



Florida Tire Recycling, Inc.

(VIA FACSIMILE 407-465-0477 AND US MAIL)

June 20, 1994

Joseph Kahn, PE, Solid Waste Supervisor
SOUTHEAST DISTRICT
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
PO Box 15425
West Palm Beach, FL 33416

RE: YOUR INSPECTION SUMMARY DATED JUNE 9, 1994

Dear Mr. Kahn,

As directed, I write to "respond to each item of non-compliance and each item requiring clarification within 10 days of receipt" of your letter addressed to Susan K. Wilson and received June 13, 1994.

ITEM 10B

Through its engineer Joseph Friscia, FTR continues to attempt to secure permission from FP&L to accept the "temporary loop road". However, FP&L has taken the position that it wants no further construction in the easement beyond that associated with the MSSW permit application (the wet and dry detention area). Without such permission FTR cannot proceed.

Representatives of FP&L have expressed the sentiment that any other construction, especially a road such as the one we are proposing at the Department's direction creates a sense of permanency to the storage of shreds in the FP&L easement. Moreover, with the removal accomplished there would no longer be a need for an access road since it would serve no purpose.

It should be noted that there exists an all seasons access road created by FP&L which is located north of the shred pile, in the FP&L easement. This access road is currently passable, even in wet weather, by fire department type vehicles.

Since the shreds located in the easement are being aggressively moved from the easement as the Department has directed, and since the FP&L access road exists, and since FP&L will not agree to further road construction in the easement, it is FTR's suggestion that the FP&L fire road does for all practical purposes provide the access required - the practical requirement for which will disappear when the shreds are removed from this area, on or about July 14.

Providing An Environmental Solution

9676 Range Line Road • Port St. Lucie, Florida 34987 • (407) 465-0477 • FAX (407) 489-2124

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ITEM 10C 1 (C)

As indicated by the attached invoices from NAPA, spark arrestors have been purchased and were subsequently installed on the internal combustion equipment which operates in the vicinity of the waste tire material.

ITEM 10C 2 (A)

FTR continues to employ AMERICAN SECURITIES ASSOCIATES OF FLORIDA, whose personnel hold Class D licenses, to furnish security guards at FTR from the close of business to the open of business the following day on those days when FTR does not operate on a 24 hour basis (daily security logs are available for inspection).

ITEM 10C 2 (B)

At this writing the area which you refer to as the "southern access road" is not an accepted access road. FTR has been restrained from completing the area as an access road by an action brought by FDEP against FTR regarding the construction in this area. Since this road is a road under construction, construction which has been halted by the Department, it is premature to locate anything beyond a construction barrier until such time as there is a passable road. As representatives from FDEP have seen during previous site inspections, an access gate has been constructed and is ready to be installed at such time that the road becomes passable.

FTR has discussed this issue with representatives of FDEP on several occasions and understood that there was an agreement that a barrier preventing access to the area would be acceptable until such time as the road in fact becomes an operational road.

In fact, during a first visit by the Department, inspectors requested that FTR extend the barrier so that it more properly denied access to the road. This extension was completed within 48 hours of the request and has been in place since, except for those times when FTR at the direction of FDEP has returned to the area to clean shreds from the surface and adjoining areas of the road. Therefore, we are confused as to why the access gate continues to be an issue.

ITEM 10 C (8)

FTR continues to work with SLCFFCD with regard to its fire plan. As a result of a recent inspection by Captain Vaughn and Deputy Chief Sessoms (see enclosed letter dated June 7, 1994), FTR expects shortly to receive approval of its plan from SLCFFCD.

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Further, FTR did not interpret Captain Vaughn's letter of April 14, 1994 as a denial; rather, the Company accepted it as part of the process in working toward an acceptable plan. Captain Vaughn made several recommendations which have been followed by FTR.

