



July 10, 2020

VIA ELECTRONIC MAIL: areviati@atrg1.com

Alfredo Reviati, President
American Tire Recycling Group, LLC
3551 NW 116th Street
Miami, FL 33167

RE: Responses dated June 16, 2020 and June 30, 2020 to the Request for Additional Information No.3 (RAI #3) letter dated June 5, 2020 pertinent to a Waste Tire Processing Facility Permit Modification Application for the American Tire Recycling Group, LLC facility located at, near, or in the vicinity of 3551 NW 116th Street, Miami, Miami-Dade County, Florida; FDEP Project No. 0303329-004-WT / WACS No. 99254 / DERM No. SW-1731.

Dear Mr. Reviati:

The Environmental Permitting Section (EPS) of the Department of Regulatory and Economic Resources (DER)-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 June 17, 2020 and updated information via email on June 30, 2020. Based on the Department's review, the application remains incomplete at this time.

Please provide the information requested on the attached sheet(s) as soon as possible. The Department must receive a response within ninety (90) days of the date of this letter, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-4.055(1), Florida Administrative Code (F.A.C.) and Section 120.60, Florida Statutes (F.S.), be advised that failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the permit application.

The herein requested information shall be submitted to the individuals listed at the end of this letter via email in electronic format. Be advised that failure to provide a timely response may also result in enforcement action by DERM.

For files that exceed the maximum allowable file size for email transmittals, a file transfer service (e.g., dropbox, FTP service, etc.) must be used to submit the response. All files must be transmitted in portable document format (pdf), contain one layer (flattened) without any embedded objects, not be encrypted or password protected, and not exceed 500 megabytes in size. If the response includes documentation that is required to be signed and sealed by a licensed professional (e.g., engineer, geologist, surveyor, etc.), the files must be electronically/digitally signed, sealed and dated in accordance with the rules of the applicable licensing board.

If you have any questions concerning the above, please contact the undersigned (email: johnny.vega@miamidade.gov) of the EPS at (305) 372-6600.

Sincerely,

Johnny Vega, P.E., Manager
Environmental Permitting Section
Pollution Regulation Division

Copies furnished to:

Johnny Vega, P.E., Danielle Jimenez, Alejandro Vergara – DERM (via email)
Ricardo Fraxedas, P.E. - Wood PLC (via email: ricardo.fraxedas@woodplc.com)
SW Financial Coordinator – FDEP (via e-mail: Solid.Waste.Financial.Coordinator@FloridaDEP.gov)
Tor Bejnar – FDEP (via email: Tor.Bejnar@FloridaDEP.gov)
ECM (DERM No. SW-1731) / Oculus (FDEP WACS No. 99254)

ATTACHMENT: REQUEST FOR ADDITIONAL INFORMATION No. 4 (RAI #4)

In order to complete the review of the referenced application pursuant to Section 403.087(4), Florida Statutes (FS), Chapter 62-701 and 62-711, Florida Administrative Code (F.A.C.), please address the following Request for Additional Information (RAI) comments noted below. Note that said comments follow the sequence of the items outlined in the FDEP Waste Tire Processing Facility Permit Application form #62-701.900(23).

1. Response accepted as of June 17, 2020.
2. Response accepted as of May 8, 2020.
3. For increases in the maximum quantity of waste tires to be handled/stored at the site, the following shall be addressed:
 - (a) The following comments are provided concerning the submitted closure cost estimate:
 - (i) Response accepted as of June 30, 2020.
 - (ii) Response accepted as of June 17, 2020.
 - (b) **Item remains outstanding.** Refer to the closure cost estimate approval letter dated July 10, 2020 issued under separate cover. In accordance with the provisions of Rule 62-701.630, F.A.C., you are required to provide the Department with proof of financial assurance issued in favor of the State of Florida in the total amount indicated above. Please contact the FDEP Solid Waste Financial Coordinator in Tallahassee at (850) 245-8732 concerning compliance with financial assurance requirements. Financial assurance documents shall be sent to the address below for review and approval. This comment shall remain outstanding until the FDEP coordinator's approval has been obtained.

Florida Department of Environmental Protection
Attn: Solid Waste Financial Coordinator
2600 Blair Stone Road MS 4548
Tallahassee, FL 32399-2400

For additional information pertaining to the preparation and submittal of financial assurance documents, please visit <https://floridadep.gov/waste/permitting-compliance-assistance/content/solid-waste-financial-assurance> or contact Mr. Tor Bejnar of the FDEP Solid Waste Financial Assurance section at (850) 245-8743 or via email at tor.bejnar@dep.state.fl.us.

4. Response accepted as of June 17, 2020.

Additionally, be advised of the following:

- A. If needed, a teleconference may be requested with this office to discuss the comments provided in this letter. Said request shall be made within seven (7) days of receipt of this letter.
- B. Failure to provide a timely response may result in enforcement action by DERM.
- 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 the permitting process.
- D. Be advised that additional information may be required by DERM upon receipt and review of the information requested in this letter.
- E. All revisions to plans shall be clearly indicated by clouding the affected area and placing an adjacent triangular flag circumscribing the appropriate revision number on the drawing. A brief description of the revision made shall also be noted in the revision block on the plan.

- F. 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.