

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
JUL 21 2008
SOUTHWEST DISTRICT
TAMPA

OPERATIONS PLAN
For:
GLOBAL TIRE RECYCLING OF SUMTER COUNTY

1.0 Introduction

This Operations Plan for Global Tire Recycling of Sumter County has prepared as shown in the bottom left corner of the document and is effective that date. This document is meant to be an all inclusive plan and supercedes all previous documents, including the most recently approved document dated and submitted March 7, 2003, and the most recently submitted document dated April 2008.

2.0 Facility Description and Design

The facility is located at 1201 Industrial Drive; Wildwood, Sumter County, Florida. The site consists of one building, in two parts. The larger portion of the building is used for processing the used tires and the smaller portion is used for offices. In addition, an enclosed Crumb Rubber Hopper and storage containment units exist. The Site Plan, showing the as-built condition, was originally dated 4/1/98 and was prepared by Robert L. Rogers Engineering Co. Inc.. This figure was submitted to the FDEP as Figure 1 of 1 in April 1998. An updated Site Plan was submitted as Sheet 1 of 1, prepared by Robert L. Rogers Engineering Co. Inc., and was dated April 16, 2003. A new Site Plan is included herewith in this submittal. Also, a reduced Site Storage Plan is included with this Section for ease of use by the regulatory inspector.

The facility, which is within the city of Wildwood Willard Peebles Industrial Park, is not within 200 feet of any natural or artificial body of water, including wetlands. Rogers Engineering submitted a certification letter, dated March 7, 2003, that the area was inspected and that no water bodies, potable water wells, or wetlands were within 500 feet of the site. Pursuant to a site review by a Professional Engineer, this includes all new outside areas used for storage as of 2008.

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An updated Boundary & Topographical Survey plan, dated 4/15/08, has been completed and was included in the April 2008 Permit Renewal Submittal.

The Site Grading Plan (Sheet 4 of 5, dated 8/27/97 by Robert L. Rogers Engineering Co.) was previously filed with the FDEP as part of Attachment D to the Waste Tire Processing Permit Application dated 1/12/98 and indicated that outside elevations are such as to direct liquid runoff from any potential waste tire fire away from the perimeters of the site and away from any water body.

Production and storage areas are on, or surrounded by, concrete or asphalt paving. Other landscaped areas will be maintained so as to minimize risk of fire.

An attendant or guard shall remain on duty at the gatehouse, or at times in other locations, during all hours of operation, and at all times that the access gate is open. At present, an attendant is on premises 24/7.

3.0 Facility Operation

The facility is operated as a tire recycling facility and as such has numerous stages of operation, including receiving of waste product, storage of product, processing of product, removal of non-rubber materials, storage of processed materials, and removal of processed materials.

3.1 Process and Products

A confidential Process Description document was submitted with the 1998 application as Attachment H. An updated document was submitted as Attachment H in the 2003 permit renewal application, and was dated February 25, 2003 and revised May 2, 2003. Due to confidentiality and proprietary information, this document is not being re-submitted.

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3.2 Processing Equipment

Global Tire Recycling's Production Equipment Book was submitted with the 1998 application as Attachment I and Attachment C, respectively. Attachment I of the 2003 Application included the Production Equipment Book with Equipment List Index/Horsepower, Electrical Specs and Capacities/Manning Table. The document dates were February 13, 1998 with revisions March 10, 2003, May 9, 2003 and May, 2003. These documents are referenced herein as the current documents with no changes since the last submittal. The equipment and layout of that equipment remain unchanged. Figures previously submitted showing the processes involved included the following prepared by Riddle Consulting Engineers, dated 9/16/07:

FIGURE #	TITLE
A-1	Overall Floor Plan
A-2	Office Floor Plan
A-3	Bath/Break/Lab Floor Plan
A-4	Exterior Elevations
E-1	Office Power Layout Plan
E-2	Office Lighting Plan
E-3	Production Area Lighting Plan
E-4	Production Area Power Plan
E-5	Panel Schedules
E-6	Fixture Schedules/Riser Diagram & Instructions to Contractors
E-7	Parking Lot Lighting Plan
M-1	Reflective Ceiling Plan
M-2	Production Area Fire Protection Plan

