

**West, Tommi**

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**From:** Matoska, Maria  
**Sent:** Tuesday, March 05, 2013 11:17 AM  
**To:** West, Tommi; Leamons, Bryan  
**Subject:** FW: Makool Response letter  
**Attachments:** Kool Response 3-4-13.pdf

**Rec'd Digitally**

**AFIN:** 19-00410

**PMT#:** 0028-SWTP

**RECEIVED**  
By Tommi West at 11:22 am, Mar 05, 2013

**DOC ID#:** 64015

**TO:** MM>File

**S**  
**W**  
**M**  
**D**

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**From:** Bradley Cline [<mailto:brad.cline@yahoo.com>]  
**Sent:** Tuesday, March 05, 2013 10:34 AM  
**To:** Matoska, Maria  
**Cc:** Koolgas LLC  
**Subject:** Makool Response letter

Mrs. Matoska,

Please find attached the response letter and attachments for Kool Metal Recycling, LLC's waste tire permit application.

Let me know if I can provide any further information.

Thanks,

*Brad Cline P.E.*  
**Cline Environmental, Inc**  
3621 CO-OP Drive  
Bono, AR 72416  
Cell -870-926-6496  
Office-870-935-4466  
fax -870-972-0027  
<http://www.clineenvironmental.com/>



**CLINE ENVIRONMENTAL INC**  
3621 CO-OP Dr.  
Bono, AR 72416  
Phone 870-926-6496  
Fax 870-972-0027

March 3, 2013

Maria Matoska  
Arkansas Department of Environmental Quality  
Solid Waste Permitting  
5301 Northshore Dr.  
North Little Rock, AR 72118-5317

Subject: Kool Metal Recycling – Notice of Deficiency Response for Administrative Completeness  
AFIN: 19-00410 Permit No.: 0028-SWTP

Dear Mrs. Matoska,

Cline Environmental, Inc., on behalf of Kool Metal Recycling, LLC, is responding to the letter dated January 31, 2013. The deficiencies and responses are listed below:

1. Arkansas Code Annotated 8-4-310 and Arkansas Pollution Control & Ecology Commission Regulation 19.401.  
The facility has constructed and operated a possible source of air contaminant without first obtaining a permit. The facility will need to have the source's emissions and any associated process emissions evaluated by our Department's Air Division Permitting Branch.

RE-1: The facility mentioned above was only in operation for testing purposes, as to obtain a waste stream for the waste tire processing permit. The facility has since ceased all operation and has acquired services from Cline Environmental, Inc to complete the air permit application. The application was submitted for review on October 22. The facility operations will remain ceased until all required permits are obtained.

2. Explain the agreement between the owner and applicant. Provide copy of lease or purchase agreements.

RE-2. The owner is leasing the property and has no involvement in the day to day operations of Kool Metal Recycling, LLC. A copy of the lease agreement is included as Attachment A.

3. The application included real estate property records for the proposed site. Please provide a file-marked copy of the legal instrument giving right to use the property for waste tire processing including a current boundary survey.

RE-3. A copy of the lease agreement and a current boundary survey are included in Attachment A.

4. Section 5-Operating Plan discusses the waste stream and potential markets. The application states that black carbon and/or tire derived fuel will be purchased by Safety Klean and FCC Environmental. Steel components will be sold to Arkansas Steel Mill. Please explain these potential markets and provide a copy of the purchase agreements.
- RE-4. Attachment B contains the revised operating plan and the agreements with each company to dispose of the black carbon, tire derived fuel, and the steel radials.
5. The application did not include a disclosure statement. Please provide.
- RE-5. Attachment C contains the disclosure statement.
6. The application states that the facility proposes to process not more than 500 tires or 12 tons per month. Please revise as 500 passenger tires equates to 5 tons depending on size.
- RE-6. The facility will be receiving a processing waste tires based on weight. The pending Air Permit is limited to 12 tons per month. The facility will be receiving passenger tires as well as truck and agricultural tires. The facility would like to propose that it be permitted based on weight, not quantity of tires for this reason.
7. A waste tire processing facility may not accept any waste tires for processing if it has reached its storage limit. The storage limit for processing facilities is thirty (30) times the daily capacity of the processing equipment used. Owners or operators of waste tire processing facilities shall provide processing equipment specifications from which daily capacity may be determined. Please provide.
- RE-7. Attachment D contains the specifications for equipment currently in place at the facility.
8. Please provide documentation that the applicant has applied for a stormwater permit *ADEQ Water Division*.
- RE-8. Attachment E contains the Notice of Coverage for the No Exposure Exclusion under the Industrial Stormwater Permit ARR000000.
9. Regulation 22.203 contains an administrative requirement for local authority approval of site selection for processing facilities. More specifically, 22.203 (b) and (c) requires the applicant to receive approval from county or regional solid waste district where site selection restrictions have been adopted. if the local or regional authority does not have waste tire processing site selection restrictions, then the applicant needs to submit notification to the county and regional solid waste district. Contact the county authority and the regional solid waste management district and discuss with them any site selection restrictions. Please provide either the written approval or the written notification, whichever is required.
- RE-9. Attachment F contains letters of approval from the City of Wynne, Cross County, and the local waste district.

10. Section 9-Collection and Removal Plan states that the site currently has approximately 43 tons of waste and processed tires on site. Be advised that the Department cannot issue a permit to a facility that has exceeded its proposed permitted limit. The facility must reduce the amount of waste and processed tires on site prior to issuance of a permit.

RE-10. Attachment G contains documentation of the disposal of 14.5 tons of the previously stored tires. The current storage of tires is now estimated to be 28.5 tons.

11. The application provided closure cost estimates that did not include hauling of fuel/liquids, site (soil) remediation and other related costs. Closure costs should include disposal of the maximum amount of solvent generated from the pyrolysis operation. All stored solvent with no immediate market will be waste and will likely be a hazardous waste. Therefore, liquid waste disposal cost estimates should be included.

