

Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Waste Tire Auth. Related
David B. Struhs
Secretary

Permit Authorization

February 6, 2003

WACS 53122

FAC Type WTRF (710)

SUBJ: RAI

R. Brian Fifer, President & CEO
Global Tire Recycling of Sumter County, Inc.
1201 Industrial Drive
Wildwood, FL 34785

Re: Global Tire Recycling of Sumter County, Inc.
Waste Tire Processing Facility, Wildwood
Pending Permit No.: 136808-004-WT, Sumter County

Dear Mr. Fifer:

This is to acknowledge receipt of the permit renewal application prepared by Robert L. Rogers Engineering Co., Inc. dated January 14, 2003, (received January 15, 2003), to operate a waste tire processing facility.

This letter constitutes notice that a permit will be required for your project pursuant to Chapter(s) 403, Florida Statutes.

Your application for a permit is incomplete. This is the Department's 1st request for additional information. Please provide the information listed below promptly. Evaluation of your proposed project will be delayed until all requested information has been received.

The following information is needed in support of the waste tire processing facility application [Chapter 62-711, Florida Administrative Code (F.A.C.)]. Please provide:

1. Sections 62-711.530(7), F.A.C. Application Form #62-701.900(23) Part I "General Information" Section B.7. "Facility Location Coordinates": The latitude/longitude coordinates provided do not appear to correspond to the actual location of the facility. Please verify the correct coordinates for the facility and provide a corrected page 1 of 4 of the application form.
2. Sections 62-711.530(7), F.A.C. Application Form #62-701.900(23) Part II "Operations" Section C. "Storage": The maximum quantities provided in this section are not consistent with those provided on "Site Plan Sheet 1 of 1" received 1/15/03 and are not consistent with "Addendum To Waste Tire Processing Permit Application Part III.D. - Financial Assurance Calculations". Please address these inconsistencies and revise the amounts provided in this section accordingly.
3. Sections 62-711.530(7), F.A.C. Application Form #62-701.900(23) Part III.A.1. and "Addendum To Waste Tire Processing Permit Application Part III.A.1. - A Topographical or Section Map": A topographic or section map of the facility, no more than a year old, showing land use and zoning within one mile of the facility was not provided. Please provide this information.

"More Protection, Less Process"

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4. **Sections 62-711.530(7), F.A.C. "Addendum To Waste Tire Processing Permit Application":** Please provide following additional information and revisions to the Addendum. Please provide a comprehensive Addendum report that incorporates the responses to these comments.

a. **Sections 62-711.530(7), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.1. - Facility Operation & Process Description:** The facility's Certification of Construction Completion dated January 29, 2001 indicates that the primary cracker mill (E-2) that was part of the facility's permitted operation was replaced by a grizzly granulator. Please provide a revised Attachment H - "Process Description" that incorporates this and any other change that has occurred in the facility's permitted equipment or process.

b. **Sections 62-711.530(7), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.1. - Facility Operation & Process Description:** Section 4 "Fine Grind Reduction" of Attachment H - "Process Description", indicates that the finished product is fed directly into auger baggers A-2 and A-3 and automatically bagged. However "Site Plan Sheet 1 of 1", received 1/15/03, shows finished product storage in Areas H1 & H2 (mesh sized rubber), Areas H3 & H4 (granular rubber), and Area H5 (crumb rubber). Please describe the how each of these products are produced and how they are transported to each of the storage areas in the process.

c. **Sections 62-711.530(7), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.2. - Facility Equipment Description & System Layout:** The facility's Certification of Construction Completion dated January 29, 2001 indicates that the primary cracker mill (E-2) that was part of the facility's permitted operation was replaced by a grizzly granulator. Please provide a revised Attachment I - Production Equipment Book and Attachment C - System Layout Drawing that incorporate this and any other change that has occurred in the facility's equipment or process.

d. **Sections 62-711.530(7), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.2. - Facility Equipment Description & System Layout:** "Site Plan Sheet 1 of 1", received 1/15/03, shows finished product storage in Areas H1 & H2 (mesh sized rubber), Areas H3 & H4 (granular rubber), and Area H5 (crumb rubber). Please revise Attachment I - Production Equipment Book and Attachment C - System Layout Drawing to include these areas in the system layout and provide information on any equipment utilized in the production, transportation, or storage of these products (i.e 6-bin crumb rubber hopper)..

