as needed, or on a minimum annual basis.

1.5 Safety Devices

All heavy operating equipment at the facility will be fitted with protective structures and fire extinguishers as noted in the previous section. Personnel safety gear, such as hard hats, safety glasses, and steel toed shoes, are required for operational personnel. **The above safety devices will be provided solely at the owner's expense.**

1.6 Emergency Access

In the event of a fire, waste materials originally destined for the facility will be rerouted to another permitted site. The site access roads are currently constructed to allow passage of vehicles under all expected weather conditions. Pavement exists at 7th Street to the facility entrance, and the entire facility is paved outside of all building footprints and the stormwater pond. These paved areas provide suitable access for all emergency vehicles. The access roadways shall be maintained with an all-weather surface, minimum 20'0" wide with a 13'-6" vertical clearance, and shall accommodate fire apparatus with a minimum weight of 42tons.

1.7 Communication Facilities

Telephone service is present at the scale. In addition, site supervisors and equipment operators will be equipped with two-way radios or mobile phones. All emergency numbers (i.e., 911, fire department, police department, etc.) will be posted at the scale house. One (1) additional two way radio or mobile phone will be available on site for emergency fire department command officer.

1.8 Waste Tire Processing Area

TRI plans to store whole waste tires in 40-cubic yard (cy) steel roll-off containers stationed north of the wood recycling area as shown on the attached Site Plan (Figure 2). The number of whole waste tires stored at the facility at any one time will depend on the type of tire (passenger or heavy truck) and the number of 40 cy roll-off containers that are stationed in the designated storage locations. The dimensions of a 40 cy roll-off container are approximately 20'L x 8'W x 6'T. As shown on Figure 2, approximately 17 containers can be neatly stationed in the area shown, while maintaining a minimum 25-foot fire lane from interior site fencing and structures and five feet separation between the roll-off containers. Additionally, roll-off containers will be kept a minimum of 50 feet away from all property boundary fencing, as shown on Figure 2. This will allow for 10 containers to store whole tires, 6 containers for processed tires, and 1 container for residuals. A photograph representing a typical roll-off container is provided as Attachment 1. No smoking signs will be posted near the tire containers and processing area. Additional operation details of the waste tire storage and processing operations are provided in Section 4 of the facility's Operation Plan.

1.8.1 NFPA Uniform Fire Code, Chapter 33 Compliance

TRI does not plan to store tires in piles at the facility, but rather inside steel roll-off containers; therefore, the requirements that reference "tire piles" in Chapter 33 of the NFPA should not strictly apply. However, the following describes TRI's plan to comply with applicable NFPA 33 Sections.

33.1.1 Facilities storing more than 500 tires outside shall be in accordance with Chapter 33.

More than 500 tires will be stored in roll-off containers at the facility.

33.1.2 Permits. Permits, where required, shall comply with Section 1.12

TRI is applying for a Waste Tire Storage and Processing Facility Permit from the FDEP, Orange County EPD, and an operating license from the Orange County Solid Waste Division.

33.1.3 Fire department access roads to separate tire piles and for effective fire-fighting operations shall be in accordance with Table 33.1.3.

TRI will store tires in steel roll-off containers and five feet separation will be maintained between the containers. Containers will be kept a minimum of 50 feet from the property boundary fencing. A minimum 25-foot fire lane will also be maintained around the perimeter of the containers. Table 33.1.3 references exposed face dimensions and pile heights for storage of tires on the ground. This would not apply to the storage of waste tires in containers as proposed at the facility.

33.1.4 Separation of yard storage from buildings, vehicles, flammable materials, and other exposures shall be in accordance with Table 33.1.3.

The tire storage and processing area will be located at least 100 feet away from buildings, vehicles, and flammable materials as shown on the Site Plan (Figure 2). As previously noted, Table 33.1.3 references separation distances based on storage of tires on the ground.

33.1.5 Trees, plants, and vegetation within the separation areas shall be managed in accordance with Section 10.14

There will be no trees, plants, and vegetation in the tire storage and processing area.

33.1.6.1 Smoking shall be prohibited within the tire storage area.

TRI will prohibit smoking and post "Non-Smoking" signs in the tire storage and processing area.

33.1.6.2 Sources of ignition such as cutting and welding, heating devices, and open fires shall be prohibited within the tire storage area.

TRI will prohibit the use of cutting and welding, heating devices, and open fires within the tire storage area.

33.1.6.3 Safeguards shall be provided to minimize the hazard of sparks from equipment such as refuse burners, boiler stacks, and vehicle exhaust, when such hazards are located near tire storage areas.

If necessary, safeguards will be provided to minimize the above referenced hazards.

33.1.7 Piles of tires or altered tire material shall not be located beneath power lines or structures.

Whole tires and altered tire material stored in roll-off containers will not be located beneath power lines or structures as shown on the Site Plan (Figure 2).

33.1.8 Piles of tires or altered tire material shall be at least 50 feet from the perimeter fence.

Piles of tires or altered (processed) tire material will not be stored on the ground. Tires and altered tire material will be stored in steel roll-off containers. A 25-foot fire lane will be maintained around the perimeter of the containers with five feet of separation between the containers. Containers will be kept a minimum of 50 feet away from all property boundary fencing. The steel roll-off containers provide an additional fire barrier and protection from further propagation.