Analytical testing of surfaces and environments media is not included in the cost estimate. Analysis of any remaining residuals, all cleaned surfaces and all potentially impacted soils, sediments and surface waters will be required for closure. A list of analytical parameters should, at a minimum, include the chemicals which make up the waste and/or products. Costs for this testing should be provided.

Cost estimates for contaminated soil removal and site restoration of those disturbed areas are not included. Although the proposed operation is to be generally conducted inside a building, the site plan shows outside storage of incoming and outgoing waste and products which can impact the environment if not managed correctly. Please provide cost estimates for contaminated soil removal and site restoration.

RE-11. Attachment H contains the revised closure plan and closure cost estimate.

If you have any questions or comments concerning this report, please do not hesitate to contact Brad Cline at 870-926-6496.

Sincerely,



Brad Cline, P.E.  
Project Manager

## **Attachment A**

Lease Agreement and Current Boundary Survey

## COMMERICAL LEASE

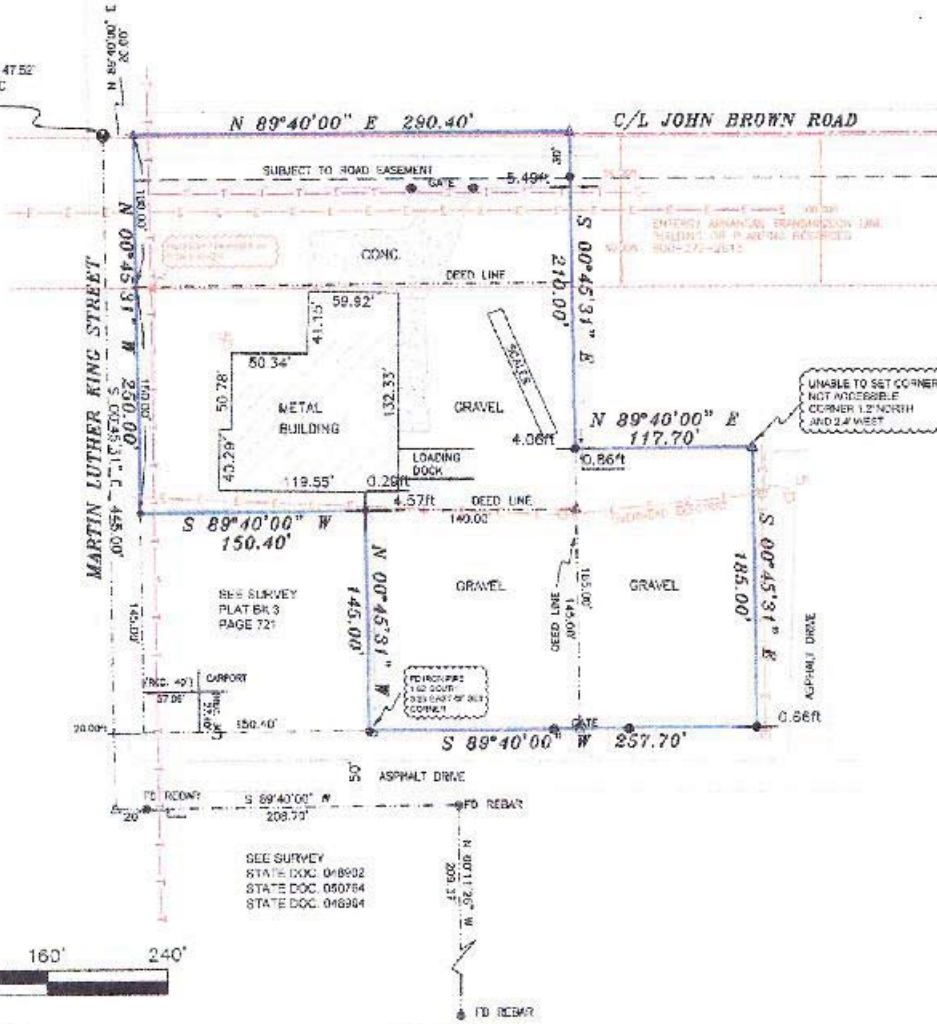
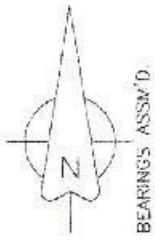
This lease is made between Jerry & Peggy Caldwell, herein called Lessor and Tim Makool herein called Lessee.

Lessee hereby offers to lease from Lessor the premises situated on 495 John Brown Road in the City of Wynne, State of Arkansas, described as commercial building including office and warehouse space, upon the following **TERMS AND CONDITIONS.....**

1. Term and Lease. Lessor demises the above premises for the term of 3 years, commencing on September 1, 2011 and terminating on September 1, 2014, at the monthly rental of Twelve Hundred Dollars due on the first day of each month.
2. Use. Lessee shall use and occupy the premises for the purpose of Waste Tire Processing.
3. Care and Maintenance of Premises. Lessee shall, at his own expense and at all times, maintain the premises in good and safe condition, and shall be responsible for all repairs required, except the roof, exterior walls, structural foundation.
4. Ordinances and Statutes. Lessee shall comply with all statutes, ordinances and requirements of all municipal, state and federal authorities now in force or which may hereafter be in force, pertaining to the premises, occasioned by or affecting the use thereof by Lessee.
5. Utilities. All applications and connections for necessary utility services on the demised premises shall be made in the name of Lessee only and Lessee shall be solely liable for utility charges as they become due, including those for sewer, water, gas, electrical and telephone services.
6. Destruction of Premises. In the event of a partial destruction of the premises during the term hereof, from any cause, Lessor shall forthwith repair the same, provided that such repairs can be made within sixty (60) days under existing governmental laws and regulations, but such partial destruction shall not terminate this lease, except that Lessee shall be entitled to a proportionate reduction of rent



NW CORNER  
SECTION 16, T7N, R3E  
FD COTTON PICKER SPINDLE  
REF.  
POWER POLE BRGS N 60°02' E 47.52'  
4" IRON PIPE FILLED WITH CONC  
BRGS S 54°32' W 32.5'



