



FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office
13051 North Telecom Parkway #101
Temple Terrace, Florida 33637-0926

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

REQUEST FOR ADDITIONAL INFORMATION

November 13, 2020

Mr. Thomas Fanell, CEO
U.S. Ironworks Company
P.O. Box 9220
Panama City Beach, Florida 32417
tjfanell@usironworks.us

Re: Second Request for Additional Information (RAI)
Hillsborough County – Solid Waste
Facility Name: Tire Shredders of America
Facility ID: 106062
DEP Application No.: 391792-001-WT/02

Dear Mr. Fanell:

Thank you for the additional information submitted on October 23, 2020, for DEP Application No. 391792-001-WT/02 for a new Waste Tire Processing Facility permit. The additional information has been reviewed and the items in the attached document remain incomplete. Please provide the remaining information and refer to this RAI in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

To continue the processing of your application, the Department must receive a response within 90 days of this letter, February 11, 2021, 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), F.A.C. and Section 120.60, F.S., 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 Mr. Justin Chamberlain to schedule a meeting time and date. If you have any questions, please contact Justin Chamberlain by telephone at (813) 470-5725 or by e-mail at Justin.Chamberlain@FloridaDEP.gov.

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Please submit your response by email to SWD_Waste@FloridaDEP.gov, with a copy to Justin.Chamberlain@FloridaDEP.gov. If the submittal 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 e-mail to SWD_Waste@FloridaDEP.gov, with a copy to Justin.Chamberlain@FloridaDEP.gov, alerting us that it has been posted.

Sincerely,



Pamala Vazquez
Program Administrator
Permitting and Waste Cleanup Program
Southwest District

cc: Robert Middleton, U.S. Ironworks Co., robertdemet@aol.com
Donald Fairbairn, P.E., Northside Engineering, Inc., don@northsideengineering.net
Ron Cope, Hillsborough County EPC, Cope@epchc.org
Steve Morgan, DEP Southwest District, Steve.Morgan@FloridaDEP.gov
Melissa Madden, DEP Southwest District, Melissa.Madden@FloridaDEP.gov
Justin Chamberlain, P.G., DEP Southwest District, Justin.Chamberlain@FloridaDEP.gov
Emily Wargo, DEP Southwest District, Emily.Wargo@FloridaDEP.gov

Attached: List of Requested Information

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U.S. Ironworks Company

Facility Name: Tire Shredders of America

Facility ID: 106062

DEP Application No.: 391792-001-WT/02

Waste Tire Processing Facility Permit Application (DEP Form # 62-701.900(23), F.A.C.), dated October 13, 2020 and received October 23, 2020

Part I - General Information

1. **B.8 & B.9.:** The anticipated dates to start and complete construction and the anticipated dates for receiving and processing tires seem premature based the receipt date of this application. Please note that construction and operation of a solid waste management facility without Department permit or authorization is a violation of Rules 62-701.300(1)(a), F.A.C. and 62-711.400(4), F.A.C. As previously requested in the Department's September 11, 2020 RAI #1, please verify that the facility has not initiated construction or the installation of processing equipment and is not currently storing or processing waste tires at this facility.

Part III - Attachments

2. **A.2. – Site Plan Drawing C4.1:** Please provide a revised Site Plan Drawing to ensure the requirements of Form 62-711.900(23), Item A.2 are met. The following deficiencies are noted:
 - a. As previously requested in the Department's September 11, 2020 RAI #1, please have the Site Plan Drawing signed and sealed.
 - b. The calculations provided for the Inbound Storage Area depicted on the Site Plan are based on the volume calculation of a cube, i.e., a 50 ft. by 50 ft. square pile with vertical sides perpendicular to the ground up to a height of 9 ft. Please note that it does not appear to be feasible to store loose tires in this manner, and that a pile of loose tires would have sloped sides, similar to a pyramid. Therefore, while the pile must remain no greater than 50 feet wide in accordance with the storage requirements of Rule 62-711.540(3)(b), F.A.C., the pile may need to be greater than 50 feet in length in order to store 80 tons of loose tires. Please review the storage requirements contained in Rule 62-711.540(3)(b), F.A.C. and recalculate the dimensions of the storage pile needed to store 80 tons of tires. Please revise the Site Plan as necessary to reflect the recalculated dimensions of the storage pile. Additional comments related to the storage pile are presented in Comment 5 below.
3. **B.5 - A description of how the operator will maintain compliance with the storage requirements of Rule 62-711.540, F.A.C.:** According to Drawing C4.1, a wetland exists both on and off the property. As previously requested in the Department's September 11, 2020 RAI #1, please explain how the Facility will comply with Rule 62-711.540(3)(a), F.A.C., which specifies that a waste tire site shall not be constructed, maintained or operated in or within 200 feet of any natural or artificial body of water, including wetlands.

4. **D. – Proof of Financial Responsibility:** The closure cost estimates provided in the Closure Calculation Letter, dated October 9, 2020 are not approved. Once the estimate has been approved, per Rule 62-711.500(3), F.A.C., please provide proof of financial responsibility. Please see Comment 7 below related to the closure cost estimate.

Operational Plan – Tire Shredders of America, Orient Road Tire Processing Center, dated July 31, 2020, revised September 17, 2020

5. **Operational Procedures - Section 5.:** The operation plan calls for a single storage pile for whole tires that measures 50 feet wide by 50 feet long and 9 feet tall. However, a whole tire pile would not achieve a cubic shape and the 80 tons of whole tires would not fit within the allotted area (2,500 sq. ft.). Please review and revise the operating plan, application form, site plan drawings and other portions of the application based on the calculations requested in Comment #2.b. above.

Regulatory Permits

6. As previously requested in the Department's September 11, 2020 RAI #1, please revise the Florida Department of Environmental Protection Reference ID of the Waste Tire Collector Registration to WACS ID No. 105935. The ID numbers provided (1866 and 1867) are the current year's decal numbers associated with the registration and will change annually. The WACS ID No. is permanently associated with the registration and will not change.

Closure Calculation Letter, dated October 9, 2020 – Rule 62-711.500(3), F.A.C.

7. As previously requested in the Department's September 11, 2020 RAI #1, please provide revised closure cost estimates, including all references, calculations and assumptions, utilizing third-party quotes from an authorized Waste Tire Collector or Processor for the loading, hauling, processing of whole tires and disposal of all waste tires (based on the maximum storage capacities for whole waste tires and processed tires) from the site. A third-party quote should be from a vendor authorized to haul waste tires and should include but not be limited to: a summary of the proposed services included under the quote, the name of the vendor, the pick-up location (i.e., Tire Shredders of America), the disposal location (i.e., the name of the permitted Waste Tire Processing Facility or permitted landfill), the unit cost for the quoted services, and the total cost based on the proposed maximum storage quantities at the facility. Please include all third-party quotes supporting the revised closure costs in your response. Please note that in the Department's experience, the provided estimate of \$19.75 per ton is significantly less than the industry standard for the processing and disposal of whole waste tires.