



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**
CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

May 30, 2013

E-Mail

MarkatGTR@aol.com

Mr. Mark Bailey
Global Tire Recycling of Sumter County, Inc.
1201 Industrial Drive
Wildwood, Florida 34785

OCD-SW-13-1623

Sumter County – SW WACS # 53122
Global Tire Recycling of Sumter County – Waste Tire Processing Facility
Second Request for Additional Information
Permit Application No. 0136808-006-WT-02

Dear Mr. Bailey:

The additional information dated May 10, 2013 and received on May 20, 2013 was reviewed. The items listed on the attached page remain incomplete. Evaluation of your application will continue to be delayed until all the requested information has been received.

Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Accordingly, please provide the additional information within 30 days of the date you receive this letter. Submit one copy of the requested information to the Department and reference the above permit application number in your correspondence.

If you have any questions, please contact Kim Rush at (407) 897-4314 or by e-mail at kim.rush@dep.state.fl.us.

Sincerely,

F. Thomas Lubozynski, P.E.
Waste & Air Resource Programs Administrator

FTL/kr

Enclosure

cc:

FDEP Solid Waste Financial Coordinator, solid.waste.financial.coordinator@dep.state.fl.us
Lawrence G. Schmaltz, P.E. – Apex Companies, LLC, lschmaltz@apexcos.com
Nancy J. Rose, P.G. – Apex Companies, LLC, nrose@apexcos.com
Gloria DePradine – DEP – gloria.depradine@dep.state.fl.us
Reggie Phillips – DEP – reggie.phillips@dep.state.fl.us

Note that all references to “Report” in the following text refer to the document entitled, “Global Tire Recycling of Sumter County – Waste Tire Processing Facility, First Request for Additional Information,” prepared by: Lawrence G. Schmaltz, P.E., dated May 10, 2013.

2. The Department has the following comments on the updated Emergency Preparedness Manual:
 - a. Page 4 states “Immediate action by facility personnel will concentrate on: “... (2), preventing the plant’s automatic emergency water sprinkling system from engaging unnecessarily.”
 - i. The Department understands that the facility wants to avoid having to deal with large quantities of potentially contaminated water. However, normally this is not an appropriate immediate action in response to an emergency. Any situation where the emergency water sprinkling system might engage unnecessarily should be analyzed and adjusted for during times of maintenance not during an emergency situation.
 - ii. The immediate actions in response to an emergency should be to protect human health and the environment. The plan does mention caring for injured personnel.
 - iii. It is your decision whether to delete or keep this action in the plan.
 - b. Page 5 describes telephone, paging systems, and a siren alarm system which “will be” available and installed.
 - i. Are these systems in place and available for use in an emergency situation? If not, when will the systems be installed?
 - ii. Often plans will have a diagram that shows the location of the alarm system pull boxes and fire extinguishers, as well as, evacuation routes. The plan does not have any diagram; one is not required, but is recommended.
 - c. Page 6 describes the disposal of the waste water after a fire. Please add to the plan that a waste determination must be conducted on the waste water and solids after a fire prior to disposal. We recommend the plan states to consult with DEP about testing and handling procedures. The waste determination has two objectives:
 - i. Prove whether the waste material is characteristic for hazardous waste. If it is, there are special handling requirements.
 - ii. Prove that the liquid material can go to the sanitary sewer system. You will have to verify with your utility what their requirements are regarding the wastewater characteristics at the time of disposal.
 - d. Page 6 references the Production Area Fire Protection plan and details of the pollution control baffle. Since the Emergency Preparedness plan is intended to be a stand-alone document, please make these two references attachments to the plan.
 - e. Pages 6-11 include first aid response techniques. Please note that the first aid treatments described are outside of the Department’s expertise. Therefore, the Department has not reviewed the first aid actions for accuracy or appropriateness.
 - f. The Department recommends adding a section in the plan to address the steps to be taken in preparation for and in response to a hurricane or other natural disaster. If included the section should address the following:
 - i. What procedures will be implemented during the period from 72 hours up to landfall?
 - ii. At what point will the facility shut down?
 - iii. Who makes the decision to re-open the facility?
 - iv. Who inspects for damage that may affect whether permit conditions can be met?
 - v. Who notifies the Department if the damage might affect compliance with the permit and the operation plan?

Please revise the Emergency Preparedness plan accordingly and submit a copy to the Department in response to this RAI.