

Mailing: Post Office Box 5127 Gainesville, FL 32627-5127 Physical: 4014 NW 13th Street Gainesville, FL 32609-1923 www.kooglerassociates.com 352.377.5822

Florida Department of Environmental Protection Department of Solid Waste <u>DEP_CD@Floridadep.gov</u> 3319 Maguire Blvd. Ste 232 Orlando, FL 32803-3767

RE: Suwannee American Cement Company, LLC - Tire Permit Renewal

Sumterville, Sumter County, Florida FDEP Permit No. 297136-003-WT

Dear Solid Waste Staff:

On behalf of Suwannee American Cement Company, LLC, (SAC) Koogler and Associates, Inc. is submitting this application package to modify the Suwannee American Cement Company's Tire Processing permit 297136-003-WT for their facility in Sumterville in Sumter County.

SAC is proposing to increase the amount of outside storage from 80.4 to 104 tons by adding 3 new trailers. No change to the tire throughput is proposed (15.4 tons). The total amount of tires on-site at any one time is 119.4 tons

A copy of this application package is being submitted electronically. Upon notice of receipt by the FDEP, SAC will provide the permit application fee of \$1250 electronically. If you have any questions regarding this submittal, please contact me at tgarcia@kooglerssociates.com.

Best regards,

Tammy L. Garcia

Environmental Scientist II

Herry & Garcia

/tlg

Enclosure

Cc: Manuel Sequera – Suwannee American Cement Company; manuel.sequera@ashgrove.com
Maxwell R. Lee, P.E. – Koogler and Associates, Inc.; mlee@kooglerassociates.com
FDEP – Solid Waste Financial Coordinator;

Solid.Waste.Financial.Coordinator@FloridaDEP.gov; Chantay.Jerger@FloridaDEP.gov



Florida Department of **Environmental Protection**

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 DEP Form #62-701.900(23)

Form Title: Waste Tire Processing

Facility Permit Application

Effective Date: January 6, 2010 Incorporated in Rule 62-711.530(6)

Waste Tire Processing Facility Permit Application

Perr	nit No.					
Ren	ewal ☐ Modification ☐	Existing unpermitted facility	Proposed new facility □			
Part	I-General Information:					
	Applicant Information: Applicant Name: Applicant Street Address:	annee American Cement Comp				
	City:					
		,				
5.	City:	County:	Zip:			
6.	Contact person:	Phone: ()	FEID No:			
В.	any solid waste management facility in this state? This includes any Complaint, Notice of Violation, or revocation of a permit or registration, as well as any Consent Order in which a violation of Department rules is admitted. It does not include a Warning Letter, Warning Notice, Notice of Noncompliance, or other similar document which does not constitute agency action. Yes No If yes, attach a history and description of the enforcement actions. 8. Facility Information:					
1.	Facility Name:					
2.	Facility Street Address (Main	Entrance):				
3.	City:	County:	Zip:			
4.	Facility Mailing Address:					
5.	City:	State:	Zip:			
6.	Contact Person:	Phone:	()			
7.	Facility Location Coordinates:					
	Section:	Township:	Range:			
	Latitude:	Longitude:				
8.	Anticipated date for starting co	onstructionand for	completion of construction			
9.	Anticipated date for receipt of	tiresand for	start of processing			

Mail completed form to appropriate district office listed below

DEP Form #62-701.900(23)

Form Title: Waste Tire Processing Facility Permit Application

Effective Date: January 6, 2010 Incorporated in Rule 62-711.530(6)

C .	Land Owner Infor . Owner's name:	·		nent Company,	LLC	
2	. Land owner's maili	ng address:		, ,		
3	. City:		State:		Zip:	
4	. Authorized Agent:			Agent's phone	e (<u>) </u>	
5	. Current lease expir	es:				
D. 1.	Facility Operator I Operator's name:	•):		
2.	Operator's mailing	address:				
3.	City:		State:		Zip: _	
4.	Contact person:			Phone: ()	
E. 1.	Preparer of Applic Name of person pre					
2.	Mailing address:					
3.	City:		State:		Zip:	
4.	Phone: ()					
5.	Affiliation with facili	ty:				
	t II-Operations: Facility type (checl	(appropriate box)	:			
	Waste tire processing	ng facility.				
	Waste tire processir	ng facility with on -s	ite disposal of proce	essed tires or proce	ssing residuals.	
	Waste tire processir	ng facility with on -s	ite consumption of v	waste tires or proces	ssing residuals.	
	Permitted solid was	te management fac	ility modification to	allow wa ste tire site	and processing.	
B.	Type of processing	facility (check as	many as apply):			
		Cutter □Cho Supplemental fuel u			ator with energy rec	overy
C.	Storage: Indicate the expressed in tons, to					ssing residuals,
		Outdoor Storage(tons)	Outdoor Storage (sq.ft)	Indoor Storage (tons)	Indoor Storage (sq.ft)	Total Storage (tons)
٧	/hole waste tires:					
P	rocessed tires:					
Ρ	rocessing residuals:					
Т	OTALS:					

DEP Form #62-701.900(23)

Form Title: Waste Tire Processing Facility Permit Application

Effective Date: January 6, 2010 Incorporated in Rule 62-711.530(6)

D.	For reporting quantity	of tires in tons, tires will be:	weighed on site ☐ weights will be calculated	weighed off site \square ated \square
E		pe disposing of processed tire management facility where p		al on the facility site must indicate the als will be disposed.
1.	Name of facility			
2.	Street address:			
3.	City:	Co	unty:	Zip:
F.	Facilities that will be delivering processed tires to consuming facilities must describe the existing or proposed markets for those processed tires.			
-				
-				

Part III-Attachments:

A. Facility design

NOTE: All maps, plan sheets, drawings, isometrics, cross sec tions, or aerial photographs shall be legible; be signed and sealed by a registered professional engineer responsible for their preparation; be of appropriate scale to show clearly all required details; be numbered, referenced to narrative, titled, have a legend of symbols used, contain horizontal and vertical scales (where applicable), and specify drafting or origination dates; and use uniform scales as much as possible, contain a north arrow and use NGVD for all elevations.

- A topographic or section map of the facility, including the surrounding area for one mile, no more than one year old, showing land use and zoning within one mile of the facility
- 2 A plot plan of the facility on a scale of not less than one inch equals 200 feet. At a minimum, the plot plan shall include
 - a. The facility design, including the location and size of all storage and processing areas for used tires, unprocessed waste tires, processed waste tires, and waste tire processing residuals;
 - b. All wetlands and water bodies within the facility or within 200 feet of any storage area;
 - c. Stormwater control measures, including ditches, dikes, and other structures;
 - d. Boundaries of the facility, legal boundaries of the land containing the facility, and any easements or rights of way that are within the facility or within 200 feet of any storage area;
 - e. Location, size, and depth of all wells within the facility or within 200 feet of any storage area;
 - f. All structures and buildings that are, or will be, constructed at the fac ility; include those used in storage and processing operations;
 - g. All areas used for loading and unloading;
 - h. All access roads and internal roads, including fire lanes;
 - i. Location of all fences, gates, and other access control measures; and
 - i. Location of all disposal areas within the facility.

B. Facility operation.

- 1. A description of the facility's operation, process and products including how waste tires will be received and stored.
- 2 A description of the equipment used for processin g tires. This description shall include the make, model, and hourly capacity of each piece of equipment.
- 3 Description of the waste from the process, the amount of waste expected and how and where this waste will be disposed of.
- 4 Statement of the maximum daily throughput and the planned daily and annual throughput.
- 5 A description of how the operator will maintain compliance with each of the storage requirements of Rule 62 711.540, F.A.C.
- A copy of the emergency preparedness manual for the facility with a statement of the on site and off site locations where that manual will be maintained.
- 7. A copy of the fire safety survey
- 8 A description of how 75% of the annual accumulation of waste tires will be removed for disposal or recycling.
- C. Completed closing plan for the facility as required by Rule 62 -711.700(2) and (3), F.A.C.

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Form Title: Waste Tire Processing

Facility Permit Application

Effective Date: January 6, 2010 Incorporated in Rule 62-711.530(6)

- Attach proof of financial responsibility as requirement by Rule 62 -711,500(3) OR a calculation showing that D. financial assurance documents, currently on file with the Department, are sufficient to assure closing of the waste tire site as well as any other solid waste management facility at that location.
- A letter from the land owner (if different from applicant) authorizing use of the land as a waste tire pr ocessing E. facility.
- If waste tires will be consumed or diposed of at the facility, attach a description of the other environmental F., permits that the applicant has for this use, including, permit number, date of issue, and name of issuing agency
- The permit fee as required in Rule 62-4, F.A.C.

Part IV-Certification:

Applicant:

The undersigned applicant or authorized representative of

Suwannee American Cement, Company, LLC

Is aware that statements made in this form and attached information are an application for a Waste Tire Processing Facility Permit from the Florida Department of Environmental Protection and certifies that The information in this application is true, correct and complete to the best of his knowledge and belief. Further, the undersigned agrees to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department. It is understood that the Department will be notified prior to the sale or legal transfer of the facility.

Dirk Cox

Digitally signed by Dirk Cox Date: 2022.12.15 08:28:07 -05'00'

Dirk Cox, Plant Manager

12/15/2022

Signature of Applicant or Authorized Agent

Name and Title

Date

Professional Engineer registered in Florida. В.

This is to certify that the engineering features of this waste tire processing facility have been Designed/examined by me and found to conform to engineering principals applicable to such facilities. In my professional judgment, this facility, when properly maintained and operated will comply with all applicable statues of the State of Florida and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions for proper maintenance and operation of the facility.

Signature

PO Box 5127

LeeuPh.D., P.E.

