

Florida Tire Recycling, Inc.

10 The Kah	n From Skip Robinson
© FOEP	Co. FTR
Dept.	Phone #

(VIA FACSIMILE TRANSMISSION 407-467-2325)

March 1, 1994

Captain Fred Vaughn ST. LUCIE COUNTY - FT. PIERCE FIRE DEPARTMENT PO Box 3030 2400 Rhode Island Avenue Fort Pierce, FL 34948

RE: FIRE PLAN REVIEW

Dear Captain Vaughn,

Thank you for returning my calls yesterday after several missed attempts on both of our parts (telephone tag).

I write now to acknowledge our conversation of yesterday in which you confirmed that you had received our Site Plan and Emergency Manual, had discussed the same with Captain Sessoms and feel "comfortable" with the material.

Further, I understand from you that until such time as you receive a copy of the State's Plan, you are unwilling or reluctant to formalize a response to the review process which we have requested.

As I explained during our conversation, we are currently operating under a court ordered Stipulation which requires that we, "prepare a fire plan acceptable to the St. Lucie County Fire District that describes the detail of fire fighting resources available to fight a fire at the FLORIDA TIRE site. The Fire Plan shall be submitted to DEP within 30 day of entry of the Stipulation order period". Since the Stipulation was entered on January 14, 1994, the FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION has cited us as being in non-compliance because we have not received a notice of your acceptance of our plan.

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Therefore, it is our hope, that notwithstanding the FDEP'S failure to supply you with the State's plan, you and the appropriate people at the Fire Department will review the material and provide some response to our request for direction and assistance.

Thank you for your review of this material.

Sincerely,

Skip Kobinson

FLOR DA TIRE RECYCLING, INC.

cc: Joseph Kahn, PE

James R. Brindell, Esquire

EMERGENCY PREPAREDNESS MANUAL

for

FLORIDA TIRE RECYCLING, INC. 9675 Range Line Road Port St. Lucie, FL 34987

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PERSONS TO NOTIFY IN EVENT OF FIRE OR OTHER EMERGENCY

ST. LUCIE COUNTY-FT. PIERCE FIRE DEPARTMENT FIRE STATION #3			911 871-5461
PAUL GRIFFIS	OPERATIONS MANAGER	HOME MOBILE PAGER	466-1059 595-7895 871-3871
SUSAN K. WILSON	PRESIDENT	HOME MOBILE MOBILE	595-1953 595-7902 595-7900
PORT ST. LUCIE POLICE DEPARTMENT			911 871-5000
FLORIDA DEPARTMENT (SOUTHEAST D			7-433-2560

II. TYPE OF EMERGENCY

The primary emergency of special concern at FLORIDA TIRE RECYCLING, INC. is fire to the waste tire material located on the property.

Prevention and early detection is paramount to minimizing the effect of this event. FTR operates 7 days/week 12-16 hours/day. Employees are trained to be ever vigilant to detect and report a fire. Each employee is informed as to the procedure to follow (see III) if fire is discovered.

During non-business hours, FTR'S outside security force monitors the entire site. This force is equipped with a cellular augmented telephone system and is instructed to notify the St. Lucie County-Ft. Pierce Fire Department immediately upon detection of a fire and to follow the procedures in section III.

III. PROCEDURE TO FOLLOW FOR FIRE

- 1. DIAL 911 to notify fire and police departments. Tell them to respond to 9675 Range Line Road, off Glades Cut-Off Road ... give directions.
- 2. SPREAD THE ALARM LOCALLY: Notify all employees on job site... activate FTR'S Quick Response Fire Battalion.
- 3. Remove customers and non-essential employees from the vicinity of the fire.
- 4. Call FDEP at once: 407-433-2560

FTR is developing a Quick Response Fire Battalion under the supervision of its foreman, Paul Griffis. This fire team is training in the use of equipment which includes: (a) 2 self contained six wheel drive, all terrain 1000 gallon fire tank trucks one of which is equipped with foam and which can reach any area of the property on the currently installed roads in any weather conditions; (b) 2 six yard front end loaders; (c) 2 20 yard end dumps; (d) miscellaneous hose and hand tools.

In the event of fire, and at the same time the St. Lucie County-Ft. Pierce Fire Department is contacted, one front-end loader will be dispatched immediately to the adjacent business, ALLIED UNIVERSAL CHEMICAL/MIAMI TANK, where it will hook to the rail cars and tow them out of harm's way, approximately 200 yards down the spur track. FTR has secured permission from its neighbor, ALLIED UNIVERSAL CHEMICAL to execute this plan.

At the same time, the other loader together with the Fire Battalion will be dispatched directly to the fire area itself. Once there, these individuals, specifically trained for this circumstance, will use the equipment to segregate and contain the fire material and apply water and foam as necessary with the goal of arresting within the first minutes any fire that might occur.

As time continues, the personnel and equipment will be used to continue to move or separate material from the rubber which is involved in the fire in order to prevent the ignition of additional material. The Battalion will also attempt to berm the fire area to prevent run off from spreading to other areas of the property.

When the loader that has been dispatched to move the rail cars has completed that task, it will return to assist the Fire Battalion, the other front end loader and the 2 end dumps in removing unaffected material from the burn site and in berming the burn site to prevent the spread of run-off.

Once the St. Lucie County-Fort Pierce Fire Department arrives management of the fire fighting effort will be turned over to them, and a plan coordinated with the Department will be implemented. FTR's equipment and personnel will be available to the Fire Department for further containment and/or suppression.

Management will provide a containment pond/lake on the property for use by the Fire Department and adequate to supply a minimum of 510,000 gallons.