

March 24, 2016

**VIA ELECTRONIC MAIL**

Mr. Stephen Amirault  
Florida Department of Environmental Protection  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803

RECEIVED  
MAR 25 2016  
DEP Central District

Subject: Response to FDEP First Request for Additional Information  
Orange County – Solid Waste  
Facility Name: Taft Recycling, Inc., Material Recovery Facility  
Facility ID: 0173968  
DEP Application No.: 0173968-011-WT-02, and 0173968-012-SO-31  
HSA Golden Project No. 06-404.022

Dear Mr. Amirault:

On behalf of Taft Recycling, Inc. (TRI), HSA Golden is responding to your request for additional information (RAI) letter dated March 2, 2016, regarding the subject permit application. The following comments are offered for your review and approval. Hereafter, we restate the Florida Department of Environmental Protection's (FDEP) comments in italics, followed by our responses. One copy of all requested information is submitted with revisions noted with strikethrough (~~strikethrough~~) and shading (**shading**). All revisions to drawings are summarized in the revision box on each sheet, and clouded if a detail or note has been revised or added.

*Comment 1. The Application Section 5- Financial Assurance Cost Estimate, Table 1 Opinion of Probable Closure Costs lists a maximum storage capacity of 50,000 tons of recovered asphalt/concrete. Appendix H of the Operation Plan indicates that 2,500 cubic yards at an estimated 4,000 pounds per cubic yards (equivalent to 5,000 tons) will be managed at the facility. Please indicate which quantity is correct and revise either the Closure Cost estimate or Appendix H of the Operation Plan.*

Response 1. Both the Cost estimate and Appendix H have been revised. The concrete/asphalt storage area has been added to the site plan. It is approximately 60 feet in diameter and a maximum of 15 feet high, with 2:1 side slopes, with a maximum storage volume of 14,000 cubic yards (28,000 tons). Please note that the wood storage volume has also been revised to 14,000 cubic yards storage volume (2,555 tons based on 365 lbs/cy).

*Comment 2. Appendix H of the Operation Plan indicates that the recovered asphalt/concrete will be stored in the outside storage yard. The Operation flow chart included in Appendix B of the Operation plan indicates that recovered concrete, roofing tile, brick and concrete will be stored on the Class III waste tipping floor.*



- a. Which location is correct?
- b. Is there enough space to store 50,000 tons of recovered asphalt/concrete?

Response 2. a. The storage is outside as shown on the revised plan. The Operations Flow Chart has been modified to clarify this.

b. Storage for 14,000 cubic yards is shown (see attached Response to Comment 1).

Comment 3. *If recovered asphalt/concrete material will be stored at a location in the outside storage yard, please illustrate on the Site Plan where this material will be stored and managed.*

Response 3. The storage area has been added to the Plan (see attached Revised Site Plan).

Comment 4. *Please revise the operation plan to describe how the asphalt/concrete material will be managed. If asphalt will be segregated and managed separately for beneficial use or reuse, please indicate this.*

Response 4. The Operations Plan Section 2.2 and 3.5 have been revised to clarify the management of concrete and Asphalt (see attached Response to Comment 4).

Comment 5. *The Application Section 5 Financial Assurance Cost Estimate indicated that it is assumed that recovered asphalt/concrete materials will be accepted at the facility adjacent to TRI for no disposal cost. The previous detailed cost estimate dated February 16, 2011 assumed a typical Class III disposal rate would apply to disposal of this material. Please either provide a letter of agreement from the facility adjacent to TRI indicating the name of the business located at the facility and that they will in fact accept the maximum storage capacity of material at no disposal cost, or revise the cost estimate to include the typical Class III disposal rate for the maximum storage capacity of asphalt/concrete facility that is anticipated to be managed at the TRI facility.*

Response 5. Section 5 has been revised to indicate that the material will be accepted at JED Landfill at no cost. A letter from Progressive Waste Solutions is attached.

We appreciate your review and trust that you will be able to approve the subject permit renewal application. Please call if you have any questions.

Sincerely,

**HSA GOLDEN**

John P. Smith, P.E.  
Vice President, Principal Engineer  
Attachments

cc: Mr. Michael Kaiser, Taft Recycling Inc.

DEP\_CD@dep.state.fl.us,



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PEP Central District

**TABLE 1. OPINION OF PROBABLE CLOSURE COSTS**  
**TAFT RECYCLING, INC.**  
**TAFT TRANSFER STATION/WASTE PROCESSING MATERIAL RECOVERY FACILITY**  
**ORLANDO, FLORIDA**

Recovered Material and Unprocessed Material Stored	Maximum Storage (tons)	Handling and Loading Costs (\$/ton)	Transportation Costs (\$/ton)	Disposal Costs (\$/ton)	Total Loading, Transportation and Disposal (\$/ton)	Total All Costs (\$)
1 Unprocessed Class III	500	\$2.50 (5)	\$5.50	\$25.60	\$33.60	\$16,800.00
2 Unprocessed Class I Putrescible	1500	\$2.50 (5)	\$5.50	\$33.60	\$41.60	\$62,400.00
3 Recovered Asphalt/Concrete	28,000	\$2.50 (2)	\$5.50	\$0.00	\$8.00	\$224,000.00
4 Recovered Roofing Tiles	20	\$0.00 (2)	\$5.50	\$25.60 (3)	\$31.10	\$622.00
5 Recovered Cardboard (Baled)	1482	\$2.50 (5)	\$5.50	\$25.60 (3)	\$33.60	\$49,795.20
5a Recovered Cardboard (Loose)	200	\$2.50 (5)	\$5.50	\$25.60 (3)	\$33.60	\$6,720.00
6 Recovered Paper (Baled)	37.5	\$2.50 (5)	\$5.50	\$25.60 (3)	\$33.60	\$1,260.00
7 Recovered Metal (Ferrous, Steel, Pipe)	40	\$0.00 (2)	\$5.50	\$25.60 (3)	\$31.10	\$1,244.00
8 Metal (Aluminum Cans)	1.5	\$2.50 (5)	\$5.50	\$25.60 (3)	\$33.60	\$50.40
9 Glass (Whole Bottles)	18	\$2.50 (5)	\$5.50	\$25.60 (3)	\$33.60	\$604.80
10 Plastic (Mixed Loose)	1.4	\$2.50 (5)	\$5.50	\$25.60 (3)	\$33.60	\$47.04
11 Wood	2555	\$2.50 (5)	\$5.50	\$25.60	\$33.60	\$85,848.00
12 Whole Tires	67.5	\$2.50 (4)	\$0.00 (4)	\$50.00 (4)	\$52.50	\$3,543.75
13 Processed Shredded Tires	67.5	\$0.00 (2)	\$5.50	\$33.60	\$39.10	\$2,639.25
14 Processed Tire Residuals	10	\$0.00 (2)	\$5.50	\$33.60	\$39.10	\$391.00
15 Recycling Residuals	50	\$0.00 (2)	\$5.50	\$33.60	\$39.10	\$1,955.00
16 Washdown/Cleanup/6 month maintenance					LS	\$4,500.00
17 Waste Oil/House Hold Haz. Waste	55 Gallon Drum	\$100.00	\$100.00	\$300.00	\$500.00	\$500.00
18 Misc. Sampling and Analysis					LS	\$1,000.00
19 Sub Total						<b>\$463,920.44</b>
20 Contingency (15%)						\$69,588.07
21 Total						<b>\$533,508.51</b>

**Notes:**

- Maximum storage volumes taken from table of Material Disposition, Appendix B, Operation Plan.
- Other than wood and concrete, there are no loading costs for these materials. Materials are stored in roll-off containers and would not require loading.
- Although processed/baled cardboard, paper, steel, aluminum cans, glass, plastic and concrete have commodity value, assumed worst case condition and disposal at Class III rates.
- Whole waste tire disposal rate includes transportation by RMD Americas of Florida, LLC. Loading costs to transfer/load onto their trailers.
- Unprocessed Class I, III, and C&D materials, and loose glass, plastic and wood loaded onto transfer trailers using rubber tire loader equipment.
- Class III wastes include C&D debris.
- Item 16 - 6 months closure period maintenance at \$500/month





## MATERIALS DISPOSITION

Taft Recycling, Inc.

