

Facility Operation
Part III- B
Cover Page

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**Part III-B-1
Facility Operation**

1.) FTT is a tire dealer that specializes in used tires. We purchase and get paid to procure our rough stock from which we process and sell our finished product. We sell used tires by repairing, regrooving, and mounting the tires. We also wholesale to other tire dealers throughout the state.

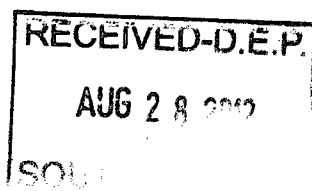
We receive our waste tires by collecting them throughout the state and bringing them to our Avon Park facility. We unload them at our unloading dock and place them into 5 categories.

The categories include a) Bias Truck, b) Radial Steel Truck, c) Passenger, d) OTR, and f) Reusable Tires. The first 4 categories are all waste and are stored on or adjacent to the loading dock. These waste tires are shipped out when a full truck load is accumulated. The last category is the reusable group and they are stored until processed. These are stored adjacent to our production facility.

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Part III-B-2
Facility Equipment

2.) FTT does not process whole tires into processed tires. This non-processing format makes it unnecessary to have processing equipment.



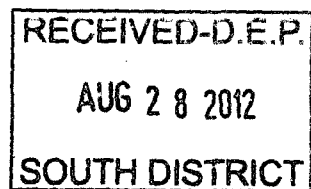
Part III-B-3
Waste From Processing

3.) FTT ships all its' tires as whole tires and in turn we have no waste from processing.

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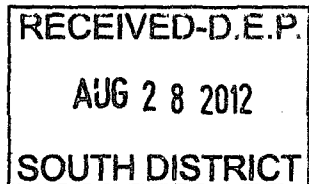
Part III-B-4
Maximum Daily Throughput

4.) FTT has the capacity to transfer 20 tons a day. Our current throughput is actually closer to 7 tons a day.



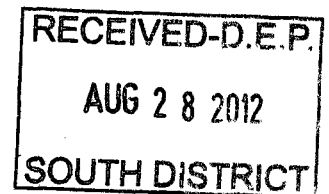
Part-III-B-5
Storage Requirements Compliance

I have included a plot plan with this narrative showing the approximate storage capacities of our designated storage cells. The total current units in storage totals 4400 units as of 03-15-06. These 4400 units totaled equal approximately 230.23 tons. These 4 cells are shown on the storage cell plot plan included. The Avon Park Fire Marshall concluded that these cells would be appropriate for tire storage. This approval is outlined in the Avon Park Fire Control Survey written on Nov 9th, 2004. In Conjunction with the survey we also requested and received an approval for "Alternate Procedures" in relationship to rules 62-711.540(2)(e), 62-711.540(2)(g), and 62-711.540(3)(c). This alternative procedure approval provides F.T.T. with the ability to store tires on the current facility. The State of Florida Dept. of Environmental Protection Division of Waste Management in Tallahassee, Fl. gave this approval and a copy is included.



**FLORIDA TIRE TERMINAL
EMERGENCY PREPAREDNESS
MANUAL
&
SAFETY MANUAL**

Edited 8/1/2012



Part III-B-6
EMERGENCY PREPAREDNESS MANUAL &
SAFETY MANUAL
Pg.-1

SECTION-I Planning

A) Fire Prevention

1-Cleanliness- all work areas and storage areas will maintain a clean atmosphere.

- a) Sweeping aisles at the end of a work day
- B) Put away tools and unfinished work.
- c) Clean up in work area by removing any papers, cups, rags or throw away debris.
- d) All aisles will be kept free of tires.

2-Safety- all employees will maintain themselves in a safe manner.

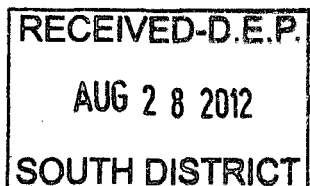
- a) Employees will wear safety glasses and gloves when working on tires
- b) Employees will take note of fire extinguishers and fire exits at all times.
- c) Employer will post exit signs and extinguisher locations in all work areas.
- d) Employer will provide maps with quickest exit routes for all buildings in case of fire.
- e) Employer will provide appropriate safety equipment when employees are working with hazardous materials. I.e.: respirators, safety glasses, gloves, chemical suits, and

3-Emergency Notification-

- a) Employer will establish and maintain a list of 4 emergency coordinators and their phone numbers to respond to emergencies
- b) Employer will provide phone numbers for the fire dept. and for emergency coordinator in the appropriate areas within the business premises.
- c) Employer will educate each employee as to the location of fire pull stations.