Mailing Address

Gainesville, FL 32627-5127

City, State, Zip

352-377-5822

Telephone number

12/16/2 % Date

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PART III – ATTACHMENTS

SECTION A – FACILITY DESIGN

Attachment 1: Topographic Map

Attachment 2: Zoning and Future Land Use Map

Attachment 3: Facility Plot Plan

Attachment 4: Tire Feed System Plan View Layout

SECTION B - FACILITY OPERATION

Attachment 5: Comprehensive Operations Plan

Attachment 6: Hazardous Materials Emergency and Contingency Plan

Attachment 7: Fire Safety Survey

SECTION C- CLOSING COST ESTIMATES

SECTION D - FINANCIAL ASSURANCE

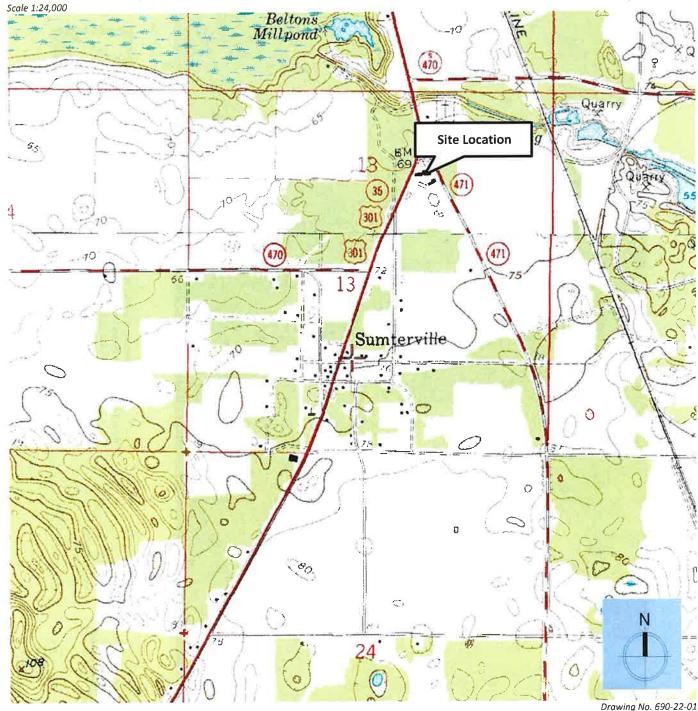
Attachment 8: Closing Costs and Financial Assurance

USGS Map Name: Bushnell, FL

MAP MRC: 28082F1

MapCenter: N28.74499° W82.06342° Datum: NAD83 Zoom: 4m/pixel

NOTE: Topographic map was accessed on 3/1/2022 from: https://www.topoquest.com/map.php?lat=28.74499&lon=-82.06342&datum=nad83&zoom=4&cross=on



Professional Engineer Certification:

I, the undersigned me leby certify, except as particularly noted herein* that based on information and belief formed after reasonable inquiry, to the nest of my knowledge, the statements and information in this document are true, accurate and complete any exceptions are attached.

NAMONS THINITING THE

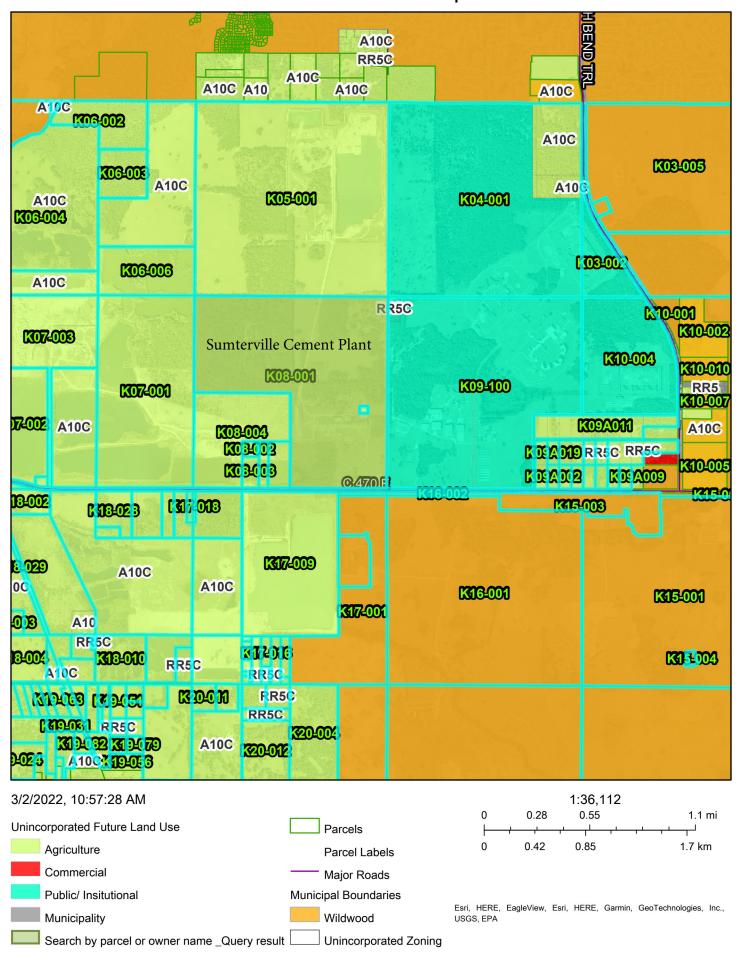
Attachment 1

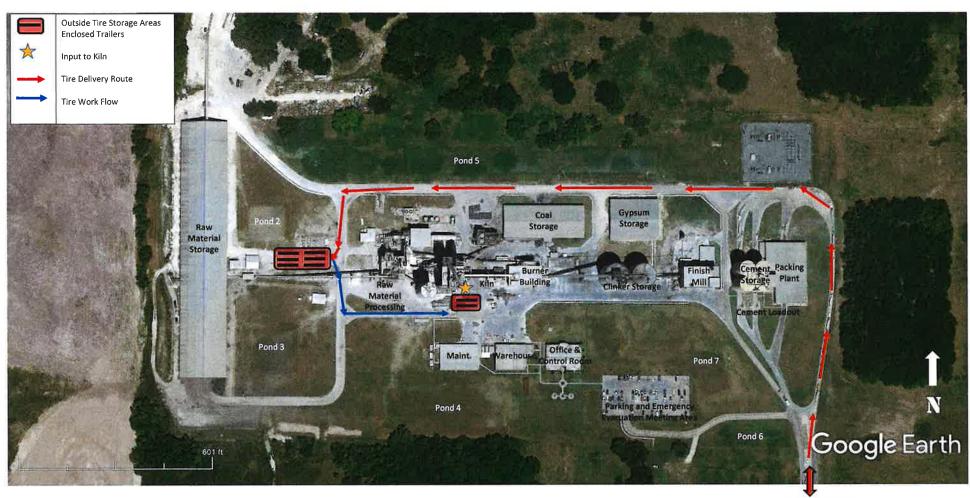
USGS Topographic Map Suwannee American Cement Co, LLC Sumterville, Sumter County, Florida **Tire Processing Permit Modification** WACS ID No. SWD/60/98523 Permit No. 297136-003-WT



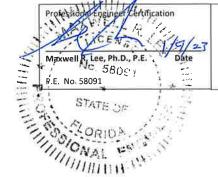
PO Box 5127 Gainesville FL 32627-5127 352-377-5822

ATTACHMENT 2 - Zoning and Future Land Use - Sumter County ArcGIS Web Map





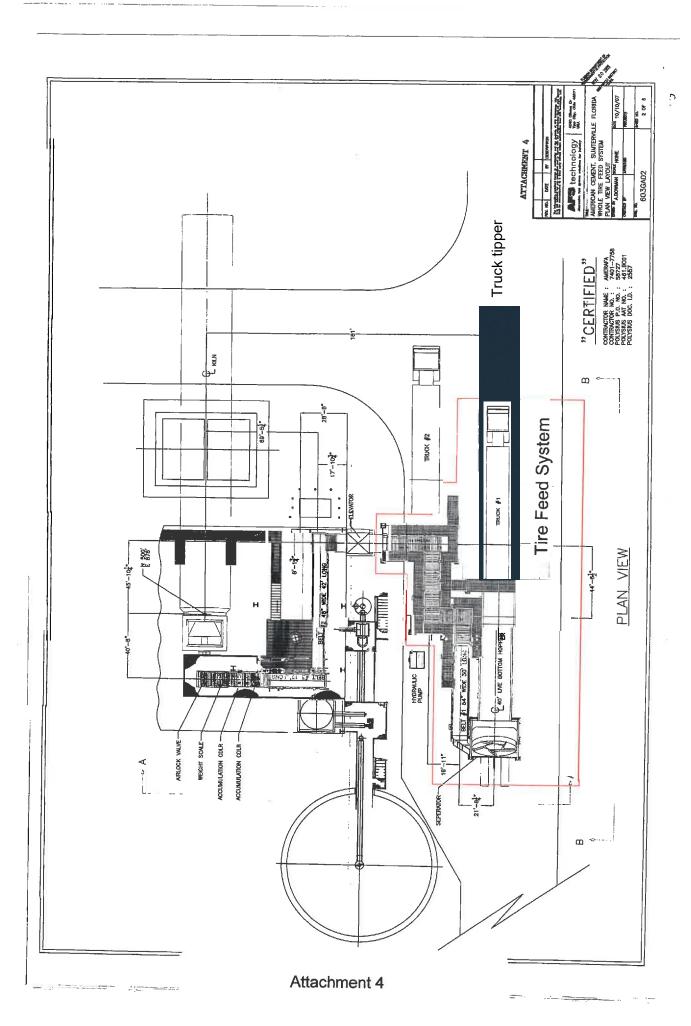
Plant Entrance/Exit



Scale 1"+/- 600 ft.

Aerial Image from Google Earth Image Date 05/16/2021 Drawing No. 690-22-01 All locations are approximate Attachment 3 – Plot Plan
Waste Tire Storage and Processing – Suwannee American Cement Plant
Suwannee American Cement Co, LLC
Sumterville, Sumter County, Florida
WACS ID No. SWD/60/98523
Modification of Permit No. 297136-003-WT





690-22-01 December 9, 2022

PART III SECTION A – FACILITY DESIGN

1. Topographic Map and Zoning and Future Land Use Map

A topographic map is provided as Attachment 1. A Sumter County zoning and land use map showing the parcel boundaries, zoning, and future land use for the subject property and surrounding area is provided as Attachment 2.

2. Plot Plan

A plot plan aerial map is provided as Attachment 3. The plot plan includes the major components of the facility. It specifically identifies and depicts the waste tire storage and processing areas and the delivery route of tires to the facility for storage and from the storage areas to the kiln. The tire feed system is depicted on Attachment 4. No changes have occurred since the permit renewal in 2018 except for the addition of 3 trailers for storage and a truck tipper.

PART III SECTION B – FACILITY OPERATION

1. A description of the facility's operation, process and products including how waste tires will be received and stored.

The Suwannee American Cement Plant produces Portland cement using a dry process kiln with a preheater and calciner. The cement kiln is authorized to burn tires and tire-derived fuel as a supplemental fuel. Pre-sorted tires are delivered to the facility from a single contractor in container trailers.

The modification is to increase the amount of tires permitted to be stored at the facility. The current permitted amount is 80.4 tons. The Plant is proposing to increase the outdoor storage capacity from 65 tons to 104 tons by adding 3 new trailers (storage location depicted on Attachment 3). The permitted inside storage area at the tire handling system is for 15.4 tons. The total proposed storage amount is 119.4 tons. A copy of the facility's Comprehensive Operations Plan is provided as Attachment 5.