**LEGEND**

- These standard symbols shall be found in the drawing.
- FOUND CORNER AS NOTED
  - SET 1/2" REBAR W/ CAP
  - ⊙ FD COTTON PICKER SPINDLE
  - ▲ HIGHWAY RIGHT OF WAY MARKER
  - ⊙ FOUND REBAR
  - △ CALCULATED CORNER
  - - - FENCE LINE
  - ELECTRIC
  - ⊙ SET PK NAIL
  - ⊙ POWER POLE

SEE SURVEY  
STATE DOC. 048902  
STATE DOC. 050764  
STATE DOC. 046944

**DESCRIPTION:**  
A PART OF THE NORTHWEST QUARTER OF THE NORTHWEST QUARTER OF SECTION 16, TOWNSHIP 7 NORTH, RANGE 3 EAST, CROSS COUNTY, ARKANSAS AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:  
Commencing at the Northwest corner of said Section 16; thence North 89°40'00" East 20.00 feet to the point of beginning proper; thence continue North 89°40'00" East 290.40 feet; thence South 00°45'31" East 210.00 feet; thence North 89°40'00" East 117.70 feet; thence South 00°45'31" East 185.00 feet; thence South 89°40'00" West 257.70 feet; thence North 00°45'31" West 145.00 feet; thence South 89°40'00" West 150.40 feet; thence North 00°45'31" West 250.00 feet; to the point of beginning proper, having an area of 114671.34 square feet, 2.63 acres more or less and being subject to all public and private roads and easements

- SURVEYOR'S NOTES:**
1. The bearings shown on this plat are assumed and are to be used to define the general direction and true angle at the intersection of property and land lines.
  2. Property is subject to utility services and underground utility lines not located.
  3. Reference made: Deed Book 350 at page 142

**SURVEYOR'S CERTIFICATION**  
This is to certify that the above data is a true and correct representation of the land surveyed and shown on this plat and that the same is correct to the best of my knowledge.

**H & S HIME PROFESSIONAL SURVEYING SERVICES**  
P.O. Box 353  
Brookland, Arkansas 72417



STATE CODE: 500-07E-03E-0-16-440-19-1143



**H & S HIME PROFESSIONAL SURVEYING SERVICES**  
POB No. 353  
BROOKLAND, ARKANSAS 72417

PHONE: 870 972 1288  
FAX: 870 972 1011  
E-MAIL: hshime\_butch@yahoo.com

PLAT OF SURVEY	
drawn:	III
date:	2-15-2012
scale:	1" = 80'
client:	Tim McKool Jerry Coldwell owner
A PART OF THE NORTHWEST QUARTER OF THE NORTHWEST QUARTER OF SECTION 16, T7N, R3E, CROSS COUNTY, ARKANSAS	

## **Attachment B**

Revised Operation Plan

Agreements with Safety Kleen, FCC Environmental, and Sims  
Metal Management

# **OPERATION PLAN**

## **PROCESSING FACILITY**

*Kool Metal Recycling, LLC*

*Revised 3-4-13*

In compliance with PC&E Commission Regulation 14 the Kool Metal Recycling, LLC Waste Tire Processing Facility will be operated in the following manner:

### **FACILITY LOCATION**

The facility is owned and operated by Kool Metal Recycling, LLC. In case of an emergency, dial 911. Provide the following information to the dispatcher:

Facility Location: 495 John Brown Road  
Wynne, AR

Facility Phone: 870-238-3220

Directions to the facility: From fire department: Drive north 0.6 miles on Falls Street (hwy 1), Turn left onto Saint Peter road drive 0.4 miles and Saint Peter becomes John Brown Road and the Facility is located on the left at the intersection of John Brown and Martin Luther King St (BR Hwy 64).

### **OPERATION PROCEDURES**

#### **Receiving**

Incoming loads of tires will be weighed and checked in at scale. The receiving weight of all loads will be documented and records kept in office located on site. Incoming tires will be stored in the receiving area located within the building. Overflow storage will be located outdoors and overflow tires will be stored in covered containment vessels. The site has a perimeter chain link fence and gates will be locked when facility is not in operation or unattended. A no smoking sign will be posted and an emergency preparedness manual will be maintained at the site.

#### **PROCESSING**

Tires will be transferred from the storage area to the sidewall cutting station. At this station the side walls will be removed and palletized. The remaining tread caps will be gathered and transferred to the shearing station. At this station each tread cap will be cut into two separate lengths, these lengths will be transferred immediately to the baler station. At this station processed tread caps will be baled and strapped into bundles weighing approximately 1500-2300 lbs. The bundles of tread caps and the pallets of side walls will be used as feedstock for the pyrolysis process.

The pyrolysis process uses indirect heat to break down the components of used tires to black carbon, steel, tire derived fuel, and tire derived gas. A feed stock of approximately one ton will be placed into

the vessel and the door secured. Propane burners placed under the vessel will be ignited and the inside temperature of the vessel will raise and be maintained at the reaction temperature of 800°F for a period of approximately four hours. The low pressure steam generated will leave vessel through a vent leading directly to the cooling coil. During the cooling process the steam condenses to a liquid state and becomes a mixture of tire derived fuel and gas. The mixture leaves the cooling coil and enters the fuel storage tank. This tank has a vent that leads to a series of flares that are placed next to the propane burners. The flares automatically ignite and burn until the process is complete. Once the process reaches this point the system is left overnight to cool to ambient temperature. The next day the door to the vessel is opened and the components, black carbon and steel, are removed, separated and stored until they are resold. A process flow diagram is included in Attachment A.

### **STORAGE**

Facility will not accept any waste tires for processing if we have reached our storage limit. Bundles of processed tread caps and pallets of sidewalls will be stored indoors until loading. Overflow items will be stored outdoors. All processed and non process tires will be stored in accordance with state and local fire protection regulations. Black carbon and steel will be stored in covered containers to reduce the loss of particulate matter. The tire derived fuel will be stored in the 500 gal tank until capacity reaches 75% which at that time it will or be sold to the third party refinery.

