



Regulatory and Economic Resources  
Environmental Resources Management  
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January 8, 2018

Mr. Elias Dammous  
MMD Enterprises, Inc.  
9975 NW 88 Avenue  
Miami, FL 33178

CERTIFIED MAIL NO. 7017 2400 0000 7830 0810  
RETURN RECEIPT REQUESTED

Re: FDEP Waste Tire Processing Facility permit renewal application dated December 11, 2017 for the MMD Enterprises, Inc. facility located at, near, or in the vicinity of 9975 NW 88 Avenue, Miami Dade County, Florida; FDEP Project No. 307930-002-WT/ FDEP WACS No. 100118; DERM File No. SW-1713.

Dear Mr. Dammous:

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 submittal on December 13, 2018. 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 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.
- 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 Francisco T Calleja, P.E. or Johnny Vega, P.E. with the DERM Environmental Permitting Section at telephone number (305)372-6600 or via email respectively at callef@miamidade.gov and vegajo@miamidade.gov.

Sincerely,

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

cc: Patti Emad, Johnny Vega, P.E, Francisco T Calleja, P.E. – DERM  
Elias Dammous – MMD Enterprises, Inc. (via email: info@mmdtires.com)  
Wilford Zephyr, P.E. – Zephyr Engineering, Inc. (via email: wzephyreng@gmail.com)  
Tor Bejnar – FDEP (via email: tor.bejnar@dep.state.fl.us)  
Oculus (FDEP WACS No. 100118) \ DERM File No. SW-1713



**MMD ENTERPRISES, INC.**  
**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) comments noted below.

1. The method for weighing the waste tires received on site shall be reflected on Section D. of Part II "Operations" of the Waste Tire Processing Facility Permit Application form.
2. The submittal includes a certification page signed by the engineer of record indicating that the previously submitted plans and operations remain unchanged. Note that as previously requested, such certification shall be expanded to list and reaffirm that all information (i.e. site plan, emergency response plan, description of operations, etc.) previously submitted by the applicant, and approved by the Department, remain valid. The submittal shall include the aforementioned statement and reinstate the applicable submittal/approval dates for all applicable documents. (*Rule 62-701.320(10), F.A.C.*)
3. The EPS acknowledges the cost estimate amount of \$ 6,800.00 for the loading, transportation and disposal of 12,000 waste tires, which equates to \$0.57/tire approximately. Note that a review of the disposal rates for waste tires published by the solid waste management authorities of Miami-Dade and Broward Counties<sup>1</sup> as well as the site abatement costs listed on table #6 of the FDEP's document titled "Waste Tires in Florida State of the State"<sup>2</sup>, dated August 27, 2015, indicate that the average disposal rate for waste tires exceeds \$0.57/tire. The published disposal costs by the County authorities alone exceed \$100/ton (i.e., more than \$1/tire assuming 100 tires/ton), while the State of Florida published abatement costs (which only covers up to the year 2014) are \$1.18/tire on average. The facility's cost estimate shall be representative of the closure costs that make closing most expensive. Please provide a revised closure cost estimate that addresses the aforementioned deficiencies. (*Rule 62-711.500(3), F.A.C.*)

<sup>1</sup>The County rates published online are limited to disposal costs. Loading and transportation costs are not included.

<sup>2</sup>The State of Florida report may be obtained online from <https://floridadep.gov/waste/permitting-compliance-assistance/content/tires-publications>. The published costs are not limited to the abatement of sites located in south Florida region. The costs are inclusive of all costs incurred to clean a specific facility (i.e., loading, transportation and disposition).

Additionally, be advised of the following:

- A. Based on the receipt date of the referenced permit renewal application and pursuant to Rule 62-701.320(10), F.A.C the renewal application is considered timely and sufficient. Therefore, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department.
- B. 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.
- C. 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.
- D. If your responses involve the practice of engineering or geology, as defined in Chapters 471 or 492, Florida Statutes respectively, please have that work signed and sealed by a professional engineer or professional geologist as appropriate.
- E. 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.