



Florida Department of Environmental Protection

Central District
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Charlie Crist
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Lt. Governor

Michael W. Sole
Secretary

By E-Mail

mkaiser@wasteservicesinc.com

Mr. Mike Kaiser
Omni Waste of Osceola County, LLC (Omni)
1501 Omni Way
St. Cloud, FL 34773

OCD-SW-10-0023

Osceola County – SW WACS # 89544
J.E.D. Solid Waste Management Facility, Class I
Auto Shredder Residual Recycling & Waste Tire
Storage Processing Operations – Minor Modification
First Request for Additional Information
Modification of Permit No. SO49-0199726-012
Permit Application Nos. SO49-0199726-013 and WT49-0199726-014

Dear Mr. Kaiser:

HDR submitted on your behalf, "Request For Minor Permit Modification." It was dated December 16, 2009 and received December 22, 2009. We have assigned permit numbers SO49-0199726-013 and WT49-0199726-014 to the application. The application is incomplete. Please provide the information listed on the attached sheet promptly. Evaluation of your application will be delayed until all the requested information has been received.

Pursuant to Section 120.60(2), Florida Statutes, the Department may deny an application, if the applicant, after receiving timely notice, fails to correct errors and omissions, or supply additional information within a reasonable period of time. Accordingly, please provide the additional information within 30 days of the date you receive this letter. Submit three copies of the requested information to the Department and reference the above permit application number in your correspondence.

If you have any questions, please contact me at (407) 893-3328.

Sincerely,

F. Thomas Lubozynski, P.E.
Waste Program Administrator

FTL/gc/ew

Enclosure

cc: Brenda Ann Smith Clark, P.E. – HDR Engineering, Inc. Brenda.clark@hdrinc.com

Note that all references to "Report" in the following text refers to the document entitled, "Request For Minor Permit Modification, Operation Permit, J.E.D. Solid Waste Management Facility," Prepared by: HDR, Miami Lakes, Florida, dated December 16, 2009.

1. Engineering Drawings, Sheet 2, Site Plan for Auto Shredder Residual Recycling Operations: The auto shredder residual recycling operations typical layout provided on Sheet 2 is not drawn to scale and is shown to be approximately 150' X 250'. Provide a revised layout drawn to scale that shows the layout plan, elevation view, and the sectional details of how the recycling operations system is setup. If operations are not under a roof or cover then provide information as to how leachate will be handled and provisions for securing the system in the event of major storm/hurricane.
2. Auto Shredder Residual Recycling Plan, Section 7, Employee Training: This section does not discuss the employee training requirements for operating the auto shredder residual recycling system. Does the operation of this system require any special training other than the Solid Waste Operator/Spotter training or will the on-duty landfill Solid Waste trained and certified Operator/Spotter be able to perform this function?
3. DEP Form 62-701.900(23), Page 3 of 4, Part III-B-7: Provide a copy of the fire safety survey.
4. Waste Tire Storage Requirements and Prohibitions, Page 3, Section 5.3: Provide a description of the procedures to be followed in the event of a fire, including procedures to contain and dispose of the oily materials generated by the combustion of large number of waste tires, Rule 62-711.540(1)(e)3, F.A.C.
5. DEP Form # 62-701.900(23), Page 2 of 4, Part II – C, Storage: The maximum quantities of whole waste tires, processed waste tires, and processing residuals, in tons stored at the facility, in accordance with Rule 62-711.530(2), F.A.C. is shown as 948 tons. Page 1, Paragraph 2 of Exhibit A states that no more than 13,200 tons of the aggregate of whole tires, processed tires and residuals, or 6,600 tons of whole waste tires could be stored at the WTSP area at any one time. Provide an explanation, since the latter statement is not in agreement with the requested maximum storage of 948 tons at any one time shown in the permit application. The cost estimate is also dependent on the maximum storage of tires at any one time.
6. Closure Cost Estimate: The Department agrees that the closure cost estimate to close the ASR recycling and waste tire storage and processing operation are not included in this request for minor modification. The Department has received the revised cost estimate for the J.E.D. facility submitted under separate cover by Geosyntec Consultants for the partial closure project dated December 31, 2009, which includes the closure cost estimate for the ASR recycling and waste tire storage and processing operations. Approval of the closure cost estimate for this project is contingent upon approval of the revised closure cost estimate submitted by Geosyntec Consultants for the J.E.D. facility, dated December 31, 2009.
7. Financial Assurance: Before the application can be deemed complete, a financial mechanism must be funded in the amount specified in the approved cost estimate and accepted by the Department's Financial Coordinator. Financial responsibility arrangements for the facility for the approved amounts are to be made with the Financial Coordinator, Solid Waste Section, MS-4565, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and a copy of the approval letter submitted to: Department of Environmental Protection, Central District, Solid Waste Section, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803-3767.