



Florida Department of Environmental Regulation

Southeast District • 1900 S. Congress Ave., Suite A • West Palm Beach, Florida 33406 • 407-964-9668

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Scott Benyon, Deputy Assistant Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAR 16 1990

St. Lucie County
Florida Tire Recycling, Inc.
Permit File

Mr. John J. Wilson, Secretary-Treasurer
Florida Tire Recycling, Inc.
10151 Range Line Road
Port St. Lucie, FL 34987

Dear Mr. Wilson:

Ref: Florida Tire Recycling, Inc. (FTRI)
Permit #WT 56-165345

Sub: Waste Tire Processing Facility
Response Letter Dated February 27, 1990

The Department acknowledges receipt of your letter concerning your facility. We will answer each of your responses in the same numerical order.

1. The amount of processed waste tires on-site was approximated by walking the length and width of both piles and multiplying these figures by the approximate height. Since you apparently have accurate figures, please provide them to this office for our concurrence with the methodology that you utilized to ascertain your amounts. Secondly, the weight per cubic yard of waste tires was given to us by the St. Lucie County Solid Waste Division from the tire chipping operation that occurred last year. Again, if you have more accurate weights, please provide this information as stated above. Thirdly, I disagree with your statement that the "...only disposal cost that Florida Tire would incur is the cost of transporting shredded tires to the St. Lucie County Landfill." This assumption is based upon the tire chips being a maximum size of four square inches. Again, our inspection revealed that greater than 95 percent of your tire chips are in excess of this size limit. We realize that you have ordered a second chipper to meet this maximum size limit for your benefit. Consequently, our current position is accurate regarding that FTRI would be charged \$37/ton for tire chips disposed of presently pursuant to Florida Administrative Rule 17-711.400(3)(a). After July 1, 1989, waste tires that have been cut into sufficiently small parts may be disposed of or used as daily cover at a permitted landfill. For use as daily cover, a sufficiently small part means that 70 percent of the waste tire material is cut into pieces of 4 square inches or less and 100 percent of the waste tire material is 32 square inches or less. Therefore, we believe that your estimated cost of closure for this site is inaccurate.

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2. Florida Administrative Rule 17-711.530(2) states that a waste tire processing facility may not accept any waste tires for processing if it has reached its storage limit. The storage limit for a processing facility is 30 times the daily through-put of the processing equipment used. In your application, you've stated that the maximum through-put is 50 tons/days. Therefore, the maximum storage is 1500 tons total. Be advised that we would not grant a permit modification to increase your through-put since you are not in compliance now.
3. You've acknowledged that you are in violation of your storage capacity dimensions pursuant to FACR 17-711.540(2)(b). Your prompt compliance in this matter would be appreciated.
4. Our comment on your storage facility was to bring your attention to the documentation that was supplied in your application. The Department issues permits based upon this information and reasonable assurances concerning our rules.

Again, we are looking for an amicable solution to resolve these issues. Any supportive documentation to give us reasonable assurances of your intent to comply would be helpful (ie: copies of cancelled checks for the "new chipper" from Cumberland and date of delivery). As stated, we will be reinspecting your facility during the first week of April.

Should you have any questions, please call me at telephone number (407) 964-9668.

Sincerely,



Joseph W. Lurix
Solid Waste Permitting

WL:jlh/33

cc: Ronald Sigmon, St. Lucie County
Carol Meeds, Enforcement, DER/WPB
Bill Parker, Solid Waste, DER/Tlh.