### Taft Transfer Station/Waste Processing & Material Recovery Facility

Recovered Material or Unprocessed Waste Type	Maximum Storage Volume	Density (lbs/cy)	Covered or Uncovered	Method of Storage	Disposal/ Recycling Location	Maximum Hold Time
Unprocessed Class III	2,000 cy	500	Covered	Tipping Floor	Class III Landfill	1 Week
Unprocessed Class I Putrescible	6,421 cy	450	Covered	Tipping Floor	Class I Landfill	48 Hours
Recovered Asphalt/Concrete	2,500 14,000 cy	4,000	Uncovered	Outside Storage Yard	Re-Sale Public	6 Months
Recovered Roofing Tiles	20 cy	2,000	Uncovered	Outside Roll-off Container	Re-Sale Public	6 Months
Recovered Cardboard (Baled)	4,559 cy	650	Uncovered	Outside Storage Yard	Re-Sale Public	6 Months
Recovered Cardboard (Loose)	1,333 cy	300	Uncovered	Near Loading Hopper at Baler	Re-Sale Public	48 Hours
Recovered Paper (Baled)	100 cy	750	Uncovered	Outside Storage Yard	Re-Sale Public	6 Months
Recovered Metal (Ferrous, Steel, Pipe & Misc)	80 cy	1,000	Uncovered	Outside Roll-off Container	Re-Sale Public	6 Months
Recovered Metal (Aluminum Cans)	40 cy	75	Uncovered	Outside Roll-off/Sorting Bay	Re-Sale Public	6 Months
Glass (Whole Bottles)	60 cy	600	Uncovered	Outside Roll-off/Sorting Bay	Re-Sale Public	6 Months
Plastic (Mixed Loose)	80 cy	35	Uncovered	Outside Roll-off/Sorting Bay	Re-Sale Public	6 Months
Wood	1,500 14,000 cy	365	Uncovered	Outside Storage Yard	Re-Sale Public	6 Months
Whole Tires	400 cy	337	Uncovered	Outside Roll-off Container	Processing Facility	1 Year
Processed/Shredded Tires	225 cy	600	Uncovered	Outside Roll-off Container	Class I Landfill	48 Hours
Processed Tire Residuals	20 cy	500	Uncovered	Outside Roll-off Container	Class I Landfill	48 Hours
Recycling Residuals (RSM)	100 cy	1,000	Covered	Outside Roll-off Container	Class I Landfill	6 Months
Waste Oil/House Hold Hazardous Waste - Rejected	55 gallons	8 lbs/gal	Covered	Inside Building	Safety Kleen or Other Haz. Waste Recycler	30 Days

**Notes:**

Maximum storage volumes for Unprocessed Class I, III /C&D are based on estimated peak daily projection as noted in Section 2.2.1 of Operation Plan.

Total of all equal approximately 8,421 cy (converted 2,000 tons).

Unprocessed cardboard and paper included in Class III volumes.

Volume-to-weight factors for recyclables are provided as an attachment.

**TAFT TRANSFER STATION/WASTE PROCESSING & MATERIAL RECOVERY FACILITY  
CALCULATIONS, ASSUMPTIONS AND SUPPORTING INFORMATION  
CLOSURE COST ESTIMATE FOR FINANCIAL ASSURANCE**

**February 8 ~~March 9~~, 2016**

The closure cost estimate shown on Table 1 (attached) is based on the table of Material Disposition, Appendix H, Operation Plan. The closure cost estimate includes the cost of loading, transporting, and disposal of the maximum on-site storage of recyclable materials which may be at the Facility at any time. The estimate considers a third party performing the work and is signed and sealed by a registered professional engineer. The assumptions and supporting documentation used to prepare the closure cost estimate in Table 1 are summarized below.

- Loading of Class I, III, C&D and non-processed/non-baled recyclable materials provided by RCS Excavation, Inc.
- Transport of Class I, III, C&D and non-processed/non-baled recyclable materials provided by Stafford Trucking.
- Loading, transport and end disposal of processed/baled cardboard, aluminum, glass, plastic, metal and paper was assumed at the Orange County Landfill. Although these materials would likely have commodity value, a worst case assumption was made in the closure cost estimate to allow for disposal.
- Disposal rates for Class I, III, C&D and non-processed/non-baled recyclable materials provided by Orange County Landfill. The Orange County Landfill is the closest facility that could accept these types of wastes.
- Handling and loading of recovered concrete/asphalt will be provided by RCS Excavation, Inc. Transportation will be provided by Stafford Trucking. ~~It is assumed that these materials will be accepted at the facility adjacent to TRI JED Landfill for no disposal cost (see attached).~~
- Transport and recycling of whole tires quoted by RMD Americas of Florida, LLC, RMD will transport and recycling whole tires at the rate provided. Loading of whole tires from roll-off containers to RMD's trucks will be completed by RCS Excavating, Inc. at the rate provided.
- Processed tires and residuals will be directly transported to Orange County Landfill for use as daily cover or direct disposal in the Class I landfill. Assumed disposal rate for Class I refuse would apply.
- Costs for final cleaning/washdown, removal of household hazardous waste, and any final sampling and analysis are based on general estimating experience.

Upon approval of this closure cost estimate, Taft Recycling, Inc. will renew the financial assurance instrument for the Facility.