2. A description of the equipment used for processing tires. This description shall include the make, model, and hourly capacity of each piece of equipment.

Not applicable – tires are not processed on site.

3. Description of the waste from the process, the amount of waste expected and how and where this waste will be disposed of.

No changes since the last permit renewal. No wastes are generated from the process. The organic components of the tires are combusted in the high-temperature kiln, providing heat value (Btu's) to the process. The inorganic components are incorporated into the kiln

production (clinker). Handling of residuals is described in the Comprehensive Operations Plan provided as Attachment 5.

4. Statement of the maximum daily throughput and the planned daily and annual throughput.

The permitted maximum daily throughput is 60 tons/day and the annual throughput is 21,900 tons per year. The throughput amounts are not proposed to change with this application.

5. A description of how the operator will maintain compliance with each of the storage requirements of Rule 62-711.540, FAC.

The proposed storage of tires and storage requirements are discussed in the Comprehensive Operations Plan provided as Attachment 5.

6. A copy of the emergency preparedness manual for the facility with a statement of the on site and off site locations where that manual will be maintained.

Refer to the Hazardous Materials Emergency and Contingency Plan (Attachment 6), which contains emergency preparedness procedures for the facility. The local authorities have been notified of the facility's emergency procedures. A copy of the Plan is maintained onsite in the Environmental Manager's office and the Front Gate Guard House. The off-site locations are the home addresses of:

- Dirk Cox, Plant Manager
- Manuel Sequera, Environmental Manager

7. A copy of the fire safety survey.

A copy of the latest fire safety survey is provided as Attachment 7.

8. A description of how 75% of the annual accumulation of waste tires will be removed for disposal or recycling.

No changes since the last permit renewal. Removal of the annual accumulation of tires is discussed in the Comprehensive Operations Plan provided as Attachment 5.

Suwannee American Cement Company, LLC Suwannee American Cement Plant Tire Processing Facility Modification of Permit No. 297136-003-WT

690-22-01 December 9, 2022

ATTACHMENT 5

COMPREHENSIVE OPERATIONS PLAN

COMPREHENSIVE OPERATIONS PLAN

SUWANNEE AMERICAN CEMENT COMPANY, LLC SUWANNEE AMERICAN CEMENT PLANT

4750 East Sumter County Road 470 Sumterville, Sumter County, Florida 33585

TIRE PROCESSING FACILITY Permit No. 297136-003-WT

Plan Revision Date: December 9, 2022 for Modification of Permit No. 297136-003-WT

Updated by Koogler and Associates, Inc. PO Box 5127 Gainesville, FL 32627-5127 352-377-5822

KA 690-22-01

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1.0 INTRODUCTION

This Waste Tire permit, per 62-711, FAC, Comprehensive Operations Plan provides a

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description of the facility's operation, process and products including how tires will be

received and stored. A copy of the emergency preparedness manual for the facility is

included with this submittal.

The on-site and off-site locations where the emergency preparedness manual will be

maintained are as follows:

The on-site locations for the emergency preparedness manual will be the Environmental

Manager's office and the Front Gate Guard House. The off-site locations for the

emergency preparedness manual will be the home addresses of:

□ Dirk Cox, Plant Manager

□ Manuel Sequera, Environmental Manager

This section includes a statement of the maximum daily throughput and the planned daily

and annual throughput.

The applicant is the landowner and has authorized the use of the land as a tire

processing facility.

Facility Name: Suwannee American Cement Company, LLC

Suwannee American Cement Tire Processing Facility

Facility Owner/Operator: Suwannee American Cement Company, LLC

Mailing address: Post Office Box 445

Sumterville, Florida 33585

Sumter County

Telephone: (352) 569-5393

Facsimile: (352) 569-5397

Physical Location:

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4750 East Sumter County Road 470

Sumterville, Sumter County, Florida 33585

Section 8, Township 20 South, Range 23 East

Latitude 28°45'38" North, Longitude 82°01'35" West

Facility Contact: Dirk Cox – Plant Manager

This facility is a Tire Processing Facility with all tires used for on-site consumption of tires as supplemental fuel and raw material for a Portland cement kiln. The maximum quantity of tires to be stored at the facility at any one time is 119.4 tons which includes outdoor trailer storage and feed system capacity. The nominal maximum daily throughput to the kiln is 60 tons/day. This nominal amount is not a solid waste permit limit. The design daily throughput is 60 tons/day based on the consumption rate of 60 mmbtu/hr tire heat input. and annual throughput is 21,900 tons per year. See Section 8.0 for Engineering Calculations.

2.0 OPERATIONS AND ACCESS

Tires for this facility will be supplied from suppliers that are FDEP registered waste tire collectors. Tires will not be accepted from the general public, or from a non-registered tire collector.

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Suwannee American Cement Company, LLC will maintain recordkeeping consistent with the applicable portions of Rule 62-711.530(4), F.A.C., as follows:

- (4) The owner or operator of a waste tire processing facility shall record and maintain for three years the following information regarding their activities, which records shall be available for inspection by Department personnel during normal business hours:
- (a) For all waste tires shipped from the facility, the name and waste tire collector registration number of the waste tire collector who accepted the waste tires for transport, and the quantity of waste tires shipped with that collector.
- (b) For all waste tires received at the facility, the name and waste tire collector registration number of the collector who delivered the waste tires to the facility, and the quantity of waste tires received from that collector.

Suwannee American Cement Company, LLC will also maintain recordkeeping consistent with Rule 62-711.540(1)g., F.A.C., as follows:

(g) The operator of the site shall maintain records of the quantity of waste tires received at the site, stored at the site, and shipped from the site.

The Environmental Manager will record the tonnages of tires received at the site and maintain the other records specified above.

Tires are stored in enclosed trailers at two locations at the site, as shown on the tire facility plot plan (Figure 1)



Plant Entrance/Exit

Professional Engineer Conflication

No 58091 / 7/23

Maxwell R. Lee, Ph.Dt. P.E. Date |

STATE OF

P.E. No. 58091

Scale 1"+/- 600 ft.

Aerial Image from Google Earth Image Date 05/16/2021 Drawing No. 690-22-01 All locations are approximate Figure 1 – Plot Plan
Waste Tire Storage and Processing – Suwannee American Cement Plant
Suwannee American Cement Co, LLC
Sumterville, Sumter County, Florida
WACS ID No. SWD/60/98523
Modification of Permit No. 297136-003-WT



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All of the tires are stored in outdoor trailers until manually loaded into the 40' Live Bottom Hopper.

Access to the facility is controlled by security personnel on site 24 hours per day, 7 days per week, fences and natural barriers.

When tires arrive at the facility during normal business hours the incoming vehicles check in with the receiving department, who checks for a current tire collector permit decal. Any vehicle that does not have a valid tire collector permit decal will not be accepted at the site. For off-hour deliveries, the control room operator will have a plant attendant check the truck in and direct the driver where to leave the trailer at the storage area.

Records of the daily tonnages received, combusted, and returned to vendor will be reviewed weekly to ensure that the facility does not exceed the allowable storage quantity.

3.0 PROCESSING

This section provides a description of the equipment used for processing tires. The facility is defined as a tire processing facility by Rule 62-701.200(129), F.A.C., because equipment is used to consume tires so that they are no longer exist as whole tires. However, the facility burns only whole tires – not processed tires. Coarse separation means separating the tires into a single file. "Refinement" of the tires means rejecting tires not meeting size specifications and spacing the tires along the conveyor to meet the supplemental fuel needs of the kiln. Rejected tires are also called residual tires.

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The truck drivers are employees of the tire collector. The tire delivery arrangement with the tire collector requires that only whole tires are delivered to prevent unacceptable tires from being loaded into the 40' Live Bottom Hopper.

Tires are unloaded from trailers into the 40' Live Bottom Hopper by SAC personnel by bringing the trailers to the truck tipper platform. After securing the trailer, they activate the tuck tipper to partially or completely unloaded into the 40' Live Bottom Hopper following the internal SOP Loading, Operation and Unloading of Tire Tipper (provided at the end of Section 3.0). The 40' Live Bottom Hopper conveys the tires to the Rotary Disk Tire Separator. The Rotary Disk Tire Separator is for coarse separation, to separate tires that may have stuck together, and feeds them onto the Separator Inclined Discharge Belt, which conveys tires and debris up to a platform where the debris drops off the end of the conveyor, into a receptacle, and the tires are conveyed onto the Tire Separation, Refinement, and Accumulation Roller Conveyor used for the separation and refinement, for automatic sensing of the tires are of proper size for continued feeding in the system and to ensure the tires are in a single-file row and accumulated. The level of tire accumulation will also control the Rotary Disk Tire Separator by turning it on when the level is low and off when the level is high.

The Tire Separation, Refinement, and Accumulation Roller Conveyor allows only one tire at a time to be discharged onto the Tire Rejection Roller Conveyor for tire sizing in this area. Any tires not meeting the proper specification regarding size are discharged from the Tire Rejection Roller Conveyor. When a tire is located on the Tire Rejection Roller Conveyor and does not meet the size specifications the conveyor diverts the reject tire to

the reject bin for return to the tire vendor. The system is equipped with opposed-mode photo sensors for determining dimensionally oversized and undersized tires. Tires of undesirable size will be diverted from the Tire Rejection Roller Conveyor. This is a motor driven automatic process. Undesirable size as it is used in this section means tires with a diameter larger or smaller than the typical passenger car size tire. Incoming tires removed by the "Tire Rejection Roller Conveyor" are discharged into the collection area, for manual

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The tires meeting size specifications are then conveyed to the kiln preheater by a hook elevator and two belt conveyors in series. The tires are then transferred to a Weight Scale at the kiln to accurately supply the kiln with the necessary tire fuel quantity. The tires are then inserted into the kiln via an Airlock Valve.

loading into the tire vendor's trailer and returned to the vendor.

This section provides calculations that include all tire storage in the handling system (including hoppers, accumulation conveyors, etc.).

Item	Qty. tires
Live bottom hopper	1000
Rotary disk tire separator	30
Separator inclined discharge belt	15
Tire separation & refinement roller	35
conveyor	
Tire rejection and conveying roller	60
conveyor	
Tire elevator	30
Upper roller conveyor 1	10
Upper roller conveyor 2	10
Weight scale	1
Rejected tires	100
Total	1291

The combustion rate of tires is limited by the facility's Air Operation Title V Permit (current No. 1190042-023-AV) as follows:

- **C.10.** Tire Derived Fuel (TDF) Usage Limitations and Requirements. The use of whole or chipped tire derived fuel (TDF) in the pyroprocessing system is limited by the following requirements:
- a. The maximum heat input rate from firing TDF shall not exceed 60 MMBtu per hour and/or 15% of the total pyroprocessing system kiln and calciner heat input

rate (the remaining 85% of the total pyroprocessing heat input rate shall be from the firing of other authorized fuels);

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The 40' Live Bottom Hopper has a capacity of approximately 1000 car passenger tires or 10 tons. The typical feed rate is approximately 3-4 tires per minute where 60 mmbtu/hr equates to approximately 4.2 tires/minute. See Section 7.0 for Engineering Calculations.