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FIGURE #	TITLE
M-3	Office Fire Protection Plan
M-4	HVAC Plan
P-1	Production Area Plumbing Plan
P-2	Office Plumbing Plan
S-1	Foundation Plan
S-2	Typical Section and Details

3.3 Waste Process Description

The facility consistently processes approximately 32 million pounds of tires annually. The scrap rate is approximately 34% for 10.88 million pounds of scrap. The scrap composition is consistently 22% wire/rubber and 12% fiber/rubber. These residuals are loaded into open-top bulk containers for sale or disposal, or loaded into roll-off containers to be hauled off by Waste Management to its Bayside facility, or the County Road 33 Facility.

3.4 Daily and Annual Throughput

The maximum daily throughput of the system is 4,000 pounds of crumb rubber finished product per hour, or 96,000 pounds of crumb rubber finished product per 24 hour day. With a 34% scrap rate, 142 tons, or 1420 whole passenger tire equivalents (PTE's), can be processed in each 24 hour period.

The planned throughput is approximately 39.36 million pounds.

3.5 Operational Compliance

The Global facility does receive tires from the general public, in addition to Florida FDEP-registered waste tire collectors or holders of Florida waste tire processing permits. Both are

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allowed to dispose of tires at the Global plant. A sign is posted at the entrance to the facility stating the operating hours, costs of disposal, and site rules.

No open flames will be allowed within 25 feet of any waste tire pile, and signs will remain posted within and outside of the plant near the live floor hoppers to remind all employees and visitors of this requirement. The machine shop area occupies the southwest section of the plant and is the area where welding equipment is stored. No scheduled welding is performed at this location, as that task is contracted out. Should on-site welding or emergency repair be necessitated, all waste tires and residuals will first be removed beyond 25 feet. The City of Wildwood Fire Chief reviewed and approved the fire safety and protection plans. Fire safety survey/inspections are performed on an annual basis. In the event of a fire or other emergency, Global will contact the Department's Emergency Response contact at 800-320-0519, with a follow up written report.

Copies of the Emergency Preparedness Manual are kept on file at the facility in the foreman's office, as well as at the corporate offices in Miami, Florida. Record keeping is in accordance with Chapter 62-711.530(4) and (5) and by the Quarterly and Annual Waste Tire Processing Facility Reports. Additional record keeping requirements of OSHA 29CFR1910.20. The facility maintains a land line phone system, as well as having key personnel equipped with cellular phones in order to assure communication with the fire department if necessary.

By having exposed tires only in Moving Zones, no tires with potential water inside will remain outdoors in the open long enough to be a potential breeding ground for mosquitoes. No food or organic matter will be permitted in or near the moving zones so as to not attract vermin.

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All roadways within Global's property will remain passable for motor vehicles. Industrial Drive will never be used as a staging or waiting area. A 50' fire lane will be maintained at each tire pile, with unobstructed emergency equipment access. Access to the site will be controlled by fencing around the perimeter with a locking gate observed by the gatehouse attendant.

All outdoor waste tire piles, chip piles (height not to exceed 8') and moving zones will not exceed 50' width x 15' height and 10,000 square feet of surface area. Production and storage areas will be only on concrete or asphalt surfaces.

Regarding indoor storage, an area north of the Grizzly granulator is designated for temporary storage of a small number of good used tires culled for resale. This area will never exceed 20 feet in width. Only one indoor storage area exists, for permanent or continuous storage, Area E, and any aisles will maintain a minimum 8' width. The maximum height of indoor storage is 5 feet. The eave height on the west side of the building is 21 feet, and 24 feet on the east side/ The sprinkler system piping and sprinkler deflectors are set higher than 18 feet from the finished floor. The production area is not heated. Ventilation is supplied by fresh air intake louvers and exhaust fans. If it becomes necessary to provide radiant space heaters during cold weather, they will be placed more than 3 feet from any storage area or other flammable materials.