33.1.9 Provisions for surface water drainage and measures to provide protection of pyrolitic oil runoff shall be directed around and away from the outdoor tire storage site to an approved location.

TRI has a FDEP approved stormwater management system in place at the facility. Stormwater runoff from the waste tire storage and processing area is directed towards inlets leading to the stormwater retention pond as shown on the Site Plan (Figure 2). TRI will store a sufficient supply of absorbent sock materials at the facility for use in controlling possible pyrolitic oil runoff from reaching the stormwater management system in the event of a fire. Additionally, the stormwater retention pond allows for significant storage of stormwater runoff prior to discharge offsite. This will allow additional time to absorb any possible pyrolitic oil that may reach the stormwater pond in the event of a fire.

33.1.10 Tires shall be removed from rims immediately upon arrival at the storage site.

TRI will not accept rimmed tires at the facility. In the event a rimmed tire is inadvertently received, the rim will be removed from the waste tires prior to storage at the designated location.

33.1.11 Tires shall not be stored on wetlands, flood plains, ravines, canyons, or steeply graded surfaces.

The proposed tire storage and processing area will not be located on wetlands, flood plains, ravines, canyons, or steeply graded surfaces as shown on the Site Plan (Figure 2).

33.2.1.1 New individual outside storage piles containing more than 500 tires shall be limited in volume to 125,000 ft^3.

A total of (17) 40-cubic yard roll off containers will be associated with the proposed waste tire storage and processing operation, or a total storage volume of 680 cubic yards or 18,360 cubic feet.

33.2.1.2 The dimensions of new tire storage piles shall not exceed 10 ft (3m) in height, 50 ft (15m) in width, and 250 ft (75m) in length.

TRI will not store tires in piles on the ground. Tires will be stored in steel roll-off containers which are 20 feet long by 8 feet wide by 6 feet high.

33.2.1.3 Individual piles shall be separated in accordance with Table 33.1.3.

As previously noted in 33.1.3 & 33.1.4, tires will be stored in steel roll-off containers and not in individual piles on the ground. Five feet of separation will be maintained between the roll-off containers.

33.3.1 The operator of the outside tire storage facility shall develop an emergency response plan and submit it for approval by the AHJ.

This Emergency and Fire Preparedness Plan has been developed for the TRI tire facility and will be submitted for approval by the OCFRD. An Emergency and Contingency Plan is included in Section 2 of the facility's Operation Plan required by the FDEP. A copy of the Plan has been provided to the OCFRD for review and approval during past reviews of this document. A current copy of the Operation Plan is provided as Attachment 2.

33.3.2 The AHJ shall retain a copy of the approved emergency response plan.

A copy of this plan will be on file with OCFRD, OCEPD and FDEP.

33.3.3 The operator of the outside tire storage facility shall keep a copy of the approved emergency response plan at the facility.

A copy of this approved Emergency and Fire Preparedness Plan will be kept onsite at all times at the administration and scalehouse offices.

33.3.4 The AHJ shall be immediately notified of and approve any proposed changes to the emergency response plan.

This Emergency and Fire Preparedness Plan will be updated as operations and facility personnel change. Updated copies of the plan will be forwarded to the appropriate agencies including OCFRD, OCEPD and FDEP.

33.4 Fire Control Measures. Measures to aid in the control of fire shall be in accordance with Section 33.4

Please refer to Section 1.4 of this plan and the below items.

33.4.1.2 One dry chemical fire extinguisher with a minimum rating of 4A:40BC shall be carried on each piece of fuel-powered equipment used to handle scrap tires.

One dry chemical fire extinguisher with a minimum rating of 4A:40BC will be carried on each piece of fuel-powered equipment used in conducting operation of the waste tire storage and processing operations.

33.4.1.3 On-site personnel shall be trained in the use and function of this equipment to mitigate tire pile ignition.

TRI personnel will be trained on a minimum annual basis in the operation and use of fire mitigating equipment.

33.4.2 An approved water supply capable of supplying the required fire flow to protect exposures and perform fire suppression and overhaul operations shall be provided.

The facility is serviced by a six-inch diameter fire water main. Three fire hydrants are located on the facility at the locations described in Section 1.3 of this plan. Figure 2 shows the locations of the hydrants and their locations relative to the proposed waste tire processing area.

33.5.1 Access to the site and each tire storage yard and pile shall be in accordance with Section 18.2 of this section.

Access to the tire storage area is controlled by gated access and an eight foot chain-link perimeter fence with screening slats and two feet of barbed wire on top. Photographs of the fence are provided in Attachment 1.

33.5.2 Access shall be maintained clear of combustible waste or vegetation and shall remain accessible to the fire department at all times.

The waste tire storage and processing area is located in an asphalt paved location. TRI will maintain clear access to the tire storage area at all times and will maintain the area clear of combustible waste or vegetation.

33.6 Signs and Security. Access by unauthorized persons and security of the site shall be in accordance with Section 33.6.

Access to the tire storage area by unauthorized persons will be prevented by a secured perimeter and facility personnel during operating hours. Supervisors and equipment operators maintain constant oversight of customers using the facility, and will direct customers to the waste tire storage area and monitor offloading into the proper roll-off container to prevent unauthorized activities.

33.6.1 Signs bearing the name of the operator, the operating hours, emergency telephone numbers, and site rules shall be posted at site entrances.