Title	Loading, Operation and Unloading of Tire Tipper	Rev#	1
Department	Health & Safety	Rev Date	6/17/2022
Doc Type	Procedure - PD	Doc#	Intelex Doc#
Author	Randy Martinez/ Jon Ness/ Mark Autry	Pages	Page 1 of 3

1. OBJECTIVE

AGC has established a procedure for steps to follow when loading, operation and unloading the alternative fuels tire tipper system to provide protection for employees.

2. REFERENCES

• LSR Best Practices- Process safety, mobile equipment safety

3. RELATED DOCUMENTS

- Mobile Equipment Procedure
- Pre-trip inspection

4. **DEFINITIONS**

None

5. SCOPE

• This procedure applies to any employees and contractors at our facility.

6. RESPONSIBILITIES

- 6.1. All Employees, Supervisors & Managers- to adhere to this procedure and be aware of the dangers associated with tire tipper operation and positioning of trailers.
- 6.2. Safety Manager- to ensure all individuals who have the potential to be exposed are trained on the safety hazards associated with the tire tipper and mobile equipment associated with positioning tire trailers.

7.0 PREPARATION

Prior to conducting any work, a thorough inspection of the workplace shall be completed and hazards controlled Then documented on an AGC Workplace exam form.

- Ensure Yard Dog has a pre-trip inspection and is ready to run by a tasked trained operator.
- Ensure there is a full trailer of tires to be used.
- Ensure you have a spotter/ signal person available.

Human Performance Error Precursors-

- Blind spots of reversing equipment
- Starting and stopping equipment.
- Task training
- Illumination of area



Title	Loading, Operation and Unloading of Tire Tipper	Rev#	1
Department	Health & Safety	Rev Date	6/17/2022
Doc Type	Procedure - PD	Doc #	Intelex Doc#
Author	Randy Martinez/ Jon Ness/ Mark Autry	Pages	Page 2 of 3

 Not utilizing a signalman/ spotter for trailer positioning

8.0 PROCEDURE

8.1 Loading Tire Trailer:

- 1) Remove yellow safety chain from the entrance of the ramp for the tire tripper.
- 2) Spot the full tire trailer in front of the ramp and set the parking brakes for the yard dog and trailer.
- 3) Carefully open the tire trailer doors slowly to ensure no loose tires fall out. (Driver or/and spotter can perform this task.)
- 4) Open both doors and secure to the side of the trailer so they don't swing when reversing into location.
- 5) Using the spotter slowly back the tire trailer up the ramp and onto the tire tipper. Always have a visual or be in radio contact with your spotter. Spotter should not be on the ramp or tire tipper while backing up the tire trailer. The two spots for the spotter to be safely out of the way is on the catwalk north and south side of the tire hopper.
- 6) Once the tire trailer is firmly against the back stop of the tipper set the tire trailer and yard dog brakes.
- 7) Disconnect the yard dog from the tire trailer and pull off the tire tipper and ramp.
- 8) Properly secure tire trailer to the tire tipper with safety chain that is in place.
- 9) Attach yellow safety chain across the entrance of the ramp of the tire tipper when done.

8.2 Operation of the Tire Tipper:

- 1) Before operating Tire tipper inspect pivot points and lift sensors for obstructions or loose tires.
- 2) The tire tripper control panel is located on the catwalk north of the tire tipper. It has the Hydraulic Pump Control and the raising and lowering tire tipper controls.
- 3) Push the start button for Hydraulic Pump. The light should illuminate green and indicated the pump is running.
- 4) Push and hold the raise tipper button. The tire tipper should begin to raise. Lift the tire tipper up enough to fill the tire hopper. Just let go of the button to stop the tire tipper.
- 5) After the tire hopper is filled push and hold lower tire tipper.
- 6) Once the tire tipper is even with the ramp let go of the button.
- 7) Push the stop button for Hydraulic Pump and the green light should go out and the hydraulic pump stops.

8.3 Unloading of Tire Trailer

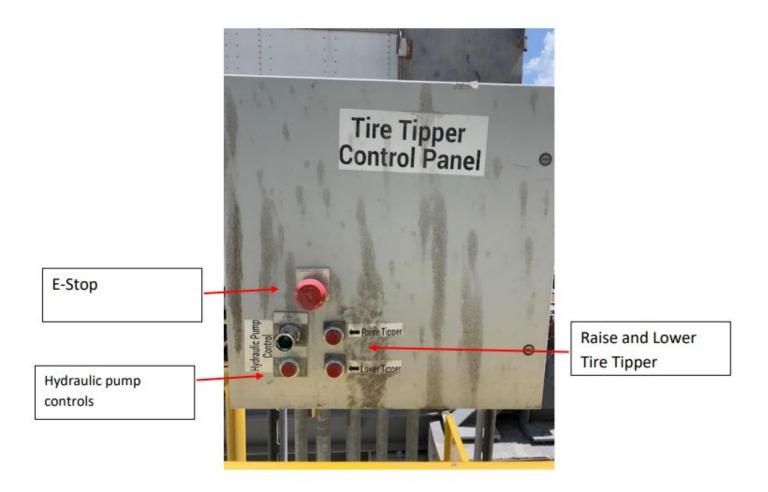
- 1) Remove yellow safety chain from the entrance of the ramp for the tire tipper.
- 2) Remove safety chain from the tire trailer that secured to the tire tipper.
- 3) Back up yard dog to the tire trailer and connect to it.
- 4) Make sure tire trailer doors are still secured to the side of the tire trailer.



Title	Loading, Operation and Unloading of Tire Tipper	Rev#	1
Department	Health & Safety	Rev Date	6/17/2022
Doc Type	Procedure - PD	Doc#	Intelex Doc#
Author	Randy Martinez/ Jon Ness/ Mark Autry	Pages	Page 3 of 3

- 5) Slowly remove tire trailer off the tire tipper. Once clear of the ramp. Stop and set brakes on yard dog and tire trailer. Close the doors on the tire trailer.
- 6) Park the tire trailer in its designated area.

7. APPENDIX



4.0 STORAGE

This section provides a description of how the operator will maintain compliance with each

of the storage requirements of Rule 62-711.540, F.A.C. This section also provides a

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description of how 75% of the annual accumulation of tires will be removed for disposal or

recycling.

Tires are stored in enclosed outdoor trailers at two locations at the site as shown on Figure

1 in the Section 2.0. The total tire storage in trailers at the site is limited to 104 tons at any

time. Tires are typically received and stored in 8' by 45' enclosed trailers. The trailers

each typically hold approximately 13 tons of tires. Obviously, load sizes and trailer

capacities vary. All of the tires are stored in trailers and are not unloaded until they are

used. The facility storage capacity may be described by the following scenarios:

A. 104 tons/13 tons/trailer = 8 trailers plus 15.4 tons in handling system

B. Combination of trailer storage and tire handling system not to exceed 119.4

tons facility-wide total.

Tires not meeting the required specifications are returned to a trailer for removal by the

tire vendor. This trailer is included in the eight trailer calculation above. During steady-

state operation, the storage limit can be met by limiting onsite storage as follows:

8 full trailers x 13 tons/trailer = 104.0 tons

<u>15.4 tons of tires in system = 15.4 tons</u>

Total = 119.4 tons

13 | P a g e

This section provides calculations that include all tire storage in the handling system (including hoppers, accumulation conveyors, etc.).

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KA 690-22-01

Item	Qty. Tires
Live Bottom Hopper	1000
Rotary Disk Tire Separator	30
Separator Inclined Discharge Belt	15
Tire Separation & Refinement Roller Conveyor	35
Tire Rejection Roller Conveyor	60
Upper Elevation Belt #1	150
Upper Elevation Belt #2	150
Weight scale	1
Rejected tires	100
TOTAL	1541
Tons @ 100 tires/ton	15.41

Market conditions will dictate the quantity of tires received. The quantity of tires stored at the facility will not exceed 119.4 tons. This amount is far more limiting than that allowed by Rule 62-711.530(2)(a), F.A.C., which allows that amount of tires that the equipment is capable of combusting over a thirty (30) day period.

2.5 tons/hour x 24 hours/day x 30 days = 1800 tons of tires

Since no more than 119.4 tons of tires can be stored on site the requirement of 75% of disposal or recycling of annual accumulation is easily met. 75% of the maximum number of tires can be used as fuel within 24 hours, or returned to the tire collector in eight trailers. See Section 7.0 for Engineering Calculations.

Suwannee American Cement Company, LLC (SAC) will not need to provide control of mosquitoes and rodents to protect the public health and welfare since the tires will be store inside enclosed trailers until placed into the tire feed system as fuel. All the tires remain in the trailers until just before they are loaded onto the 40' Live Bottom Hopper and none will be stored on the ground. The handling area is managed in such a way as to divert stormwater or floodwaters around, off and away from the Tire Trailer Storage Area and the Tire Processing Facility. These areas are contained within the drainage area for Pond 4, as shown on the Facility Plot Plan.

5.0 RESIDUALS

There is no waste from the combustion of whole tires in the cement manufacturing process. All of the ash and residue resulting from the combustion are blended as valuable raw materials into the clinker product from the kiln. Entire whole tires are combusted within the kiln environment. Particulate matter captured by the kiln system air pollution control device as fed back into either the kiln feed material or shuttled to the finish mill system and becomes integral to finished cement.

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SAC contracts only with FDEP-registered tire collectors and retains the right of refusal for any tires that are unsuitable for combustion in the cement kiln. Rejected tires are referred also as "residual" tires. Tires that SAC rejects from the vendor supply are loaded into a single trailer dedicated for reject tires for removal from the site by the tire vendor. Whole tires rejected by the system are loaded back into the trailer and returned to the vendor. These items are loaded by plant personnel or tire vendor personnel. The rejected tire trailer is checked at least once every 8 hours. Rejected tires are loaded into a trailer as necessary. Where possible, such tires are loaded into the same trailer they are delivered in and immediately removed from the supplier.

Each trailer is logged into the computer system. The computer will allow the tracking of materials for returns. There are no outdoor piles of tire rims or scraps. The residual tires trailer will store tires for no more than than one month. This trailer is included in the eight trailer maximum storage quantity.

6.0 OTHER ENVIRONMENTAL PERMITS

As tires will be consumed at the facility, this section provides a description of the other environmental permits that the applicant has for this use. As noted above, the current Title V Air Operation Permit allows the use of tires as fuel.

