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Regulatory and Economic Resources
Environmental Resources Management
701 NW 1st Court • 7th Floor
Miami, Florida 33136-3912
T 305-372-6600 F 305-372-6893

November 21, 2016

Alfredo Reviati, President
American Tire Recycling Group, LLC
3551 NW 116th Street
Miami, FL 33167

CERTIFIED MAIL NO. 7014 1200 0002 0823 1739
RETURN RECEIPT REQUESTED

Re: Response dated October 24, 2016 to the Request for Additional Information No.1 (RAI#1) dated September 16, 2016 pertinent to a Waste Tire Processing Facility Permit Modification Application for the American Tire Recycling Group, LLC facility located at, near, or in the vicinity of 3551 NW 116th Street, Miami, Miami-Dade County, Florida; FDEP Project No. 0303329-003-WT / WACS No. 99254 / DERM File No. SW-1731.

Dear Mr. Reviati:

The Environmental Permitting Section (EPS) of the Department of Regulatory and Economic Resources (RER)- Division of Environmental Resources Management (DERM), under delegation by the Florida Department of Environmental Protection (hereafter jointly referred to as the Department), hereby acknowledges receipt of the referenced response via e-mail on October 24, 2016 and associated revision on November 3, 2016. Please see the item checked below for the status of your application.

- Checkboxes with text: This letter constitutes notice that a permit will be required for your project pursuant to Chapter(s), Florida Statutes. Your application for permit is complete as of xx-xx-xxxx and processing has begun. You are advised that the Department under Chapter 120, Florida Statutes, must take final action on your application within ninety (90) days unless the time is tolled by administrative hearing. [X] Your application for permit remains incomplete. Please provide the information requested on the attached sheet within forty-five (45) days of receipt of this letter. Evaluation of your proposed project will be delayed until all requested information has been received. The submittal to the referenced RAI was reviewed and deemed incomplete. Therefore, the additional information requested in the (attached) shall be submitted within forty five (45) days from the date of this letter. Further evaluation of the permit modification will be delayed until the outstanding RAI items have been addressed. At this time, no permit is required for your project by the Solid Waste Section. Any modifications in your plans should be submitted for review, as changes may result in permits being required. This letter does not relieve you from the need to obtain any other permits (local, state or federal) that may be required.

If you have any questions regarding the above, please contact Susana Palomino, P.E. or Johnny Vega, P.E. with the DERM Environmental Permitting Section at telephone number (305)372-6600 or via email respectively at paloms@miamidade.gov and vegajo@miamidade.gov.

Sincerely,

[Handwritten signature]

Rashid Z. Istambouli P.E., Chief
Pollution Regulation Division

cc: Patti Emad , Johnny Vega, P.E., Susana Palomino, P.E. – DERM
Alfredo Reviati – American Tire Recycling Group, LLC (via e-mail: areviati@gmail.com)
Ricardo Fraxedas, P.E.- Amec Foster Wheeler (via e-mail: ricardo.fraxedas@amecfw.com)

DERM File No. SW-1731

**WASTE TIRE PROCESSING FACILITY PERMIT APPLICATION
REQUEST FOR ADDITIONAL INFORMATION No.1 (RAI #1)**

In order to complete the review of the referenced application pursuant to Section 403.087(4), Florida Statutes (FS), Chapter 62-701 and 62-711, Florida Administrative Code (F.A.C.), please address the following Request for Additional Information (RAI) comments noted below. Note that said comments follow the sequence of the items outlined in the FDEP Waste Tire Processing Facility Permit Application form #62-701.900(23).