e. **Sections 62-711.530(7), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.4.a.) - Maximum Daily Throughput:** Please confirm and document that the daily throughput information presented in this section is based on the revised process description, equipment description, and system layout provided in response to the above Department comments. The reference to a 64% scrap rate in this section appears to be a typographic error that should be corrected.

f. **Sections 62-711.540(1)(b), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.5.(1)(b):** Please provide the "Overall Floor Plan, Page A-1 of the Project Drawings - Attachment B" referenced in this section. Alternatively, previously provided plans, reports, or documentation that are still valid may be referenced, but must be specifically referenced (by document name, document date, author, and specific page and/or plan number).

(Comment #4, cont'd)

g. Sections 62-711.540(1)(b), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.5.(1)(b): This section states that "Global's machine shop ... occupies an area in the southwest corner of the plant. Any welding or other necessary use of open flames will take place in an area ... well over 25 feet from either the indoor whole storage area or the bagged crumb rubber storage area". Site Plan Sheet 1 of 1 received 1/15/03 shows the machine shop area located between and within 25 feet of the mesh sized rubber storage area ("H2") and the bagged crumb rubber pallet area ("G"), with the notation "(No Welding or Open Flames)". Please address this inconsistency and revise either this section or the Site Plan accordingly.

h. Section 62-711.540(1)(d), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.5.(1)(b): Please provide the "site plan and project drawings, including M-2, the production area fire protection plan and M-3, the office area fire protection plan" referenced in this section. Alternatively, previously provided plans, reports, or documentation that are still valid may be referenced, but must be specifically referenced (by document name, document date, author, and specific page and/or plan number).

i. Section 62-711.540(1)(e), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.5.(1)(e): "Attachment F" was not submitted as stated in this section, however the updated facility Emergency Preparedness Plan dated November 20, 2002 was specifically referenced in Part III.B.5.(6) of the Addendum. Please revise this section to provide the specific document reference. Please also verify the applicant's address. Application Form #62-701.900(23) Part I. A., B., & E indicates that R. Brian Fifer's address is the facility's Wildwood, Florida address. This section provides a Miami address for Mr. Fifer.

j. Section 62-711.540(1)(h), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.5.(1)(h): Please provide the "copy of Global's Warranty Deed" ("Attachment J") referenced in this section. Alternatively, previously provided plans, reports, or documentation that are still valid may be referenced, but must be specifically referenced (by document name, document date, author, and specific page and/or plan number).

k. Section 62-711.540(1)(j), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.5.(1)(j): This section states "...Global will not store waste tires outdoors, other than in closed trailers..." However "Site Plan Sheet 1 of 1" received 1/15/03 provides for storage of waste tires in outdoor locations "A" and "C". Please address this inconsistency and outline the facility's procedures for mosquito and vermin control in outdoor waste tire storage areas.

l. Section 62-711.540(2)(a), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.5.(2)(a): This section indicates that there are two indoor tire pile storage areas and references the location of one as being "an area north of the primary cracker mill." However "Site Plan Sheet 1 of 1" received 1/15/03 shows only one indoor whole tire storage area "E" and the facility does not have a "primary cracker mill." Please address this inconsistency and revise this section accordingly.

(Comment #4, cont'd)

m. Section 62-711.540(2)(b), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.5.(2)(b): This section states "The distance between the two indoor tire storage areas is well over 50 feet." In addition to the discrepancy regarding "two indoor tire storage areas" addressed in the above comment, "Site Plan Sheet 1 of 1" received 1/15/03 shows that the distance between storage areas "E" and "H1" is approximately 30 feet and that there is approximately 8 feet between storage areas "H1" and "H2". Please address this inconsistency and revise this section accordingly.

n. Section 62-711.540(2)(g), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.5.(2)(e.,f.,g.): Please provide "The Production Area Fire Protection Plan ... No. M-2 of the Project Drawings submitted as Attachment B", referenced in this section. Alternatively, previously provided plans, reports, or documentation that are still valid may be referenced, but must be specifically referenced (by document name, document date, author, and specific page and/or plan number).

o. Section 62-711.540(3)(a), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.5.(3)(a): Mr. Rogers' January 8, 1998 letter referenced in this section was not included with this application. Please provide documentation of a recent verification that the facility does not lie within 200 feet of any natural or artificial bodies of water, including wetlands.

