



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

By E-Mail
MKaiser@wasteservicesinc.com

Mr. Mike Kaiser
Taft Recycling, Inc.
2893 Executive Park Drive, Suite 305
Weston, FL 33331

OCD-SW-10-0333

Orange County – SW WACS # 87104
Taft Recycling, Inc. – TS/MRF - WPF
Waste Tire Processing Facility
Modification of Permit No. SO48-0173968-007
Permit No. WT48-0173968-008

This is the Department's Intent to Issue the Modification of Permit No. SO48-0173968-007. Enclosed are the "Notice of Intent to Issue Permit" and Draft Permit for the project and file number noted above. Please contact the Central District's Solid Waste Program at 407-893-3328 if you have any questions or need further information.

INTENT TO ISSUE PERMIT FOR MODIFIED PROJECT

The Department of Environmental Protection gives notice of its intent to issue a permit (copy of conditions attached) for the proposed modified project as detailed in the application specified above, for the reasons stated below.

The applicant Taft Recycling, Inc./Mike Kaiser, 2893 Executive Park Drive, Suite 305, Weston, FL 33331, applied on October 30, 2010, to the Department of Environmental Protection to modify DEP Permit No. SO48-0173968-007 for the Taft Recycling Inc., Transfer Station/Materials Recovery Facility – Waste Processing Facility, in Orange County, FL. The permit will be modified, thereby requiring additional public notice under Rule 62-103.150(2)(a)5 of the Florida Administrative Code.

The Department has permitting jurisdiction under Section 403.7097(1), F.S., and Chapters 62-4, 62-701 and 62-711, F.A.C. The project is not exempt from permitting. The Department has determined that a modification to the existing permit is required to include installation and operation of the waste tire storage and processing operations at the facility.

Under Section 403.815 of the Florida Statutes and Rule 62-103.150 of the Florida Administrative Code, you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Permit for Modified Project. The notice must be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of sections 50.011 and 50.03 1 of the Florida Statutes, in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used should be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant must provide proof of publication to the Department, at the Department of Environmental Protection, 3319 Maguire Blvd., Suite 232, Orlando, FL 32803, telephone 407/893-3328, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57 of the Florida Statutes before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received by the clerk) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

Petitions by the applicant or any of the parties listed below must be filed within fourteen days of receipt of this written notice. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the notice or within fourteen days of receipt of the written notice, whichever occurs first.

Under Section 120.60(3) of the Florida Statutes, however, any person who has asked the Department for notice of agency action may file a petition within fourteen days of receipt of such notice, regardless of the date of publication.

The petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. Any subsequent intervention (in a proceeding initiated by another party) will be only at the discretion of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

- (a) The name, address, and telephone number of each petitioner; the name, address, and telephone number of the petitioner's representative, if any; the Department permit identification number and the county in which the subject matter or activity is located;
- (b) A statement of how and when each petitioner received notice of the Department action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A statement of facts that the petitioner contends warrant reversal or modification of the Department action;
- (f) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take.

A petition that does not dispute the material facts on which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under Section 120.573 of the Florida Statutes is not available for this proceeding.

Any party to this order has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the

applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



F. Thomas Lubozynski for

Vivian F. Garfein
Director, Central District
3319 Maguire Blvd., Suite 232
Orlando, FL 32803
407/894-7555

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to Section 120.52, F. S., with the designated Department Clerk, receipt of which is hereby acknowledged.



Clerk

June 1, 2010

Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE PERMIT FOR MODIFIED PROJECT and all copies were sent before the close of business on June 1, 2010 to the listed persons.



Clerk

VFG/gc/sj

Enclosures:

1. Wording required in Notice of Proposed Agency Action
2. Draft Permit No. WT48-0173968-008
3. Appendix A – List of Documents Incorporated into Permit
4. Appendix B – Time Sensitive Specific Conditions

Copies furnished to:

Richard Tedder, P.E. – DEP – Tallahassee
Fred Wick – DEP – Tallahassee
Frank Hornbrook – DEP – Tallahassee
David Bromfield, OCEPD, david.bromfield@ocfl.net
David L. Leggett, P.E. – HSA Golden, Inc. dleggett@hsagolden.com
James E. Golden, P.G. – HSA Golden, Inc. jgolden@hsagolden.com

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Protection gives notice of its intent to issue a permit modification to Taft Recycling, Inc./Mike Kaiser, 2893 Executive Park Drive, Suite 305, Weston, FL 33331. The proposed work involves a modification to the existing operation permit to include installation and operation of a waste tire storage and processing facility at the existing Taft Recycling Inc., Transfer Station/Materials Recovery Facility – Waste Processing Facility.

The facility is located at 375 West 7th Street, St. Orlando, in Section 02, Township 24 South, Range 29 East, in Orange County, Florida.