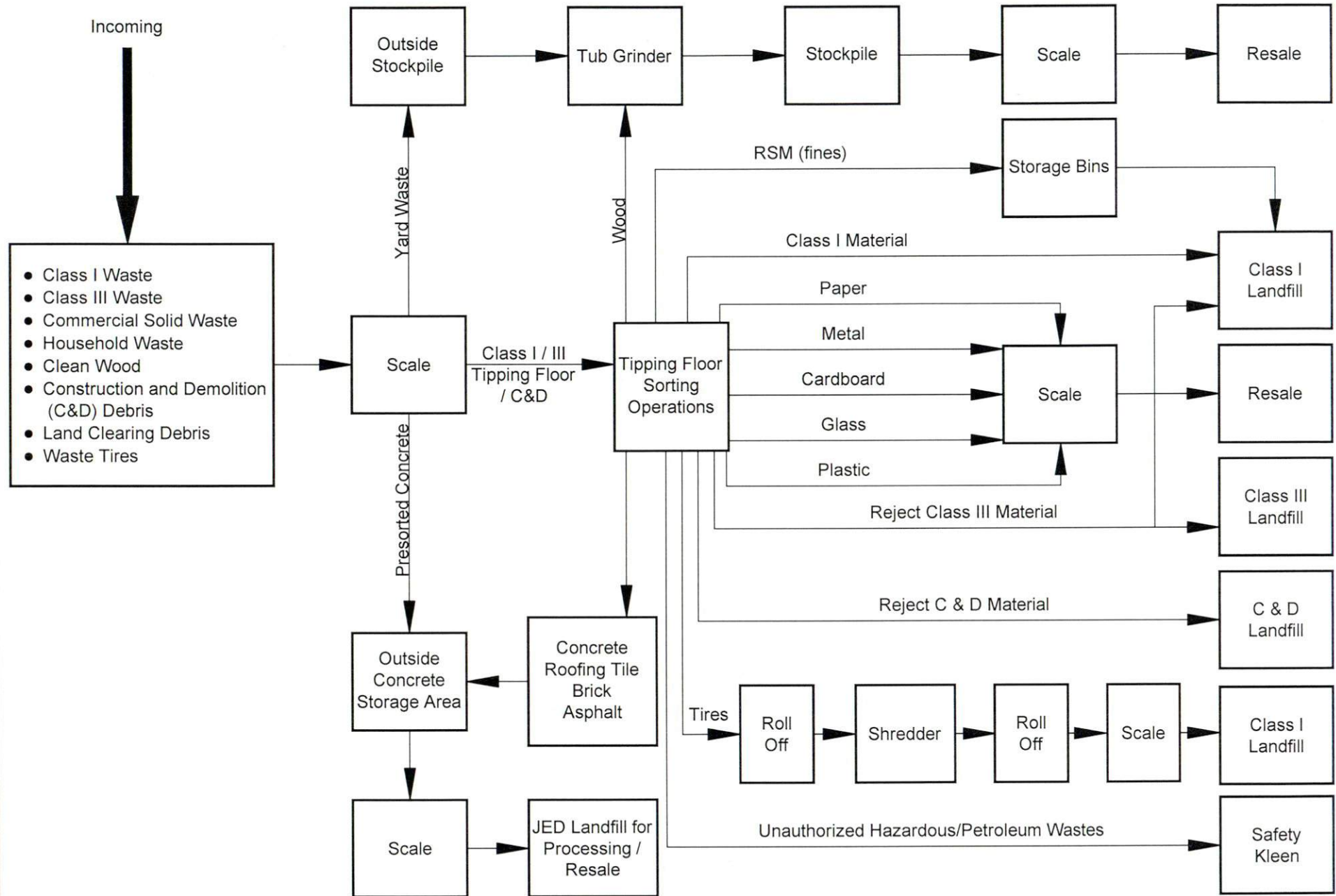
Prepared by: \_\_\_\_\_

John P. Smith, P.E.  
Florida P.E. No. 63423  
HSA Golden, Inc. FBPE #9915

Date: 3/24/16







PROJECT #  
06.404.022  
APPENDIX  
B

OPERATION FLOW CHART  
TAFT RECYCLING INC.

TAFT TRANSFER STATION / WASTE PROCESSING &  
MATERIAL RECOVERY FACILITY  
ORANGE COUNTY, FLORIDA

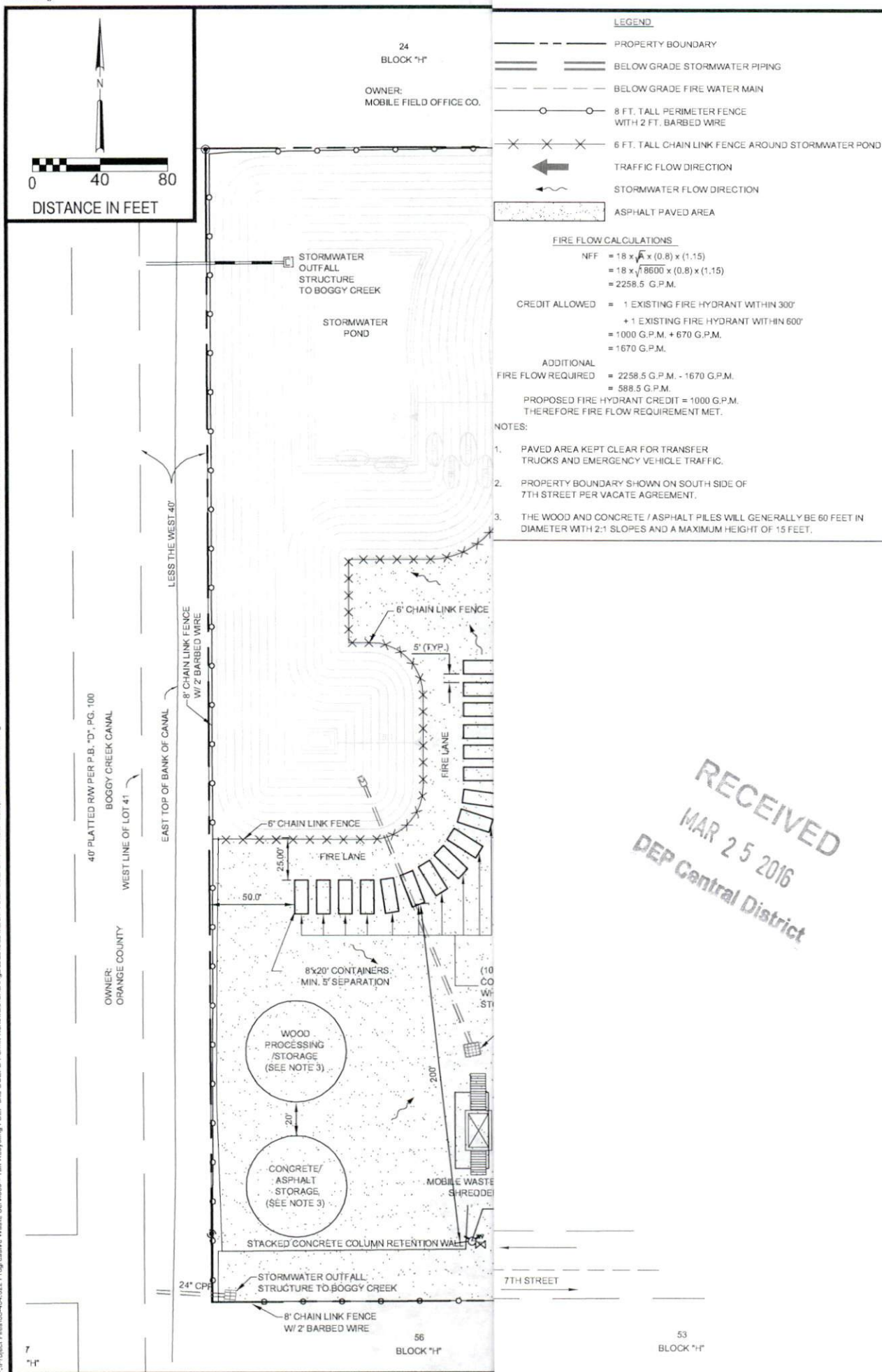
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APPENDIX-B.DWG

MARCH 2016











# OPERATION PLAN

Taft Recycling, Inc.  
Taft Transfer Station/Waste Processing & Material Recovery Facility  
375 W. 7<sup>th</sup> Street, Orlando, Florida 32824

*Prepared for:*

**Taft Recycling, Inc.**  
375 W. 7<sup>th</sup> Street  
Orlando, Florida 32824

*Prepared by:*

**HSA Golden**  
11 Lake Gatlin Road  
Orlando, Florida 32806

Prepared January ~~March~~ 2016

HSA Golden Project No. 06-404.022



# OPERATION PLAN

## Taft Transfer Station/Waste Processing & Material Recovery Facility

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# **OPERATION PLAN**

## **Taft Transfer Station/Waste Processing & Material Recovery Facility**

### **1.0 INTRODUCTION**

#### **1.1 Site Description and Background**

The Taft Transfer Station/Waste Processing & Material Recovery Facility (facility) is owned and operated by Taft Recycling, Inc. (TRI). The property currently consists of approximately 12 acres in a roughly rectangular shape with an existing office building, equipment maintenance building, 18,600 square foot waste & material recovery processing building, and sorting areas. Topography at the southern limits of the site generally slopes toward a drainage ditch along the southern property boundary that flows west to the Boggy Creek Canal. Topography of the northern limits slopes towards a sediment pond that discharges to Boggy Creek Canal. The property is relatively flat with an elevation of approximately 95 feet National Geodetic Vertical Datum (NGVD). Access is off of 7<sup>th</sup> Street along the southern portion of the property. A site location map is provided as Figure 1.