### **VOLUME OF OPERATIONS**

Facility plans to process not more than 500 tires or 12 tons a month. This site will be used as a research and development facility and does not plan to run a full scale operation at this site.

### **WASTE STREAM**

Facility will produce three components during operation. The black carbon and tire derived fuel will be sold to one of two parties. Safety Klean, 3536 Fite road, Millington, TN 38053 and FCC Environmental, 2654 Channel Avenue Memphis, TN 38109 have agreed to purchase any and all of the black carbon and/or tire derived fuel generated. The steel components will be sold Sims Metal Management, located in Memphis, TN.

### **INDOOR TIRE STORAGE**

Waste tires stored indoors will be stored under conditions that meet NFPA 231D Standard for Storage of Rubber Tires (1998 Edition).

### **OUTDOOR ABOVE-GROUND TIRE STORAGE**

(A) If waste tires are collected and stored without benefit of a container or trailer, a storm water permit from the Department's Water Division will be required unless approval is received in writing, from the Department's Water Division that a permit is not needed.

(B) Waste tires will be stored separately from used tires, if applicable, in such a manner that is easily recognizable.

(C) An outdoor waste tire pile or processed tire pile will have no greater than the following maximum dimensions:

- (1) Width: fifty (50) feet;
- (2) Length: one-hundred (100) feet; and
- (3) Height: fifteen (15) feet.

(D) A fifty (50) foot wide fire lane will be placed around the perimeter of each waste tire pile. Access to the fire lane for emergency vehicles will be unobstructed at all times.

#### **VECTOR CONTROL PLAN**

This facility has had no issue with mosquitoes and rodents during its operation. Should an issue arise in the future, services will be requested from the local mosquito and vector control office, so as to protect the public health and welfare.

Mosquito control measures may include covering containers and trailers used for the collection and storage of waste tires with a tarp or placing them under some type of constructed cover during inclement weather and/or when the business is closed.

#### **OTHER OPERATION PROCEDURES**

A sign legible from a distance of twenty (20) feet will be posted at the entrance of the site stating operating hours, cost of disposal and site rules.

No operations involving the use of open flames will be conducted within twenty-five (25) feet of waste tire pile.

An approach and all weather access road to the facility will be kept passable for any motor vehicle at all times.

Access to the site will be controlled through the use of fences, gates and natural barriers.

Effective surface water run-on/run-off controls, such as berms and ditches, will be established for all waste tire storage and processing areas to prevent surface water from entering the storage and/or processing area and to prevent liquid runoff from a potential tire fire from leaving the site or entering surrounding water bodies.

Communication equipment will be maintained at the facility to assure that the facility staff can contact local fire protection and emergency authorities in case of a fire.

The facility will be kept free of grass, underbrush, and other potentially flammable vegetation at all times.

Kool Metal Recycling, LLC will keep an emergency preparedness manual at the site. The manual will be updated at least once a year, upon changes in operations at the site.

Kool Metal Recycling, LLC will immediately notify ADEQ in the event of a fire or other emergency if that emergency has potential off-site effects and will submit a written report within two (2) weeks.

Adequate equipment to aid in the control of fires will be provided and maintained at the facility at all times.

Kool Metal Recycling, LLC will maintain records of the quantity of waste tires and processed tires received at the site, stored at the site, and shipped from the site.

The minimum separation distances between exposed buildings and piles or between isolated piles will be in accordance with NFPA 231D Standard for Storage of Rubber Tires (1998 Edition).



Safety-Kleen Systems, Inc.  
3536 Fite Road

Millington, TN, 38053

February 6, 2013

Tim Makool  
Owner  
KOOL METAL RECYCLING LLC  
495 John Brown Rd.  
Wynne, AR 72396-1582

Dear Tim Makool:

Thank you for helping me better understand your business processes and needs. Below is a proposal aimed to help you address the following strategic initiatives you are currently pursuing:

- Lower costs by analyzing overall waste streams and identifying cost saving initiatives including bundled offers, lower transportation costs and use of
- Minimize waste generation through recommendations on technology use and disposal techniques
- Reduce risk through Safety-Kleen rigorous operating procedures and guarantee of assurance and indemnification
- Improve consistency of reporting & billing
- Provide single source for environmental services
- Anticipate waste generation tier movement and make recommendations in advance of increased requirements
- Generate goodwill associated with recycling and sustainability through Safety-Kleen closed-loop processes and procedures

Safety-Kleen supports more than 330,000 businesses across North America by recycling their used oil and industrial waste, and delivering environmentally friendly cleaning products and services. Customers choose Safety-Kleen because of our personal service, extensive liability protection and focus on sustainable solutions. Our goal is to provide customers like KOOL METAL RECYCLING LLC with the best solutions while keeping your company in balance with the environment.

I look forward to reviewing this proposal with you at your earliest convenience.

Sincerely,

Tim Vandegriff

Tim.Vandegriff@safety-kleen.com  
+19012484744  
Safety-Kleen Systems, Inc.



## The Safety-Kleen Commitment

Safety-Kleen customers rely on us as a strategic partner in the ongoing operations of their business. Since 1963, we have built our reputation on understanding the most important issues facing our customers and delivering solutions accordingly.

### **Understanding your business**

Through regular assessments of your specific business requirements, your Safety-Kleen account representative will identify for you both products and services that fit your business.

### **Protecting your business**

Our products are environmentally friendly, creating a safer environment for your employees. They are covered with a 45-day money back guarantee. And Safety-Kleen backs up its services with a Certificate of Assurance and Indemnification backed by \$1 billion in assets. Every Safety-Kleen employee is professionally trained and supported by facilities across North America. Those facilities follow strict operating policies within our ISO14001 standards compliant environmental management system.

### **Serving your business on time and bill you accurately**

Our heavy investment in hand-held and back-end technologies reduces errors that affect your administrative burden. Your Safety-Kleen representative or local office gives you fast resolution to any questions or issues.