4-Fire Survey-APFD-1-08

- a) Employer will abide by all the provisions stated in the above Fire Survey.



Section-2 Equipment

A) Fire Equipment

1- Fire Extinguishers-

a) All extinguishers will be maintained monthly and their locations will be marked

2- Hazardous Fuels and Materials

a) All fuel and explosive materials will be stored in proper flames proof cabinets

3- Safety Equipment

a) All personal safety equipment will be stored in the office
And employees will be responsible for asking for it when it is needed.

4-Fire Warning Equipment

a) FTT will be responsible for installing and maintaining the proper smoke alarms and warning devices proposed in the "Fire Survey" dated November 9th 2004.

5-Training

a) All FTT employees attend a fire safety training class on an annual basis.

b) The class will be provided by local fire safety personal and will include.

I) - Fire extinguisher training

II) -Proper exit techniques

III) - Employees will study exit routes

Section-3 Emergency Reaction

A) Fire (early stages)

1-Employees should proceed to extinguish small fire while maintaining an exit pathway.

2-Employees should

Exit while activating fire pull station

3-Employees should dial 911 from safe location with easy exit pathway.

4-Employees proceed to designated meeting spot where a head count will be taken by lead manager.

5-Employees should note whether all visitors have exited from buildings.

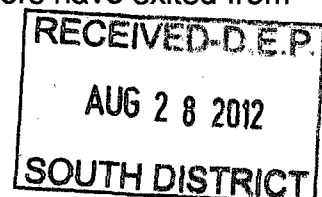
B) Fire (late stages)

1-Employees should exit and meet in designated areas
Wilhite St. on

2-Fire pull station should be activated during exit procedure

3-Employees should dial 911 from safe location with easy exit pathways

4-Employees should take note whether all visitors have exited from
Buildings



Public Emergency Official Phone #s

Fire or Police Emergency- 911

Avon Park Fire- 863-453-6557

Avon Park Police- 863-453-6622

Employee Emergency Contact Phone #s

Employee #s

**1-Bill Newbould- cell-863-443-1515
home-863-385-2117**

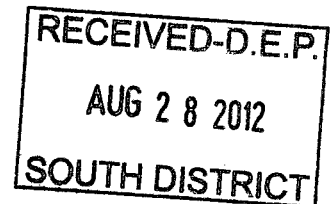
**2-Robert Reisig- cell-321-689-2445
home-407-876-3069**

3-Kevin Prince- cell-863-443-2609

**4-T.J. Judson- cell-407-446-2892
home-407-217-6362**

5-Eric Garcia- cell-863-443-2085

6-Candy West- home-863-443-2085



EMERGENCY RESPONSE EQUIPMENT

1) Fire Extinguisher Locations

The following diagrams show where the 11 monitored fire extinguishers are located.

These devices are monitored monthly to confirm there that they are charged up.

2)-First Aid Station Location-

The first aid supplies are located in the sales office. It is available to any employee who may need them.

3)- Skid Steer Loaders-

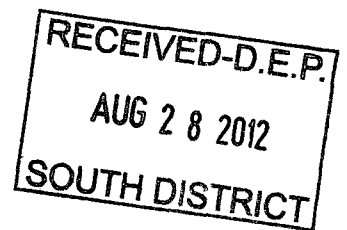
These loaders may be used in the event of a major catastrophe or falling of debris.

FIRE CONTAINMENT PROCEDURES

- 1-THE FLOW OF OILY RESIDUE WILL FLOW TOWARDS THE SOUTH WALL AND WILL BE CONTAINED THERE.**
- 2.THE FLOW COULD MOVE NORTHWARD WHERE THE RETENTION PONDS ON THE NORTH SIDE WILL CONTAIN THERE.**

RESIDUE CLEANUP

- 1-WE WILL USE THE LOADERS WITH BUCKETS TO PUT THE RESIDUE INTO THE PROPER CONTAINERS FOR DISPOSAL.**



**Part III-C-1
Completed Closing Plan**

- A) Stop access to site-All gates and doors will be locked preventing public access to site.
- B) Notices will be posted on gates and doors with forwarding number for public waste authorities.
- C) The county and state DEP will be notified.
- D) All waste tires and residuals will be removed to an authorized waste tire recycler.
- E) All solid waste will be removed to a permitted solid waste management facility
- F) A closing schedule will be generated based on factors present at the time of closing.
- G) The site will be rehabilitated if any contamination is present. Due to the fact that no tires are processed on site there should be no hazardous waste residuals present.
- H) Financial assurance will be provided

Note: A closing cost estimate has been included based on the most recent inventory taken on 01-25-12. The closing cost figures and inventory are attached to this page.

