



# FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis  
Governor

Jeanette Nuñez  
Lt. Governor

Noah Valenstein  
Secretary

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, FL 32256

September 9, 2019

Mr. Jon E. Bischoff, President/Owner  
Advanced Tire Recycling, Inc.  
8369 SW County Road 313  
Trenton, Florida 32693  
Transmitted via email to: [trentontireman1@aol.com](mailto:trentontireman1@aol.com)

Re: Second Request for Additional Information (RAI)  
Gilchrist County – Solid Waste Permitting  
Facility Name: Advanced Tire Recycling, Inc., Waste Tire Processing Facility  
Facility WACS I.D. Number: 101060  
DEP Application Number: 321853-002

Dear Mr. Bischoff:

Thank you for the additional information submitted on August 29, 2019 for your Permit Renewal Application to continue to operate the Advanced Tire Recycling, Inc., Waste Tire Processing Facility. The additional information has been reviewed and the items listed below remain incomplete. Please provide the remaining information and refer to this RAI in your response. The response to this RAI must be signed, sealed, and dated by a registered Florida Professional Engineer.

To continue processing your application, the Department must receive a response within 90 days of this letter, unless a written request for additional time to provide the requested information is submitted and approved. It is the Department's desire to provide prompt turnaround times on permit applications, and a quicker response to this RAI shortens the timeframe for which a final decision on the application can be made. Pursuant to Rule 62-4.055(1), Florida Administrative Code (F.A.C.) and Section 120.60, Florida Statute, failure of an applicant to provide timely requested information by the applicant deadline may result in denial of the application. To ensure the response will complete your application, the Department requests that a meeting be scheduled prior to submitting a response to discuss the draft submittal. Once you have a draft submittal, contact Michael Bogin to schedule a meeting time and date.

Your processor, Michael Bogin, can be contacted at 904-256-1579, or by email at [Michael.Bogin@dep.state.fl.us](mailto:Michael.Bogin@dep.state.fl.us). Please submit the response by email to [DEP\\_NED@dep.state.fl.us](mailto:DEP_NED@dep.state.fl.us), with a copy to [Michael.Bogin@dep.state.fl.us](mailto:Michael.Bogin@dep.state.fl.us). If the file is very large, you may post it to a folder on this office's ftp site at: <ftp://ftp.dep.state.fl.us/pub/incoming>. After posting the submittal, send an email to [Michael.Bogin@dep.state.fl.us](mailto:Michael.Bogin@dep.state.fl.us) alerting us that it has been posted.

Sincerely,

A handwritten signature in blue ink, appearing to read "T. Kallemeyn".

Thomas Kallemeyn  
Permitting Program Administrator

ec: Jeff Schroer, DEP-NED  
Michael Bogin, DEP-NED

Solid Waste Financial Coordinator, FDEP, [Solid.Waste.Financial.Coordinator@dep.state.fl.us](mailto:Solid.Waste.Financial.Coordinator@dep.state.fl.us)  
Cyn DeLee Dalton, Advanced Tire Recycling, Inc., [cyndelee@advancedtirerecycling.com](mailto:cyndelee@advancedtirerecycling.com)

Attached: List of Requested Information

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1. Response was not provided. Please have a Professional Engineer, registered in the State of Florida, sign and seal the application form, and supporting documentation, then resubmit to Northeast District Waste Program staff.
2. Response was not provided. Please completely fill out application form's Part II.E. and Part II.F., and resubmit the completed form to Northeast District staff.
3. Response is not adequate. According to the Figure 1 "Site Location", several outdoor waste tire storage areas are located at the Facility. Each of the areas do not meet Rule 62-711.540(3), F.A.C. requirements. Specifically:
  - a. An outdoor waste tire pile shall have no greater than 50 feet in width and 10,000 square feet by area.
  - b. A 50-foot wide fire lane shall be placed around the perimeter of each outdoor waste tire pile. Access to the fire lane for emergency vehicles must be unobstructed at all times.
  - c. The site shall be bermed or given other adequate protection if necessary to keep liquid runoff from a potential waste tire fire from entering water bodies.

Please reconfigure outdoor waste tire piles to meet the Rule requirements and provide a revised "Site Location" plan. Also, please construct surrounding berm or given other adequate protection to keep liquid runoff from a potential waste tire fire from entering water bodies. Furthermore, please verify all waste tire piles/ storage areas are free of grass, underbrush, and other potentially flammable vegetation and that they will remain free of grass, underbrush, and other potentially flammable vegetation at all times.

4. Response was not provided. In accordance with Application Form Part III.B. requirements, please submit a "Facility Operation" plan that adequately summarizes and accurately reflects Rules 62-711.530 and 62-711.540, F.A.C.
5. Response is not adequate. According to 40 CFR 264.143(c)(7), "Whenever the current closure cost estimate increases to an amount greater than the penal sum, the owner or operator, within 60 days after the increase, must either cause the penal sum to be increased to an amount at least equal to the current closure cost estimate and submit evidence of such increase to the Regional Administrator [DEP], or obtain other financial assurance as specified in this section." The new closing cost estimates, dated June 12, 2019, were signed and sealed by a Professional Engineer on June 17, 2019, indicated an increase in the number of waste tires being stored on the property. Please provide updated financial assurance account information showing an increase in the amount of financial assurance for this site that is consistent with the increase in waste tires being stored on the property and reported in your most recent closure cost estimates.