



# Florida Department of Environmental Protection

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Jonathan P. Steverson  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

January 6, 2017

Dennis Mulberger, General Managing Director  
Consolidated Tire Processing, LLC  
3100 S. Ridgewood Unit 190  
South Daytona, Florida, 32119  
consolidatedtire@aol.com

Re: First Request for Additional Information (RAI)  
Volusia County – Solid Waste  
Site Name: Consolidated Tire Processing, LLC  
Facility ID: 0310464  
WACs ID 100465  
DEP Application No.: 0310464-002-WT

Dear Mr. Mulberger:

Thank you for your application for Solid Waste Operation Permit Renewal for the above referenced Facility. The Department has assigned DEP Application No. 0310464-002-WT to the application. A Department staff review of the application and supporting documentation submitted on December 20, 2016, indicates the application is incomplete. Pursuant to the provisions of Rule 62-4.055, F.A.C., please provide the information in the attached document and refer to this correspondence in your response.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 60 days of the date of this letter, February 20, 2017, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-4.055(1), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

We recommend you contact Stephen Amirault when you have the information ready to be submitted. We can review it with you to make sure it addresses all the questions.

Please submit the response in electronic format to [DEP\\_CD@dep.state.fl.us](mailto:DEP_CD@dep.state.fl.us), with a copy to [stephen.amirault@dep.state.fl.us](mailto:stephen.amirault@dep.state.fl.us). If the file is very large, you may post it to a folder on the Central District's office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/Central\\_District/](ftp://ftp.dep.state.fl.us/pub/incoming/Central_District/). After posting the document, send an e-mail to [DEP\\_CD@dep.state.fl.us](mailto:DEP_CD@dep.state.fl.us), with a copy to [stephen.amirault@dep.state.fl.us](mailto:stephen.amirault@dep.state.fl.us), alerting us that it has been posted.

If you have any questions, please contact Stephen Amirault by telephone at 407-897-2942 or by e-mail at [stephen.amirault@dep.state.fl.us](mailto:stephen.amirault@dep.state.fl.us).

Sincerely,



F. Thomas Lubozynski, P.E.  
Environmental Administrator  
Florida Department of Environmental Protection

v. 1.4

cc:

Brian Pohl, P.E., Universal Engineering Sciences., [bpohl@UniversalEngineering.com](mailto:bpohl@UniversalEngineering.com)  
FDEP Central District: Tom Lubozynski, Stephen Amirault, Sirena Davila, Gloria-Jean DePradine

Attached: List of Requested Information

### **Attachment: List of Requested Information**

Consolidated Tire Processing, LLC  
Facility Name: Consolidated Tire Processing, LLC  
Facility ID: 0310464  
WACs ID No. 100465  
DEP Application No.: 0310464-002-WT

1. The application Section II C requests a permitted indoor storage capacity of 100 tons. Please confirm that this is equivalent to 10,000 tires and includes whole waste tires, baled tires, and used tires for resale.
2. The application states that Attachment items A-through F have been previously submitted in 2012. Item E requires that applicants for a waste tire processing facility submit a letter from the land owner authorizing the use of the land as a waste tire processing facility. The letter and lease agreement which was provided in 2012 states that the lease expires in February, 2017. Please provide an updated letter and lease agreement.
3. The emergency preparedness manual required by item Section III B.6 of the Application is required to be updated annually in accordance with Rule, 62-711.540(1)(e), F.A.C. The manual shall contain the following elements:
  - a. A list of names and numbers of persons to be contacted in the event of a fire, flood, or other emergency (For the FDEP Central District, use the receptionist phone number 407-897-4100 and general e-mail address: (DEP\_CD@dep.state.fl.us.);
  - b. A list of the emergency response equipment at the site, its location, and how it should be used in the event of a fire or other emergency; and
  - c. A description of the procedures that should be followed in the event of a fire, including procedures to contain and dispose of the oily material generated by the combustion of large numbers of waste tires. (We recommend that the manual state contact FDEP Central District to discuss what the necessary actions will be. The actions could vary depending on the severity of the fire.)
4. Financial Assurance Cost Estimate. The \$7,100 amount (\$0.71 per tire) which the Department approved on October 26, 2016 was only for the 2016 annual cost estimate update. The electronic mail which was sent to you approving this amount directed you to provide a new cost estimate to clean up the site for the requested permitted amount of 10,000 tires on-site. (In the e-mail, we stated, "The cost of \$0.71 per tire will not be accepted because the closure cost estimate must include additional costs, not just the disposal costs.") The application included letter from Liberty Tires, dated 11/28/2016 which stated the cost to transport, process, and dispose a 53-foot trailer filled with tires would be \$1,005. The Application did not include any costs or the cost basis for the following:
  - a. Cost for loading tires onto trailers;
  - b. How many trailer loads of tires would be required to remove 10,000 tires; and
  - c. The basis for estimating how many tires would fit into a 53-foot trailer.The following website has estimation tools for waste tires:  
<http://www.calrecycle.ca.gov/tires/enforcement/inspections/NumberTires.htm>  
Please provide an updated Financial Assurance Cost Estimate that includes the information above.