ITEM 10 D (1)

As pointed out in the May summary, at various times the fire lanes and perimeter roads have been clear to the bare ground. However, since these same areas are part of the working roads for moving shredded material, especially material from the FP&L easement, and since from time to time, as a result of that moving of shreds, material drops from the front end loaders performing the removal and relocation work, it is not practically possible to keep these roads at all times clear of shreds. Frankly, FTR revisits these roads and clears them. But these are working areas and do not permit a surface totally clean of shreds until the reconfiguration is complete.

ITEM 10 D (2)

See above 10 D (1)

ITEM 10 E

FTR is confused by your suggestion that it has not removed an adequate tonnage of tires for the month of May. A review of the first page of the May summary, submitted on June 8th, together with the weekly reports (all of which are attached and which were provided to the Department at the close of each week) indicates that FTR has in fact exceeded the Base Removal Amount (BRA) for May by 12.13 tons. (Please see enclosed photo copy of adding machine tapes: shipped from the site, 3966.18 - BRA, 3954.05 = 12.13 tons).

If there are questions with regard to this material please call; I may be reached at 407-465-0477.

Sincerely,



Skip Robinson
FLORIDA TIRE RECYCLING, INC.

cc: James R. Brindell, Esquire

MONTHLY SUMMARY

FROM: 05/02/94 TO: 05/31/94

1. TONNAGE IN: 1854.05 - ^{us} 1784.39 - (69.66)
2. TONNAGE OUT: 3966.18 - 3623.43 - (342.73)
- a. WHOLE TIRES 95.52
- b. SHREDDED MATERIAL 3870.66
- COMPUTATION FORMULA: PASSENGER TIRES 20 LBS EACH; LIGHT TRUCK 40 LBS EACH; TRUCK TIRES 100 LBS EACH.
3. REMOVAL AND CONFIGURATION OF STORED MATERIAL:
SEE ATTACHED EXHIBIT A
4. FIRE FIGHTING; EQUIPMENT - TRAINING:
SEE ATTACHED EXHIBIT B
5. TRUST FUND: SEE ATTACHED EXHIBIT C
- A. DEPOSIT AMOUNT: N/A
- B. BALANCE: \$50,000 plus accrued interest from January 13, 1994.

FAX 0

0 * *

394.99 +

426.23 +

507.26 +

439.29 +

88.28 +

IU

1.854.05 *

1.854.05 +

Brw

2100.00 +

3954.05 *

0 * *

0 * *

977.20 +

965.81 +

930.21 +

688.60 +

404.36 +

OUT

3966.18 *

3966.18 +

3954.05 -

12.13 *

**TONNAGE REPORT
WEEKLY**

FROM 5/2 TO 5/7

INCOMING	5.2 MON	5.3 TUE	5.4 WED	5.5 THUR	5.6 FRI	5.7 SAT	TOTAL
BULK	66.71	46.96	11.77	54.75	69.03	X	249.22
PERIODIC	30.93	19.04	17.62	23.45	36.72	X	127.76
SCALE	.29		14.12	3.60		X	18.01
OTHER						X	
GRAND TOTAL	97.93	46.00	43.51	81.80	105.75		394.99
OUTGOING SHREDS	MON	TUE	WED	THUR	FRI	SAT	TOTAL
ORANGE WASTE RECYCLING	25.21	53.20	79.07	70.64	24.03	24.57	283.72
RELIABLE WOOD TO ORANGE WASTE	24.59	45.88	—	42.34	25.17	—	137.98
CHAMBERS	25.11	24.14	25.10	25.79	21.55	28.82	153.51
GA PACIFIC	139.05	44.46	66.61	43.08	87.89	—	381.09
WEST PALM							
OTHER							
GRAND TOTAL	213.96	167.68	170.78	188.85	161.44	53.39	956.30
WHOLE TIRES OUTGOING	MON	TUE	WED	THUR	FRI	SAT	TOTAL
PASSENGER	2.68			4.88			7.56
TRUCK			13.34				13.34
RIMS							
TUBES							
GRAND TOTAL	2.68		13.34	4.88			20.90