An automatic sprinkler system was installed in compliance with "The Standard for Storage of Rubber Tires", NFPA 231D, and specifically in accordance with NFPA #13 Standards, all materials conforming to specifications set forth in Chapter 2, NFPA #13 edition. The Production Area Fire Protection Plan (No. M-2) and the Office Fire Protection Plan (No. M-3), both dated 9/16/97 by Riddle Consulting Engineers were previously submitted as part

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of Attachment B to the Permit Application date 2/12/98.

The level of tire chips stored in Global's temporary chip storage area will be maintained at a level of 4 - 5 feet and will never exceed 8 feet in height.

All residuals are contained in 30 cubic yard dumpsters and are hauled off by Waste Management to their Bayside Landfill in Ocala, Florida.

4.0 Annual Accumulation

During full scale production, 100% of its annual accumulation of waste tires is removed via processing into saleable crumb rubber and residual.

5.0 Facility Operations Modifications

Due to the necessity of expanding staging areas, additional areas have been designated as exterior staging areas. All staging areas are on impervious surfaces within security-controlled areas. Additional staging areas include:

- 5.1 Front Parking Area:** The parking lot area to the east of the office will be utilized as a process materials storage and staging area. Refer to the Site Plan dated July 16, 2008 for details (Figure A2L-1). The maximum quantity of storage will be approximately 1,000 tons (calculated at 935 tons) in palletized supersack bags. Storage time will be approximately 6 months. The storage area will consist of an area 70' x 220' with rows being 17 deep and 55 wide.

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5.2 Area F:

The area to the immediate west of the manufacturing building between the building and the hoppers will be utilized as an outdoor storage and staging area for the temporary placement of waste tires as they enter the facility. These tires will then be taken from this location and placed into the hoppers for processing. This storage and staging area will only be utilized as short-term staging as tires come into the facility and before they can be processed. Refer to the Site Storage Plan, Figure A2L-1S dated July 16, 2008 for details. This area will be delineated using barricades that will consist of painted lines along the sides of the boundary area. The total maximum number of tires stored and staged in this area is estimated at 6220. The total area will be approximately 40' x 70' with a maximum height of approximately 6' at the peak.

5.3 Area J:

The area to the immediate north of the manufacturing building. Due to trucking schedules, processed material cannot always be picked up timely. Therefore, a wire or fiber storage area will be located along this area as well as rolloff containers to temporarily store wire, fiber and trash prior to pick and removal. A rolling direct load trailer will be located in this area to load waste and recyclable product for pickup by truck as scheduling permits. Refer to the Site Storage Plan, Figure A2L-1S dated July 16, 2008 for details. The configuration shown on the drawing is but one option of actual use. All, none or some of the rolloffs, trailer and pile

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may exist at any one time. Typically as many as three (3) 30 cy rolloff containers may be used on site and two (2) semi-trailers. Wire or fiber storage will be loaded directly into semi tractor trailers, super sack bags, or 30 cy rolloff containers. The maximum storage time will be 48 hours. The actual storage area for wire and/or fiber will be a 12' x 50' area, unless dumpsters are present at that time. Wire and fiber will only be stored on the ground temporarily prior to loading. Refer to Figure A2L-1S for estimate of quantities in this area.

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PERMIT RENEWAL APPLICATION

For

Global Tire Recycling of Sumter County

July 2008

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
JUL 21 2008
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Referenced and Application Documentation

The following documents are incorporated by reference into the July 2008 Permit Renewal Application:

1. Waste Tire Processing Permit Renewal - Global Tire Recycling of Sumter County, Inc., and supporting information prepared by Robert L. Rodgers Engineering Co., Inc., dated January 14, 2003.
2. Additional information prepared by Robert L. Rodgers Engineering Co., Inc., dated March 7, 2003.
3. "A Site Plan for Global Tire Recycling of Sumter County, Inc. - Storage Area Locations, Sheet 1 of 1", prepared by Robert L. Rodgers Engineering Co. Inc., dated April 16, 2003.
4. Additional information prepared by Robert L. Rodgers Engineering Co. Inc., dated May 2, 2003.
5. Additional information prepared by Global Tire Recycling, dated May 9, 2003.
6. Aerial Photo, City of Wildwood and Sumter County Zoning Documents, Building Permit Issued by the City of Wildwood, received February 13, 1998 (updated Aerial Photo, dated March 29, 2000, received March 10, 2003).
7. Global Tire Recycling of Sumter County Inc. Project Drawings, prepared by Riddle Consulting Engineers, dated September 16, 1997, with revised Drawing A-1 "Overall Floor Plan", revised by Robert L. Rodgers Engineering Co., Inc.
8. System Layout Drawing, prepared by Dave Jensen, Inc., dated April 15, 1995, revised by Robert L. Rodgers Engineering Co., Inc.
9. Surveyor's Wetlands, Water Bodies and Well Certification, prepared by Robert L. Rodgers Engineering Co. Inc., dated March 7, 2003 and Florida DEP Storm Water Runoff Permit and Application, dated September 26, 1997.
10. Emergency Preparedness Plan, prepared by Global Tire Recycling, dated November 20, 2002.

11. Process Description, prepared by Robert L. Rodgers Engineering Co. Inc., dated February 25, 2003 and revised May 2, 2003.
12. Production Equipment Book with Equipment List Index/Horsepower, Electrical Specs and Capacities/Manning Table prepared by Robert L. Rodgers Engineering Co. Inc., dated February 13, 1998 with revisions received March 10, 2003, May 9, 2003, and May 10, 2003.
13. Warranty Deed, received February 13, 1998.
14. Exhibits to Global Tire Recycling of Sumter County, Inc., WTPF Permit Application Addendum Dated 4/17/98, with revised Exhibit K " Addendum to Process Description" prepared by Robert L. Rodgers Engineering Co. Inc., received May 9, 2003.
15. Global Tire Recycling Inc. Chemical Information, dated October 28, 1997.
16. Site Plan, Figure A2L-1, prepared by A2L Technologies, Inc., dated 1/4/08.
17. Site Plan with Drainage, Figure A2L -2, prepared by A2L Technologies, Inc., dated 4/18/08.
18. Boundary and Topographical Survey, Sheet 1 of 1, prepared by Robert L. Rodgers Engineering Co. Inc., dated 4/15/08.
19. Sumter County Future Land Use Map, Submitted January 2008
20. Proof of Publication, submitted April 2008

CLOSURE PLAN
For:
GLOBAL TIRE RECYCLING OF SUMTER COUNTY

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
JUL 21 2008
SOUTHWEST DISTRICT
TAMPA

1.0 Introduction

This Closure Plan for Global Tire Recycling of Sumter County has prepared as shown in the bottom left corner of the document and is effective that date. This document is meant to be an all inclusive plan and supercedes all previous documents, including the latest approved Closure Plan dated March 7, 2003 and the latest submitted plan dated April 2008.

2.0 Closure Procedures

In closing the facility, Global will perform the following tasks:

- ▶ Stop access to the site
- ▶ Post a notice indicating that the site is closed and the location of the nearest waste tire processing facility where waste tires can be deposited
- ▶ Notify the FDEP and Sumter County of the closing
- ▶ Remove all waste tires, processed tires, and residuals to a waste tire processing facility, solid waste management facility authorized to accept waste tires, or a legitimate user of processed tires
- ▶ Remove any solid waste to a permitted solid waste management facility and notify the FDEP when the closure is complete

3.0 Notifications

The FDEP will be given a minimum of 60 days written notice prior to closure. Such notification will give the FDEP the opportunity to inspect the facility and determine whether any other procedures shall be followed as part of the closure. Any such directives shall be followed. No waste tires will be accepted within 15 days prior to the date that closure will commence. Global will complete

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closure on the site in accordance with approved closure plan within 180 days after receiving the final quantity of waste tires.

