

Jeb Bush
Governor

Department of Environmental Protection

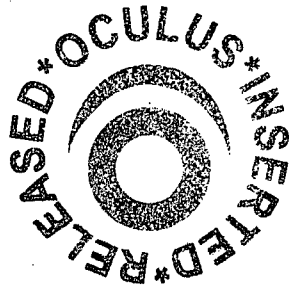
South District
P.O. Box 2549
Fort Myers, Florida 33902-2549

Colleen M. Castille
Secretary

March 31, 2005

COPY

Beck's Tire Service
d/b/a Florida Tire Terminal
c/o Robert Reisig, Manager
400 Feagin Street
Avon Park, Florida 33826



Re: Highlands County – WT
Florida Tire Terminal
Waste Tire Processing Facility
Application No. 0245850-001-WT/02
Request for Additional Information (RAI) No. 1
Lake Wales Ridge EMA

Dear Mr. Reisig:

The Department has reviewed your application with supporting data regarding a permit for the subject facility and found the submittal to be incomplete. Please submit additional information as addressed below to complete the application.

APPLICATION FORM, PART I

Please mark "x" in the box for "Existing unpermitted facility".

- A.1: i) Please clarify whether Beck's Tire Service or Florida Tire Terminal is a corporate legal entity registered with the State of Florida Department of State.
- ii) Please clarify which is the responsible operating authority of the Florida Tire Terminal and who is responsible for the financial affairs of the facility. Please note that only a corporate legal entity registered with the State of Florida Department of State can assume financial responsibility to provide financial assurance for facility closure. If an individual owns the entire facility, he/she can assume the responsibility for providing financial assurance for closure of the facility. A letter dated March 1, 2005 submitted with supporting data indicates that Eugene H. Beck, Jr. is President and owner of this company (Beck Tire International, 4950 Stilwell Avenue, Kansas City, Missouri 64120-1134) and property. Moreover, the letter authorizes "the current occupant of 400 Feagin Street in Avon Park, FL to continue in business there." The name

of the current occupant is not mentioned and the name of the responsible person is not described. As such, the authorization is not acceptable. A proof of land ownership is also required along with the authorization.

- iii) The application should be signed by the owner/operator of the business; however, an authorized agent can sign the application. The submitted application is signed by Robert A. Reisig, manager, and is submitted without an authorization letter by the owner of the business.

Please clarify the ownership of the business, registration with the State of Florida as a corporation, and re-submit the application signed by an authorized agent, along with a letter of authorization.

A.7: Please submit a history and description of the enforcement actions.

B.7: Please complete information regarding Township and Range, and enter the correct latitude and longitude in degrees, minutes, and seconds.

PART II and PART III: It appears that the report (supporting data) is not prepared by a professional engineer as the title (cover) sheet does not bear a signature and a seal. Moreover, the certification by the professional engineer on Page 4/4 of the application includes the words, "Tire Storage Only" which limits his certification, but it is not clear whether the tire storage is regarding the storage areas or the quantity of tire storage in tons. However, the drawings "Proposed Site Plan" is signed by the professional engineer.

As such, the submitted report/narrative cannot be accepted for review. However, a couple of comments are made.

The storage capacity of different areas (outdoor and indoor) is not marked on the plan and described in the narrative, and no calculations are submitted, the storage detailed on Page 4/4 of the application indicates the total storage as 230 tons, which is beyond the maximum storage allowed for 15,000 tires (150 tons). The submitted closure cost estimate is for 242 tons, which is in excess of the allowed amount. Moreover, the total closure cost is not correct.

It is to be noted that the submitted Section Map (revised Zoning Map) dates back to September 24, 2001. The city or the engineer has to certify that is the latest one.

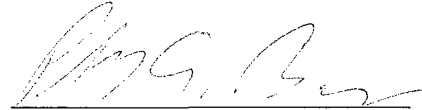
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Please submit a revised application with a narrative/report and a complete table of contents, addressing each item of the application in accordance with applicable sections of Florida Administrative Code Rule 62-711 and the DEP approved Alternate Procedure. The narrative/report and drawing(s) shall be signed, dated and sealed by a professional engineer.

Should you need further assistance, please call Ghous Minhaj at (239) 332-6975, extension 185.

Please submit at least four (4) copies of your response as early as possible but by April 30, 2005. Your cooperation in this matter is appreciated.

Sincerely,

A handwritten signature in dark ink, appearing to read "Philip A. Barbaccia", is written over a horizontal line.

Philip A. Barbaccia
Environmental Administrator

PAB/GAM/se

cc: Bill Krumbholz, DEP