A sign is posted at the gated entrance at 7th Street listing the information required in 33.6.1.

33.6.2 The facility shall have noncombustible fencing at least 10 ft (3m) high with intruder controls on top, in accordance with local laws, around the entire perimeter of the property.

As noted in previous sections, an eight-foot high chain-link security fence with screening slats and two feet of barbed wire on top surrounds the entire facility perimeter as shown on the Site Plan (Figure 2).

33.6.3.2 An attendant shall be on site at all times when the site is open.

An attendant, including supervisors and equipment operators, will be on site at all times the facility is open.

33.7.1 A 10 ft (3m) fence shall be maintained around the altered tire material storage area.

As noted in previous sections, an eight foot high chain-link security fence with screening slats and two feet of barbed wire on top is located around the entire facility perimeter.

33.7.2 Altered tire material piles shall be kept 50 ft (15m) from perimeter fencing.

Altered (processed) tire material will be stored in steel roll-off containers, and kept 50 ft. from all site boundary fencing.

33.7.3 Potential ignition sources such as welding, smoking, or other open flame uses shall not be allowed within 20 ft (6m) of the altered tire pile.

TRI will prohibit the use of potential ignition sources such as welding, smoking, or other open flame uses within 20 feet of the altered (processed) tire storage area.

33.7.4 Individual altered tire piles shall not be located on site in excess of 90 days.

Altered (processed) tires will be removed from the site within 48 hours.

33.7.5 Individual altered tire material piles shall be kept sheltered from precipitation.

Altered (processed) tire material will be stored in steel roll-off containers and not in piles. While staged onsite, roll-off containers containing altered (processed) tires will be completely tarped (with no openings) to prevent precipitation from entering the containers.

2.0 Fire Suppression Methods and Procedures

The following sections describe various fire prevention and suppression methods, but do not supersede the methods used by the responding fire department. TRI personnel must work together with the OCFRD personnel by providing heavy equipment, soil, water and logistical support during a fire or emergency. OCFRD command officers will be in charge of the scene upon arrival and work closely with the TRI personnel to mitigate any emergency situation. Emergency operations will adhere to OCFRD Standard Operating Procedures. Structural and vehicle fires will be suppressed in accordance with Emergency Operation Guidelines.

Operational Fire Prevention NFPA 23011.2.2

11.2.2.1 Combustible waste materials such as bark, sawdust, chips, and other debris shall not be permitted to accumulate in a quantity or location that constitutes an undue fire hazard.

11.2.2.2 Smoking shall be prohibited except in specified safe locations approved by the authority having jurisdiction. Signs that read "No Smoking" shall be posted in those areas where smoking is prohibited (including the waste tire processing area), and signs indicating areas designated as safe for smoking shall be posted in those locations.

(A) Smoking areas shall be provided with approved, noncombustible ash receptacles.

11.2.2.3 Access into yard areas by unauthorized persons shall be prohibited.

11.2.2.4 Storage areas shall be enclosed with a suitable fence equipped with proper gates located as necessary to allow the entry of fire department apparatus.

11.2.2.5 Miscellaneous occupancy hazards such as vehicle storage and repair shops, cutting and welding operations, flammable liquid storage, liquefied petroleum gas storage, and similar operations shall be safeguarded in accordance with recognized good practice.

11.2.2.6 Reference shall be made to NFPA standards that apply to specific occupancy hazards.

11.2.2.7 Vehicles and other power devices shall be of an approved type and shall be safely maintained and operated.

(A) Vehicle fueling operations shall be conducted in specified safe locations, isolated from storage areas and principal operating buildings.
(B) Diesel- or gasoline-fueled vehicles that operate on hogged material or chip piles, in log storage areas, or in lumber storage areas shall be equipped with fixed fire-extinguishing systems of a type approved for off-road vehicles.

11.2.2.8 All electrical equipment and installations shall conform to the provisions of NFPA 70, *National Electrical Code®*.

11.2.2.9 Salamanders, braziers, open fires, and similar dangerous heating arrangements shall be prohibited.

11.2.2.10 Heating devices shall be limited to approved-type equipment installed in an approved manner.

11.2.2.11 Suitable safeguards shall be provided to minimize the hazard of sparks caused by equipment such as refuse burners, boiler stacks, vehicle exhausts, and locomotives.

11.2.2.13 Cutting, welding, or other use of open flames or spark-producing equipment shall not be permitted in the storage area unless by an approved permit system.

11.2.3 Exposure Protection. Exposure to the yard shall be protected in accordance with the requirements of 11.2.3.1 through 11.2.3.2.

11.2.3.1 Yard areas shall be separated from plant operations and other structures so that fire exposure into the yard is minimized.

(A) Minimum separation shall be by means of a clear space permanently available for fire-fighting operations.
(B) The width of the clear space shall be based on the severity of exposure, which varies with the area, height, occupancy, construction, and protection of the exposing structure and the type of stacking and height of adjacent stacks.

11.2.3.2 Forest, brush, and grass fire exposure shall be minimized by providing adequate clear space that is carefully kept free of combustible vegetation.

(A) Clear space of a width at least equivalent to the driveway shall be provided for grass exposures, and clear space of a width not less than 30 m (100 ft) shall be provided for light brush exposures.
(B) In forested areas, a wider clear space shall be provided.