1. Although the department acknowledges the information contained in the referenced response, it has been determined that additional information/clarification is necessary to address the following concerns pertaining to the proposal:

The proposed modification seeks an increase of approximately 133 % in the facility's daily processing throughput. The information received to date claims that the facility's quantity of waste tires will not be affected by the increase, although no specific analysis or supporting information was included to substantiate the same. Based on this information, the following additional comments shall be addressed by the applicant:

- (a) The department is of the opinion that an increase in the processing volume of tires to a level equivalent to 28,000 tires/day (based on equipment throughput of 1800 tires/hr or 20 tons/hr during a 16 hr work day) is expected to result in an increase in the quantity of waste tires (whole waste tires and processed waste tires) to be handled/stored at the facility at any time. Since the requested modification implies that the facility may manage up to 28,000 waste tires on a given day, it is possible that the maximum storage quantity of waste tires subject to financial assurance requirements may have to be re-established for such a figure. The maximum quantity is dependent on operational conditions (e.g., quantity of whole waste tires received/stored, removal/shipment of processed waste tires off-site during working hours, operational efficiency, downtimes, etc), capacity limitations and adherence to waste tire storage requirements as addressed in items (b) and (c) below, as well as any other factor affecting the storage capacity of the site. In order to properly assess the applicant's claim, please provide an evaluation of the site's waste tire storage needs that considers the aforementioned factors.
 - (b) Pursuant to item (a) above, indicate the maximum volumetric capacity of each area designated for the storage/staging of whole and processed waste tires. Refer to the attached site plan provided with the original permit application that outlines the extents and locations of all such areas of the facility. In the event that the configuration or uses of the areas have changed, an updated site plan shall be provided along with the volumetric capacities. The use of outdoor storage areas (in trailers, storage containers, etc) shall not be assumed/included in the calculations.
 - (c) Pursuant to item (b) above, provide calculations demonstrating the maximum quantity of waste tires (whole and processed) that each of the facility's storage/staging areas can accommodate. This demonstration shall be compliant with the storage requirements of Rule 62-711.540, F.A.C. and also consider material circulation and accessibility needs at the site. The response shall also take into account the passenger and truck tire tonnage conversion criteria included in the definition of the term "Quantity of Tires" captured in Rule 62-701.200, F.A.C. If both passenger and truck tires are accepted at the facility, quantity assumptions applicable to each type based on historical data and/or operational experience shall be included. Conversions of whole waste tire quantities to tons of material shall be shown for consistency since both whole and processed waste tires are present at the site.
2. In the process of formulating a response to comment #1 above, please clarify if the requested modification to process 28,000 tires/day remains feasible based on operational and physical factors/limitations. In the event of a change, please update all applicable information (e.g., permit application, process descriptions, operations plan, flow charts, etc) for consistency.
 3. For increases in the maximum quantity of waste tires to be handled/stored at the site, the following shall be addressed:
 - (a) Provide a revised closure cost estimate that complies with the provisions of Rule 62-711.500(3), F.A.C. and that reflects the (updated) maximum quantity of waste tires (whole and processed) to be stored at the facility at any time. The permittee is not required to update the cost unit rate included in its most recent estimate recalculation as part of the response. In the event that a unit rate change is adopted, supporting information (e.g., third party estimates, etc) shall be included with the revised estimate.

- (b) Upon approval of a revised closure cost estimate inclusive of an increase in the facility's total closing cost, the permittee will be required to obtain the approval of the FDEP financial assurance coordinator for the establishment of a suitable a financial instrument in accordance with the financial assurance requirements of Chapter 62-711, F.A.C. This shall be satisfied as a requirement for the completion of the permit modification process.

Additionally, be advised of the following:

- If necessary, a meeting may be scheduled with DERM to discuss the comments of this letter. Said meeting shall be requested within seven (7) days of receipt of this letter. Please contact the reviewer listed at the end of page #1 to make the appropriate arrangements.
- All application content, format, and sequence shall be in accordance with Rule 62-701.320(7), F.A.C.

A minimum of two (2) original sets each of any plans, reports, and supporting information for the proposed construction, operation or closure of the facility shall be provided to RER.