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Current Title V Air Permit is No. 1190042-023-AV issued on March 11, 2021.

SECTION III. EMISSIONS UNIT AND SPECIFIC CONDITIONS

Subsection C. Emissions Unit No. 003, Pyroprocessing System

The calciner burners and main kiln burner are capable of burning pulverized coal (primary fuel), petroleum coke, natural gas, on-specification used oil, No. 2 fuel oil, and certain categories of alternative fuel materials. The alternative fuels include, but are not limited to, tire-derived fuel (TDF), plastics, roofing materials, agricultural biogenic materials, untreated and treated cellulosic biomass, carpet-derived fuel, alternative fuel mix, biosolids, and engineered fuel (EF). A kiln tire feed mechanism with an airlock/gate system is capable of feeding TDF into the kiln system at the transition section between the base of the calciner and the point where gases exit the kiln.

7.0 ENGINEERING CALCULATIONS

- 1. Title V (1190042-023-AV) Title V Air Operation Permit Limit
- 60 MMBTU/ hour which is equivalent to 15 percent of total design heat input to kiln system (calciner and/or main burner)

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2. Typical tire weight and heat content characteristics

Tire weight (typical passenger tire) = 20 lb/tire

- 2,000 lb/ton / 20 lb/tire = 100 tires/ton
- 12,000 Btu/lb or 24 MMBtu/ton
- 0.24 MMBtu/tire
- 3. Tire Trailer Storage Characteristics
- Waste tire permit capacity of outdoor storage is eight (8) full trailers of which one
 trailer is used for storage of reject tires that are off-specification size tires for the
 tire feed system. The Tire Feed System rejects tires not within size
 specifications and conveys them into a holding bin. This holding bin is then
 emptied into the trailer for reject tires for return to the supplier.
- 4. Equivalent weight-based maximum tires input to kiln
- Design kiln feed rate at 60 MMBtu/hr = 2.5 tons tires/hour
- 5. Waste Tire Feed System Characteristics
- Design kiln mass feed rate: 60 mmbtu/hr /24 mmbtu/ton = 2.5 tons/hr
- Design kiln mass feed rate: 2.5 ton/hr x 24 hr/day = 60 ton/day
- 6. Supply/Storage Trailer Characteristics
- Max storage of tires in trailers: 1,300 tires/trailer or 13 tons/trailer.
 8 trailers (1 trailer for reject tires) = 104 tons = 10,400 tires
 7 trailers of usable tires = 91 tons
- Design kiln feed rate: 60 ton/day / 13ton/trailer = 4.6 trailers/day
- 7. Tires Onsite vs. Daily Tire Feed Rate
- 91 tons / 60 tons/day = 1.52 days of tire supply on site at design mass feed rate of tires
- 91 tons / 30 tons/day = 3.03 days of tire supply on site at average mass feed rate
 of tires
- 8. 75% Tire Removal/Usage Requirements
- Removal of 75% of tires per 12-month period
- Design rate of consumed tires per 30 day: 2.5 tons/hour x 24 hours/day x 30 days = 1800 tons of tires

Tire Feed System Characteristics:

• Tire capacity of tire feed system in addition to tire storage:

Equipment	Number of Tires
Live Bottom Hopper	1,000
Rotary Disk Tire Separator	30
Separator Incline Discharge Belt	15
Tire Separation & Refinement Roller Conveyor	35
Tire Rejection Roller Conveyor	60
Upper Elevation Belt #1	150
Upper Elevation Belt #2	150
Weight Scale	1
Rejected Tires	100
Total Number of Tires in System	1,541

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Maximum Amount of Tires Onsite:

- Supply and Reject Trailers:
 - 8 Trailers x 1,300 tires/trailer = 10,400 tires = 104 tons
- Tire Feed System (completely full)
 - 1,541 tires = 15.4 tons
- Maximum Tires Onsite:
 - 104 + 15.4 = 119.4 tons or 11,940 tires

^{1,541} tires / 100 tire/ton = 15.41 tons tires

Suwannee American Cement Company, LLC Suwannee American Cement Plant Tire Processing Facility Modification of Permit No. 297136-003-WT

690-22-01 December 9, 2022

ATTACHMENT 6

EMERGENCY PREPAREDNESS PLAN

(Hazardous Materials Emergency and Contingency Plan)

Suwannee American Cement Company, LLC.

Hazardous Materials Emergency and Contingency Plan

September 2014
Revised January 9, 2019
Revised May 27, 2022
for
Modification of Permit No. 297136-003- WT

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Introduction

This Hazardous Materials Emergency and Contingency Plan details the minimum steps that must be taken by all employees when responding to an incident involving a hazardous material spill or other emergencies. The goal of the plan is to provide employees with safe and effective methods to prevent and control hazardous material spills, which pose a potential threat the human health and/or the environment and to notify the appropriate emergency service provider for assistance, where necessary. The provisions of this plan must be carried out immediately whenever there is a fire, explosion, or unplanned sudden or non-sudden release of a hazardous substance to air, soil, or water is noticed. Intentional or negligent spills of hazardous materials will not be tolerated and may result in disciplinary action in accordance with company policies.

Employee awareness and management support are essential to spill prevention and the control of spills that may occur. This Plan is presented as a general guideline to minimize adverse effects to human health and the environment in the event of an unintended release of a hazardous material.

Emergency Services Coordination

The Sumterville Fire Department will respond to fire and medical emergencies and facilitate the care and transportation of injured personnel to appropriate medical facility. Local medical facilities are aware of the potential emergency needs through the routine activities of worker's compensation care and claims.

Spill Prevention

The prevention of hazardous material spills is the ultimate goal, however, the areas where large quantities of hazardous materials are stored and/or dispensed are susceptible to minor spills during normal operations. The periodic inspection of tanks and associated pumps, valves, piping, hoses, and containment structures, is essential to good spill prevention measures. Minor leaks at or near these locations can be managed with absorbent materials and/or drip pans while arrangements are made to repair or replace defective parts.

At locations where bulk loads of hazardous material are unloaded, there must be adequate provisions to control the potential of spillage during the coupling and uncoupling of hoses. The unloading must be monitored at all times. The drivers will typically monitor the offloading pump, hoses and coupling during this process. A key element of this process is to make sure that there is adequate space in the tank or container for the delivery volume. In the event the tank is not equipped with automatic overfill protection, care must be taken to prevent over filling the tank.

A competent person must inspect designated hazardous material storage locations, at least once a month and more frequently as warranted by site conditions. The results of the inspection must be documented, and any deficiencies must be corrected as soon as possible.

Good housekeeping around hazardous material storage areas must be maintained clean and tidy at all times. The accumulation of combustible or incompatible materials must not be allowed. Minor spills from dispensing hoses, pumps, valves, or piping must be addressed immediately upon discovery and the source of the leak must be controlled. Minor spills on metal or concrete surfaces may present a slip hazard and should be cleaned up as soon as practical. The spill of a combustible material may present a fire hazard. It is the responsibility of all employees to report and/or take immediate corrective action regarding spills or potential spills of hazardous materials.

Spill Reporting

An emergency coordinator should be contacted, whenever there is an imminent or actual emergency. These individuals will be responsible for insuring employee safety, spill cleanup/recovery, coordinating the appropriate emergency services, and the initial reporting of the spill. The safety and wellbeing of all employees will be the first priority. The emergency coordinator will have the authority to commit the resources necessary to control, contain, and/or cleanup the spilled material. When it becomes necessary, contacting the emergency coordinator will proceed in accordance with the following mandatory notification list.

Emergency Coordinators	Order of Contact	Contact Phone Number
Dirk Cox Plant Manager	1	(352) 626-2253 - Cellular Radio
Rene Sotomayor Production Manager	2	(352) 626-2395 - Cellular Radio
Mark Autry Health & Safety Manager	3	(352) 626-2908 - Cellular Radio
Manuel Sequera Environmental Manager	4	(352) 569-2217 - Office (813) 616 0343- Cellular

The progression of notification shall proceed as indicated until an emergency coordinator is contacted, that is available for immediate response. Once on scene, the emergency coordinator will determine the need for contacting additional emergency coordinators. However, the Environmental Manager shall be contacted in all cases. The Environmental Manager will determine the need for and make the appropriate notifications and reports to regulatory agencies.

Spill Response Equipment Location

The attached plot plan (Appendix 3) identifies buildings, process locations, hazardous material storage areas, and the location of spill equipment. In addition to the spill equipment, the operation has several types of heavy equipment such as dozers and front-end loaders that may be used to construct berms and impoundments to contain large spills and facilitate cleanup, when necessary.

Storm Water Management System

This facility is designed to manage the storm water from rainfall events with zero discharge to off property surface water features. A series of Stormwater retention ponds collect all, in plant, rainfall run off. Furthermore, the perimeter elevation of the facility is higher than adjacent land surfaces to prevent any off-site runoff.

Hazardous Materials Storage

The various hazardous materials stored in the facility are listed below and their location is depicted on the plot plan (Appendix 3). Tanks are all constructed of materials compatible with the contents and are of double walled construction or have other appropriate secondary containment for potential spills. Where required, storage tanks are equipped with leak detection, high-level alarm, overfill protection, and/or a level indicator. All tanks are above ground and are inspected at least once a month for product tightness and housekeeping.

• Above Ground Storage Tanks: Plot Plan #34

20,000 Gal. On-Spec Fuel Tank
20,000 Gal. On-Spec Fuel Tank
10,000 Gal. Off-Road Diesel Tank
10,000 Gal. 19.5% Ammonia Tank
10,000 Gal. Grinding Aid Tank
10,000 Gal. Masonry Additive Tank
600 Gal. Off-Road Diesel Fuel Tank, GEN Set
500 Gal. Unleaded Gasoline Tank

• Coal Storage Building: Plot Plan #15 6,000 tons Coal

Oil Storage Areas:

Finish Mill Building: Plot Plan #11
 4,000 Liter (1,056 Gal.) Finish Mill Gearbox
 2,000 Liter (528 Gal.) Hydraulic Oil Tank
 540 Liter (143 Gal.) Hydraulic Oil Tank

- Clinker Cooler Hydraulic Room: Plot Plan #8
 1,600 Liter (422 Gal.) Hydraulic Oil Reservoir
- Coal Mill Hydraulic Room: Plot Plan #16 160 Liter (42 Gal.) Hydraulic Oil Tank
- Coal Mill Gearbox: Plot Plan #16
 460 Liter (121 Gal.) Coal Mill Gearbox
- Raw Mill Building: Plot Plan #2
 2,450 Liter (647 Gal.) Raw Mill Gearbox
 240 Liter (63 Gal.) Hydraulic Oil Tank
 400 Liter (105 Gal.) Hydraulic Oil Tank
 400 Liter (105 Gal.) Hydraulic Oil Tank
- Raw Material Storage (RMS) Reclaimer: Plot Plan #1 200 Liter (53 Gal.) Chain Lube Tank
- Quarry Maintenance Shop: One (1) Mile North of RMS Building 6 – 55-gallon drums of oil

Gas Cylinder Storage Areas:

- West of Raw Mill building, Ground Floor: Plot Plan #3
 Hydrogen
 Propane
 Oxygen
 Acetylene
 Nitrogen
- South of Main Baghouse Fan, Ground floor: Plot Plan #3 CEMS Gasses
- Preheater Tower 6th Floor: Plot Plan #4
 Hydrogen
 CEMS Gasses

Emergency Spill Materials

Emergency spill materials are located in the Maintenance Warehouse for easy access and availability. Emergency spill materials are located at the Quarry Maintenance Shop.