### **Making sustainability a priority**

Safety-Kleen recycles more than 80 percent of the waste streams it manages for customers. As a result, our customers gain the goodwill associated with doing what is best for business and the planet.



We propose to implement the following services for KOOL METAL RECYCLING LLC:

Description	Price Per Service	Service Frequency in Weeks	Qty	Price Per Month
LANDF NON USDOT HAZMAT, N CYB	417.00	8	1	225.8750
BOX, 1 YARD PLASTIC COATED WINNER-OUTER	95.00	8	1	51.4583
<b>Total:</b>				<b>277.3333</b>

Quote is valid for 30 days

Date \_\_\_\_\_  
Customer Name \_\_\_\_\_  
Customer Title \_\_\_\_\_  
Customer Signature \_\_\_\_\_



2654 Channel Ave., Memphis, TN. 38113

02/11/13

Kool Gas, LLC  
 Attn: Tim  
 720 Murray Ave.  
 Wynee, AR. 72396

Dear Tim,

FCC Environmental is pleased to offer the following services to help manage the recyclable materials at your facility. FCC Environmental is a service company with extensive experience in helping companies manage their operating and compliance cost through the recycling of non-hazardous materials. FCC Environmental has developed extensive regulatory and treatment methodologies as well as an extensive service offering to our customers.

Listed below are the services and charges based on your locations' needs per our conversation.

Item	Rates
Used Oil	Fair market value per gallon based on sample analysis prior to collection. Review of analysis will determine if Material will recycled or handle for disposition meeting all State and Federal guidelines.
Price will adjust weekly per attached index	Price is determined by the weekly average spot price of the Gulf Coast Ultra Low Sulfur #2 Diesel fuel
Energy Surcharge *	12% of Total Invoice
*will adjust monthly	Based on West Texas Crude Oil Index

The above pricing is dependent on the truckload analysis matching the Waste Characterization Forms and samples. Proposed pay for oil rate is valid from 15 days of this date. All **non-conforming** materials are subject to be rejected at the customer's expense. This proposal is subject to FCC Environmental terms and conditions. Payment terms are net 30 days from date of invoice and interest will be charged at maximum allowed by law for unpaid balances over 30 days old. The above quote is exclusive of any applicable taxes. \* Additional transportation charges will apply if work is done outside of **our normal business hours of 6AM to 6PM, Monday through Friday.**

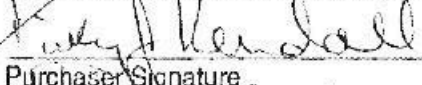
Audits of FCC Environmental facilities' by our customers and prospective customers are always welcome. We have taken comprehensive steps in the design and operations of these facilities to meet or exceed all applicable state and federal guidelines and regulations, and we are proud to offer these services to you.

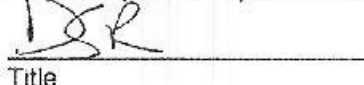
I appreciate the opportunity to submit the above proposal to you and look forward to working with you. If there are any questions, please do not hesitate to contact me at (901) 628-4062.

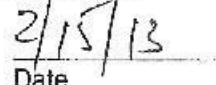
Best Regards,  
 Rick Kendall  
 Direct Sales

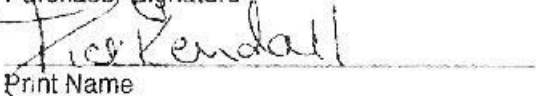
Please sign and return a copy of this proposal at your earliest convenience.

ACCEPTANCE: I am Authorized to and do hereby Accept this Proposal on behalf of Purchaser.

  
 Purchaser Signature

  
 Title

  
 Date

  
 Print Name



117 William Avenue  
PO Box 7625  
Memphis, TN 38107

401 Green Springs Valley  
Springfield, MO 65702  
660.888.1100  
www.simsmm.com

Mr Makool,

This letter is to inform you that we will take the steel wire that you produce from tires at the monthly market values. We look forward to continuing to do business with you.

Thanks,

A handwritten signature in cursive script, appearing to read 'Anthony Morales'.

Anthony Morales  
662-539-1946  
Anthony.morales@simsmm.com

## **Attachment C**

### Disclosure Statement

Instructions for the Completion of this Document:

- A. Individuals, firms or other legal entities with no changes to an ADEQ Disclosure Statement, complete items 1 through 5 and 18.
- B. Individuals who never submitted an ADEQ Disclosure Statement, complete items 1 through 4, 6, 7, and 16 through 18.
- C. Firms or other legal entities who never submitted an ADEQ Disclosure Statement, complete 1 through 4, and 6 through 18.

Mail to:  
ADEQ  
DISCLOSURE STATEMENT  
[List Proper Division(s)]  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Hand Deliver to:  
ADEQ  
DISCLOSURE STATEMENT  
[List Proper Division (s)]  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

1. APPLICANT: (Full Name) Kool Metal Recycling  
2. MAILING ADDRESS (Number and Street, P.O. Box Or Rural Route):  
720 E. MURRAY AVE  
3. CITY, STATE, AND ZIP CODE:  
Wynne, AR 72396

4. (check all that apply.)

- Individual     Corporate or Other Entity  
 Permit     License     Certification     Operational Authority  
 New Application     Modification     Renewal Application (If no changes from previous disclosure statement, complete number 5 and 18.)  
 Air     Water     Hazardous Waste     Regulated Storage Tank     Mining     Solid Waste  
 Environmental Preservation and Technical Service

5. Declaration of No Changes:

The violation history, experience and credentials, involvement in current or pending environmental lawsuits, civil and criminal, have not changed since the last Disclosure Statement I filed with ADEQ on \_\_\_\_\_

Signature of Individual or Authorized Representative of Firm or Legal Entity  
(Also complete #18.)

Timothy W. Makool

6. Describe the experience and credentials of the Applicant, including the receipt of any past or present permits, licenses, certifications or operational authorization relating to environmental regulation. (Attach additional pages, if necessary.)