The Department has assigned File No. WT48-0173968-008 to the project and intends to issue the permit as a modification to the existing operation Permit No. SO48-0173968-007 which expires on February 20, 2011.

The Department will issue the permit modification unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57 of the Florida Statutes before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Department of Environmental Protection, 3319 Maguire Blvd., Suite 232, Orlando, FL 32803, telephone 407/893-3328.

Documents in this matter can also be accessed through the OCULUS electronic document management system at: www.dep.state.fl.us. Once at the DEP home page, click on Programs, and then click on Waste Management, and then click on OCULUS.

Login as netuser and password: netuser. Click the login button. Under Catalog select Solid Waste and under Profile select Permitting_Authorizations. Enter 87104 in the Facility ID field and hit the tab button. The computer will automatically fill in the County and facility name. Next to the Document Date, click on symbol “V”, select the symbol “>” from the options. In the first blank box to the right, insert 10-27-2009. Click the search button. You will see a listing of all documents related to this permit application (WT48-0173968-008). If you want to see all permit application related documents, leave the Document Date fields empty.

A person whose substantial interests are affected by the above proposed agency action may petition for an administrative determination (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Department's Office of General Counsel, Marjory Stoneman Douglas Building, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within 14 days of publication of this notice or receipt of the written notice, whichever occurs first. The petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 of the Florida Statutes, or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the discretion of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of all material facts disputed by petitioner or a statement that there are no disputed facts;

(e) A statement of facts which the petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes the petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

A petition that does not dispute the material facts on which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In accordance with Section 120.573, F.S., the Department advises that mediation is not available in this case as an alternative to filing a petition for an administrative determination.



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Permit Issued to:

Taft Recycling, Inc., TS/MRF -WPF Facility
Located at: 375 West 7th Street
Orlando, Florida, Orange County
Telephone No. (407) 851-0047
Facility ID No.: WACS ID # 87104

Authorized Representative: Mr. Mike Kaiser
Title: Vice President, Taft Recycling, Inc.
2893 Executive Park Drive, Suite 305
Weston, FL 33331

Solid Waste Operating Permit
Waste Tire Storage and Processing Operations –Modification
Taft Recycling Inc., TS/MRF-WPF Facility – Orlando
Revised Permit No.: SO48-0173968-007
Includes Modification No.:
WT48-0173968-008

Permit Issued:

Permit Renewal Application Due Date: 12/19/2010
Permit Expires: 02/20/2011

Permitting Authority

Florida Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803
Telephone No. (407) 893-3328



Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
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Secretary

By E-Mail

Mkaiser@wasteservicesinc.com

Mr. Mike Kaiser
Taft Recycling, Inc.
2983 Executive Park Drive, Suite 305
Weston, FL 33331

OCD-SW-10-0

Orange County – SW WACS # 87104
Taft Recycling, Inc., - TS/MRF - WPF
Waste Tire Processing Facility
Modification of Permit No. SO48-0173968-007
Permit No. WT48-0173968-008

Dear Mr. Kaiser:

In response to the request submitted on October 30, 2009, by HSA Golden Consultants, Permit No. SO48-0173968-007 is modified to include waste tire storage and processing at the Taft Recycling Inc., Waste Processing Facility.

Project Background:

- The Taft Recycling, Inc., TS/MRF – Waste Processing Facility receives Class I, Class III, and Construction and Demolition Debris (C&D) Waste for processing and sale as recycled material. The process equipment includes cardboard bailing, and site material handling equipment. The materials that are not recycled will be removed from the site and hauled for disposal to a Department permitted Class I, Class III, or C&D disposal facility.
- The property consists of approximately 12 acres in a roughly rectangular shape with an existing office building, vehicle maintenance building, 18,600 square feet waste processing building, and sorting areas. The facility serves Orange, Osceola, and Seminole Counties, and the City of Orlando.
- The leachate is stored in the 5,000 gallon aboveground storage tank, and transported by an industrial waste hauler to a DEP permitted industrial wastewater treatment plant, such as IWS, Jacksonville, Florida.
- The project does not incorporate a water quality monitoring plan.
- Permit modification WT48-0173968-008 allows for waste tire storage and processing at the facility. The maximum daily throughput is limited to 67.5 tons. A mobile waste tire shredder will be used at the facility. The processed tires will be transported to a Class I landfill where they will be used as initial/daily cover. Specific Condition Nos. 27 to 41 are added to Permit No. SO48-0173968-007.
- The expiration date for Permit No. SO48-0173968-007/008 remains February 20, 2011.

Page 1 of 4

PERMITTEE:
Taft Recycling Inc.