- **When responding to this Request for Additional information (RAI), if a response modifies a section of the documents, the respective section(s) should be updated accordingly. A revised, complete version of the documents that includes all revisions made in responding to this RAI should be attached. To enable the Department to view changes to the documents, all additions should be underlined (e.g., added) and all deletions should be struck through (e.g., ~~deleted~~). Additionally, the submittal should make a positive statement that all revisions have been tracked in the aforementioned way. By this method, the Department hopes to have one final version of the respective documents that includes all revisions made during this permitting process.**
- All revisions to the drawings shall be clearly indicated by clouding the affected area and placing an adjacent triangular flag circumscribing the appropriate revision number on the drawing. A brief description of the revision made shall also be noted in the revision block on the drawing.
- If your responses involve the practice of engineering or geology, as defined in Chapters 471 or 492, Florida Status respectively, please have that work signed and sealed by a professional engineer or professional geologist as appropriate.
- If the applicant intends to request the issuance of a permit with duration of more than five (5) years (i.e., 10 or 20 year permit) with the permit application, it shall be demonstrated that the facility is in compliance with the provisions of Rule 62-701.320(9)(d), F.A.C and the applicant shall clearly state said intent in writing. In the event that the issuance of a permit with duration exceeding five (5) years is authorized by rule, the applicant shall indicate how it intends to pay the permit fee as allowed under Rules 62-701.315(13) and (14), F.A.C.
- 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.

NOTE:
DRAWING CREATED FOR REFERENCE PURPOSES ONLY AND IS NOT TO BE USED FOR CONSTRUCTION.

REFERENCE:
SITE & DEMOLITION PLANS CREATED BY:
CRISTINA FANDIÑO AIA
ARCHITECT
A.R. No. 0014682
9281 S.W. 76 St. MIAMI FLORIDA 33173
DATE: OCTOBER 2010 786.877.3179
DRAWN BY: LL
PROJECT MANAGER: C.F.

PROFESSIONAL ENGINEER
SIGNATURE: (NOT VALID WITHOUT SIGNATURE & RAISED SEAL)
DATE: *10/18/11*
NAME: **RICARDO FRAVEDAS**
STATE: FLORIDA
LICENSE No.: 43287
EXP. DATE: 02/28/13

MACTEC
MACTEC ENGINEERING & CONSULTING, INC.
5845 N.W. 158th STREET
MIAMI LAKES, FL 33014
TEL: (305) 826-5588 / FAX: (305) 826-1799
MACTEC PROJECT #: 6783-10-2164.01