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NORTH

SCALE 1"=60'

CANFIELD STREET

1 STORY FRAME & METAL
(CONC. FLOOR)

1 STORY METAL
(CONC. FLOOR)

TIRE
CELL #3
50 TONS
STORAGE
CAPACITY

FIRE
LANE

FIRE
LANE

INDOOR STORAGE
30 TONS
STORAGE
CAPACITY

SHELL BERM

FIRE
LANE

FIRE
LANE

TIRE
CELL 2

BARRIER BLOCK

20' FIRE LANE

BARRIER BLOCK

CELL #1
60 TONS
STORAGE
CAPACITY

TIRE
CELL 1

FEAGAN STREET

BELL STREET

1 STORY METAL
(CONC. FLOOR)

FIRE
LANE

TRANSFER
AREA
90.23 TONS
STORAGE
CAPACITY

SHELL BERM

NO TIRE
STORAGE

1 STORY C.B.S.

BELL STREET

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AUG 28 2012

SOUTH DISTRICT

SCL RAILROAD

FLORIDA TIRE TERMINAL

2925 KENILWORTH BLVD. P.O. BOX 568
SEBRING, FLORIDA 33871-0568
883-366-5584

POLSTON ENGINEERING, INC.

SCALE 1"=60'

WORK ORDER # 03153

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

IN RE: FLORIDA TIRE TERMINAL
REQUEST PURSUANT TO
FLORIDA ADMINISTRATIVE CODE
RULE 62-701.310

CASE NO. SWAP-04-02

APPROVAL OF ALTERNATE PROCEDURES

This cause comes before me upon receipt of a request by Florida Tire Terminal. for the approval of alternate procedures and requirements under Rule 62-701.310, Florida Administrative Code (F.A.C.), for use of an alternate procedure for managing waste tires. The petitioner requests that an exception be granted from compliance with provisions of Rules 62-701.200 and 62-711.530, F.A.C., which require a waste tire processing facility to cut, burn, or otherwise alter waste tires so that they are no longer whole. The petitioner also requests an exemption from the following rules regarding the storage of waste tires:

- Rule 62-711.540(2)(e), F.A.C., which requires fire walls in certain locations;
- Rule 62-711.540(2)(g), F.A.C., which requires sprinkler systems in certain locations in lieu of fire walls; and
- Rule 62-711.540(3)(c), F.A.C., which requires a 50 foot fire lane around each waste tire pile.

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FINDINGS OF FACT

1. The petitioner currently operates a business that procures, repairs and sells used tires, retreaded, regrooved and new tires in Avon Park, Highlands County, Florida. The business receives shipments of used tires and sells used tires and retreaded or regrooved tires to the public. The petitioner has stated that an inventory of 15,000 tires is necessary to support the projected level of business.

2. The petitioner maintains some equipment to alter waste tires in preparation for retreading or to regroove them, but does not maintain equipment to cut, shred, burn, or otherwise alter waste tires so that they are no longer whole. However, the petitioner's operation does result in the removal of waste tires from the solid waste stream in Florida and the recycling, reuse, or disposal of those tires.

3. The Avon Park Fire Department has inspected the facility and set out fire control guidelines for the petitioner to follow to comply with NFPA Standard 231D, Standard for Storage of Rubber Tires, including the exceptions for existing buildings. This standard contains requirements, among others, that are equivalent to or more stringent than those found in Rules 62-711.540(2) and (3), F.A.C. In addition, the requirements imposed by this standard provide fire protection equivalent to that found in Rule 62-711.540(3)(c), F.A.C. The Avon Park Fire Department has notified the applicant it will require him to adhere to these standards.

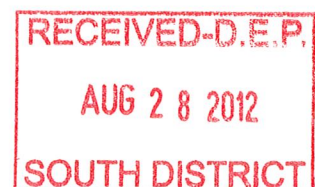


CONCLUSIONS OF LAW

Rule 62-701.310, F.A.C., authorizes the approval by the Department of alternate procedures and requirements concerning solid waste management facilities. Based upon the above findings and the information contained in the Request for Alternate Procedures the Department makes the following conclusions.

1. The petitioner manages waste tires, which are defined in Rule 62-701.200(134), F.A.C., as including used tires. The petitioner is therefore prohibited by Rule 62-711.400, F.A.C., from maintaining more than 1500 used tires except as an integral part of a waste tire processing facility.