p. Section 62-711.540(3)(c), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.5.(3)(c): While this section states that "Global does not plan to establish any outdoor waste tire piles as such.", "Site Plan Sheet 1 of 1", received 1/15/03 provides for the storage of waste tires in outdoor areas "A" and "C." Please verify that 50 foot fire lane exist around the perimeters of these areas and revise this section accordingly.

q. Section 62-711.540(3)(e), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.B.5.(3)(e): Please provide the site grading plan "Sheet No. 4 of the Site Plan: Attachment D" referenced in this section. Alternatively, previously provided plans, reports, or documentation that are still valid may be referenced, but must be specifically referenced (by document name, document date, author, and specific page and/or plan number).

r. Section 62-711.700(2), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.C.1. & 2.: "Site Plan Sheet 1 of 1", received 1/15/03 provides for the storage of either whole or processed tires in storage areas "B" and "C". Therefore please clarify how the maximum amount of whole and processed tires at the facility was determined and provide the specific calculations used to support this determination.

s. Section 62-711.700(2), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.C.1. & 2.: The referenced February 2, 2002 letters from Affordable Tires, Inc. and Waste Management state that the agreements are in effect for one year. Please provide updated letters that confirm the current disposal agreements between Global Tire and its third party disposal contractors.

(Comment #4, cont'd)

t. Section 62-711.700(2), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.C.3.: This section states that there will be a maximum of ten 30 cu.yd. dumpsters for residual material and one 30 cu.yd. dumpster for office waste at the facility. "Site Plan Sheet 1 of 1", received 1/15/03 indicates that there will be one 60 cu.yd. fiber residual trailer, 9 30 cu.yd. metal residual dumpsters and one 30 cu.yd. office waste dumpster located at the facility. Please clarify the number of dumpsters for each waste stream. In addition, please provide updated information on the third party disposal costs for each waste stream the facility generates.

u. Section 62-711.700(3), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.D. Financial Assurance Calculations: Please provide revised closure cost estimates as required by Rule 62-711.500(3), F.A.C. based on additional information provided in response to above comments.

v. Section 62-711.700(3), F.A.C. "Addendum To Waste Tire Processing Permit Application Part III.E. Land Owner: Please provide a copy of Global's Warranty Deed ("Attachment J") referenced in Part III.B.5.(1)(h) of this Addendum. Alternatively, previously provided plans, reports, or documentation that are still valid may be referenced, but must be specifically referenced (by document name, document date, author, and specific page and/or plan number).


Please note that documents or reports that are referenced will be reviewed in their entirety based on the response to this request for information, and additional information may be subsequently requested accordingly.

Please provide all responses that relate to engineering required for design and operation, signed and sealed by a professional engineer. Responses that relate to the facility operations should be included as part of the Addendum To Waste Tire Processing Permit Application or the specifically referenced attachment. All replacement pages should be numbered, and with revision date.

"NOTICE! Pursuant to the provisions of Section 120.60, F.S., if the Department does not receive a response to this request for information within 90 days of the date of this letter, the Department may issue a final order denying your application. You need to respond within 30 days after you receive this letter, responding to as many of the information requests as possible and indicating when a response to any unanswered questions will be submitted. If the response will require longer than 30 days to develop, you should develop a specific timetable for the submission of the requested information for Department review and consideration. Failure to comply with a timetable accepted by the Department will be grounds for the Department to issue a Final Order of Denial for lack of timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

You are requested to submit your response to this letter as one complete package with an original and two copies of all correspondence (with one copy sent to Ms. Susan Pelz). If there are points that must be discussed and resolved, please contact me at (813) 744-6100 ext. 385.

Sincerely,



Steven G. Morgan
Solid Waste Section
Southwest District

SM/sgm

cc: Robert L. Rogers. P.E., P.S.M., Robert L. Rogers Engineering Co., 1105 S.E. 3rd Avenue,
Ocala, Florida 34471
Virginia Watson, Sumter County, 209 N. Florida Avenue, Bushnell, Florida 33513
Don Dixon, City of Wildwood, 100 N. Main Street, Wildwood, Florida 34785
Susan Pelz, P.E., FDEP Tampa