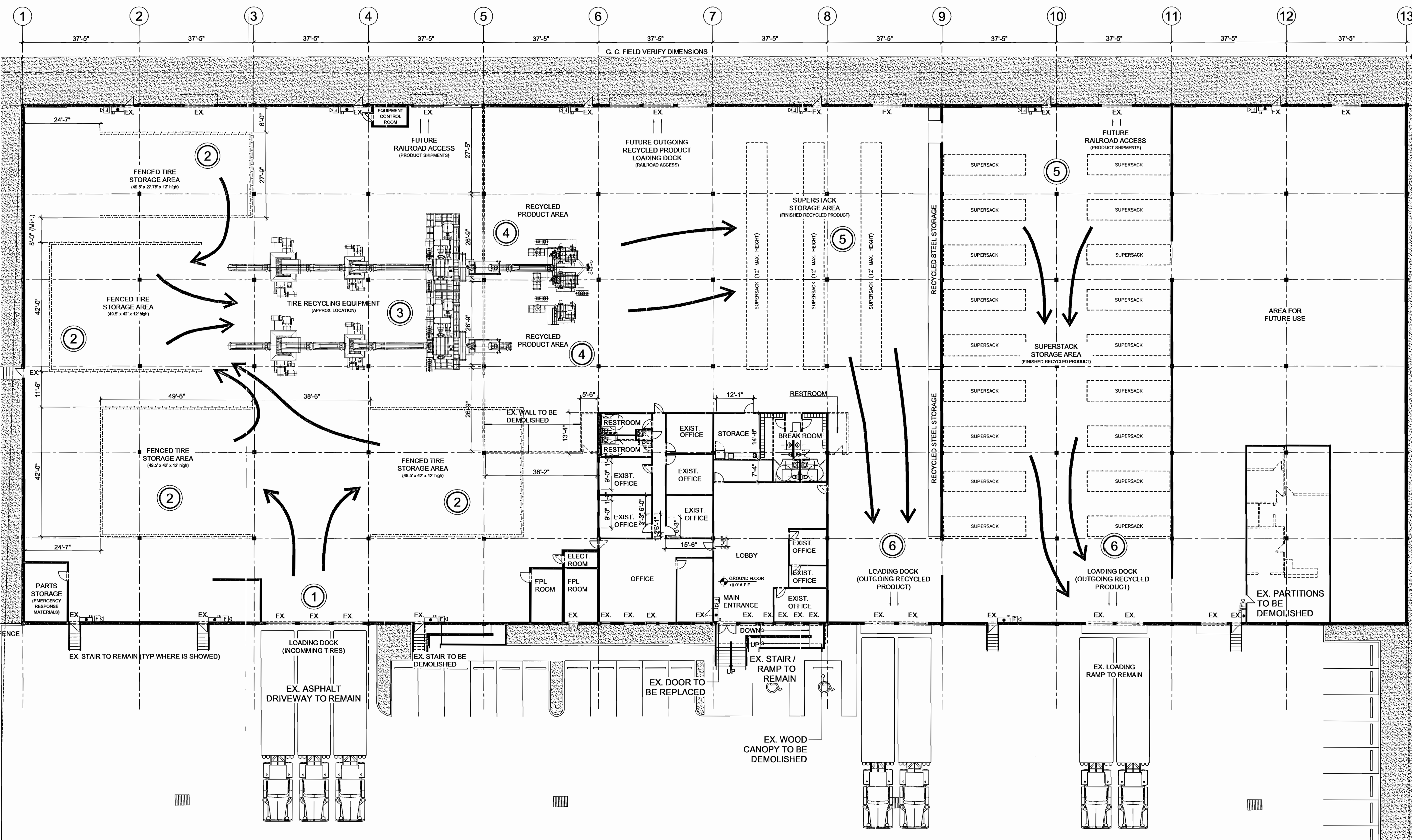
American Tire Recycling Group, LLC

3551 NW 116th STREET
MIAMI, FLORIDA 33167

FIGURE 2

FLOOR PLAN

DRAWN BY: N.A.B.	DATE: 01/18/11
CHECKED BY:	SCALE: AS SHOWN



FLOOR PLAN
SCALE: 1/16" = 1'-0"

- NOTES:
- DRAWING IS ONLY USED TO DENOTE PROCESS FLOOR STORAGE AND EQUIPMENT AREAS. NOT TO BE USED AS CONSTRUCTION DRAWING.
 - PARTITIONS TO BE DEMOLISHED ARE NOT BEARING WALLS

- LEGEND:**
- DENOTES EXISTING 8"x8"x16" MASONRY UNITS TO REMAIN
 - DENOTES EXISTING PARTITION TO REMAIN
 - DENOTES WALL OR OBJECTS TO BE DEMOLISHED
 - EXISTING WINDOW TO BE REMOVED
 - EX. EXISTING DOOR, WINDOW OR FIXTURE TO REMAIN
 - EXISTING WINDOW TO BE REPLACED. CONTRACTOR TO VERIFY SIZE OPEN AND SIZE OF NEW WINDOW GIVEN IN WINDOW SCHEDULE PRIOR TO PURCHASING WINDOW AND COORDINATE EXISTING OPENINGS.
 - FIRE EXTINGUISHER CABINET
 - FIRE ALARM AUDIO / VISUAL DEVICE
 - EXISTING DOOR AND FRAME TO BE REMOVED

- FLOOR PLAN UTILIZATION NOTES:**
- TIRES TO BE RECYCLED ARE UNLOADED HERE FOR STORAGE WITHIN THE FACILITY, PRIOR TO RECYCLING PROCESS.
 - TIRES ARE STORED IN THESE FENCED AREAS.
 - MAIN PROCESSING AND RECYCLING AREA FOR INCOMING TIRES.
 - RESULTING RECYCLED PRODUCT IS OUTPUTTED HERE, FOR STORAGE IN SUPERSACKS.
 - RECYCLED PRODUCT STORAGE AREA READY FOR SHIPPING.
 - SHIPPING AREA FOR FINISHED RECYCLED AND PACKAGED PRODUCT.