The Applicant has been in the salvage/recycling business for 6 years. Timothy W. Makool has maintained his Hazardous Material Endorsement for 25 years.

7. List and explain all civil or criminal legal actions by government agencies involving environmental protection laws or regulations against the Applicant\* in the last ten (10) years including:

1. Administrative enforcement actions resulting in the imposition of sanctions;
2. Permit or license revocations or denials issued by any state or federal authority;
3. Actions that have resulted in a finding or a settlement of a violation; and
4. Pending actions.

(Attach additional pages, if necessary.)

NONE

\* Firms or other legal entities shall also include this information for all persons and legal entities identified in sections 8-16 of this Disclosure Statement.

8. List all officers of the Applicant. (Add additional pages, if necessary.)

NAME: Timothy W. Makool TITLE: OWNER

STREET: 585 CR 354

CITY, STATE, ZIP: Wynne, Arkansas 72396

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

9. List all directors of the Applicant. (Add additional pages, if necessary.)

NAME: None TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

10. List all partners of the Applicant. (Add additional pages, if necessary.)

NAME: None TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

11. List all persons employed by the Applicant in a supervisory capacity or with authority over operations of the facility subject to this application.

NAME: Richard Shane Blesse TITLE: Supervisor/Director

STREET: 2914 SEC 311

CITY, STATE, ZIP: Forrest City, AR 72335

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

12. List all persons or legal entities, who own or control more than five percent (5%) of the Applicant's debt or equity.

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: NONE

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

13. List all legal entities, in which the Applicant holds a debt or equity interest of more than five percent (5%).

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: NONE

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

14. List any parent company of the Applicant. Describe the parent company's ongoing organizational relationship with the Applicant.

NAME: NONE

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

Organizational Relationship:

15. List any subsidiary of the Applicant. Describe the subsidiary's ongoing organizational relationship with the Applicant.

NAME: \_\_\_\_\_

STREET: NONE

CITY, STATE, ZIP: \_\_\_\_\_

Organizational Relationship:

16. List any person who is not now in compliance or has a history of noncompliance with the environmental laws or regulations of this state or any other jurisdiction and who through relationship by blood or marriage or through any other relationship could be reasonably expected to significantly influence the Applicant in a manner which could adversely affect the environment.

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: NONE

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

17. List all federal environmental agencies and any other environmental agencies outside this state that have or have had regulatory responsibility over the Applicant.

Applicant is NOT AWARE of any such agency.

## **Attachment D**

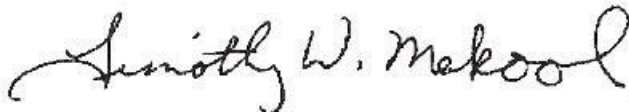
### Equipment Specifications

---

## ***KOOL METAL RECYCLING, LLC***

Serial number N/A  
Model 1-Ton Pyrolysis Unit

This unit is capable of processing one ton of tire material in a 24hr period.  
This unit is propane use only.  
This unit is equipped with a 4' x 7' capsule.



Timothy W. Makool



495 John Brown RD  
Wynne, AR 72396

PHONE (870)208-8586  
FAX (870)208-8747  
CELL (870)318-5509

---

## Tire processing equipment for Kool Metal Recycling

### **Sidewall Cutter EECO**

SN# TCM1409

Engineering Equipment Company

480-990-2037

### **Shear Milwaukee**

No# 1-1/2

SN# 1782

Dk152241

Doelger & Kirsten

Continental motor

Top Blade 8291

Bottom Blade B49830

Tufcut WAPAK

### **Baler Cram-A-Lot**

J.V. Manufacturing

72 DH LU

5307

1/4/1995

### **Case 430 Tractor**

Model# 23

4108768

**Attachment E**  
Stormwater Permit



ARKANSAS  
Department of Environmental Quality

Permit Tracking Number: ARR001049  
AFIN: 19-00410

NOTICE OF COVERAGE (NOC)

NO EXPOSURE EXCLUSION UNDER THE INDUSTRIAL STORMWATER GENERAL PERMIT ARR000000

Mr. Timothy Makoal  
Kool Metal Recycling LLC  
720E. Murray Ave.  
Wynne, AR 72396

The certification for a "No Exposure Exclusion" under the Industrial Stormwater General Permit ARR000000 was received on 9/5/2012 and reviewed by the Department. This facility has been assigned permit tracking number ARR001049 and AFIN 19-00410. Please use these numbers in all future correspondence related to this facility. This NOC is issued to Kool Metal Recycling LLC in reliance upon the statements and representations made in the submittal for the following facility located in Cross County:

Kool Metal Recycling  
495 John Brown Rd.  
Wynne, 72396

Coverage Date: 09/14/2012

Expiration Date: 06/30/2014

Mo Shafii  
Assistant Chief, Water Division

## **Attachment F**

Approval Letters from the  
City of Wynne, Cross County and the Waste District

Bob Stacy, Mayor

# City of Wynne

P.O. Box 499 • Wynne, Arkansas 72396  
Email: [cityofwynne@att.net](mailto:cityofwynne@att.net)

Phone: 870-238-0027  
Fax: 870-238-4055

February 19, 2013

Re: Kool Metal Recycling, LLC

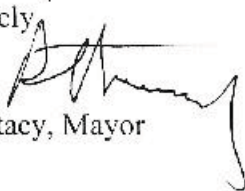
To Whom It May Concern:

I have had occasions to review Tim Makool's process and business plan. Mr. Makool's vision appears to meet the City of Wynne's desire for recycling, providing for a cleaner environment and adding jobs to our area.

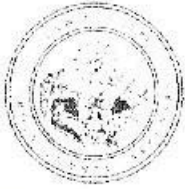
On behalf of the City of Wynne, I would like to offer our wholehearted support of Mr. Makool's endeavor and ask for favorable permitting of his application.

Thank you in advance for your consideration.