The western  $\pm 4$  acres of the site is zoned I-2/I-3 and the eastern  $\pm 8$  acres of the site is zoned I-4 based on Orange County records. All adjacent properties within 1000 feet of the site are also zoned industrial. An aerial photograph/zoning map showing a one mile radius surrounding the facility is provided as Figure 2.

The TRI facility was initially permitted as a material recovery facility (MRF) by the Florida Department of Environmental Protection (FDEP) in January 2001, under Rule 62-701.700 Florida Administrative Code (F.A.C.). This permit authorized the processing of Class III and Construction and Demolition (C&D) debris solid wastes in a 12,000 square foot building with sorting, ancillary screening and recycling facilities. In January 2005, TRI received a modified permit from the FDEP to accept Class I wastes within a proposed 6,600 square foot building expansion. In March 2005, TRI received an additional permit modification from the FDEP to accept Class I wastes within areas of the 12,000 square foot existing MRF building. An Orange County Solid Waste facility permit was issued in May 2006. Construction of the 6,600 square foot building expansion was completed in August 2007 along with several other facility improvements. A waste tire storage processing facility permit was approved as an ancillary process in June 2010.

### **2.0 OPERATION PLAN**

#### **2.1 Purpose**

The purpose of this Operation Plan is to describe the operation and maintenance procedures for the TRI facility located at 375 7<sup>th</sup> Street in Taft, Florida. The facility currently includes processing and storage areas for Class I and III materials. Materials accepted at the site include municipal solid waste, yard trash, concrete, asphaltic concrete, wood wastes, building debris,

cardboard, carpet, cloth, paper, glass, metal, plastic, waste tires, and furniture as described in Chapter 62-701, F.A.C.

## 2.2 Process Overview

All waste entering the facility will follow a process at the scalehouse of identification and sorting immediately upon arrival at the site. If the material is unauthorized, the driver will be directed to a solid waste management facility which is permitted to handle the type of material rejected. Appendix A contains a list of typical authorized and unauthorized materials for the facility.

Upon acceptance, the truck will be weighed and directed to the appropriate area where the waste will be placed on an indoor tipping floor. If the spotter or operator is located on heavy equipment when unauthorized waste is discovered, the equipment operator shall move the unauthorized waste away from the active area for placement in the appropriate container or shall stop the operation and notify another person on the ground, or another equipment operator, to remove the unauthorized waste for placement in the appropriate container before operations are resumed. Customers with presorted concrete/asphalt, wood waste or waste tires will be directed to the appropriate offloading area and monitored during offloading by a facility spotter. Class I waste will be managed on a first-in, first-out basis and will be placed by collection trucks in the Class I area located in the processing building and loaded onto transfer trailers for Class I landfill disposal. The Class III waste and C&D materials will also be placed in the building to undergo sorting operations in the form of placing the waste into a sorter with a conveyor belt where the material will be downsized and hand sorted. Unsuitable materials (i.e. paint containers, oil containers, etc.) will be temporarily stored inside the building and transported offsite for proper disposal. Recoverable (paper, plastic, cardboard, metal, etc.) and recyclable (wood and concrete) materials will be removed for recycling as market conditions allow. Cardboard is processed through a baler and wood wastes will be placed into a chipper. Mixed concrete and asphalt will be processed as a single material and loaded/transported to the JED Landfill in Osceola County. The JED landfill will further process the concrete/asphalt for recycling. Recovered screen materials (RSM) are stored in a covered concrete bin for transport to a Class I landfill for use as daily cover material or disposal.

The Class I waste tipping floor is enclosed within bays 3, 4, and 5 of the facility building. Class III/C&D tipping floors (bays 1 and 2) is separated by an eight foot concrete bin block wall. Ventilation, lighting and leachate control upgrades were added to the existing and expansion building to allow Class I waste acceptance, see following details in Sections 2.10 and 3.4.1.

Once the waste has been sorted, unacceptable waste or rejected wastes will be transported to the appropriate disposal facilities. A facility operations flow chart is provided in Appendix B.

### 2.2.1 Waste Quantity Projections

Future demand for recycled materials and disposed Class I and Class III waste material is expected to increase based on US Census data projections. Solid waste quantities are also projected to grow. Material types and quantities will be limited to the processing capabilities of this site. The primary operations at the facility will be transfer of Class I and III wastes and processing of Class III and C&D wastes for recycling. Transferred Class I and III wastes will



disposed at a permitted disposal facility. Processing of Class III and C&D wastes may include sorting, compacting and bailing, crushing and chipping. Estimated demands may require managing approximately 1,500 tons (estimated 6,445 cubic yards [cy]) per average operating day of Class I and Class III waste, with a maximum of 2,000 tons (estimated 8,421 cy) per day. This production rate of 77 to 108 tons per hour is well within the stated equipment capacities. All equipment specified for this site exceeds this initial anticipated average production rate. The equipment production capacities are 50 tons per hour for the sorter, 20 tons per hour for the cardboard compactor, and a minimum of 32 to 45 tons per hour for the wood chipper, depending on the type of material.

## 2.3 Management and Operations Personnel

Personnel trained for handling and processing of Class I, Class III, and C&D material will be designated to operate the facility. TRI will have certified operators on staff at all times during operation of the facility. The certifications for the current facility employees are provided in Appendix C. The Area and Post Collections Managers are responsible for overseeing operation of the Taft facility and other facilities within the Area. Overall management of the facility and general direction of the facility operations will be the responsibility of the Facility Manager, whose office will be located onsite. The Facility Manager's responsibilities include:

- Managing environmental compliance for the facility;
- Managing personnel requirements for the facility, including hiring of supervisory and operating personnel, and providing for their training and orientation;
- Ascertaining the operation and maintenance needs for the facility;
- Implementation of the Operation Plan for the facility; and
- Implementation of Equipment Maintenance Plans.

In the absence of the Facility Manager, duties and responsibilities of the facility will be performed by the Lead Operator/Site Supervisor. The Lead Operator/Site Supervisor's additional responsibilities include:

- Supervising the tipping floor;
- Supervising the placement of materials;
- Supervising heavy equipment operations; and
- Spotting loads.

Spotters will be employed on the tipping floor as loader equipment operators to pre-check each incoming load for unauthorized wastes and to manage sorting operations. Support staff, such as sorters, scale operators, and other equipment operators will be employed to facilitate operations at the facility.

## 2.4 Hiring and Training Program

In-house and publicly available training will be obtained to ensure that operators and spotters are properly trained to operate the facility and to identify and manage unacceptable materials

entering the facility. This plan is designed to fulfill the requirements of Rule 62-701.320(15) F.A.C.

In-house training will be provided on an as-needed basis, generally when new operators and spotters are hired until the required publicly available training is feasible. Any in-house operator training, which includes an examination required by Section 403.716 F.S., will be administered by an independent third party. Publicly available training will be provided on a schedule which complies with Rule 62-701.320(15) F.A.C. This will include 16 hours of initial operator training and eight hours of spotter training in the proper operation of the facility and to provide instruction in identifying unacceptable materials, especially materials that qualify as a hazardous waste.

Once every three years, each operator will complete eight hours of additional course work as a refresher to the initial training and to learn new operation procedures and information related to waste identification. Spotters will receive four hours of course work every three years as a refresher. The course work will be selected from courses available through the University of Florida TREEO Center that meet the needs of the facility. Records documenting the above training will be made available for inspection by the FDEP Staff at the facility and the office of the Facility Manager. Copies of current trainings certificates, schedules, and a list of approved classes are provided in Appendix C.

## 2.5 Emergency Telephone Numbers

Emergency telephone numbers are included in the Hurricane Preparedness Plan presented in Appendix D.

## 2.6 Emergency and Contingency Plan

In the event of inclement weather, accidents, fires, and equipment breakdowns, the appropriate provision of the contingency plan will be implemented immediately. Amendments will be made to this plan if the facility design, operations, or maintenance procedures change.