2. A waste tire processing facility is defined in Rule 62-701.200(137), F.A.C., as a site where equipment is used to recapture reusable by-products from waste tires or to cut, burn, or otherwise alter waste tires so that they are no longer whole. The petitioner's facility contains some equipment for altering tires in preparation for retreading or to regroove them, but no equipment that would alter them so they are no longer whole. However, the petitioner has demonstrated that its facility serves the same purpose as would a waste tire processing facility that does use equipment to alter waste tires so that they are no longer whole, and will provide an equal degree of protection for the public and the environment. The petitioner has also demonstrated that its facility is expected to be at least as effective in removing waste tires from the solid waste stream as would a facility containing processing equipment. Therefore, the



Department concludes that the petitioner's facility should be regulated as a waste tire processing facility under Chapter 62-711, F.A.C.

3. The Department also concludes that compliance with NFPA Standard 213D, Standard for Storage of Rubber Tires, as required by the Avon Park Fire Department in its letter of November 9, 2004, will provide an equivalent degree of fire protection as would strict compliance with Department rules. For this reason, the relief requested from the provisions of Rules 62-711.540(2)(e), 62-711.540(2)(g), and 62-711.540(3)(c), F.A.C., is warranted.

Upon consideration of the foregoing it is therefore ORDERED that the request for alternate procedures from Rules 62-701.200, 62-711.530, 62-711.540(2)(e), 62-711.540(2)(g), and 62-711.540(3)(c), F.A.C., is GRANTED, so that the petitioner's facility may be considered a waste tire processing facility, subject to the following conditions:

CONDITIONS

1. This Order does not authorize the petitioner to operate the facility or to maintain more than 1500 used tires at the facility. Instead, the petitioner must obtain a separate waste tire processing facility permit from the South District Office of the Department. Failure of the petitioner to obtain such a permit may result in enforcement actions for operating a waste tire processing facility without a permit.

2. The petitioner shall submit a permit application for a Waste Tire Processing Facility that conforms to Chapter 62-711, F.A.C., to the South District Office of the Department within 30 days after receipt of this Order. If such a permit is issued, this



Order will be incorporated into that permit and will be reviewed at the time of permit renewal. However, unless the Department takes affirmative action to revoke or modify this Order, it will have an unlimited duration.

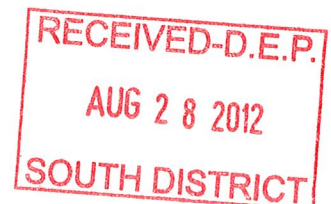
3. The petitioner may apply for a storage limit not to exceed 15,000 used tires. The storage limit shall not exceed the quantity for which financial assurance is provided as part of the waste tire processing facility permit. The facility shall not accept any waste tires if it has reached its permitted storage limit.

4. The petitioner shall not receive any waste tires if the tire selling business closes for any reason, unless the petitioner can demonstrate that the permitted storage limit for this facility will not be exceeded and that the proof of financial assurance is sufficient to close the site.

5. The petitioner shall comply with the fire control requirements set forth in the November 9, 2004 letter from the Avon Park Fire Department, which among other things, requires compliance with the NFPA Standard 231D, Standard for Storage of Rubber Tires.

NOTICE OF RIGHTS

Pursuant to Section 403.815, F.S., and Rule 62-110.106, F.A.C., you are required to publish at your own expense the enclosed Notice of Proposed Agency Action. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031,



F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. You must provide proof of publication to the Department at the address listed below within seven days of publication.

In the alternative, you may include the following language in the notice of proposed agency action for the waste tire processing facility permit, provided that the public notice allows 21 days for the filing of any petition:

The Department of Environmental Protection also gives Notice of its intent to grant approval of alternate procedures pursuant to Rule 62-701.310, Florida Administrative Code (F.A.C.), to Florida Tire Terminal, as part of the proposed permit. The approval is for an alternative to Rules 62-701.200, 62-711.530, 62-711.540(2)(e), 62-711.540(2)(g), and 62-711.540(3)(c) F.A.C., and will authorize Florida Tire Terminal, to operate a waste tire processing facility that does not cut, burn, or otherwise alter waste tires so that they are no longer whole, subject to several specific conditions.

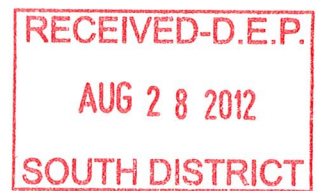
The Department's Intent to Grant Approval of Alternate Procedures shall become final unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.