11.4.1.1 The intent of the provisions of Section 11.4 shall be to provide minimum fire protection requirements to minimize the fire hazard in large yard storage areas containing lumber, wood panels, and other similar wood products not intended for retail or wholesale distribution at the site.

11.4.1.2 In addition to the provisions contained in Section 11.4, the provisions outlined in Section 11.2 shall apply to all large yard storage areas for lumber and wood panel products at other than retail or wholesale yards.

11.4.2 General. The fire hazard potential inherent in forest product storage operations with large quantities of combustible material shall be controlled by a positive fire prevention program under the direct supervision of upper level management that shall include the following:

(1) Selection, design, and arrangement of storage yard areas and materials-handling equipment based on sound fire prevention and protection principles;
(2) Means for early fire detection, transmission of alarm, and fire extinguishment;
(3) Driveways to separate large stacks and provide access for effective fire-fighting operations;
(4) Separation of yard storage from mill or other plant operations and other exposing properties; and
(5) Effective fire prevention maintenance program, including regular yard inspections by trained personnel.

2.1 Fire and Emergency Response

TRI personnel are expected to immediately respond to a fire or emergency if the area or situation can be safely accessed. TRI's ability to provide initial response to a fire or emergency could be the difference between a controlled or an out-of -control situation. Upon notification by TRI of a fire at the facility, OCFRD will respond to ensure adequate fire control. OCFRD is to be notified immediately of any fire at the TRI property.

Practice Emergency Plan

An effective fire prevention maintenance program, including suppression operations and regular yard inspections, shall be practiced periodically by trained personnel. OCFRD review is limited solely to ensuring compliance with the minimum criteria as set forth in the applicable section of Florida Administrative Code, and is not intended to guarantee the effectiveness of the plan. To enhance the plan's effectiveness, the Florida Fire Prevention Code requires that it be exercised periodically and that the facility staff be briefed and trained on procedures so that the plan can be implemented at a moment's notice.

Extinguisher Training

Designated employees shall be instructed in the use of portable fire extinguishers on a minimum annual basis.

2.2 Construction of a Fire Lane

The function of a fire line is to provide a barrier to contain the fire boundaries. The following procedures should be followed during line construction to contain a fire:

- Remove all ground cover and debris along the fire line;
- Use natural barriers such as working faces, trenches, etc.;
- Separate burned and unburned materials; and
- Construct a fire line to bare soil, free of leaves, twigs, roots, disposed debris, etc.

A site perimeter road is available within the buffer areas to allow truck access (see attached Figure 2, Site Plan).

As shown on Figure 2, a 25-foot fire lane will be maintained around the perimeter of the waste tire storage and processing area.

2.3 Use of Heavy Earth Moving Equipment

The use of heavy earthmoving equipment to suppress fires is effective because fire line construction can be completed at a faster rate. Orange County Fire Rescue will support and protect heavy equipment operators by way of exposure lines and oversight. Caution must be taken to prevent earthmoving equipment from working alone out in front of a fire. Because they have no fire extinguishing capability other than removal of fire fuel, they can easily be overrun by a fast–moving fire. TRI personnel will be expected to operate the on-site heavy equipment to assist in fire suppression and separate materials immediately and suppress burning materials with soil. Fire/Rescue will maintain control and have oversight of all emergency operations.

2.4 Water Supply and Use

Three fire hydrants are located on the facility property. One hydrant is located at the southeast area of the site (adjacent to the wood mulching operations), a second hydrant is located at the mid area of the site (west of the sorting building trommel screen), and a third hydrant is located northeast of the scalehouse (at the north end of the visitor parking area). Hose reels with 500 feet of fire hose, wrenches and nozzles are located adjacent to each hydrant

2.5 Personnel Safety and Fire Control

Fighting fires is a dangerous activity and could cause serious injury or fatality if hurried or incorrect decisions are rendered. Remember: the safety of personnel and equipment always comes first. The following standards are adopted from the U.S. Forest Service and are a good rule to follow when encountering a fire:

- **Keep informed of fire weather conditions and forecasts**. Be aware of the weather conditions, particularly to direction and velocity of the wind.

- **Know what your fire is doing at all times**. Many small fires become large if not kept under constant observation.

- **Base all actions on the current and expected behavior of the fire**. The action taken should be determined by everything that is happening and everything that might happen. Every fire has to be approached differently because of the changing conditions encountered.

- **Have escape routes for everyone and make them known**. Identify escape routes and notify personnel where they are and what to do when they get to the safety zone. Use natural barriers as much as possible.

- **Post a lookout when there is a possible danger**. A lookout observer, with communications capability, can view the "large picture" of the fire containment process and can see if any potential danger may exist for those fighting the fire directly.

- **Be alert, keep calm, think clearly, act decisively**. When faced with a situation, think, know, understand what is happening and keep calm. Panic can injure personnel.

- **Maintain prompt communication with personnel, supervisor and adjoining forces**. Adequate communication is essential to good fire control safety.

- **Give clear instructions and be sure they are understood**. Issue concise instructions and make sure the personnel understand the directions precisely.

- **Maintain control of personnel at all times**. When issuing assignments, one consideration should be the reliability of the personnel. Other considerations will include inspection of tools and coordination of available equipment.

- **Fight fire aggressively, but provide for safety first**. Aggressive action is the key to fire suppression, but it must neither shortcut nor violate any safety rule covering a particular situation.