Incidents, which might require the assistance of outside emergency response agencies, will be handled by conventional means. In the event of a natural disaster, all waste will be transferred offsite, operations at the facility shall cease, and the facility shall be evacuated until the Facility Manager has deemed the area safe for contingency operations. The evacuation plan includes gathering all personnel on the site at the main office to account for everyone's whereabouts before dismissing the employees and directing them to leave the property. If time allows, operations will be maintained on a limited basis (no incoming waste), dependent upon the Facility Manager's determination, to allow continued removal of waste and materials off the property. Appendix D presents the Hurricane Preparedness Plan prepared by TRI and Appendix K presents the Emergency and Fire Preparedness Guidelines.

### 2.6.1 Inclement Weather Operations

Litter control at the facility will occur on a continuous basis during operating hours as a component of the site maintenance program. Loose stock piled materials will be secured to



prevent litter during windy events. Litter fences will be installed around material storage areas and processing points, see Section 2.12 Litter for further details.

## 2.6.2 Personal Injury Accidents

In the event of a personal injury at the facility, the nature and extent of the injury will be assessed to the extent possible by the onsite personnel and emergency first aid techniques administered by appropriately trained personnel as necessary. If the injury appears to require professional medical attention, emergency assistance will be obtained. If the injury requires non-emergency medical attention, the injured party will be transported by conventional means to a place of professional medical care, i.e., hospital, emergency room, doctor's office, or clinic. In all cases, the Facility Manager will be notified.

## 2.6.3 Vehicular Accidents

In the event of a vehicular accident at the site, a determination will be made regarding the feasibility of safely moving the vehicle(s) under their own power. If possible, the vehicles will be moved out of the way of normal traffic flow. If the vehicles cannot move under their own power and the vehicles are interrupting traffic flow, the vehicles will be pushed out of the way using onsite equipment. The Facility Manager will be notified and arrangements to have the disabled vehicles removed will be made in accordance with the directions of the Facility Manager.

## 2.6.4 Fire

In case of a fire, fire hydrants are located near the processing area (as shown on the Site Plan, Figure 1). Hose reels with 500 feet of fire hose, wrenches, and nozzles are located adjacent to each hydrant. Water service on the site is municipally-supplied. Fire extinguishers will also be located within the processing area, on all equipment, near the waste tire storage area, and within all buildings. A stand alone document titled Emergency and Fire Preparedness Guidelines has been prepared for the facility and approved by the Orange County Fire and Rescue Division (see Appendix K). This document describes in detail the measures taken to prepare for possible fires at the facility and the appropriate response.

Larger fires located anywhere on the site will be sprayed with water. The primary emergency phone number (911) and the Fire Department will be called immediately to respond to all fires.

During a fire, placement of combustible waste in the immediate area of the fire will be suspended. Placement of combustible waste in the area of the fire can only resume after a thorough inspection by the Facility Manager.

In the event of a fire in or on facility equipment, the following procedures will be followed by the equipment operator or other nearby facility personnel:

- Activate the on-board fire suppression equipment;
- If possible, safely move the equipment away from the fire immediately, shut off the engine, and drop blade;

- Signal other operators in the immediate area of the fire via radio, mobile phone, or by hand signals;
- Evacuate the vehicle; and,
- Extinguish any reoccurring fires with the fire suppression equipment on the facility vehicles.

Charged and tested fire extinguishers will be located throughout the facility, including the tipping floor, equipment maintenance building, scale office, and other site equipment (i.e., sorter, loaders and trucks).

There will be no open burning at the facility. Any accidental fires that take more than one hour to extinguish shall be promptly reported to Orange County and FDEP.

### 2.6.5 Hot Loads

Any hot load (of authorized material) identified will be dumped in an area away from the active processing area (east side of the building on the concrete pad, see Site Plan). The load will immediately be covered with soil or sprayed with water if a fire is imminent. All run off from hot loads will be directed to the leachate collection trenches. The waste will not be processed until it has cooled completely, and the fire hazard has been mitigated.

### 2.6.6 Hazardous Waste and Spills

Hazardous wastes are not accepted at the facility. The Lead Operator/Site Supervisor, spotters, and equipment operators will be responsible for spotting unauthorized wastes. In the event waste materials of questionable nature are unloaded before they are spotted by facility personnel, the source of the waste will be recorded, and the Facility Manager shall be immediately notified to determine the appropriate action. Typical actions will include: 1) isolation of the waste in the transfer building; 2) transfer and temporary storage of small containers/quantities in 55-gallon FDOT drums; 3) transfer of larger quantities of wastes into lined roll-offs or other disposal bins; and/or 4) mobilizing a 3<sup>rd</sup> party contractor to assist in managing and properly disposing of the waste (SWS Environmental Services, Clean Harbors Environmental Services etc.). Assistance from the FDEP may be requested or will otherwise be notified of the incident. All suspect hazardous wastes will be removed from the facility within five days.

Despite these precautions, if hazardous liquid waste, fuel, or oil is spilled at the site, absorbent material will be placed to contain the spill. The Facility Manager will be notified immediately in the event a spill occurs. During the operational hours of the facility, at least one person who is trained in the spill plan procedures will be onsite. In case of a spill, the following spill contingency plan will be implemented.

- In case of, or as soon as any spill is observed, the source of the spill will be located and actions taken to prevent further spillage, if possible.
- Valves, pumps, and electrical equipment will be shut off as appropriate.
- Potential ignition sources will be removed from and restricted from entering the area of the spill.



- Existing floor drains, sumps, and storm drains will be covered or a temporary dike constructed.
- Absorbent socks/booms will be used where appropriate. A spill response firm will be contacted, if necessary, to assist in these activities. The spill response firm will provide sampling and analysis for spill cleanup materials.
- All absorbed material or contained liquid will be removed and packaged in Florida Department of Transportation (FDOT) approved containers (55-gallon drums). Used absorbent materials should be packaged separately from liquids.
- All containers used for the disposal of petroleum spill response debris will be labeled with type of waste determined by visual inspection and laboratory testing, and the start date of accumulation, and disposed in accordance with Federal and State environmental regulations. Debris from large spills will be removed immediately by the spill response firm. Debris from small spills will be kept in one 55-gallon drum located in the processing area, for no longer than 30 days.

The following spill clean up equipment will be maintained at the facility:

- Spill response kit capable of containing a spill of at least 25 gallons will be located in the processing area. This kit includes absorbent spill pads, socks, and/or booms.
- An adequate amount of nitrile gloves, nitrile or rubber boots, and other personal protective equipment.
- First aid kit and eye wash.
- Fire extinguishers.

### 2.6.7 Equipment Failure

Sufficient backup equipment will be available for equipment breakdowns and downtime for normal routine equipment maintenance. In case of major equipment failure (both primary and backup equipment failure) the following procedures will be followed:

- Arrangements with contractors and rental equipment dealers will be made to furnish equipment on a short-term basis. Equipment will be available within one to two hours.
- Applicable facility operations will cease until equipment capacity is retained by renting the necessary equipment.
- Electrical power loss will require the use of onsite 8000 kilowatt (kW) generators to operate lighting and leachate pump systems.

## 2.7 Waste-type Control Plan

Emphasis will be placed on controlling the types of waste unloaded within the facility. Each load will be visually screened, to the maximum extent practical, by the equipment operator/spotter for unauthorized wastes (batteries, drums, gas cans, oil cans, paint cans, etc.) before unloading.



A 4-foot by 8-foot painted sign is located at the entrance to the facility, which indicates the types of waste allowed. The sign includes a notice that attempting to unload unauthorized waste will result in the delivery personnel having to reload the waste and remove the waste from the site.

TRI will have two full-time spotters/equipment operators, one on each tipping floor when waste is received and processed. These individuals will be trained in identifying hazardous and unauthorized wastes unsuitable for acceptance at the facility.