A person whose substantial interests are affected by the Department's proposed agency action may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

Petitions by the applicant or any of the parties listed below must be filed within 21 days of receipt of this written notice. Petitions filed by other persons must be filed within 21 days of publication of the notice or receipt of the written notice, whichever occurs first. Under Section 120.60(3), F.A.C., however, any person who asked the Department for notice of agency action may file a petition within 14 days of receipt of such notice, regardless of the date of publication. The petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the discretion of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information:



(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are or will be affected by the Department's action or proposed action;

(d) A statement of all material facts disputed by petitioner or a statement that there are no disputed facts;

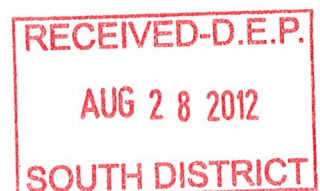
(e) A statement of the ultimate facts alleged, including a statement of the specific facts which the petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

A petition that does not dispute the material facts on which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be




different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

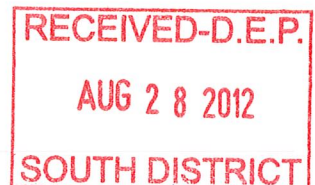
Mediation is not available in this proceeding.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within thirty days after this order is filed with the clerk of the Department.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Mary Jean Yon, Director
Division of Waste Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400




CERTIFICATE OF SERVICE

I, the undersigned designated Department clerk, HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by United States Mail to Mr. Robert A. Reisig, Manager, Florida Tire Terminal, 400 Feagin Street, Avon Park, , FL 33825, on this 31st day of January, 2005, in Tallahassee, Florida.

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120:52(11),
Florida Statutes, with the designated
Department clerk, receipt of which is
hereby acknowledged.


.. (Clerk)

1/31/05
(date)

Copies furnished to:
Chris McGuire
Bill Krumbholz
Jan Rae Clark





Fire Safety Survey

Avon Park Fire Department

Date: November 09, 2004

To: Bob Reisig
Florida Tire Terminal
400 Feagin Avenue
Avon Park, FL 33825

From: David Cloud
Fire Safety Inspector
98 S. Delaney Avenue
Avon Park, FL 33825

Subject: Fire Control

The Florida Fire Prevention Code NFPA 1 requires storage of rubber tires to comply with NFPA Standard 231D, Standard for Storage of Rubber Tires. It also grants an exception for *existing buildings*. Due to access concerns within and around the buildings I feel it is necessary to follow the guidelines of chapter three of NFPA231D dealing with storage arrangements.

NFPA231D-3 Storage arrangements

- 3-1.1 Piles shall not be more than 50 ft wide.
- 3-1.2 Main aisle width between piles not less than 8 ft.
- 3-2.2 Clearance in all directions from roof structures not less than 18 inches.
- 3-2.4 Storage clearance from heaters and ducts shall be at least 3 ft or according to equipment manufacturer's guidelines.
- 3-2.5 Maintain a clearance from light fixtures to prevent possible ignition.
- 3-3.1 On-tread piles are not to exceed 25 ft in the direction of the wheel hole.
- 3-3.2 Acceptable storage arrangements shall include:
 - A) On-floor, on-side up to 12 ft high.
 - B) On-floor, on-tread up to 5ft high.

C) Double-row or multi-row fixed or portable rack storage up to 5 ft high.

D) Single-row fixed or portable rack storage up to 12 ft high.

E) Laced tires in racks up to 5 ft high.

3-4 Tires shall be segregated from other storage by aisles at least 8 Ft wide.

Additional Fire Safety Requirements:

1. No storage will be allowed between the buildings and a clear distance of 25 feet will be maintained around the building perimeters.
2. Fire lanes within the outside storage will be maintained for firefighting access.
3. Piles will be controlled by a non combustibile barrier
4. Measures will be taken to control and contain run-off from hose streams.
5. Vegetation will be controlled around fences and walls.
6. All buildings will require a supervised alarm system for early detection of smoke and fire. The system should identify the building involved. A means of access will be provided to the alarm panel for quick location of fire.

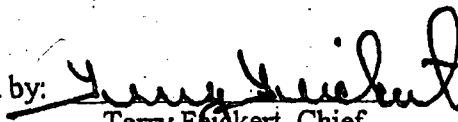
These requirements apply to existing buildings. Any renovations and new construction will be subject to current code requirements.


Pile dimensions also apply to outside storage.

Inventory:

Inventory shall be limited to 15000 tires.

Approved by:


Terry Feickert, Chief


David Cloud, Inspector