2.6 Protective Clothing

One of the best ways to prevent injury during a fire is to wear gloves, goggles, and protective clothing including proper footwear. Gloves should be comfortable and the right size to prevent abrasions and blisters. Goggles should have vents in the side and should be designed for the greatest possible field of vision. Lace-up boots are preferred, especially for uneven terrain. Heavy socks should be worn with boots.

3.0 Fire Investigation

When determined by the OCFRD, fire investigation will be referred to the State Fire Marshall's Office and/or the Division of Forestry for further investigation. Safety of the fire department and TRI personnel will be the primary concern.

4.0 Disposal of Burned Debris

The burned debris will be isolated as much as practicable from the rest of TRI facility using various means such as earthern berms, pits, transport bins, etc. Once all hot spots have cooled and the fire fully suppressed, the remains of burned debris will be transported off-site to an appropriate disposal facility. Oily residuals from burned tires will be stored in sealed roll–off containers or drums until transported to a proper disposal facility.

The aforementioned TRI operation is in compliance with Orange County Ordinance #92-22 and the permit fee of $70.00 has been paid to the OCFRD.

facility. Oily residuals from burned tires will be stored in sealed roll-off containers or drums until transported to a proper disposal facility.

The aforementioned TRI operation is in compliance with Orange County Ordinance #92-22 and the permit fee of $70.00 has been paid to the OCFRD.

The undersigned, as of this date, approve this agreement.

Mr. Carl Plaugher, Fire Chief
Orange County Fire Rescue Department

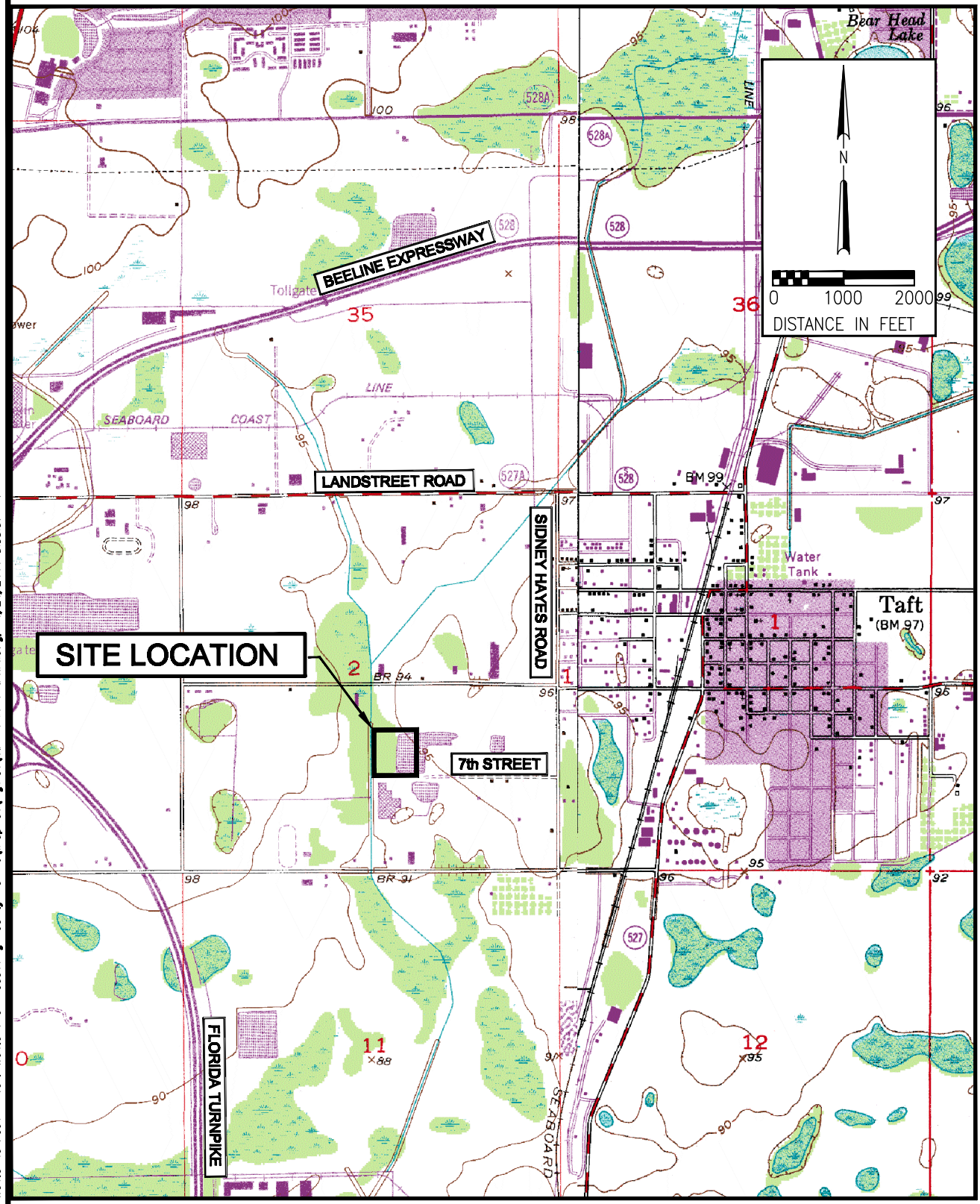
Date: 2/8/10

Mr. Mike Kaiser, P.E.,
V.P. Environmental Management and Engineering
Taft Recycling, Inc.