Spill Quantity

A spill is defined as an unexpected and unplanned release of a hazardous material from a container or tank, to the ground or surface water. Operationally, spills of hazardous materials will be divided into two categories, small and large. A small spill is defined as greater than one (1) gallon but less than five (5) gallon. A small spill should be cleaned up immediately, by the employee(s) involved, and then reported to the Environmental Manager for follow up.

A large spill is defined as greater than five (5) gallons. In the case of a large spill, efforts must be made to stop the flow of material and contain the spill. The area of the spill should be barricaded immediate to keep personnel and/or equipment out of the area until cleanup activities are initiated. Report the incident to an emergency coordinator. The emergency coordinator will then determine the next level of response and take the actions necessary to insure spill containment and cleanup of the spill. The Environmental Manager must always be contacted so appropriate regulatory notifications can be made, if required, and oversight of the clean-up.

The unexpected or unplanned release of compressed gas will be treated as large spill. In the case of compressed gas, where there is no safe provision to turn off the flow of the gas, do not approach the tank. Notify all personnel that may be exposed to the gas, evacuate as needed, and allow the gas to vent. If the gas is flammable, be sure that potential sources of ignition are extinguished, and that mobile equipment is not allowed to enter the area where the gas is venting.

A leak or a release from a container via a puncture or other small opening or a weak spot in the container must be sealed or the material must be placed in another appropriate container. Container leaks will be treated as small spills unless they result in a rapid discharge of material in excess five (5) gallons.

Spill Response

Prior to the spill response, obtain proper personal protective equipment (PPE) suitable for the material involved. If there are any questions as to the type of PPE needed, refer to the safety data sheet for the material. SDS sheets are stored online and can be accessed through QR at our Hazardous product information centers. Scanning QR codes give employees access to all hazardous product safety data sheets(SDS) located at our facility. The level of protection required may be influenced by the quantity and type of material spilled. When there are valves/piping involved, and if can safely be done, an attempt should be made to stop the flow of the material and then limit the dispersal of the material with absorbent materials or soil. All employees that are not involved in the spill response must be kept out of the spill area. Whenever it is practical, any usable hazardous material should be recovered and retained for its intended use.

Spill Recovery/Cleanup

All material used for cleanup and any contaminated soil, resulting from the spill, should be containerized as soon as possible. Generally, a fifty-five (55) gallon open top drum, with a lid and lock ring, should be used for this purpose. Larger containers such as roll-off boxes may be

needed to minimize the number of drums needed. Based on product knowledge and/or the MSDS sheet, a determination will be made as to the type of waste generated. Non-hazardous and hazardous will be managed in accordance with applicable local, state, and federal regulations.

Fire/Explosion

Immediately report any fire or explosion to the shift supervisor and if any injuries are involved, the well being of those involved is the first concern. Only after reporting the fire should you attempt to extinguish it; again, evacuate those not involved in controlling the fire. If it can safely be performed, approach the fire with available portable fire extinguishers. Preferably, there should be at least two people involved in extinguishing the fire to minimize the potential for a single person to need aid or assistance and there is no one around. If the fire has not been extinguished with one (1) or two (2) fire extinguishers, the fire department should be called using the 911 emergency services number and follow the instructions below:

Fire Reporting to Sumterville Fire Department

When an employee becomes aware a fire cannot be extinguished with fire extinguishers then:

- Contact the Control Room via radio
- Control Room personnel will dial 911 to notify the Sumter County Fire Department
- Control Room personnel will contact all Emergency Coordinators via radio or telephone
- All personnel near the fire shall be evacuated to a safe gathering point.
- Personnel will be accounted for, if possible, prior to Fire Department arrival.
- The guard on duty will be notified at telephone extension 2042 to allow entry of Fire Department personnel and equipment.
- An Emergency Coordinator or designee will meet Fire Department to direct to fire location via most expedient route, and report of personnel not accounted for.
- If the fire involves the Waste Tire System the Environmental Manager will contact FDEP, Central District, Solid Waste Program, of the incident via telephone (attachment 1, Verbal Form), and follow-up with a written report (attachment 2, Written Form) within two weeks.

Emergency Coordinators	Order of Contact	Contact Phone Number
Dirk Cox Plant Manager	1	(352) 626-2253 - Cellular Radio
Rene Sotomayor Production Manager	2	(352) 626-2395 - Cellular Radio
Mark Autry Health & Safety Manager	3	(352) 626-2908 - Cellular Radio
Manuel Sequera Environmental Manager	4	(352) 569-2217 - Office (813) 616 0343- Cellular

Injuries

If a serious injury results, from any incident, the emergency services number, 911, should be called immediately. A victim should not be moved unless they are in a position or location that exposes them to further injury. If the victim must be moved, *always* assume a neck/spinal injury and handle them accordingly to prevent movement of the head, neck, or spine. When placing the call give brief description of the incident, the number of employees involved, your location or address, your name, and telephone number. Again, do not hang up until you are sure the person on the other end of the line has all the information they need. They may also give you instructions on the care of the injured until the arrival of emergency services. When the emergency service personnel have attended to the injured, ask them to which medical facility they will be transporting the injured. Be sure that a family member of the injured person(s) is notified of their injury and the facility they were transported, as soon as possible.

Emergency Coordinators	Order of Contact	Contact Phone Number
Lindsey Morris Human Resources Manager	1	(352) 250-9840 - Cellular (352) 569-2223 - Office
Mark Autry Health & Safety Manager	2	(352) 626-2908 - Cellular Radio
Dirk Cox Plant Manager	3	(352) 626-2253 - Cellular Radio

Container Management

For the purposes of this plan, a container will be defined as 65 gallons or less. All containers shall be of substantial construction and compatible with the material stored and must be labeled as to the contents, regardless of the size of the container. The label of a container must be maintained in legible condition until it is empty. Whenever, material is transferred from the original container into another container. The receiving container must be labeled with names of the material. All containers must be capable of being sealed with a cap or lid, free of holes, and in good condition. When open top containers are used to drain fluids or oil from equipment, it should be filled no more that three-quarters (3/4) full. The materials should be immediately transferred, after sealing with lid and ring tightened, to a tank or closed top container. Do not leave open top containers at the job site or in areas not protected from the rain or other sources of water.

When a container is empty, and intended to be used as a storage container, it should be labeled empty. If the drum is returnable for deposit if should be transported to the approved holding location for return drums. If the drum is not returnable transport to the nearest waste / recyclable materials storage area for re-use.

Employee Awareness Program

This plan will be distributed to managers and supervisors and will be incorporated into routine training session for plant employees.

Other notification of incidents

If warranted MSHA will be contacted as required for regulatory compliance.

Record keeping

The Environmental Manager will maintain records relating this plan and when necessary make the required reports to regulatory agencies.

APPENDIX 1

VERBAL EMERGENCY INCIDENT REPORT

FDEP, Central District, Solid Waste Program at telephone number: 407-897-4300

Date of Incident:	_
Verbal Notification by:	
Verbal Notification to:	
Description of Emergency:	
Actions Being Taken to Deal with Emergency:	
	_

Follow-up:

Within two weeks of any emergency, the operator of the site shall submit to the Department (FDEP Solid Waste Program) a written report on the emergency.

• F.A.C. 62-711.540(f)

APPENDIX 2

WRITTEN EMERGENCY INCIDENT REPORT

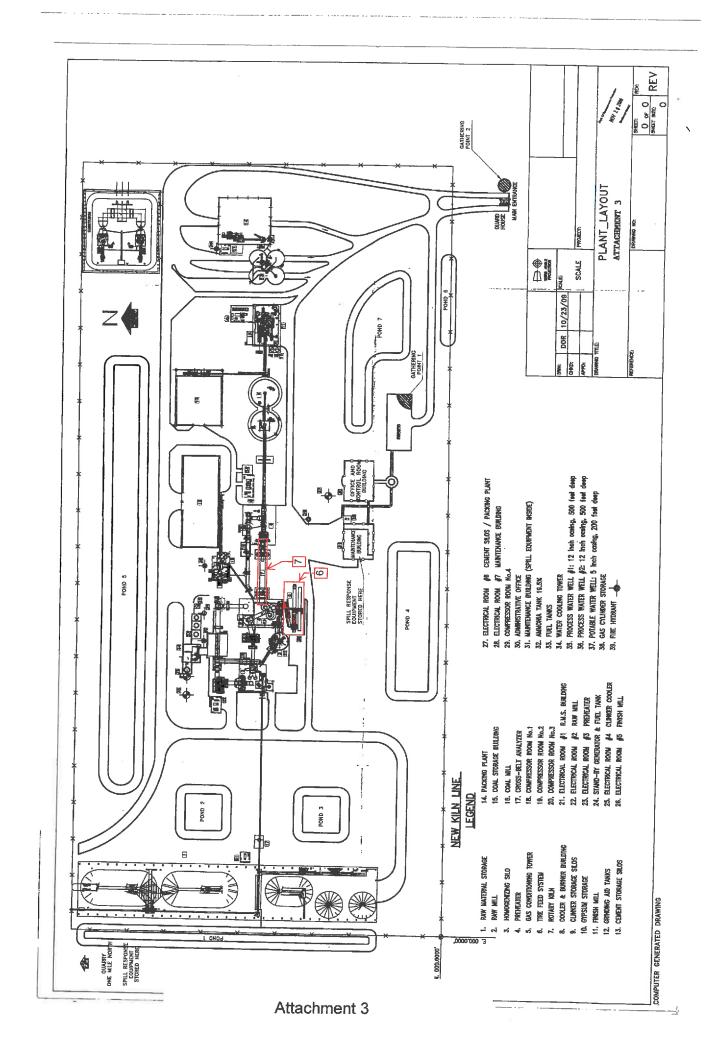
Date of Incident:
Verbal Notification by:
1. Describe origins of emergency:
2. Actions taken to deal with emergency:
3. Results of actions taken:
4. Success and Failure Analysis of event:a. Successes:b. Failures:c. Analysis and Improvements:

Instructions for use:

Within two weeks of any emergency, the operator of the site shall submit to the Department (FDEP Waste Section) a written report on the emergency.