In the event unauthorized waste is observed by any spotter, sorter, or equipment operator, the spotter, sorter, or equipment operator will be responsible for isolating the suspect waste. The rejected waste will be loaded into the proper transport vehicle for disposal offsite and recorded in a log (see the Unauthorized Waste Log Form in Appendix E).

Reasonable effort will be made to prevent the delivery of unauthorized waste to the facility. In the event unauthorized waste is delivered to the facility, it will be handled as described in Section 2.6.6 and in accordance with applicable laws. Unauthorized waste will not be processed at the facility.

Pressure-treated lumber (i.e. treated with chromated copper arsenate (CCA)) will be recovered from the waste stream and transported to a lined Class I facility. The CCA treated wood will be either identified by waste type (fencing or decking) or by the distinctive greenish color.

### 2.7.1 CCA-Treated Wood Management Plan

TRI will follow best management practices recommended in the document Guidance for the Management and Disposal of CCA-Treated Wood, authored by the Florida Center for Solid and Hazardous Waste Management and FDEP. Excerpts from the FDEP guidance can be found in Appendix F.

In accordance with Rule 62-701 F.A.C., CCA-treated wood shall not be incorporated into compost or made into mulch, decorative landscape chips, or any other wood product that is applied as ground cover, soil, or soil amendment.

## 2.8 Weighing and Measuring Incoming Waste

All incoming and outgoing waste will be weighed on a calibrated scale prior to processing at the facility. TRI will retain all records at the regional facility's administrative office for a minimum of three years.

The records will be available to Orange County and FDEP personnel upon request. Report outputs can include daily, month-to-date, and year-to-date totals of waste received and County of origin.

## 2.9 Signs and Vehicles Traffic Control

Ingress and egress to the facility will be limited to the main entrance gate at 7<sup>th</sup> Street. A sign will be located at the entrance gate stating facility name, hours of operation,

acceptable/unacceptable wastes, and emergency phone numbers. Additional interior signs will be used to direct traffic to the appropriate tipping areas. Roadway access exists from the facility entrance gate located near the southeast property corner and extends through the scale area to the transfer buildings and exiting at the entrance gate area. Transfer trailers will enter near the southeast corner at the main entrance gate, load at the transfer building, and exit at the same southeast corner of the site. The entrance and exit roads will be accessible in all weather conditions. Lockable gates will control access to the site. Vehicle traffic flow is depicted on Figure 3.

TRI personnel will direct incoming truck traffic to expedite safe movement of vehicles within the facility. Traffic will be directed as necessary to prevent dangerous traffic conditions and to assure that any back up of in-bound vehicles is kept off of the public right-of-way.

## 2.10 Odor and Ventilation

Action shall be taken to prevent fugitive odors and particulates from creating offsite nuisance conditions in compliance with Orange County Code 38-1452. These steps include the following:

- Rejection of unacceptable waste that would create odors;
- Removal from the site of putrescible or other rejected waste that could cause odor problems within 48 hours;
- Cleaning of the MSW tipping floor daily;
- Active management of recycled materials;
- Use of odor masking agents applied by misters at all facility building openings and roof; and
- Wall mounted (three horsepower) ventilation fans installed in the existing facility building to insure interior ventilation.

## 2.11 Dust

The following steps will be taken to minimize fugitive dust emissions at the facility:

- The Taft facility will comply with Orange County Code Section 38-1452 that prohibits dust levels in excess of code limits. Fugitive dust emission will not be allowed offsite from transport, loading, unloading, or processing operations. All primary roadways and loading areas are paved.
- Sprinkling unpaved roadways, stockpile areas, and processing areas with water as necessary.

## 2.12 Litter

The site will be inspected daily for litter. Litter will not be allowed to accumulate and will be picked up daily (or as often as necessary) and put into appropriate containers for proper disposal. Litter fencing will be constructed to control blowing litter around the material storage areas and building (wherever feasible). TRI will collect litter weekly along West 7<sup>th</sup> Street access road (east from the facility to Sidney Hayes Road); Sidney Hayes Road (between West 7<sup>th</sup> Street and



Palmetto Street); Fourth Street (between Sidney Hayes Road and Boyce Avenue); Boggy Creek Canal Access Road (adjacent to property); and Recycle Center Road, if authorized by owners. Screen cages are proposed to be added to conveyor transfer points. The wood mulch storage area will be inspected daily to ensure that mulch product is maintained within designated areas of the property.

## 2.13 Vector Control

The following steps will be taken to minimize vectors at the site:

- Unacceptable wastes will not be accepted at the recycling facility.
- Rejected wastes will be promptly removed and disposed of at an appropriate disposal facility. Rejected waste will be removed within one week.
- Class I waste will be disposed offsite within 48 hours.
- Non-active portions of the site will be kept mowed and free from debris accumulation.
- If needed, pesticides will be used in accordance with Florida Department of Agriculture rules and standards.
- Waste tire storage and processing area will be monitored for the presence of vectors including mosquito control and eradication as necessary.

## 2.14 Hours of Operation

The facility is permitted to be open for operation 24 hours per day, seven days per week. Presently the facility is open during the hours listed below:

Monday through Friday 4:00 a.m. to 7:00 p.m.  
Saturday 4:00 a.m. to 2:00 p.m.  
Closed Sunday

Receipt or shipment of waste, and waste processing are limited to within the hours of operation. Activities such as maintenance and cleaning are not considered operational and may be scheduled at the facility's discretion. During non-daylight hours, lighting will be provided by 400-watt building and yard lights in the processing area.

## 2.15 Access Control and Site Security

Access to the facility will be controlled by an eight-foot tall chain link fence with two feet of barbed wire strands on the top. Security will be maintained by locking the entrance and exit gates during any times the facility is not operating. Semiannual inspections of the wall and fence will be conducted to identify locations in need of repair.

## 2.16 Equipment and Operation Procedures

The facility tipping floor operation is expected to operate with the following equipment:

- Front-End Loader (2)



- Excavator with Grapple (2)

The recycling operation is expected to operate with the following equipment:

- Fork Lift - Primary (2);
- Front-End Loader - Primary (1);
- Excavator - Primary (1);
- Sorting Line - Primary (1);
- Compactor - Primary (1);
- Horizontal Portable Wood Grinder - Primary (1); and
- Miscellaneous Roll-Off Containers/Bins (As Needed).

All of the equipment on the site will be owned by TRI. Details on the loaders, excavator, compactor, tub grinder (chipper), and tire shredder are provided in Appendix G.

Where appropriate, equipment will be fitted with safety cabs, fire extinguishers, and radio communication equipment. The radio equipment will also be stationed in the administrative offices located onsite, along with telephone service.

The onsite administrative offices will include potable water, sanitary facilities, emergency first aid supplies, telephone, fax, and electricity. The building also will provide shelter for employees during inclement weather conditions.

Maintenance to the equipment will be performed by TRI Mechanics or an offsite mobile contractor. General maintenance for heavy equipment will be performed in the maintenance area. Major overhauls of equipment will be performed offsite.

## 2.17 Notice of Violation

The Facility Manager will provide immediate notice to the Area and Post Collections Manager in the event TRI is notified by federal, state or local governmental agencies or officials regarding violations of any permits or approvals held by TRI relating to the operation and use of this facility. The Area and Post Collections Manager will respond appropriately to the various agencies, and immediately correct the noncompliance item.

## 3.0 CLASS I AND III OPERATIONS

### 3.1 Purpose

The facility processes the incoming material to remove that portion of the waste that has an end-use market. Residuals from the recycling facility are disposed of at appropriate disposal facilities.

### 3.2 Start Up and Shut Down Procedures

Start-up procedures will consist of the Facility Manager inspecting the processing and storage areas for safety purposes. Equipment will be turned on and allowed to warm up if necessary. Storage bins will be inspected to verify ample storage capacity for the day's activities. In the event that the storage capacity is inadequate, additional sorting will cease until the existing stored materials have been removed for resale.