Date: 2/2/2010

06-404.010-USGS.dwg

DATE: October 2009



SOURCE: USGS LAKE JESSAMINE AND PINE CASTLE, FLORIDA, 7.5 MINUTE QUADRANGLE MAP, 1980

HSA Golden Engineering
100 EAST PINE STREET, SUITE 605
ORLANDO, FLORIDA 32801
PHONE: 407 649-5475 FAX: 407 649-6582

TAFT RECYCLING, INC.
ORANGE COUNTY, FLORIDA

PROJECT NO. 06-404.010

SITE LOCATION MAP

FIGURE
1

P:\projects\06-404.010 Waste Services - Taft Waste Tire Processing Facility\Permit\Figures\06-404.010-USGS.dwg, 10/29/2009 8:38:57 AM

FEBRUARY 2010

24
BLOCK "H"

OWNER:
MOBILE FIELD OFFICE CO.

23
BLOCK "H"

OWNER:
JAMES E. STRATES

22
BLOCK "H"

OWNER:
PAUL STRAUBINGER

"H"

8' CHAIN LINK FENCE
W/ 2' BARBED WIRE

96
94
92
90
5:1

STORMWATER
OUTFALL
STRUCTURE
TO BOGGY CREEK

STORMWATER
POND

6' CHAIN LINK FENCE

SEE
NOTE 1

METAL GARAGE
NOT IN USE

CONCRETE

TRANSFER BUILDING

TRANSFER TRUCK LOADING

CLASS 1 TIPPING FLOOR

2:1

5:1

84
86
88
90
92
94
96

SEE
NOTE 1

LESS THE WEST 40'

6' CHAIN LINK FENCE
W/ 2' BARBED WIRE

6' CHAIN LINK FENCE

CLASS III
C&D TIPPING FLOOR

FE 98.24

FIRE
HYDRANT

435'

EMPTY
ROLL-OFF
CONTAINER
STORAGE
AREA
(NOT PAVED)

STORMWATER
INLET

FWM

EMPLOYEE AND
VISITOR PARKING
AREA

5' (TYP.)

(1) 40 C.Y.
ROLL-OFF
CONTAINER
TIRE
RESIDUALS
STORAGE

RSM STORAGE
(COVERED)

LOOSE ALUMINUM
CAN STORAGE
AREA

RECYCLED
METALS/BALED
ALUMINUM
STAGING
AREA

90'

FIRE
HYDRANT

TROMMEL SCREEN
AND CONVEYOR

STAIRS

BUILDING OVERHANG

PLASTIC, PAPER, ALUMINUM,
AND CARDBOARD STORAGE
FROM SORTING OPERATIONS

TWO STORY SORTING BLDG.

LOOSE CONTAINER
BOARD/FEED
TO BALER

SEPTIC FIELD

TRUCK SCALE

SCALE OFFICE

TRUCK SCALE

SCALE BY-PASS LANE

GRASSED AREA

FWM

CONCRETE
SLAB

40' PLATTED R/W PER P.B. "D", PG. 100
BOGGY CREEK CANAL

EAST TOP OF BANK OF CANAL

FIRE LANE

6' CHAIN LINK FENCE

25.00'

FIRE LANE

50.0'

OWNER:
ORANGE COUNTY

WEST LINE OF LOT 41

(6) 40 C.Y.
ROLL-OFF
CONTAINERS
PROCESSED
TIRE
STORAGE

SEE
NOTE 1

WASTE TIRE
STORAGE AND
PROCESSING AREA

8'x20' CONTAINERS
MIN. 5' SEPARATION

(10) 40 C.Y. ROLL-OFF
CONTAINERS
WHOLE TIRE
STORAGE

13' METAL WALL

RECOVERED MATERIAL
STAGING AREA

BALER
RECYCLING
EQUIPMENT

BALED PAPER
AND
CONTAINER
BOARD
STAGING AREA

STORMWATER
INLET

MOBILE WASTE
TIRE SHREDDER

SEE
NOTE 1

200'

RECYCLED BALED PLASTIC
STAGING AREA

FWM

TRUCK LOADING
DOCK

6" CURB

GRASSED AREA

CONCRETE
RETAINING WALL

LANDSCAPED AREA

FWM

OFFICE AND
MAINTENANCE
GARAGE

12.8'

12.8'

ASPHALT PAVEMENT

GRASSED AREA

RECYCLING
CONTAINER
STORAGE
AREA

WOOD RECYCLING
AREA

FIRE HYDRANT

STACKED CONCRETE COLUMN RETENTION WALL

EDGE OF PAVEMENT

6" FIRE WATER MAIN (FWM)

FWM

7TH STREET

24" CMP

STORMWATER OUTFALL
STRUCTURE TO BOGGY CREEK

8' CHAIN LINK FENCE
W/ 2' BARBED WIRE

8' CHAIN LINK FENCE
W/ 2' BARBED WIRE

ENTRANCE GATE
(20' SWING EACH SIDE)

57
ck "H"

56
BLOCK "H"

55
BLOCK "H"

54
BLOCK "H"

0 20 40
DISTANCE IN FEET

LEGEND

- PROPERTY BOUNDARY
- BELOW GRADE STORMWATER PIPING
- BELOW GRADE FIRE WATER MAIN
- 8 FT. TALL PERIMETER FENCE WITH 2 FT. BARBED WIRE
- 6 FT. TALL CHAIN LINK FENCE AROUND STORMWATER POND
- TRAFFIC FLOW DIRECTION
- STORMWATER FLOW DIRECTION
- ASPHALT PAVED AREA

NOTES: 1. PAVED AREA KEPT CLEAR FOR TRANSFER TRUCKS AND EMERGENCY VEHICLE TRAFFIC.