TOTAL IN 394.99 + (500 BRA) = 894.99

TOTAL OUT 977.20 + 82.21



**TONNAGE REPORT
WEEKLY**

FROM 5/9 TO 5/14

INCOMING	5.9 MON	5.10 TUE	5.11 WED	5.12 THUR	5.13 FRI	5.14 SAT	TOTAL
BULK	69.36	54.18	31.74	36.24	113.50	 	305.02
PERIODIC	17.91	28.01	18.26	17.10	35.83	 	117.11
SCALE	1.26		.13	1.10	1.61	 	4.10
OTHER						 	
GRAND TOTAL	88.53	82.19	50.13	54.44	150.94		426.23

OUTGOING SHREDS	MON	TUE	WED	THUR	FRI	SAT	TOTAL
ORANGE WASTE RECYCLING	47.13	48.56	—	83.20	84.02	29.81	295.02
RELIABLE WOOD TO ORANGE WASTE	—	46.00	23.82	21.49	21.82	—	112.63
CHAMBERS	25.37	31.85	30.75	28.06	32.89	30.19	179.11
GA PACIFIC	66.55	89.20	113.24	46.07	46.33	—	361.49
WEST PALM							
OTHER							
GRAND TOTAL	141.35	215.71	147.31	178.82	185.06	60.00	948.25

WHOLE TIRES OUTGOING	MON	TUE	WED	THUR	FRI	SAT	TOTAL
PASSENGER			5.8	11.20			17.00
TRUCK				.56			.56
RIMS							
TUBES							
GRAND TOTAL			5.8	11.76			17.56

TOTAL IN 426.23 + (BRA 500) = 926.23

TOTAL OUT 945.81

**TONNAGE REPORT
WEEKLY**

FROM 5/14 TO 5/21

INCOMING	5-14 MON	5-15 TUE	5-16 WED	5-17 THUR	5-20 FRI	5-21 SAT	TOTAL
BULK	66.19	47.42	41.41	72.43	109.31	 	336.76
PERIODIC	28.90	30.95	31.89	22.49	24.69	 	138.92
SCALE	6.74	7.15	.68	—	17.01	 	31.58
OTHER						 	
GRAND TOTAL	101.83	85.52	73.98	(94.92)	151.01		507.26

OUTGOING SHREDS	MON	TUE	WED	THUR	FRI	SAT	TOTAL
ORANGE WASTE RECYCLING	62.91	29.52	60.43	31.29	54.93	26.16	265.24
RELIABLE WOOD TO ORANGE WASTE	23.81	—	—	—	22.46		46.27
CHAMBERS	30.32	28.60	26.25	23.81	24.44	25.43	158.85
GA PACIFIC	44.21	109.80	131.13	45.61	92.45		423.20
WEST PALM							
OTHER							

**TONNAGE REPORT
WEEKLY**

FROM 5/14 TO 5/21

INCOMING	3.14 MON	5.17 TUE	5.18 WED	5.19 THUR	5.20 FRI	5.21 SAT	TOTAL
BULK	66.19	47.42	41.41	72.43	109.31		336.76
PERIODIC	28.90	30.95	31.89	22.49	24.69		138.92
SCALE	6.74	7.15	.68	-	17.01		31.58
OTHER							
GRAND TOTAL	101.83	85.52	73.98	94.92	151.01		507.26

OUTGOING SHREDS	MON	TUE	WED	THUR	FRI	SAT	TOTAL
ORANGE WASTE RECYCLING	62.91	29.52	60.43	31.29	54.93	26.16	265.24
RELIABLE WOOD TO ORANGE WASTE	23.81	-	-	-	22.46		46.27
CHAMBERS	30.32	28.60	26.25	23.81	24.44	25.43	158.85
GA PACIFIC	44.21	109.90	131.13	45.61	92.45		423.20
WEST PALM							
OTHER							
GRAND TOTAL	161.25	167.92	217.81	100.71	194.28	51.59	893.56

WHOLE TIRES OUTGOING	MON	TUE	WED	THUR	FRI	SAT	TOTAL
PASSENGER	3.00			11.59	7.09		21.68
TRUCK			14.97				14.97
RIMS							
TUBES							
GRAND TOTAL	3.00		14.97	11.59	7.09		36.65