4.0 Closure Cost Estimate

Based on the storage quantities estimated and included on the Permit Application, the following estimate is provided (see attached letter from Liberty Tire Services, LLC for third party closure). Refer to Total Storage Quantities and breakdown on the following page:

Waste Tires & Processed Tires: 1,651 tons @ \$50.00/ton	\$82,550
Crumb Rubber in Super Sack Bags: 1,655 tons @ N/C	\$0
Residual Tire Derived Waste: 235 tons @ \$50.00/ton	\$11,750
TOTAL:	\$94,300

**CLOSURE PLAN
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TOTAL STORAGE QUANTITIES

AREA	AREA DESIGNATION	QUANTITY	UNITS	TYPE	INSIDE/OUTSIDE
A	Processed Tires	320	TONS	W	OUTSIDE
B	Whole/Processed Tires	736	TONS	W	OUTSIDE
C	Whole/Processed Tires	170	TONS	W	OUTSIDE
D	N/A	0	N/A	N/A	OUTSIDE
E	TIRE PILE	7	TONS	W	INSIDE
F	TIRE HOPPERS	20	TONS	W	OUTSIDE
	TIRE PILE	62	TONS	W	OUTSIDE
G1	BAGGED CRUMB RUBBER	720	TONS	C	INSIDE
G2	BAGGED (PARKING LOT)	935	TONS	C	OUTSIDE
H1-H3	INSIDE STORAGE BINS	186	TONS	W	INSIDE
H4	OUTSIDE STORAGE BINS	150	TONS	W	OUTSIDE
I	FIBER RESIDUAL	20	TONS	R	OUTSIDE
J1	METAL RESIDUAL	135	TONS	R	OUTSIDE
J2	FIBER PILE	30	TONS	R	OUTSIDE
J3	WIRE PILE	45	TONS	R	OUTSIDE
K	OFFICE DUMPSTER	5	TONS	R	OUTSIDE
		3,541	TONS		

Quantities:

W	Waste Tires & Processed Tires:	1651	Tons
C	Crumb Rubber in Super Sacks	1655	Tons
R	Residual Derived Waste	235	Tons

Storage by Location:

Outside:	2628	Tons
Inside:	913	Tons

Costs:

Waste Tires & Processed Tires:	1651	@ \$50.00/Ton	\$82,550
Crumb Rubber in Super Sacks	1655	@ NC	\$0
Residual Derived Waste	235	@ \$50.00/Ton	\$11,750
TOTAL:			\$94,300



1593 Huber Street NW, Atlanta, GA 30318

April 4, 2008

Global Tire Recycling
1201 Industrial Drive
Wildwood, FL 34785

Dear Mark Bailey:

In reference to our conversations, Liberty Tire Recycling is willing and able to clean-up the Global site in the event your business closes under the following terms:

Tires on site, to be removed from site and recycled:	\$ 50 per ton
Crumb rubber in supersacks, to be removed and properly handled	no charge
Other tire derived materials on site, to be removed and properly handled	\$ 50 per ton