2. PROPERTY BOUNDARY SHOWN ON SOUTH SIDE OF 7TH STREET PER VACATE AGREEMENT.

FIRE FLOW CALCULATIONS

NFF = 18 x $\sqrt{A}$ x (0.8) x (1.15)
= 18 x $\sqrt{18600}$ x (0.8) x (1.15)
= 2258.5 G.P.M.

CREDIT ALLOWED = 1 EXISTING FIRE HYDRANT WITHIN 300'
+ 1 EXISTING FIRE HYDRANT WITHIN 600'
= 1000 G.P.M. + 670 G.P.M.
= 1670 G.P.M.

ADDITIONAL FIRE FLOW REQUIRED = 2258.5 G.P.M. - 1670 G.P.M.
= 588.5 G.P.M.

PROPOSED FIRE HYDRANT CREDIT = 1000 G.P.M.
THEREFORE FIRE FLOW REQUIREMENT MET.

DAVID L LEGGETT
LICENSE No. 70882
STATE OF FLORIDA
PROFESSIONAL ENGINEER

P.E. NO. 70882, FL
HSA GOLDEN FSPE No. 9915

HSA Golden 20
Civil Engineering Consultants
100 EAST PINE STREET, SUITE 605
ORLANDO, FLORIDA 32801
PHONE: 407 649-8476 FAX: 407 649-8882

BY	DESIGNED	DRAWN	CHECKED	FILE: 06-404.010-SITE-2.dwg
JC	TS	DL	10/09	

REVISED	CHECKED
DL	JG
JG	JW
JG	JW

DATE	REVISIONS
02/10	PER OC FIRE DEPT. COMMENTS
12/09	UPDATED FOR OCFRD FIRE SURVEY AS PER
	FDEP RAI DATED 11/17/2009
10/09	ADDED TIRE PROCESSING FACILITY

SITE PLAN

TAFT TRANSFER STATION AND MATERIAL RECOVERY FACILITY
TAFT RECYCLING, INC
ORANGE COUNTY, FLORIDA

PROJECT NO.
06-404.010

2
FIGURE

hsagolden
engineering environmental solutions

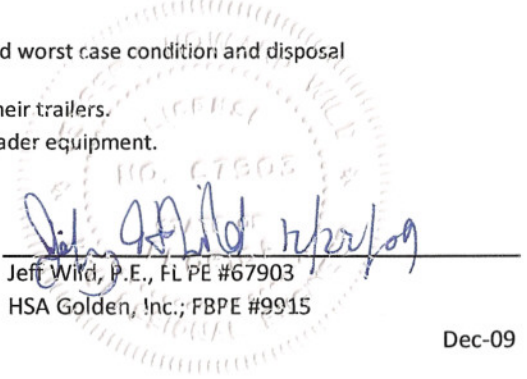
Response to Comment 7

TABLE 1
OPINION OF PROBABLE CLOSURE COSTS
TAFT TRANSFER STATION AND MATERIAL RECOVERY FACILITY
TAFT RECYCLING, INC.
ORLANDO, FLORIDA

	Recovered Material and Unprocessed Material Stored	Maximum Storage (tons)	Handling and Loading Costs ($/ton)	Transportation Costs ($/ton)	Disposal Costs ($/ton)	Total Loading, Transportation and Disposal ($/ton)	Total All Costs ($)
1	Unprocessed Class III	376	$2.50 **(5)**	$6.00	$24.00	$32.50	$12,220.00
2	Unprocessed Class I Putrescible	619	$2.50 **(5)**	$6.00	$35.10	$43.60	$26,988.40
3	Recovered Asphalt/Concrete	80	$0.00 **(2)**	$6.00	$24.00 **(3)**	$30.00	$2,400.00
4	Recovered Roofing Tiles	20	$0.00 **(2)**	$6.00	$24.00 **(3)**	$30.00	$600.00
5	Recovered Cardboard (Baled)	325	$2.50 **(5)**	$6.00	$24.00 **(3)**	$32.50	$10,562.50
6	Recovered Paper (Baled)	37.5	$2.50 **(5)**	$6.00	$24.00 **(3)**	$32.50	$1,218.75
7	Recovered Metal (Ferrous, Steel, Pipe)	40	$0.00 **(2)**	$6.00	$24.00 **(3)**	$30.00	$1,200.00
8	Metal (Aluminum Cans)	1.5	$2.50 **(5)**	$6.00	$24.00 **(3)**	$32.50	$48.75
9	Glass (Whole Bottles)	18	$2.50 **(5)**	$6.00	$24.00 **(3)**	$32.50	$585.00
10	Plastic (Mixed Loose)	1.4	$2.50 **(5)**	$6.00	$24.00 **(3)**	$32.50	$45.50
11	Wood	183	$2.50 **(5)**	$6.00	$24.00	$32.50	$5,947.50
12	Whole Tires	67.5	$2.50 **(4)**	$0.00**(4)**	$50.00 **(4)**	$52.50	$3,543.75
13	Processed Shredded Tires	67.5	$0.00 **(2)**	$6.00	$35.10	$41.10	$2,774.25
14	Processed Tire Residuals	10	$0.00 **(2)**	$6.00	$35.10	$41.10	$411.00
15	Recycling Residuals	15	$0.00 **(2)**	$6.00	$35.10	$41.10	$616.50
16	Washdown/Cleanup/6 month maintenance					LS	$4,500.00
17	Waste Oil/House Hold Haz. Waste	55 Gallon Drum	$100.00	$100.00	$300.00	$500.00	$500.00
18	Misc. Sampling and Analysis					LS	$1,000.00
19	Sub Total						**$75,161.90**
20	Contingency (15%)						$11,274.29
21	Total						**$86,436.19**

