

December 6, 2000

VIA FAX

Joe Lurix, Engineer Southeast District Florida Department of Environmental Protection P.O.Box 15425 West Palm Beach, FL 33416

Re:

Fire Inspection

Dear Joe.

Enclosed is a copy of the fire inspection report prepared by Lt. Lowell J. Nance on our facility. In addition, I am enclosing a letter received from Capt. George H. Emerson III of the St. Lucie County Fire District accepting our recently revised Emergency Preparedness Plan. This constitutes the department's approval of Florida Tire Recycling's fire control plan which was one of the items enumerated in the consent agreement.

I am Also forwarding under separate cover a copy of the Emergency Preparedness Manual for your files.

Sinverely

Chief Executive Officer

DLQ:ms Enc.

LT. LOWELL J. NANCE 3006 W, DEER RUN AVE OKEECHOBEE, FL 34974 561/597-4672

December 4, 2000

Mr. Joe Lurix, Engineer Solid Waste Section Department of Environmental Protection Southeast District P.O.Box 15425 West Palm Beach, FL 33416

Re:

Florida Tire Recycling, Inc.

Port St. Lucie, FL

Dear Sir,

I have inspected Florida Tire Recycling's facility in Port St. Lucie, Florida to determine compliance with the relevant sections of NFPA 231D published by the National Fire Protection Association. I found Florida Tire Recycling, Inc. in compliance with all relevant sections of NFPA 231D. In particular, I noted the following:

- The only whole tires at the site are those that have recently arrived and are waiting processing. Note however that there are two cells of whole tires which are larger than 1200 x 20 in size and thus, I am advised, are exempt from FDEP regulation.
- 2. There are several cells of shredded material that are configured so as to meet fire control regulations. The area around these cells has been scraped to bare earth so as to minimize the potential for fire to migrate from cell to cell by igniting loose tire shreds lying on the ground. The distance between the storage cells has be maintained at no less than fifty feet. The east/west roadway through the center of the property has also been scraped.
- The roadway along the southern and southwestern property lines as well as the east/west roadway through the center of the property are readily accessible to fire fighting equipment. As noted above, fire lanes are maintained between the storage cells.

- 4. Florida Tire Recycling completed a revised Emergency Preparedness Manual in June 2000 and has provided copies of the manual to the St. Lucie County Fire District fire marshal as well as the nearest fire station.
- 5. The company has installed a "dry hydrant" at the suggestion of the St. Lucie County Fire District. The purpose of the dry hydrant is to provide a universal connection for fire trucks to be able to connect to for the purpose of obtaining water from the large pond on site.
- 6. The company has purchased and placed in inventory a large quantity of F-500 suppressant agent, which is represented by the manufacturer to be formulated specifically for control of fires involving waste tires. Manuals and a training video on F-500 have been provided to the St. Lucie County Fire District.

As a point of reference, I am a lieutenant with the Martin County Fire and Rescue Department, having been associated with that organization for the past 14 years. During that time I have been fully trained in all aspects of fire control and prevention.

To close, please feel free to contact me should you have any questions.

Sincerely

Lt. Lowell J. Nance

LJN:sb

CC: Fire Tire Recycling, Inc.