



Regulatory and Economic Resources  
Environmental Resources Management  
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December 15, 2017

Mr. William Kissel, Sr. Env. Manager  
Titan Florida LLC (f/k/a Tarmac America LLC)  
11000 NW 121<sup>st</sup> Way  
Miami, FL 33178

CERTIFIED MAIL NO. 7017 2400 0000 7830 0780  
RETURN RECEIPT REQUESTED

Re: Waste Tire Processing Facility permit renewal application dated November 13, 2017 for the renewal of FDEP Permit No. WT13-0314354-001 pertinent to the Titan Florida LLC (f/k/a Tarmac America LLC) Waste Tire Processing Facility located at, near, or in the vicinity of 11000 NW 121<sup>st</sup> Way, Miami, Miami-Dade County, Florida; Folio No. 30-2031-001-0010; FDEP Project No. 0314354-002-WT / WACS No. 100946; DERM File No. SW-1289.

Dear Mr. Kissel:

The Environmental Permitting Section (EPS) of the Pollution Regulation Division (PRD) of the Department of Regulatory and Economic Resources (RER), under delegation by the Florida Department of Environmental Protection (hereafter jointly referred to as the Department), hereby acknowledges receipt of the referenced submittal respectively on November 17, 2017 and additional/updated documentation respectively on November 29, 2017 (letter of authorization) and December 13, 2017 (revised permit application form). Please see the item checked below for the status of your application.

- ☐ 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 \_\_\_\_\_ 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.
- ☒ Your application for permit remains incomplete. Please provide the information requested on the attached sheet on or before 01/02/2018. Note that the referenced FDEP permit is set to expire on 01/11/2018, therefore unless the referenced permit renewal application is deemed complete by said date the permit will expire.
- ☐ The submittal to the referenced RAI was reviewed and deemed incomplete. Therefore, the additional information requested in the RAI (attached) shall be submitted within 30 days from the date of this letter. Further evaluation of the permit transfer will continue to 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 concerning this matter, please contact Johnny Vega, P.E. or Bruce Coward, P.E. of the EPS at telephone number (305)372-6600.

Sincerely,

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

cc: Patti Emad, Johnny Vega, P.E., Francisco Calleja, P.E., Bruce Coward, P.E. – DERM  
William Kissel – Titan Florida LLC (via email: WKissel@titanamerica.com)  
Maxwell R. Lee, Ph.D., P.E. – Koogler and Associates, Inc. (via email: mlee@kooglerassociates.com)  
Tammy Reed – Koogler and Associates, Inc. (via email: treed@kooglerassociates.com)  
FDEP – Solid Waste Financial Coordinator (via email: Solid.Waste.Financial.Coordinator@dep.state.fl.us)  
DERM File No. SW-1289

**TITAN FLORIDA LLC (F/K/A TARMAC AMERICA LLC) – WASTE TIRE PROCESSING FACILITY  
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 (F.S.), Chapter 62-701, Florida Administrative Code (F.A.C.), please address the following Request for Additional Information (RAI) items noted below:

1. In accordance with Rule 62-701.320(7)(f)(2), F.A.C., facility plans (e.g., Figure 3 – Plot Plan, etc.) shall be signed, sealed and dated by the certifying professional engineer
2. Pursuant to the requirements outlined in Part III, sub-item A(2)a, of the DEP permit application form #62-701.900(23), "Figure 3 - Plot Plan" does not clearly depict/identify the location and size of the facility's waste tire storage areas. If storage of waste tires is expected to be done in different areas of the site, the general location of all such areas shall be identified on the plan.
3. Pursuant to the requirements outlined in Part III, sub-item B, of the referenced DEP Form, please note the following comments:
  - (a) Verbiage under Section 2.0 of the submitted Plan of Operations differs from the throughput estimates provided in Section 4.0 of the Plan. The quoted typical feed rate of 1-3 tons/hour (equivalent to 24-72 tons/day) of whole tires is significantly less than the referenced daily throughput of 96 tons/day with its corresponding throughput of 35,040 tons/year.
  - (b) In regards to the submitted emergency response manual, the following comments shall be addressed:
    - (i) The RER-DERM 24-hr response line (305-372-6955) shall be included in the list of agencies to be contacted in case of an emergency.
    - (ii) The plan shall clearly address the provisions of Rules 62-711.540(1)(e)2 and 3, F.A.C.
4. The contingency plan requirements of Rule 62-701.320(16), F.A.C., shall be addressed in the application package. As certain requirements of the contingency plan are common/similar to the emergency response manual requirements of Rule 62-711.540(1)(e), F.A.C., it is recommended that a unified contingency/emergency response plan be presented that addresses both rules.

Additionally, be advised of the following:

- A. 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 shall be attached (i.e., partial corrections or individual corrected pages shall not be submitted).** 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.
- B. If needed, a meeting may be requested with this office to discuss the additional information requested hereby. Said request shall be made within seven (7) days of receipt of this letter.
- C. A minimum of two original sets of any plans, reports, and supporting information prepared in response to this letter shall be provided to the Department for review.
- D. All sets of the engineering plans, reports, and information supporting the application shall be compiled by the engineer of record who shall be responsible for assurance that all technical components have been prepared under the direction and supervision and signed and sealed by the professional registered in the State of Florida in each contributing technical discipline (Rule 62-701.320(6), F.A.C.).