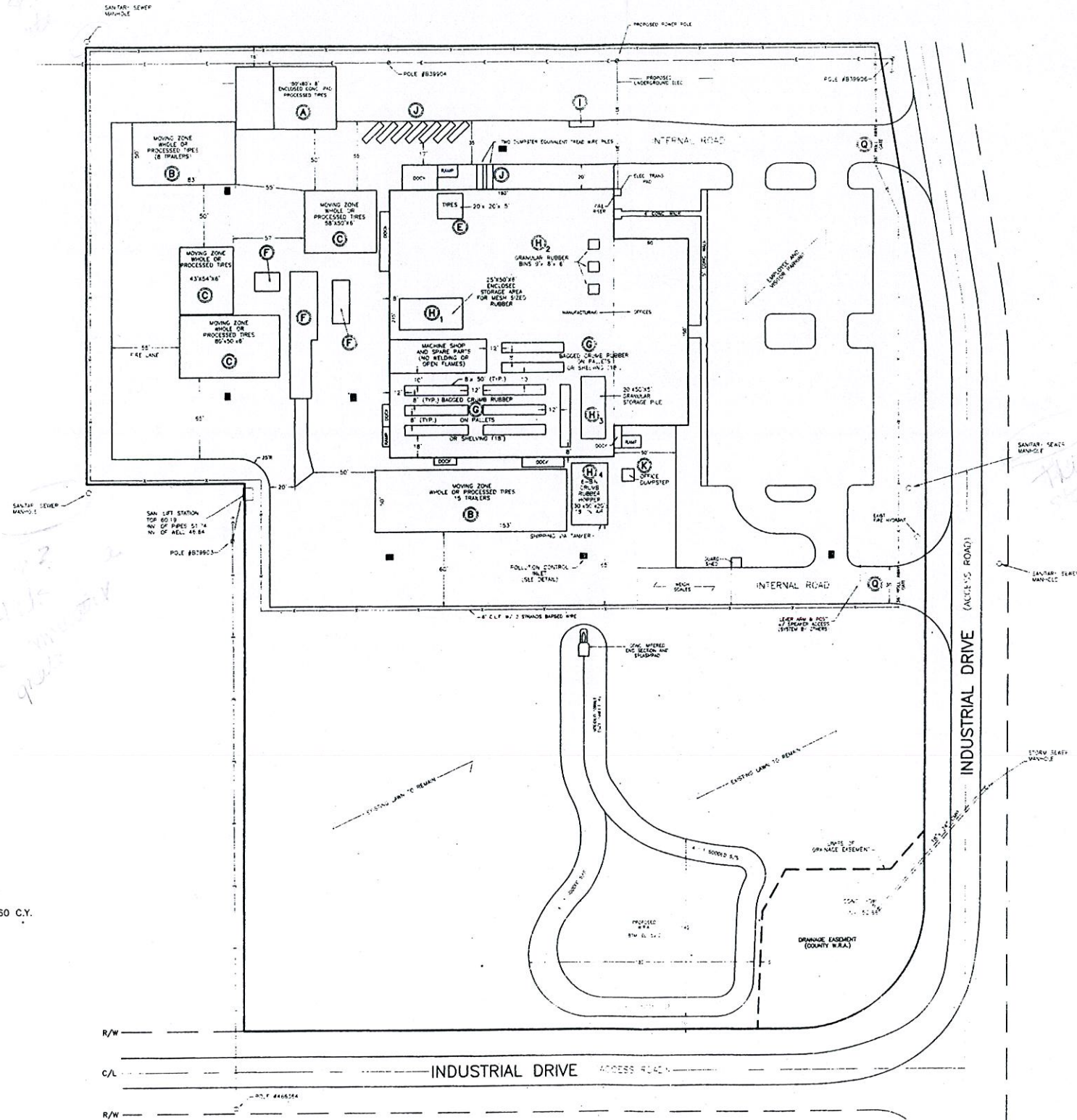
Please let me know if you need any additional information.

Sincerely,

Dewey G. Grantham Jr.
General Manager
Liberty Tire Recycling
1593 Huber Street NW
Atlanta, GA 30318