WACS#: 87104
Permit No.: Revised SO48-0173968-007
Expiration Date: 02/20/2011

Attention: Mr. Mike Kaiser

SPECIFIC CONDITIONS: Waste Tire Processing Facility - WT48-0173968-008

27. Operations Involving Use of Open Flames: No operations involving the use of open flames shall be conducted within 25 feet of a waste tire pile, Rule 62-711.540(1)(b), F.A.C.
28. Stormwater Control Methods: Stormwater control methods shall meet stormwater requirements of Chapter 62-25 and 62-330, F.A.C. The facility shall be managed in such a way as to divert stormwater or floodwater around and away from the tire storage piles, Rule 62-711.540(3)(a), F.A.C.
29. Emergency Situations: The operator of the waste tire site shall immediately notify the Department in the event of a fire or other emergency if that emergency has potential off-site effects. Within two weeks of any emergency involving potential off-site impact, the operator of the site shall submit to the Department, a written report on the emergency. This report shall describe the origins of the emergency, the actions that were taken to deal with the emergency, the results of the actions that were taken, and an analysis of the success or failure of the actions, Rule 62-711.540(1)(f), F.A.C.
30. Certification Requirements: The permittee shall not accept waste tires at the facility until the requirements of Rule 62-701.320(9)(b), F.A.C. have been met.
31. Minimum Size Requirements: Processed tires for recycling or disposal must meet the minimum size requirements specified in Rule 62-711.400(3), F.A.C.
32. Waste Tire Processing Facility Requirements: The facility shall meet the requirements of the waste tire processing facility, Rule 62-711.530, F.A.C.
33. Storage Requirements: Any storage of tires on-site shall meet with the fire department's standards along with the provisions cited in Rule 62-711.540, F.A.C. of the waste tire rule.
34. Control of Mosquitoes and Rodents: The owner or operator shall provide for control of mosquitoes and rodents at the waste tire site so as to protect the public health and welfare, Rule 62-711.540(1)(j), F.A.C.
35. Tire Pile Dimensions: An outdoor tire pile or processed tire pile shall not exceed the following maximum dimensions as shown on Sheet 1 titled Site Plan in Section 2, Revised Operation Plan, Appendix H, Site and Building Construction Plans (Reference 1 - Appendix A of this permit): a width of 50 feet; an area of 10,000 square feet; and a height of 10 feet, Rule 62-711.540(3)(b), F.A.C.
36. Waste Tire Pile - Fire Lane: A 50-foot wide fire lane shall be placed around the perimeter of each waste tire pile, Rule 62-711.540(3)(c), F.A.C.
37. Processing Requirements: At least 75% of the whole tires, used tires, and processed tires that are delivered to or are contained on the site of the waste tire processing facility at the beginning of each calendar year must be processed and removed for disposal or recycling from the facility during the year, or disposed of in a permitted solid waste management facility, Rule 62-711.530(3), F.A.C.

PERMITTEE:
Taft Recycling Inc.

WACS#: 87104
Permit No.: Revised SO48-0173968-007
Expiration Date: 02/20/2011

Attention: Mr. Mike Kaiser

SPECIFIC CONDITIONS:

38. Quarterly Reports: Owners or operators of waste tire processing facilities shall submit quarterly reports to the Department that summarize the information collected under Rule 62-711.530(4), F.A.C. The reports shall be submitted on DEP Form 62-701.900(21), on the 20th of the month following the close of each calendar quarter to the Department of Environmental Protection, Central District - Solid Waste Section, 3319 Maguire Boulevard, Suite 232, Orlando, Florida 32803, with a copy to the Department of Environmental Protection, Solid Waste Section, 2600 Blair Stone Road, Tallahassee, Florida 32399, Rule 62-711.530(5), F.A.C.
39. Closure Plan: The waste tire processing facility shall comply with the closure plan requirements of Rule 62-711.700, F.A.C.
40. Disposal of Processed Tires or Residuals: The processed tires or residuals shall be disposed of at permitted disposal sites or properly recycled.
41. Maximum Storage: The facility shall not accept any waste tires for processing if it has reached its permitted storage limit for any category of waste tires, or if the number of waste tires on the site exceeds the quantity estimate in the closing cost estimate, Rule 62-711.530, F.A.C. The maximum storage at the facility for whole waste tires, processed tires, and residuals, shall be 67.5 tons, 67.5 tons and 10 tons, respectively, as stated in Item C of DEP Form # 62-701.900(23) – Waste Tire Processing Facility Permit Application provided in Section 1 titled Forms (Reference No. 1 – Appendix A), and also on Table 1 in Response 2 (Reference No. 8 – Appendix A). The maximum storage at the facility includes a minimal amount of tires destined for re-sale.

The information submitted October 30, 2009, February 15, 2010, and March 18, 2010 on file at the Central District Office is made a part of this permit. The documents are listed in Appendix A.

All other conditions of the subject permit remain unchanged.

This letter must be attached to Permit No. SO48-0173968-007 and becomes part of that permit. The new permit numbers is WT48-0173968-008.