TOTAL IN 507.26 + (BRA 500) = 1007.26

TOTAL OUT 930.21

**TONNAGE REPORT
WEEKLY**

FROM 5/23 TO 5/28

INCOMING	5-23 MON	5-24 TUE	5-25 WED	5-26 THUR	5-27 FRI	5-28 SAT	TOTAL
BULK	54.89	86.67	43.94	77.51	57.52		320.53
PERIODIC	26.10	36.96	18.26	11.38	16.62		109.32
SCALE	1.50		1.93	4.86	1.15		9.44
OTHER							
GRAND TOTAL	82.49	123.43	64.13	93.75	75.29		439.29
OUTGOING SHREDS	MON	TUE	WED	THUR	FRI	SAT	TOTAL
ORANGE WASTE RECYCLING	20.24	52.16	25.53	74.24	83.82		255.99
RELIABLE WOOD TO ORANGE WASTE	24.85	69.98	22.15	21.05	72.03		210.46
CHAMBERS	30.53	24.83	29.14	25.14	25.08	23.37	158.09
GA PACIFIC	—	—	22.84	—	23.22		46.06
WEST PALM	—						
OTHER	—						
GRAND TOTAL	75.62	146.87	100.16	120.43	104.15	23.37	670.60
WHOLE TIRES OUTGOING	MON	TUE	WED	THUR	FRI	SAT	TOTAL
PASSENGER	6.5			11.50			18.00
TRUCK							
RIMS							
TUBES							
GRAND TOTAL	6.5			11.50			18.00

TOTAL IN 439.29 + (814.500) = 1253.79

TOTAL OUT 688.60



MAR-

**TONNAGE REPORT
WEEKLY**

FROM 5/30 TO 6/4

INCOMING	5:30 MON	5:31 TUE	6:1 WED	6:2 THUR	6:3 FRI	6:4 SAT	TOTAL
BULK	—	67.59					
PERIODIC	—	18.61					
SCALE							
OTHER							
GRAND TOTAL		86.28					
OUTGOING SHREDS	MON	TUE	WED	THUR	FRI	SAT	TOTAL
ORANGE WASTE RECYCLING	—	82.17					
RELIABLE WOOD TO ORANGE WASTE	—	116.02					
CHAMBERS	—	22.62					
GA PACIFIC	—	181.14					
WEST PALM							
OTHER							
GRAND TOTAL		401.95					
WHOLE TIRES OUTGOING	MON	TUE	WED	THUR	FRI	SAT	TOTAL
PASSENGER	—						
TRUCK	—	2.41					
RIMS	—						
TUBES	—						
GRAND TOTAL		2.41					

TOTAL IN 86.28 + (100 BRA) = 186.28

TOTAL OUT 404.36

+218.08



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 RETURNS MUST BE MADE WITHIN 10 DAYS AND MUST BE ACCOMPANIED BY THIS INVOICE**

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FLORIDA TIRE RECYCLING, INC.
 10151 RANGE LINE ROAD
 PORT ST. LUCIE FL 34987
 66-04-017592-80

CUSTOMER # 02646
 PH #407 465 0477

CHARGE INVOICE #10607-1
 CODES: 2B
 DATE: 02/17/94
 8:25 AM PAGE 1A

QTY	LINE	PART NUMBER	DESCRIPTION	CORE	LIST EACH	YOUR COST	EXTENSION	TAX
2	SM-	21579	SPARK ARRESTOR		113.17	69.14	138.78	X
2		21582	SPARK ARRESTOR		154.44	94.83	188.70	X
2		21584	SPARK ARRESTOR		188.14	114.95	229.90	X
A/R CHARGE		:\$ 556.00						
6					455.75	278.44	556.88	
TOTAL UNITS		PARTS		LABOR		TOTAL		TOTAL TAX
		RCVD BY: X		DATE: 02/17/94		PAY THIS AMOUNT		556.88