The facility plans to clear the tipping floor of Class I wastes each day, to the extent possible. However, the facility anticipates receipt of Class I waste from evening pick-up routes and therefore may have Class I waste on the tipping floor at any given time. Under no circumstances will any Class I wastes remain on the tipping floor for more than 48 hours. Odor control, such as odor masking agents will be used if deemed necessary. Any unprocessed Class III material will be left on the tipping floor for next day's processing. The processed material will be contained within the confines of the designated storage bins.

### 3.3 Sorting Operations

Class I waste will only be accepted in the tipping area designated for Class I wastes. Class III and C&D wastes will be accepted only in the designated bays in the facility building (see Figure 3). Care will be taken not to commingle wastes. If wastes are mixed, the waste must be disposed of as the highest category of wastes, i.e., Class III mixed with Class I, will be disposed of at a Class I landfill.

Within the Class III processing area, an excavator and front-end loaders equipped with buckets or clamps will place the material into a sorting machine. Personnel will be available to hand sort the materials once the machine has removed the fines and reduced the material size. Sorted material will be placed in appropriate bins for recycling or transport vehicles for disposal off-site. Bins will be used in the sorting process (glass, paper, plastic, metal, wood, concrete, cardboard, and RSM (fines). RSM will be sampled in accordance with the FDEP's guidelines for reuse, or disposed of at a Class I landfill. It will be kept in a covered bin, as shown on the Site Plan.

Personnel will operate on an eight to 10 hour shift with a lunch break in between and will be on the tipping floor at all times when waste is received or processed.

### 3.4 Leachate Collection and Disposal

The Class I tipping floor of the building has a minimum six-inch impervious concrete floor and leachate collection system and will be cleaned daily and washed on a minimum weekly basis. The leachate collection clean-out covers will be opened during washing. Water shall be directed into the building from the open wall area (east side) to ensure that none of the water leaves the building. Leachate will be collected from this area and the transfer truck scale tunnel through drains and will be discharged to a lift station and storage tank. The trench drains or catch basins will be cleaned daily to prevent clogging. The Class III concrete tipping floor is enclosed within a 150-foot by 75-foot portion of the building. No water is expected to be involved in the processing of this material. Leachate collection in this area is typically stormwater that may



enter due to the open door on the east side and liquids that may leak from the vehicles. To keep this area clean and free of excess debris, all open floor areas in this portion of the building will be swept weekly. The leachate storage tank will have a high level alarm and will be pumped out by a permitted industrial waste hauler, as needed. Leachate is presently transported to the JED Solid Waste Management Facility located in St. Cloud, Florida, and managed in their permitted liquid waste solidification operations. Leachate disposal may occur at other state permitted wastewater disposal and treatment facilities located in the central Florida area. Manifests of all waste leachate removals will be maintained by TRI.

### 3.5 Processed/Unprocessed Material Disposal Plan

The processed (recycled/recovered) material is sold to a variety of different companies for many different uses. The most common uses are described below. After processing, wood waste will be chipped and sold for fill or mulch. ~~€ Mixed concrete and asphalt~~ will be further processed, crushed, ~~onsite or offsite~~ and sold. Cardboard and paper will generally be sold to a paper mill. Metal will be sold to scrap metal dealers, and glass will be crushed offsite and sold for fill material. Plastic will be sold to companies capable of recycling mixed plastic and the recovered screened material will be sold for daily cover material. The quantity and maximum storage time for each material is listed in the table in Appendix H.

Rejected Class I waste will be placed into larger transport trailers for disposal at a Class I landfill. Unprocessed Class III materials will be placed in a waiting transport vehicle for later disposal at a Class I or III landfill. Each type of reject waste will be stored in separated bin areas at the north end of the facility building/loading area (see Figure 3).

### 3.6 Equipment Operations and Maintenance Manual

Operations and maintenance for each piece of equipment will be in accordance with manufacturer's recommendations and manuals.

### 3.7 Safety Procedures for Vehicles

TRI personnel will direct incoming truck traffic to expedite safe movement of vehicles within the facility. Traffic will be directed as necessary to prevent dangerous traffic conditions and to assure that any back up of in-bound vehicles is kept off of the public right-of-way.

### 3.8 Stormwater Management

The site has a stormwater management system that controls the 25-year, 24-hour storm event prior to any discharge to Boggy Creek Canal.

The Facility Manager will perform weekly inspections of the stormwater management system. Any required maintenance or repairs will be made within seven days. The current FDEP stormwater permit number is ERP48-0179138-003.

### 3.8.1 Stormwater Monitoring

The TRI facility also has a Multi-Sector Generic Permit under the FDEP National Pollutant Discharge Elimination System (NPDES) stormwater program under permit number FLR05F457-003. This permit requires the implementation of a stormwater pollution prevention plan, stormwater pond inspections and records, annual submittal of discharge monitoring reports (DMR) by March 31<sup>st</sup> to the FDEP for the previous year, and routine stormwater monitoring at two year intervals.

### 3.9 Record Keeping/Submittals

Record submittal requirements for the recycling facility will be in compliance with Orange County and the FDEP requirements for these facilities.

Operational records shall include a daily log of: 1) quantities and types of solid waste received; 2) quantity of solid waste processed; 3) quantity of solid waste stored; and 4) quantity of solid waste removed from site for recycling or disposal. These records/logs will be compiled monthly and made available for Orange County and FDEP inspection at the facility.

The reporting requirements include submitting a report annually (by February 1) which summarizes the amounts and types of waste received and the amounts and types of wastes disposed of or recycled. The annual report will be submitted on the FDEP Form 62-701.900(7), per 62-701.710(8)(b) F.A.C. (see Appendix I). A quarterly report will be submitted to Orange County to record the solid waste type and quantity managed at the facility, including recycled, recovered and disposed materials.

## 4.0 WASTE TIRE PROCESSING FACILITY OPERATIONS

### 4.1 Waste Tire Site and Processing Facility Operations

In October 2009, TRI submitted an application to accept, store, and process waste tires at the facility, as authorized by under Chapter 62-711, Waste Tire Rule, F.A.C. Waste tires accepted, stored, and processed at the facility will be transported to Progressive Waste's JED Solid Waste Management Facility, St. Cloud, Florida, for disposal and/or use as initial cover. Rule 62-711.400(3), F.A.C allows waste tires that have been cut into sufficiently small parts, to be disposed of or used as initial cover in a permitted Class I landfill. For use as initial cover, a sufficiently small part means 70 percent of the waste tire material is cut into pieces of four square inches or less and 100 percent of the waste tire material is 32 square inches or less. For purposes of disposal, a sufficiently small part means that the tire has been cut into at least eight substantially equal pieces. Based on market conditions, TRI may transport the processed tires to other authorized end users for alternative recycling uses or disposal at other permitted solid waste management facilities.



## 4.2 Maximum Storage limits

Based on the data presented in Appendix J, the maximum storage limits of whole waste tires, processed tires, and residuals are established for the facility in the following summary:

### Summary of Maximum Storage Volumes and Weights

#### 10 - 40 cy Roll-off Containers for Whole Waste Tire Storage

Whole Waste Passenger	6,000 Tires	400 cy	67.5 tons
Heavy Truck Tires	6,000/1,225 Tires	400 cy	67.5 tons

The maximum storage weight is 67.5 tons regardless of tire type.