Sincerely,

Vivian F. Garfein
Director, Central District

Date: _____

PERMITTEE:
Taft Recycling Inc.

WACS#: 87104
Permit No.: Revised SO48-0173968-007
Expiration Date: 02/20/2011

Attention: Mr. Mike Kaiser

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to Section 120.52, F. S., with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk

Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT MODIFICATION and all copies were sent before the close of business on _____ to the listed persons.

Clerk

VFG/gc/sj

Enclosures:

Appendix A - List of Documents Incorporated into Permit
Appendix B - Time Sensitive Specific Conditions

Copies furnished to:

Richard Tedder, P.E. – DEP – Tallahassee
Fred Wick, DEP – Tallahassee
Frank Hornbrook, DEP – Tallahassee
David Bromfield, OCEPD, david.bromfield@ocfl.net
David L. Leggett, P.E. – HSA Golden, Inc. dleggett@hsagolden.com
James E. Golden, P.G. – HSA Golden, Inc. jgolden@hsagolden.com

Appendix A
List of Documents Incorporated Into the Permit

1. Waste Tire Processing Facility Permit Application, Taft Transfer Station and Material Recovery Facility, Prepared by HSA Golden Consultants, Orlando, Florida dated October 2009. Received and stamped October 30, 2009, DEP – Central District.
2. First Request for Additional Information from Central District – DEP dated November 17, 2009.
3. Request for 30-Days Due Date Extension from Nov 17, 2009 to Dec 17, 2009 to Submit Response to First Request for Additional Information from HSA Golden Consultants, Orlando, Florida dated December 15, 2009. Received and stamped December 16 2009, DEP – Central District.
4. Approval of Request for Extension of Deadline for Submittal of First Request for Additional Information from Central District – DEP dated December 22, 2009.
5. Response to First Request for Additional Information, Taft Recycling, Inc., TS/MRF-WPF, Prepared by HSA Golden Consultants, Orlando, Florida dated February 11, 2010. Received and stamped February 15, 2010, DEP – Central District.
6. E-Mail dated March 02, 2010 from Mike Kaiser, Waste Services, Inc. to Tom Lubozynski, DEP – Central District clarifying that it is Acceptable to the Permittee to Process the Waste Tire Processing Facility Permit Application as a Modification of the Current Operating Permit.
7. Second Request for Additional Information from Central District – DEP dated March 09, 2010.
8. Response to Second Request for Additional Information, Taft Recycling, Inc., TS/MRF-WPF, Prepared by HSA Golden Consultants, Orlando, Florida dated March 17, 2010. Received and stamped March 18, 2010, DEP – Central District.
9. Third Request for Additional Information from Central District – DEP dated April 06, 2010.
10. Permit Application Completion Letter dated April 08, 2010 from DEP – Central District.
11. E-Mail dated April 19, 2010 from Frank Hornbrook, DEP – Financial Assurance Section, Tallahassee, stating that the facility is in Financial Assurance Compliance with DEP and Orange County Interlocal Agreement.

APPENDIX B
Time Sensitive Specific Conditions
Modification of DEP Permit Number SO48-0173968-007
DEP Permit Number WT48-0173968-008

Specific Condition	Requirement	Action	Due Date
29	Modification #WT48-0173968-008 Emergency Situations	Notify the Department in the event of a fire or other emergency if that emergency has potential off-site effects.	Immediately upon discovery
29	Emergency Situations	Submit a written report on the emergency involving fire or potential off-site impacts.	Within two weeks of the emergency.
30	Certification Requirements	Comply with the certification requirements of Rule 62-701.320(9)(b), F.A.C.	Upon completion of the construction and prior to the start of operation of waste tire processing facility
35	Tire Pile Dimensions	Outdoor tire pile or processed tire pile shall not exceed the following maximum dimensions: 50 feet wide, area of 10,000 square feet, and a height of 10 feet.	Seek prior Department approval for any deviations.
37	Processing Requirements	Process and remove for disposal at least 75% of the whole tires, and processed tires that are delivered to or contained on the site at the beginning of each year	By the end of the same year.
38	Quarterly Reports	Submit Quarterly Reports to the Department Central District Office summarizing information per Rule 62-711.530(3)(c) F.A.C.	No Later Than 20 th of month following the close of each Calendar Quarter
41	Maximum Storage	The maximum storage at the facility for whole waste tires, processed tires, and residuals shall be 67.5 tons, 67.5 tons, and 10 tons respectively. Additionally,	Seek prior Department Approval for any deviations.

APPENDIX B
Time Sensitive Specific Conditions
Modification of DEP Permit Number SO48-0173968-007
DEP Permit Number WT48-0173968-008

Specific Condition	Requirement	Action	Due Date
		minimal amount of tires destined for re-sale should be stored at site.	

DRAFT