Notes:

1. Maximum storage volumes taken from table of Material Disposition, Appendix B, Operation Plan.
2. There are no loading costs for these materials. Materials are stored in roll-off containers and would not require loading.
3. Although processed/baled cardboard, paper, steel, aluminum cans, glass, plastic and concrete have commodity value, assumed worst case condition and disposal at Class III rates.
4. Whole waste tire disposal rate includes transportation by RMD Americas of Florida, LLC. Loading costs to transfer/load onto their trailers.
5. Unprocessed Class I, III, and C&D materials, and loose glass, plastic and wood loaded onto transfer trailers using rubber tire loader equipment.
6. Class III wastes include C&D debris.
7. Item 16 - 6 months closure period maintenance at $500/month



Jeff Wild, P.E., FL PE #67903
HSA Golden, Inc.; FBPE #9915

Dec-09

ENVIRONMENTAL PROTECTION DIVISION
Lori Cunniff, Manager
800 Mercy Drive, Suite 4
Orlando, Florida 32808-7896
407-836-1400 • Fax 407-836-1499
www.ocepd.org

January 13, 2010

James E. Golden, P.G.
Vice President, Principal Hydrogeologist
HSA Golden
100 East Pine Street, Suite 605
Orlando, FL 32801

Subject: **Approval of Minor Permit Modification (for Waste Tire Processing)**
Taft Recycling Inc. (Materials Recovery Facility / Transfer Station)
375 West 7th Street, Taft, Orange County, FL
Parcel ID: 02-24S-29E-7268-00-410
Permit: SW-022429-MRF/TS-06-0605

Dear Mr. Golden:

On October 21, 2009, your office initiated an inquiry on behalf of Taft Recycling, Inc. concerning waste tire storage and processing within the currently permitted Materials Recovery Facility / Transfer Station operations at the above-referenced facility. The Environmental Protection Division (EPD) has determined that the proposed ancillary operations will not create an additional substantial impact on the surrounding area and they are hereby approved.

This decision is based upon the existing permitted operations and primarily upon the details of the proposed waste tire storage and processing operations as described in the "Waste Tire Processing Facility Permit Application" dated October 28, 2009. The intake rate of waste tires will be included within the previously estimated overall intake average of 1,000 tons (3,000 cu yds) per day, and a mobile shredder will be used periodically for processing. The proposed additional storage volumes are: 67.5 tons whole tires; 67.5 tons processed shredded tire; and 10 tons tire processing residuals.

The update to the Financial Assurance cost estimate includes several revisions to the maximum volumes of materials that may be temporarily stored on site and adds site maintenance costs, and is hereby approved. Therefore, the Orange County approved cost-estimates for the period of **January 5, 2009 through February 28, 2011** are summarized below.

Item	Unit Cost		Quantity		Sub-total
Closure Cost (inc. 15% contingency)	$ 86,436.19		1		$86,436.19
Post-Closure Care	$ 0	per year x	0	years =	$ 0.00
				Total	**$86,436.19**

EPD acknowledges that **"Taft Recycling, Inc"** continues to participate in the interlocal agreement to provide a single financial assurance mechanism for both the Florida Department of Environmental Protection (FDEP) and Orange County. Per the interlocal agreement, the financial assurance mechanism must cover the greater of the closure, and of the post-closure, cost estimates approved by the FDEP and Orange County.

Please have the institution providing the financial assurance mechanism attach as appropriate to the financial instrument, a signed copy of the "Notification and Agreement" form, and forward to:

Solid Waste Financial Coordinator
Attn: Frank Hornbrook
Florida Department Of Environmental Protection
2600 Blair Stone Rd. MS 4565
Tallahassee, Florida 32399-2400

This approval does not relieve the facility owners or operators from the responsibility of complying with any federal, state, or local laws or regulations. Thank you for your interest in proper waste management in Orange County. If you have any questions, please contact David Bromfield at (407) 836-1527.

Sincerely,

Lori Cunniff

Lori Cunniff
Manager
DB/AM:rb

c: Arnaldo Mercado, Program Development Supervisor, EPD
David Bromfield, Engineer III, EPD
Mike Kaiser, Vice President, Environmental Management & Engineering, U.S. Waste Services, Inc., JED Solid Waste Management Facility
1501 Omni Way, St. Cloud, Florida 34773
Solid Waste Financial Coordinator, Attn: Frank Hornbrook
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 4565, Tallahassee, FL 32399-2400