#### 6 - 40 cy Roll-off Containers for Processed Tire Storage

Processed Tires	N/A	225 cy	67.5 tons
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#### 1 - 40 cy Roll-off Container for Tire Residual Storage

Residuals	N/A	40 cy	10 tons
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TRI stores whole waste tires in 40-cy roll-off containers stationed north of the wood recycling area as shown on the attached Site Plan (Figure 3). The number of whole waste tires stored at the facility at any one time will depend on the type of tire (passenger or heavy truck) and the number of 40 cy roll-off containers that are stationed in the designated storage locations. The dimensions of a 40 cy roll-off container are approximately 20'L x 8'W x 6'H. As shown on Figure 3, approximately 17 containers can be neatly stationed in the area shown, while maintaining a minimum 25-foot fire lane. This allows for 10 containers to store whole tires, six containers for processed tires and one container for residuals. Waste Tire Processing Calculations and background information is provided in Appendix J.

The waste tire processing equipment used by TRI is a portable Saturn Model 72-44BGHT-300HP Shredder or similar equipment. Information for this shredder is provided in Attachment I. The shredder's reported single pass through-put capacity is 20 tons per hour. TRI processes the waste tires in the general location shown on Figure 3. The shredder equipment is equipped with conveyors that will allow the processed materials to be loaded directly into the designated containers or a transfer truck trailer. Processed tires and any residuals produced during processing will be directly loaded into 110 cy transfer truck trailers or 40 cy roll-off containers. Processed tires shall meet the minimum size requirements of Rule Section 62-711.400(3)(b), F.A.C. Once a container is fully loaded it will be immediately transported to the designated end use location or will be removed from the facility within 48 hours. Shredder mobilization, processing, cleanup, and demobilization can be completed in one day for the maximum storage volume of whole tires. Site equipment will be used to load any processed or residual materials that may fall onto the asphalt during processing operations.

At least 75 percent of the whole tires, used tires, and processed tires that are delivered to, or are contained on, the TRI waste tire processing facility at the beginning of each calendar year shall be processed and removed for disposal or recycling from the facility during the year.

## 4.2 Storage Requirements

As shown on Figure 3, TRI will store whole waste tires and processed tires in roll-off containers on the asphalt area located north of the wood recycling area. TRI will mobilize the portable shredding equipment when a sufficient supply of whole tires is collected and perform shredding operations in that location. To satisfy the outdoor storage requirements of Rule 62-711.540(3), TRI stores whole waste tires in 40 cy roll-off containers. Storage in roll-off containers will ensure water quality standards are maintained at the facility. The roll-off containers will be staged as shown on Figure 3 to allow unobstructed access for emergency vehicles. Fire prevention and preparedness measures have been established in accordance with the Emergency and Fire Preparedness Guidelines provided in Appendix K of this Operations Plan. The guidelines have been reviewed and approved by the Orange County Fire Rescue Division. Additionally, the facility will implement Best Management Practices (BMPs) at the waste tire storage and process area in accordance with the facility's Stormwater Pollution Prevention Plan and described in the following section.

## 4.3 Best Management Practices

Typical BMPs will include the following:

- Cleanup and sweeping of the asphalt pavement after processing is completed;
- Installing silt infiltration devices and oil absorbent socks around nearby stormwater inlets;
- Monitoring the surrounding asphalt surface area and the stormwater retention pond for the presence of oil sheens that could be attributable to the tire storage and processing operations; and
- Monitoring stormwater discharge at the retention pond outfall for evidence of non-authorized discharges.

In addition to the above-referenced storage and BMPs, additional monitoring and inspections required by the facility's NPDES permit will ensure water quality standards are maintained at the facility.

## 4.4 Mosquito Control Plan

The waste tire storage and processing area will be monitored for the presence of vectors including mosquito control and eradication as necessary. TRI will monitor the tire storage area on a daily basis for mosquito development. Insecticide applications will be performed by a local pest control company as necessary. In accordance with Orange County Code, any storage of waste tires for longer than 15 days will require implementation of a mosquito control program if there is the possibility that standing water will accumulate inside the tires.

## 4.5 Transportation of Waste and Processed Tires

Rule 62-711.520 requires any waste tire collector engaged in collecting or transporting waste tires for the purpose of storage, sale, recycling, reuse, disposal, or processing to be properly



registered with FDEP. Additionally, Rule 62-711.400(5) requires anyone that contracts the services of a waste tire collector for the transportation, disposal, or processing of waste tires to ensure that the collector is registered with the FDEP or exempt from registration requirements. TRI plans to contract the services of a registered waste tire collector to transport processed tires to the designated recycling or disposal entity. TRI will maintain records of waste tire collectors and volumes as described below.

## 4.6 Recordkeeping and Reporting

In accordance with Rule 62-711.530(4) F.A.C., TRI will record and maintain for three years the following information regarding waste tire acceptance, storage, and processing. Records will be made available at the facility for inspection by the FDEP during normal business hours.

- For all waste tires shipped from the facility:
  - The name and waste tire collection registration number of the waste tire collector who accepted the waste tires for transport.
  - The quantity of waste tires shipped with that collector.
  - If the waste tires were shipped with a person who is not a waste tire collector:
    - the number of tires shipped;
    - the person's name, address, and telephone number; and
    - the place where the waste tires were deposited.
- For all waste tires received at the facility:
  - The name and waste tire collector registration number of the collector who delivered the waste tires to the facility.
  - The quantity of waste tires received from that collector.
  - If more than five waste tires were delivered by a person who is not a waste tire collector:
    - the number of tires delivered; and
    - the person's name, address, and telephone number.
- For all waste tires removed from recapping:
  - The quantity and type removed; and
  - The name and location of the recapping facility receiving the tires.

In accordance with Rule 62-711.530(5) TRI will submit quarterly reports to the FDEP and Orange County that summarize the information above. The reports will be submitted by the 20<sup>th</sup> of the month following the close of each calendar quarter. The reports will be submitted on Form 62-701.900(21) and will also include the information listed below:

- The facility name, address, and permit number;
- The quarter covered by the report;
- The total quantity, by category, of waste tires received at the facility during the quarter covered by the report;

- The total quantity, by category, of waste tires shipped from the facility during the quarter covered by the report;
- The total quantity of waste tires processed during the quarter;
- The total quantity, by category, of waste tires located at the facility on the last day of the quarter; and
- A list of all dates on which one or more category of waste tires exceeded the storage limit, which category was in excess, and how this condition was relieved or will be relieved.

## **5.0 CLOSURE PLAN AND FINANCIAL ASSURANCE**

The closure of the facility will include removal of the operational equipment, which is completely mobile by design. Any remaining waste or recovered materials will be removed and hauled to an appropriate processing site or landfill. To protect Orange County and the State of Florida from bearing the cost of potential cleanup activities, a surety bond, or similar financial assurance mechanism, will be posted at the time of permitting, and updated annually, by March 1<sup>st</sup>. The purpose of the bond is to provide for closure of the site, if the permittee does not perform.

The owner or operator of the facility will notify the FDEP and OCEPD in writing prior to ceasing operations, and shall specify a closing date. No waste shall be received by the facility after the closing date. Within 30 days after receiving the final solid waste shipment, the owner or operator will remove or otherwise dispose of all solid waste or residue in accordance with the approved closure plan. Stored putrescible wastes shall continue to be managed in accordance with Rule 62-701.710(4)(b), F.A.C. Closure will be completed within 180 days after receiving the final waste shipment. Closure will include removal of all recovered materials from the site, as well as performing any contamination evaluation required by Rule 62-701.710(6)(c), F.A.C. When closure is completed, the owner or operator will certify in writing to the FDEP and OCEPD that closure is complete. The FDEP will make an inspection within 30 days to verify the closure and advise the owner or operator of the closure status.







**1501 Omni Way, St. Cloud, Florida 34773**

March 7, 2016

To Whom it May Concern:

We will accept clean concrete and asphalt from the Taft Transfer and MRF Facility at our JED Solid Waste Management Facility free of charge. This material is typically processed (recycled) and used for road base material within our landfill disposal area.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Hartings", is written over a horizontal line.

John Hartings  
District Manager  
Progressive Waste Solutions  
JED Solid Waste Management Facility