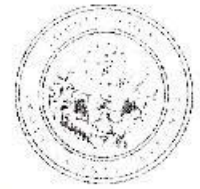
Sincerely,

  
Bob Stacy, Mayor

BS/tm



**JACK CAUBBLE**  
**COUNTY JUDGE**



# **COUNTY OF CROSS**

---

**Phone 870-238-5750**  
**Fax 870-238-5752**

**705 E. Union • Room 4**  
**Wynne, Arkansas 72396**  
**[jcaubble@crosscountyar.org](mailto:jcaubble@crosscountyar.org)**

February 19, 2012

TO: ADEQ

FROM: Jack Caubble

After reviewing Kool Metal Recycling's Operation Plan, Cross County is very fortunate to have this company wanting to locate their facility in Cross County. Please consider this letter as an endorsement of our approval of this facility locating in Cross County.

Thank you for your help in this matter.

A handwritten signature in cursive script that reads "Jack Caubble".

Jack Caubble

Cross County Judge

# EARSWMB

---

## EAST ARKANSAS REGIONAL SOLID WASTE MANAGEMENT BOARD

P.O. BOX 1403 - 2905 KING STREET - JONESBORO, ARKANSAS 72403

PHONE (870) 932-3957 FAX (870) 932-0135

March1, 2013

Timothy W. MaKool  
Kool Metal Recycling, LLC  
720 E. Murray Ave.  
Wynne, AR 72396

RE: R&D Facility

Dear Mr. MaKool:

Per your request, this letter is to inform you that the District has received and reviewed the information submitted on 2-11-13 and 3-1-13 for your TP4 waste tire facility for the purposes of research and development of a pyrolysis machine.

Additionally, your proposed facility was discussed at the East Arkansas Regional Solid Waste Management District Board Meeting held on 2-28-13. No board member commented negatively.

If you have any questions or need any additional information please feel free to contact me at (870) 932-3957.

Sincerely,



Dennis Burks  
Environmental Services Director



PRINTED ON RECYCLED PAPER

## **Attachment G**

Proof of Disposal of Excess Waste Tires



Ticket #: TXCJST

SHIP DATE: 02/09/13

Truck Ticket Contract # 049279

Shipments From: 101580  
 4800 METAL RECYCLING  
 120 E HURSTY AVE  
 JYRNE, AR 72376

MEMBER #  
 540 W Hursty Ave  
 Memphis, TN 38107  
 901-527-4400

Order # 2024 Ln 02 Supplier Invoice # 105181

SHIPMT#	COMMODITY	GROSS	FARE	NET	ADJ. REASON	PO WT	PRICE UN	TOTAL AMT
105181	WHITE GOODS/ TIM	86780b	42860a	37920	4600 RUBBER/TIRES	33320	250.0000	4165.00

*White Goods Trucks*

ALL WEIGHTS ARE REPORTED IN POUNDS UNLESS OTHERWISE INDICATED. ALL NON-POUND WEIGHTS ARE ASSUMED TO BE METRIC WEIGHTS

TOTALS: 37920 42860 37920 4600 RUBBER/TIRES 33320 250.0000 4165.00

Trailer Comment: 105181-N1151273

SHIPMASTER SIGNATURE

(SANDRA M)

GRS Date 02/09/13 GROSS TON  
 GRS Time 07:18 14.8750  
 TRL Date 02/09/13  
 TRL Time 08:32

SCALE 1 SCALE 2 SCALE 3 SCALE 4 MANUAL WEIGHT

*01580*

**Metal Manage**  
 540  
 Mem  
 90  
**BILL**

**SHIPPER**

SHIPPER *Kool metals*

ORIGIN

In order to serve you more efficiently please make sure our trucks are not unnecessarily delayed at your plant... If there is a delay, please note the time and sign.

BY *[Signature]*

Date *2-9-13* Yr. *101580*

Frm To *MEMPHIS*

Trk No *71*

Bus# *4*

Blk Cps *White Goods*

Upr Dash *Boats*

Sheet In *Med. Brkls.*

Trngs. *Cast Iron Bump*

HMS *Upr HMS*

#2 Prop *White Goods With*

**BILL OF LADING #**

*105181*

**SHIPPER WEIGHT**

**LBS**

*30.3*

**COMMODITY**

*Scrap Metal*

**CONSIGNEE**

**DRIVER**

CONTAINER *105181*

DRIVER NA



Ticket #: TXCKJS

SHIP DATE: 02/11/13

Truck Ticket Control # MF 299687

Shipped From: 101500  
KCOOL METAL RECYCLING  
120 E HUNNARY AVE  
WYNNE, AR 72396

MEMPHIS  
540 Reakley Ave  
Memphis, TN 38107  
901-521-4400

Van # 1K /ST140 LD # 15J6EXPRESS Order # 2024 Ln 01 Supplier Invoice # 105918

SHIPMT#	COMMODITY	GROSS	TARE	NET	ADD REASON	PO WT	PRICE/LB	TOTAL AMT
184432	SHEET IRON	79060b	46200a	32860	-4500 RUBBER/TIRES	28360	250.0000 N	3545.00

Please Wire funds

ALL WEIGHTS ARE REPORTED IN POUNDS UNLESS OTHERWISE INDICATED. ALL NON-POUND WEIGHTS ARE ASSUMED TO BE MANUAL WEIGHTS

TOTALS								3545.00
--------	--	--	--	--	--	--	--	---------

Ticket Comment: 105918-N1152258

WEIGHMASTER SIGNATURE

(CHARY S)