- F.A.C. 62-711.540(f)
- FDEP, Central District, Solid Waste Program 3319 Maguire Blvd., Suite 232 Orlando, FL 32803-3767

APPENDIX 3



690-22-01 December 9, 2022

ATTACHMENT 7

FIRE SAFETY SURVEY



Sumter County Fire Rescue (FL) 7375 Powell Rd. Suite 129 Wildwood, FL 34785

Department Violation Notice

November 1, 2021

ASH GROVE CEMENT LLC 4766 C-470 E, TIRE RECYCLING Sumterville, FL 33585

Sumter County Fire & EMS Prevention Bureau conducted an inspection of your facility at the above address on Nov 1, 2021 No violations were revealed during this inspection.

Inspection Note 11/1/21. A/I

THIS IS AN OUTDOOR TIRE CRUSHING MACHINE.

R.SMITH, F.I.

ROBERTSMI Robert Smith Inspector

Mark autry

690-22-01 May 27, 2022

PART III

SECTION C- CLOSING COST ESTIMATES and SECTION D - FINANCIAL ASSURANCE

Note: Rule 62-711.700(2) and (3) was repealed on February 16, 2012. Therefore this section addresses the required closing cost estimates and financial assurance as required by the applicable sections of the current Rule 62-711.500(3).

C. Completed closing cost estimates as required by Rule 62-711.500(3) FAC.

The facility's closing cost estimates are provided as Attachment 8.

D. Proof of financial assurance as required by Rule 62-711.500(3)(a)

Updated closing cost documents are provided in Attachment 8. Those include a P.E certified closing cost estimate, Form 62-701.900(28), and a copy of the current financial assurance instrument (bond) of \$10,000. The closing cost estimate has increased from \$6619.84 from 2021 to \$9943.63 The current bond exceeds the estimated closing costs.

690-22-01 December 9, 2022

ATTACHMENT 8

CLOSING COSTS AND PROOF OF FINANCIAL ASSURANCE



ATTACHMENT 8

Suwannee American Cement Company, LLC – Suwannee American Cement Tire Processing Facility FDEP File No. 297136-003-WT/WACS No. SWD/60/98523 Closing Cost Estimate December 9, 2022

The purpose of this submittal is to fulfill the requirements of Rule 62-711.500(3) F.A.C., to provide a re-estimate of the closing costs for tires at the Suwannee American Cement Tire Processing Facility. Koogler and Associates, Inc. is providing this closing cost estimate for the cost to remove, process, and dispose of the maximum amount of waste tires that is permitted to be stored at the facility at any time.

ESTIMATED CLOSING COSTS:

Tire Disposal

The estimated cost to remove, process, and dispose of the maximum permitted amount of tires stored at the facility at any time (8,040 tires/80.4 tons) is as follows:

80.4 tons @ \$80/ton = \$6,432 (or \$0.80/tire) in 2019 (third party estimate)
2022 Annual Disposal Cost Estimate using FDEP inflation factor for 2021/2022 of 1.012 =
\$6,619.84 (Approved by FDEP on 07/19/2021);
Increase from 80.4 tons to 119.4 tons @ \$80/ton = \$9,552.00
Cost Estimate using FDEP inflation factor of 1.041 for 2022/2023
=\$9,943.63

This cost estimate is backed by a third-party cost estimate from McGee Tire Company, Inc. dated January 9, 2019 (attached).

The Current Bond Amount = \$10,000, Hartford Bond No. 13BSBFQ9243

Professional Engineer Certification

Signature

 $\frac{1/9/23}{\text{Date}}$

MaxWell R. Lee, Ph.D., P.E.

PO Box 5127; Gainesville, FL 32627-5217

352-377-5822

mlee@kogglerassociates.com



Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 DEP Form # 62-701.900(28), F.A.C.

Form Title: Closure Cost Estimating Form For Solid Waste Facilities

Effective Date: January 6, 2010

Incorporated in Rule 62-701.630(3), F.A.C.

CLOSURE COST ESTIMATING FORM FOR SOLID WASTE FACILITIES

Date of DEP Approval:

				Date of L	Li Appiovai.		
I. GENERA	AL INFORMATION:						
Facility Na	me: <u>Suwannee Ar</u>	merican Ce	ment Plant Wa	aste Tire Processin	g Facility_	WACS ID: 98523	
Permit App	olication or Consent (Order No.:	Modification	of 297136-003-WT	Expira	ition Date:	
Facility Ad	dress: 4750 East 0	County Roa	ad 470				
Permittee o	or Owner/Operator:	Suwann	ee American C	Cement Company, I	_LC		
Mailing Ad	dress: PO Box 44	5; Sumterv	ille, FL 33585				
Latitude:	28 °	45'	38 N "	Longitude:	82°	01'	35 W "
Coordinate	Method: Degrees	s/Min/Sec	D	atum: WGS84 (ass	sumed)		
Collected b	y: source: Goodle	Earth 3/7/2	2022 C	company/Affiliation:	:NA		
Solid Wast	e Disposal Units Incl	uded in Es	timate:				
			Date Unit	Active Life of		If closed:	If closed:
			Began	Unit From Date	If active:	Date last	Official
-	Phase / Cell	Aoroo	Accepting	of Initial Receipt of Waste	Remaining life of unit	waste	date of
F		Acres	Waste NA		NA	received NA	closing NA
	NA	NA	INA	NA	INA	INA	INA
Total dispo	sal unit acreage incl	uded in this	s estimate:	Closure: NA	Lor	ng-Term Care:	NA
	, ,,		□ C		C&D Debris	Disposal	
(Chec	k all that apply) 💍	Other: Ti	re Processing	Facility			
II. TYPE C	OF FINANCIAL ASS	URANCE [OCUMENT (C	Check type)			
	Letter of Credit*		□ Insuran	ce Certificate	□ Esc	row Account	
	Performance Bond	*	□ Financi	al Test	□ For	m 29 (FA Defe	erral)
ř	Guarantee Bond*		□ Trust F	und Agreement			
	* - Indicates mechanisms	s that require t	the use of a Standb	y Trust Fund Agreemen	t		

III. ESTIMATE ADJUSTMENT

40 CFR Part 264 Subpart H as adopted by reference in Rule 62-701.630, Florida Administrative Code, (F,A.C.) sets forth the method of annual cost estimate adjustment. Cost estimates may be adjusted by using an inflation factor or by recalculating the maximum costs of closure in current dollars. Select one of the methods of cost estimate ajustment below.

☐ (a) Inflation Factor Adjustment

Inflation adjustment using an inflation factor may only be made when a Department approved closure cost estimate exists and no changes have occurred in the facility operation which would necessitate modification to the closure plan. The inflation factor is derived from the most recent Implicit Price Deflator for Gross National Product published by the U.S. Department of Commerce in its survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflatory by the Deflator for the previous year. The inflation factor may also be obtained from the Solid Waste website www.dep.state.fl.us/waste/categories/swfr or call the Financial Coordinator at (850) 245-8706.

This adjustment is based on the Department approved closing	g cost estimate d	ated:	NA
Latest Department Approved Closing Cost Estimate: Current Year Inflation Factor, e.g. 1.02		=	Inflation Adjusted Closing Cost Estimate:
This adjustment is based on the Department approved long-te	erm care cost est	imate dated:	NA
Latest Department Approved Annual Long-Term Care Cost Estimate: Current Year Inflation Factor, e.g. 1.02		=	Inflation Adjusted Annual Long-Term Care Cost Estimate:
			\ <u></u>
Number of Years of Long Term Care Remaining:		×	8
Inflation Adjusted Long-Term Care Cost Estim	ate:	=	-
Signature by: Owner/Operator	□ Engineer	(check what a	pplies)
200	PO E	Box 5127	
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			Address
Maxwell R. Lee, RND, PEICEN	Gain	esville, FL 32627-5	127
Name & Tifle		City, S	tate, Zip Code
No. 58091	mlee	@kooglerassociate	s com
O TATDate ORIDA Vejephone Number			ail Address

□ Recalculated Cost Estimate □ New Facility Cost Estimate Notes: 1. Cost estimates for the time period when the extent and manner of landfill operation makes closing most exp 2. Cost estimate must be certified by a professional engineer. 3. Cost estimates based on third party suppliers of material, equipment and labor at fair market value. 4. In some cases, a price quote in support of individual item estimates may be required. Number of Units Description Unit Cost / Unit **Total Cost** 1. Proposed Monitoring Wells (Do not include wells already in existence.) EΑ Subtotal Proposed Monitoring Wells: 2. Slope and Fill (bedding layer between waste and barrier layer): CY Excavation Placement and Spreading CY Compaction CY Off-Site Material CY Delivery CY Subtotal Slope and Fill: 3. Cover Material (Barrier Layer): Off-Site Clay CY Synthetics - 40 mil SY Synthetics - GCL SY Synthetics - Geonet SY Synthetics - Other (explain) Subtotal Cover Material: 4. Top Soil Cover: Off-Site Material CY CY Delivery Spread CY Subtotal Top Soil Cover: 5. Vegetative Layer SY Sodding Hydroseeding AC Fertilizer AC Mulch AC Other (explain) ___ Subtotal Vegetative Layer: 6. Stormwater Control System: Earthwork CY Grading SY LF Piping Ditches LF LF Berms Control Structures EΑ Other (explain)_____ Subtotal Stormwater Control System:

IV. ESTIMATED CLOSING COST (check what applies)

Description	Unit	Number of Units	Cost / Unit	Total Cost
7. Passive Gas Control:				
Wells	EA			
Pipe and Fittings	LF			
Monitoring Probes	EA			
NSPS/Title V requirements	LS	1		_
rter e/ rtile v requiremente	20		ubtotal Passive Gas Co	ntrol:
8. Active Gas Extraction Contr	ol:	00	10101011 1 000110 000	
Traps	EA			
Sumps	EA			
Flare Assembly	EA			
Flame Arrestor	EA			
Mist Eliminator	EA			
Flow Meter	EA			
Blowers	EA			
Collection System	LF			
Other (explain)				
\ 1 /		Subtotal Ac	tive Gas Extraction Co	ntrol:
9. Security System:	_	23.230.01710		
Fencing	LF			
Gate(s)	EA			
Sign(s)	EA			
G.g(G)			Subtotal Security Sys	stem:
10. Engineering:				
Closure Plan Report	LS	1		
Certified Engineering Drawing		1		
NSPS/Title V Air Permit	LS	1		
Final Survey	LS	1		
Certification of Closure	LS	1		
Other (explain)	20			_
- ()			Subtotal Enginee	ering:
			Ü	
Description Hours	Cost	:/Hour H	ours Cost / Hou	ır Total Cos
11. Professional Services				
<u>Contr</u>	act Managemer	<u>nt</u>	Quality Assurance	
P.E. Supervisor	<u> </u>			
On-Site Engineer	_			
Office Engineer	_			
On-Site Technician				
Other (explain)	·			
Description	4:ما ا	Number of Units	Coot / Unit	Total Con
Description	Unit LS		Cost / Unit	Total Cost
Quality Assurance Testing		1		

