



FLORIDA DEPARTMENT OF Environmental Protection

Southwest District Office
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Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valensteln
Secretary

REQUEST FOR ADDITIONAL INFORMATION

April 8, 2021

John Arnold, Authorized Agent:
Angelo's Aggregate Materials, LTD
855 28th Street South
St. Petersburg, Florida 33712
John.Phillip.Arnold@gmail.com

Re: First Request for Additional Information (RAI)
Pasco County – Solid Waste
Facility Name: Enterprise Road Recycling and Disposal Waste Tire Facility
Facility ID: 87895
DEP Application No.: 303741-004-WT/02

Dear Mr. Arnold:

Thank you for your application for renewal of a waste tire processing facility permit submitted on March 19, 2021 for the above referenced Facility. A review of your application and supporting documentation indicates the application is incomplete. Please provide the information in the attached document 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, July 7, 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), Florida Administrative Code (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. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Your processor will be Emily Wargo and can be contacted at Emily.Wargo@FloridaDEP.gov, or (813) 470-5942. Please submit your response by email to SWD_Solid_Waste_Permitting@FloridaDEP.gov, with a copy to Emily.Wargo@FloridaDEP.gov. If the submittal is very large, please contact the permit processor to assist you with posting it to this office's ftp site.

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Sincerely,



Steven G. Morgan
Air & Solid Waste Permitting Manager
Permitting and Waste Cleanup Program
Southwest District

cc:

Dominic Iafrate, Angelo's Aggregate Materials, LTD, Diafrate@angelosrm.com

Glen Bleau, Angelo's Aggregate Materials, LTD, GBleau@angelosrm.com

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Emily Wargo, FDEP Southwest District, Emily.Wargo@FloridaDEP.gov

Southwest District Solid Waste Compliance Section, SWD_Waste@FloridaDEP.gov

Attached: List of Requested Information

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Angelo's Aggregate Materials, LTD

Facility Name: Enterprise Road Recycling and Disposal Waste Tire Facility

Facility ID: 87895

DEP Application No.: 303741-004-WT/02

Waste Tire Processing Facility Permit Application – DEP Form #62-701.900(23), dated and received March 19, 2021

1. **Part I-A, Item 7: History of Enforcement.** Please revise this section of the application form to mark 'yes,' and provide a history and description of the enforcement actions taken by the Department against the applicant relating to operation of any solid waste management facility in this state.
2. **Part II-C: Storage.** Please revise this section of the application form as necessary based on Comments 7, 8, and 13 (b) and (e).
3. **Part III-A, Item 2: Plot Plan.** The Site Plan provided in Attachment A does not appear to include all relevant information from the facility's current permitted Site Plan (dated and received November 12, 2013) and required by items (a) through (j), including but not limited to: stormwater control measures, legal boundaries of the land containing the facility, all access roads and internal roads, and the location of all fences, gates and other access control measures. Please revise the Site Plan to be at a scale of not less than one inch equal to 200 feet and to include all relevant information from the current permitted Site Plan and items (a) through (j). Please see Comment 13 below for additional comments related to the Site Plan.
4. **Part III-B: Facility Operation.** Please note, if any of the facility information requested below was previously submitted to the Department and is still valid, this information does not need to be re-submitted. Instead, the permit renewal application should be revised to list and reaffirm that the previously submitted information is still valid, in accordance with Rule 62-701.320(10)(c), F.A.C.
 - a. **Item 2.** Please provide the make, model, and hourly capacity of each piece of equipment used for processing tires.
 - b. **Item 3.** Please provide a description of the waste from the process, the amount of waste expected and how and where this waste will be disposed of.
 - c. **Item 8.** Please provide a description of how 75% of the annual accumulation of waste tires will be removed for disposal or recycling.
5. **Part III-D: Financial Assurance.** Please see Comments 6 – 10 below and revise the financial assurance cost estimate as necessary. If the recalculated cost estimate is greater than the amount currently on file with the Department, then updated proof of financial responsibility in accordance with Rule 62-711.500(3), F.A.C. will be required prior to issuance of the permit renewal.

