



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

By E-Mail

mkaiser@wasteservicesinc.com

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

OCD-SW-10-0092

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

WACS ID # 87104

Dear Mr. Kaiser:

The additional information dated February 11, 2010 and received by the Department on February 15th, 2010 was reviewed. The items listed on the attached page remain incomplete. Evaluation of your application will continue to be delayed until all the requested information has been received.

Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Accordingly, please provide the additional information within 30 days of the date you receive this letter. Submit three copies of the requested information to the Department and reference the above permit application number in your correspondence. Also, an electronic version of the submittal would be appreciated.

If you have any questions, please contact George Cheryan or Sandeep Janwadkar at (407) 893-3328 or by e-mail at Geroge.Cheryan@dep.state.fl.us, or Sandeep.Janwadkar@dep.state.fl.us.

Sincerely,

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

Date: March 9, 2010

FTL/GC/sj

CC:

James E. Golden, P.G. – HSA Golden, Inc. jgolden@hsagolden.com

Jeff Wild, P.E. – HSA Golden, Inc. jwild@hsagolden.com

David Bromfield, P.E. – OCEPD, david.bromfield@ocfl.net

Lori Cuniff, - OCEPD, lori.cuniff@ocfl.net

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Frank Hornbrook – FDEP Tallahassee
Fred Wick – FDEP Tallahassee

Note that all references to "Report" in the following text refer to the document entitled, "Taft Recycling, Inc. TS/MRF-WPF, Response to First Request for Additional Information", Prepared by: HSA Golden 100 East Pine Street Suite 605, Orlando, FL 32801 dated February 11, 2010.

1. The closure cost estimates must be prepared based on the worst case scenario of the amount of wastes that might be present at your facility at any given time. The waste amount would be the maximum amount the permit allows to be at the site. In your response to Comment No. 7 of the first RAI dated November 17, 2009, you have submitted a total closure cost estimate of \$86,436.19 (Table 1, Opinion of Probable Closure Costs). Column 2 in this Table 1 lists the Maximum Storage quantities in tons. The solid waste permit if and when issued shall include a Specific Condition that will limit the maximum quantities of materials stored at the facility as listed in Column No. 2 of Table 1.

2. Additionally, the Department has the following comments related to maximum storage quantities and the unit costs listed in this Table 1:

- a. Page 3 of the revised Operation Plan dated February 2010 submitted in response to Comment No. 3 of the first RAI dated November 17, 2009: Section 2.2.1 titled "Waste Quantity Projections" states that estimated demands may include managing approximately 1000 tons per average operating day of Class I and Class III waste, with a maximum of 1,500 tons per day. However, Table 1, Column 2 lists unprocessed Class III waste of 376 tons and unprocessed Class I waste of 619 tons. Adding these two quantities (i.e., 376 tons and 619 tons) totals 995 tons which is less than maximum quantity of 1,500 tons listed in the Operation Plan. Correct this discrepancy in the Material Disposition Table dated October 2009 presented in Appendix B and update the closure cost to reflect the maximum quantities of the unprocessed Class I and Class III wastes.
- b. There appears to be a math error in your estimate of the tons of Recycling Residuals (lists 15 tons instead of 50 tons) presented as item 15 in Table 1. The material disposition table dated October 2009 presented in Appendix B of your permit renewal application titled "Waste Tire Processing Facility Permit Application" and dated October 2009 indicates recycled residuals maximum storage volume of 100 cy, and a density 1000 lbs/cy which equates to 50 tons instead of 15 tons. Submit the corrected Table 1.
- c. Table 1, items 5 and 6 includes costs for baled recovered cardboard and recovered paper. The worst case scenario for facility closure cost may include recovered cardboard and paper that are left unbaled. Confirm that the unit loading, transportation, and disposal (\$/ton) cost applied for the baled product would also be applicable to the unbaled recovered cardboard and recovered paper. If is not, change Table 1 by assuming the cardboard will not be baled and use the appropriate cost factors.
- d. Your permit renewal application titled "Class I & III Waste Processing Facility, Taft Recycling, Inc. Taft, Florida" dated December 2005 and received by the Department on December 15, 2005 in Attachment E titled "Financial Assurance" included Table titled "Opinion of Probable Closure Costs" signed by James T. Show, P.E. of HSA Golden Consultants. This table included the following waste streams: 1) Yard Trash (40 tons); and 2) Class I Reject (140 Tons). However, these waste streams were missing in the Table 1 of the Response to Comment No. 7 of the Department First RAI dated November 17, 2009. Clarify if these waste streams are being stored or processed at the facility. If yes, then update the closure cost estimate to include these quantities.

Submit the revised closure cost estimate to include responses to all comments. This closure cost estimate must be signed and sealed by a Professional Engineer licensed in the State of Florida.