STORAGE VOLUME AND WEIGHT

- A** PROCESSED TIRES
 $80 \times 50 \times 8 = 32,000 \text{ C.F.}$
 $20\#/\text{C.F.} = 320 \text{ TONS}$
- B** WHOLE OR PROCESSED TIRES (TRAILERS)
 TRAILER VOLUME - $8' \times 50' \times 8' = 118.5 \text{ C.Y.}$
 $8 \text{ TRAILERS} \bullet 118.5 \text{ C.Y.} = 948 \text{ C.Y.}$
 $948 \text{ C.Y.} \bullet 540\#/\text{C.Y.} = 256 \text{ TONS}$
 $15 \text{ TRAILERS} \bullet 118.5 \text{ C.Y.} = 1,778 \text{ C.Y.}$
 $1,778 \text{ C.Y.} \bullet 540\#/\text{C.Y.} = 480 \text{ TONS}$
 (BASED ON PROCESSED TIRES $\bullet 20\#/\text{C.F.}$)
- C** WHOLE OR PROCESSED TIRES (PILES)
 $58 \times 50 \times 6 = 17,400 \text{ C.F.}$
 $80 \times 50 \times 6 = 24,000 \text{ C.F.}$
 $43 \times 54 \times 6 = 13,932 \text{ C.F.}$
 $55,332 \text{ C.F.} = 2,050 \text{ C.Y.}$
 LESS 17% FOR TRAPEZOID SHAPE -1,701 C.Y.
 $1,701 \text{ C.Y.} \bullet 10 \text{ TIRES/C.Y.} = 17,010 \text{ TIRES}$
 $17,010 \text{ TIRES} \bullet 20\#/\text{TIRE} = 170 \text{ TONS}$
- D** (RESERVED)
- E** INDOOR WHOLE TIRE PILE
 $20 \times 20 \times 5 = 2,000 \text{ C.F.} = 74 \text{ C.Y.}$
 $74 \text{ C.Y.} \bullet 10 \text{ TIRES/C.Y.} = 740 \text{ TIRES}$
 $740 \text{ TIRES} \bullet 20\#/\text{TIRE} = 7 \text{ TONS}$
- F** TIRE LOADING HOPPERS
 $2,000 \text{ TIRES} \bullet 20\#/\text{TIRE} = 20 \text{ TONS}$
- G** BAGGED CRUMB RUBBER
 $50\# \text{ BAGS OR SUPER SACKS ON 1 TON PALLETS}$
 MAX. OF 273 PALLETS $\bullet 1 \text{ TON/EA.} = 273 \text{ TONS}$
- PROCESSED RUBBER STORAGE**
- H₁** INSIDE STORAGE BIN $50 \times 25 \times 6 = 7,500 \text{ C.F.}$
- H₂** INSIDE STORAGE BINS (3) $9 \times 8 \times 6 = 1,296 \text{ C.F.}$
- H₃** INSIDE STORAGE BIN $50 \times 20 \times 5 = 5,000 \text{ C.F.}$
- H₄** OUTSIDE BULK SHIPPING BINS $50 \times 30 \times 20 = 11,111 \text{ C.F.}$
 $24,907 \text{ C.F.}$
 $24,907 \text{ C.F.} \bullet 27\#/\text{C.F.} = 336 \text{ TONS}$
- TOTAL TONS OF WASTE TIRE RUBBER = 1,862 TONS**
- WASTE AND SCRAP STORAGE VOLUME AND WEIGHT**
- I** FIBER RESIDUAL DUMPSTER
 $2 \text{ DUMPSTER EQUIVALENT TRAILERS} \bullet 30 \text{ C.Y./EA.} = 60 \text{ C.Y.}$
 $60 \text{ C.Y.} \bullet 667\#/\text{C.Y.} = 20 \text{ TONS}$
- J** METAL RESIDUAL DUMPSTERS
 $7 \text{ DUMPSTERS} \bullet 30 \text{ C.Y./EA.} = 210 \text{ C.Y.}$
 $2 \text{ EQUIVALENT DUMPSTERS} \bullet 30 \text{ C.Y./EA.} = 60 \text{ C.Y.}$
 TOTAL = 270 C.Y.
 $270 \text{ C.Y.} \bullet 1,000\#/\text{C.Y.} = 135 \text{ TONS}$
- K** OFFICE DUMPSTER
 $1 \text{ DUMPSTER} \bullet 30 \text{ C.Y.} = 30 \text{ C.Y.}$
 $30 \text{ C.Y.} \bullet 333\#/\text{C.Y.} = 5 \text{ TONS}$
- TOTAL** 160 TONS
 $2 - 30 \text{ C.Y. DUMPSTERS (FIBER)}$
 $9 - 30 \text{ C.Y. DUMPSTERS (METAL)}$
 $1 - 30 \text{ C.Y. DUMPSTER (OFFICE)}$



- LEGEND**
- STORM WATER GRATE INLETS
 - STORAGE PILE (SEE TABLE)
 - C.L.F. CHAINLINK FENCE
 - SECURITY GATES

ROBERT L. ROGERS
 PROFESSIONAL
 FLORIDA REGISTERED

A SITE PLAN

FOR

GLOBAL TIRE RECYCLING OF SUMT.

STORAGE AREA LOCATIONS

ROBERT L. ROGERS ENGINE
 LIC. BUS. #4074

1105 S.E. 3rd Ave. OCALA, FLORIDA 34

SCALE
 1" = 50'

DATE
 12-17-02