

Florida Tire Recycling, Inc.

January 26, 1994

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

RE: SITE PLAN

Dear Captain Vaughn,

I was disappointed your were unable to conduct the site inspection scheduled for this week. However, as per your request please find enclosed a copy of the Site Plan drawn by our engineer, Joe Friscia, and indicating the contemplated location for shredded material, a containment pond, a drafting pit and access roads.

I have also enclosed a draft copy of our Emergency Fire Plan. Please review both of these documents and if possible give us the benefit of your Department's comments.

I look forward to speaking to you and as always to working with the Department.

Sincerely,

Skip Robinson

FLORIDA TIRE RECYCLING, INC.

encl.

EMERGENCY PREPAREDNESS MANUAL

for

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

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I. PERSONS TO NOTIFY IN EVENT OF FIRE OR OTHER EMERGENCY

ST. LUCIE COUNTY-FT. PIERCE FIRE DEPARTMENT FIRE-STATION-#3			911 871-5 461
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 OF ENVIRONMENTAL PROTECTION (SOUTHEAST DISTRICT)			407-433-2560

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

this provision, shall be submitted to DEP within 30 days of the entry of the Sipulation Order.

FIRE PROTECTION MEASURES

- C. Within 30 days of entry of the Stipulation Order, Florida Tire shall implement the fire control measures required by subsections C.1., 2., 5., 6., 7., and 8. The onsite water system required by subsections C.3 and 4 shall commence implementation within 15 days of receipt of all necessary permits and shall proceed to completion within 90 days of receipt of all necessary permits.
 - Minimize probability of ignition.
 - (a) The tire and waste tire storage area must become a no smoking area.
 - (b) All flammable and combustible liquids must be segregated and stored in appropriate containers and configurations.
 - (c) Spark arresters must be placed on all internal combustion equipment.
 - (d) Cutting (other than shredding or chopping of tires), welding, heating devices, and open fires must be prohibited in the tire and waste tire storage area.

2. Site Security.

- (a) Security shall be provided each day from the close of business to the opening of business by personnel holding a Class "D" license pursuant to Section 493.6301, et seq. The mission of these personnel is to regularly survey the site for fire, intrusion, or unsafe practices and to report such incidents to Florida Tire and DEP.
- (b) Installation of a control gate at the southern access road.

- (c) Installation of perimeter lighting along the Range Line Road boundary of the Florida Tire site and which maintains a minimum light value of 5 foot candles at any given point along the perimeter using either halogen or fluorescent lighting.
- (d) An enclosed operations area shall be provided for the security personnel Fixed and portable telephones shall be provided for the security personnel.
- 3. Site fire protection systems must be installed. A method to integrate fire department motorized fire pumps into the water delivery system must be designed, developed and implemented. The design shall be acceptable to the St. Lucie County Ft. Pierce Fire District.
- A water supply and distribution system must be 4. designed and developed to insure the ability to deliver 1000 gpm to any location in the site after the first 30 minutes. After 60 minutes, the gpm delivery shall be demonstrated 2000 gpm to distribution points a minimum of 300 feet from any point, and a maximum of 600 feet from any point on the site for the next 3 hours at a pressure which meets the requirements of the St. Lucie County - Ft. Pierce Fire District. More than distribution point may be used to meet this requirement. Also, the equipment of the St. Lucie County - Ft. Pierce Fire District may be included in the design and development of the water distribution system. The water supply can be in the form of a single properly designed containment area or a combination of containment and well pumps. All design proposals must be proven designs developed by a licensed engineer and/or professional geologist operating within their declared area of expertise. Immediately upon the detection of a fire in the tire material, Florida Tire shall notify the St. Lucie County-Ft. Pierce Fire District. During the first 30 minutes after a fire is detected in the tire material, Florida Tire shall respond by deploying the two motor vehicles required by subparagraph C.5., below, to the location of the fire and applying the water and fire suppressant to the

- fire. A front-end loader shall also be deployed to the scene to reduce the amount of tire material which is accessible to the fire.
- Two motor vehicles must be proposed and 5. obtained to deliver the first attack at a fire event. The vehicles must carry at least 700 gallons of water, and deliver extinguishing agent at a maximum rate of 300 gpm. A method of treating the extinguishing agent with an additive, like AFFF, shall be provided. At least 60 gallons of either a foam product or a chemical extinguishing agent must be carried on board one of the vehicles. The vehicles must have at least two 1½ inch hose lines, each 150 feet long to be connected to said vehicles. A hose reel with 250 feet of 1 inch line must be provided. A self-contained fire pump shall be provided on the vehicles. It shall be liquid fuel driven and include all piping and apparatus required to safely control water flow to the hand lines. vehicles shall carry adequate equipment and fittings to supply two 2 1/2 inch hand lines for use by other than the two vehicles. The platform on which this fire control assembly is built must be quickly and reliably transported to the scene of the fire on site and shall be immediately deployed to the scene of the fire.

Either as part of these vehicles, or as part of another vehicle, adequate soft hose line must be provided in order to supply the main attack assembly at the scene of a fire on site. This hose is intended to attach to an on site water distribution system.

- 6. A training program shall be developed to insure the personnel on site are capable of transporting the fire attack equipment to the site of a fire event on the site. This training-shall include driver training for the motor vehicles, and operation of the fire pump, hose lines, and other equipment.
- 7. Compile a resource list of at least five front end loaders, five 10-wheel dump trucks, and five bulldozers, which may be deployed to the site within four hours of notification to the supplier. The list shall be provided to DEP within 30 days of entry of the Stipulation

- Order and shall list the source and location of the equipment.
- 8. Prepare a fire plan acceptable to the St. Lucie County-Ft. Pierce Fire District that describes in detail the firefighting resources available to fight a fire at the Florida Tire site. The fire plan shall be submitted to DEP within 30 days of entry of the Stipulation Order.

SITE STABILIZATION

D. Within 180 days of entry of the Stipulation Order, Florida Tire shall reconfigure the whole and shredded tires on site into a series of piles which do not exceed 50 feet in width, 15 feet in height and 10,000 square feet, with a 50 foot wide fire lane placed around the perimeter of each waste tire pile and which are consistent with Rules 17-330, 40E-4, 40E-40, and 17-312, Florida Administrative Code.

The stabilization of the site shall be accomplished in the following order and schedule:

- 1. Clear tires and shreds from a 50' perimeter around the site to allow required equipment access for installation of perimeter roadway within 30 days of entry of the Stipulation Order.
- 2. Clear fire lanes 1, 2 (including removal of T-12 and T-14), and 3 as identified in Appendix A to divide the shred pile into smaller segments within 60 days of entry of the Stipulation Order.
- 3. Clear fire lane 4 to enhance separation between whole tire piles within 90 days of entry of the Stipulation Order.
- 4. Lower the height of each remaining shred pile segment to 15 feet or less, then clear an additional fire lane through the center of