Enterprise Class III Landfill and Recycling Facility Waste Tire Processing Facility Dimensions, Volumes, Capacities & Closure Cost Estimate, dated March 2016

6. The included cost estimate is a copy of the cost estimate provided with the March 2016 permit renewal. Please provide a recalculated cost estimate for the 2021 permit renewal that is based on new third-party quotes for: whole and processed tires, transportation, rims, residuals/Class I removal,

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and site clean-up and restoration. Additionally, please provide copies of all third-party quotes and reference materials used to calculate the cost estimate.

7. Please update the calculations for the Processed Tire pile and the Rims storage pile as necessary based on Comments 13(d) and (e) below.
8. Please see Comment 13(b) below regarding the Tire Processing Feed Area shown on the Site Plan and provide calculations for the dimensions, volume, and capacity of this area. The Department considers this area to be an additional storage pile, therefore it should be included in the facility's overall storage capacity and in the financial assurance cost estimate. Please revise the cost estimate accordingly.
9. Please provide a copy of the referenced Manufacturers Literature regarding the tire processor capacity or provide the reference for where this information was previously provided to the Department.
10. Please provide a copy of the referenced Rubber Manufacturers Association, Scrap Tire Characteristics, Section 3 regarding the density of shredded tires used in the calculations or provide the reference for where this information was previously provided to the Department.

Emergency Response Plan (Preparedness Manual) – Enterprise Road Recycling and Class III Disposal Facility, Waste Tire Processing Facility, dated March 2021

11. Section 2: Site Description and Layout

- a. Please revise the narrative in this section to include a description of the Tire Processing Feed Area shown on the Site Plan, including the dimensions and purpose of the Feed Area.
- b. The new Site Plan appears to depict different dimensions than what is described in this section of the Emergency Response Plan. Please review the Site Plan and update the dimensions of the processed tire storage pile in the Emergency Response Plan and the Closure Cost Estimate as necessary.

12. **Section 9: Notification.** Per Rule 62-711.540(1)(f), F.A.C., the operator of the site shall immediately notify the Department in the event of a fire or other emergency which poses an unanticipated threat to the public health or the environment and then submit a written report to the Department within two weeks of the emergency. Please revise the second paragraph of Section 9 to state that the operator will immediately notify the Department of an emergency and then submit a written report within two weeks, in compliance with Rule 62-711.540(1)(f), F.A.C.

13. Attachment A: Site Plan

- a. Please see Comment 3 above and revise the Site Plan as necessary.
- b. As stated in Comment 8 above, the Tire Processing Feed Area is considered to be a waste tire storage pile, and should therefore comply with the maximum dimensions for an outdoor waste tire pile as described in Rule 62-711.540(3)(b), F.A.C. Additionally, in accordance with Rule 62-711.540(3)(c), F.A.C., a 50-foot wide fire lane should be maintained around all outdoor waste tire piles. The provided Site Plan does not appear to maintain a 50-foot wide fire lane between Whole Tire Pile 3 and the Tire Processing Feed Area. Please review and revise the Site Plan as necessary.
- c. As referenced in Section 2 of the Emergency Response Plan, please revise the Site Plan to depict the locations of the water and soil supplies for fire suppression.

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- d. The Processed Tire pile appears to have different dimensions than those described in the Emergency Response Plan and included in the Closure Cost Estimate Calculations. Additionally, the dimensions of the Processed Tire pile appear to be greater than the maximum allowable dimensions of an outdoor waste tire pile contained in Rule 62-711.540(3)(b), F.A.C. Please review and revise the Site Plan, Emergency Response Plan, and Closure Cost Estimate as necessary.
- e. Please revise the Site Plan to include the Rim Storage pile. Please revise the Closure Cost Estimate Calculations as necessary based on the new/updated dimensions of the Rim Storage pile.
- f. The facility's current Site Plan (dated November 12, 2013) and the Closure Cost Estimate identify a Class I roll-off container adjacent to the waste tire processing area. Please revise the updated Site Plan to include the location of this Class I roll-off container.