		Subtotal of 1-11 Above:	
12.	Contingency % c	f Subtotal of 1-11 Above	
		Subtotal Contingency:	
		Estimated Closing Cost Subtotal:	
	Description		Total Cost
13.	Site Specific Costs		
	Mobilization		
	Waste Tire Facility	_	\$9,943.63
	Materials Recovery Facility	_	
	Special Wastes	_	
	Leachate Management System	Modification	
	Other (explain)		
		Subtotal Site Specific Costs:	\$9,943.63
		TOTAL ESTIMATED CLOSING COSTS (\$):	\$9,943.63

V. ANNUAL COST FOR L	ONG-TERM CARE			
See 62-701.600(1)a.1., 62-70				
certified closed and Departme	· · · · · · · · · · · · · · · · · · ·		-	e years remaining.
(Check Term Length) ☐ 5 Yea		_		
	stimates must be certified by			
2. Cost es	stimates based on third party	suppliers of material,	equipment and labor at fai	r market value.
3. In some	e cases, a price quote in sup	port of individual item	estimates may be required	I.
All items must be addres	sed. Attach a detailed exp	planation for all entri	es left blank.	
	Sampling			
	Frequency	Number of	(Cost / Well) /	
Description	(Events / Year)	Wells	Event	Annual Cost
1. Groundwater Monitorin	ng [62-701 510(6) and (8	?\/a\ 1		
Monthly	12	,)(α)]		
Quarterly	4			
Semi-Annually	2			
Annually	1			
Allitually	ı		Groundwater Monitorin	
2. Surface Water Monitor	ring [62-701 510(4) and (Groundwater Monitorin	g
Monthly	12	(0)(0)]		
Quarterly	4			
Semi-Annually	2			
•	1			
Annually	ı	Cubtotal C	urface Water Manitaria	~-
2 Coo Monitoring IG2 70	1.400/40\1	Subtotal S	urface Water Monitoring	g:
3. Gas Monitoring [62-70	· /-			
Monthly	12			
Quarterly	4			
Semi-Annually	2			
Annually	1		0.1.1.0	
A. I. a sala sta Missalta atau P	00 704 540(5) (0)(b)		Subtotal Gas Monitorin	g:
4. Leachate Monitoring [62-701.510(8)C]		
Monthly	12			
Quarterly	4			
Semi-Annually	2			
Annually	1			
Other (explain)				
		Subto	otal Leachate Monitorin	g:
		Number of		
Description	Unit	Units / Year	Cost / Unit	Annual Cost
5. Leachate Collection/T	reatment Systems Maint	enance		
<u>Maintenance</u>				
Collection Pipes	LF			
Sumps, Traps	EA			
Lift Stations	EA			
Cleaning	LS	1		
Tanks	EA			

		Number of		
Description	Unit	Units / Year	Cost / Unit	Annual Cost
5. (continued)				
<u>Impoundments</u>				
Liner Repair	SY	- : · · · · · · · · · · · · · · · · · ·		
Sludge Removal	CY	- : · · · · · · · · · · · · · · · · · ·		
Aeration Systems				
Floating Aerators	EA	- : · · · · · · · · · · · · · · · · · ·		
Spray Aerators	EA			
<u>Disposal</u>				
Off-site (Includes	1000 gallon			
transportation and disposal)		Subtotal Leacha	te Collection / Treatmer	nt
			Systems Maintenance	ə: <u> </u>
6. Groundwater Monitoring W	ell Maintenance			
Monitoring Wells	LF			
Replacement	EA			
Abandonment	EA			
	Subto	otal Groundwater Moni	toring Well Maintenance	e:
7. Gas System Maintenance				
Piping, Vents	LF			
Blowers	EA			
Flaring Units	EA			
Meters, Valves	EA			
Compressors	EA			
Flame Arrestors	EA			
Operation	LS	1		
		Subtotal G	as System Maintenance	e:
8. Landscape Maintenance				
Mowing	AC			
Fertilizer	AC			
		Subtotal I	_andscape Maintenance	e:
9. Erosion Control and Cover	Maintenance			
Sodding	SY			
Regrading	AC	<u> </u>		
Liner Repair	SY			
Clay	CY	<u> </u>		
•	Su	btotal Erosion Control	and Cover Maintenance	e:
10. Storm Water Managemen				
Conveyance Maintenance	LS	1		
,		orm Water Manageme	nt System Maintenance	e:
11. Security System Mainten		-	,	
Fences	LS	1		
Gate(s)	EA			
Sign(s)	EA			-
Jigi No)	L/ 1		ity System Maintenance	

			Number of		
	Description	Unit	Units / Year	Cost / Unit	Annual Cost
12.	Utilities	LS	1		
				Subtotal Utilities:	
13.	Leachate Collection/Trea	ntment Systems C	peration		
<u>Op</u>	<u>eration</u>				
	P.E. Supervisor	HR			
	On-Site Engineer	HR			
	Office Engineer	HR			
	OnSite Technician	HR			
	Materials	LS	1		
		Subtotal Le	achate Collection/Treatm	nent Systems Operation:	
14.	Administrative				
	P.E. Supervisor	HR			
	On-Site Engineer	HR			
	Office Engineer	HR			
	OnSite Technician	HR			
	Other				
				Subtotal Administrative:	
		-			
			S	ubtotal of 1-14 Above:	
15.	Contingency		% of Subtotal of 1-14 Ab		
				Subtotal Contingency:	
			Nils a n a f		
_	Description	Unit	Number of Units / Year	Cost / Unit	Annual Cost
	Site Specific Costs	Oilit	Omto / Tear	COSt / Offic	Aimaai Gost
10.	one opecinic dosis				
				total Site Specific Costs:	
			Gubi	total offe openine oosts.	
		A	NNUAL LONG-TERM C	ARE COST (\$ / YEAR):	
			Number of Ye	ears of Long-Term Care:	
			TOTAL LONG-1	TERM CARE COST (\$):	

VI. CERTIFICATION BY ENGINEER

This is to certify that the Cost Estimates pertaining to the engineering features of this solid waste management facility have been examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, the Cost Estimates are a true, correct and complete representation of the financial liabilities for closing and/or long-term care of the facility and comply with the requirements of Rule 62-701.630 F.A.C. and all other Department of Environmental Protection rules, and statutes of the State of Florida. It is understood that the Cost Estimates shall be submitted to the Department annually, revised or adjusted as required by Rule 62-701.630(4), F.A.C.

Signature

PO Box 5127

Mailing Address

Maxwell R. Lee, Ph.D., P.E.

Name and Title (please type)

Gainesville, FL 32627-5217

City, State, Zip Code

TOTAL CONTRACTOR

mlee@kooglerassociates.com

E-Mail address (if available)

No. 58091

E-IVIAII address (II availab

Porida Registration Number STATE OF (please affix seal) 2-377-5822

Telephone Number

VII. SIGNATURE BY OWNER/OPERATOR

Signature of Applicant

PO Box 445

Mailing Address

Dirk Cox, Plant Manager

Name and Title (please type)

Sumterville, FL 33585

City, State, Zip Code

dirk.cox @ashgrove.com

E-Mail address (if available)

352-569-5393

Telephone Number

Koogler and Associates, Inc.

690-22-01 December 9, 2022

PART III SECTION E – LETTER FROM LANDOWNER

E. A letter from the land owner (if different from applicant) authorizing use of the land as a waste tire processing facility.

Not applicable – Suwannee American Cement owns the land.

690-22-01 December 9, 2022

PART III SECTION F – OTHER ENVIRONMENTAL PERMITS

F. If waste tires will be consumed at the facility, attach a description of the other environmental permits that the applicant has for this use, including, permit number, date of issue, and name of issuing agency.

Tires are burned in the cement kiln as a supplemental fuel. Therefore, the facility must be authorized under an air permit to burn tires in the kiln. The facility is permitted to burn whole tires and tire-derived fuels in the kiln under Title V Permit No. 1190042-023-AV (issued on March 11, 2021). This information is also provided in the Comprehensive Operations Plan provided as Attachment 5.

690-22-01 December 9, 2022

PART III SECTION G – PERMIT FEE

G.	The	permit	fee as	required	in	Rule	62-4,	FAC.
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The required permit fee of \$1,250 (per Rule 62-4.050(4)(j)10, FAC) will be paid electronically after application submittal.

690-22-01 December 9, 2022

PART IV - CERTIFICATION

Except as particularly noted herein, based on information and belief formed after reasonable inquiry, to the best of my knowledge, the statements and information in this document are true, accurate, and complete.

Exceptions to the professional engineering certification are presented below.

- Attachment 1 USGS Topographic Map: The topographic map was accessed on 3/1/2022 from http://www.topoquest.com/map.php?lat=28.74499&lon=-82.06342&datum=nad83&zoom=4&cross=on. The map was not prepared or issued by the professional engineer and / or was not under the professional engineer's responsible supervision, direction or control.
- 2. Attachment 2 Zoning and Future Land Use Map: The Zoning and Future Land Use map was accessed on 3/2/2022 from Sumter County's GIS Department; https://www.arcgis.com/apps/webappviewer/index.html?id=0f1f020d62c242bcaeb8689876d99881&extent=-9202100.9938,3309346.4355,-9082859.2297,3380738.6199,102100 The information contained in the map was not prepared or issued by the professional engineer and / or was not under the professional engineer's responsible supervision, direction or control.
- 3. Attachment 4 Tire Feed System Plan View: The Tire Feed System Plan View was not prepared or issued by the professional engineer and / or was not under the professional engineer's responsible supervision, direction or control. The attached plot plan was part of the application submission dated November 19, 2009 and was included with the permit renewal in 2018. For clarity, Koogler and Associates outlined and labeled the tire injection system on the figure for the 2018 permit renewal. The facility added the truck tipper detail to this drawing in 2022 and provided the revised drawing to Koogler. According to facility personnel, the plot plan is accurate. No other changes have occurred to the figure with this submittal.