*MMJ*

GRS Date 02/11/13 GROSS TON 12.6607  
GRS Time 16:00  
TRF Date 02/11/13



Metal Mar

Date 2/11/13 Yrd. # \_\_\_\_\_

Frm./To 1506 Express

Trk. No. 101580

SHIPPER Kool Metal

ORIGIN Sim Metal

COMMODITY \_\_\_\_\_

CONSIGNEE \_\_\_\_\_

DESTINATION \_\_\_\_\_

DRIVER \_\_\_\_\_

CONTAINER \_\_\_\_\_

Bush \_\_\_\_\_ Hubs \_\_\_\_\_

Blk. Clips \_\_\_\_\_ Whole Cars \_\_\_\_\_

Unp. Bush \_\_\_\_\_ Brills \_\_\_\_\_

Sheet Iron  Mxd. Brills \_\_\_\_\_

Trngs. \_\_\_\_\_ Cast Iron Springs \_\_\_\_\_

HMS \_\_\_\_\_ Unp. HMS \_\_\_\_\_

#2 Prep \_\_\_\_\_ White Goods W/In \_\_\_\_\_

UNP P&S \_\_\_\_\_ P&S \_\_\_\_\_

Wire \_\_\_\_\_ HR Cast \_\_\_\_\_

Motor Blocks \_\_\_\_\_ TLW/Wood Floor \_\_\_\_\_

W/W Ant Floor \_\_\_\_\_ Top Case \_\_\_\_\_

Label \_\_\_\_\_

Inspected by W. J. Tines

*WJ*

BILL OF LADING #

**M 105918**

SHIPPER WEIGHT LBS

**G 79040**

T

N

ADDITIONAL CERTIFICATE  
TRUCK SCALE



SMM South Corporation

Ticket #: TXCKIP

SHIP DATE: 02/11/13

Truck Ticket Control #: 299659

Reference From: 1051180  
KOOL METAL RECYCLING  
720 MURRAY AVE  
WYNNE, AR 72396

MEMPHIS  
540 Weakley Ave  
Memphis, TN 38107  
901-521-4400

Van # TK 751999 ID # 2324GEM Order # 2024 Ln 02 Supplier Invoice # 105118

SHIPMT#	COMMODITY	GROSS	TARE	NET	ADJ. REASON	PD WT	PRICE/UM	TOTAL AMT
184414	WHITE GOODS/ TIN	79160b	41700a	37460	-4500 RUBBER/TIRES	32960	250.0000 MT	4120.00

Please Wire Funds

ALL WEIGHTS ARE REPORTED IN POUNDS UNLESS OTHERWISE INDICATED. ALL NON-POUND WEIGHTS ARE ASSUMED TO BE MANUAL WEIGHTS

TOTALS

Ticket Comment: 105118-41352334

ADDITIONAL SIGNATURE

(SANDRA H)

GRS Date 02/11/13	GROSS TON
GRS Time 15:04	14.7143
TRE Date 02/11/13	
TRE Time 15:48	

a=SCALE 1 b=SCALE 2 c=SCALE 3 d=SCALE 4 e=MANUAL WEIGHT



Metal Ma

Date 2/11/13 Yrd. #

From/To

Trk. No.

Bush

Hulks

Blk. Cips.

Whole Cars

Unp. Bush

Bnds

Sheet Int.

Max. Bnds

Trngs.

Cast Iron Bongs

HMS

Unp. HMS

#2 Prep

White Goods W/Tin

UNP P&S

P&S

Wire

HB Cast

11 Bnds

11 Bnds

11 Bnds

11 Bnds

11 Bnds

11 Bnds

11 Bnds

11 Bnds

WW

BILL OF LADING #

M 105118

SHIPPER WEIGHT

LBS

G 79160

T 41660

N

SHIPP

SHIPPER

KOOL METALS

ORIGIN

720 MURRAY AVE  
WYNNE, AR

In order to serve you more efficiently please make sure  
our trucks are not unnecessarily delayed at your plant. If  
there is a delay, please note the time and sign.

COMM

ST

SC

CONS

DR

CONTAINER

751999 751999

Truck # 104976  
104976



SMM South Corporation

Ticket #: TXCLAU

DATE: 02/13/13

Truck Ticket Control # 30310

104976  
104976  
104976  
104976

104976  
104976  
104976  
104976

Order # 2024 in 02 Supplier Invoice # 104976

SKPNT#	COMMODITY	GROSS	TARE	NET	ADJ. REASON	PD. WT.	PRICE CH.	TOTAL AMT
184807	WHITE GOODWILL	76820b	39180b	37640	4500 RUBBER/TIRES	33140	250.0070 NT	4142.50

Please Wine Tires

ALL WEIGHTS ARE REPORTED IN POUNDS UNLESS OTHERWISE INDICATED. ALL NON-POUND WEIGHTS ARE ASSUMED TO BE MANUAL WEIGHTS.

TOTALS: # CARS: 6 37640 54500 33140 4142.50

Trailer Comments: 104976-1150333

DRIVER SIGNATURE

(MARY S)

DR Date	02/13/13	GROSS Wt
LBS Time	12:48	14.794
TR Date	02/13/13	
TR Time	13:10	

WEIGHT SCALE 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100



Metal

Date 2-13-13 Yrd # 101580

SHIP

RECEIVED

ENGINE

From/To

Trk No.

Push

BK Cps

Unp. Bush

Sheet Int

Trngs

HMS

#2 Prep

UNP P&S

Wire

Roller

...

BILL OF LADING #

M 104976

SHIPPER WEIGHT

LBS

G 76800

T 39180

N

In order to serve you more efficiently please make sure our trucks are not unnecessarily delayed at your plant... if there is a delay, please note the time and date.

COMM

CONSIG

DRIVE

CONTAINER

104976  
104976  
104976  
104976

104976  
104976  
104976  
104976

DOMESTIC CERTIFICATE  
OF ORIGIN



SMM South Corporation

\*\* REPRINTED ON 02/15/13 \*\*  
Ticket #: TXCLVZ

100760  
METAL BUILDING  
100 S. HURKAY AVE  
WYNNE, AR 72396

RESERVED  
500 S. HURKAY AVE  
HURKAY, AR 72396  
501.521.4400

Track Ticket Central: 9670053

Lot # 100760 ID # 125EXPRESS Order # 2024 Ln 01 Supplier Invoice # 100760

SHIPMT#	COMMODITY	GROSS	TARE	NET	ADJ. REASON	PD WT	PRICE UM	TOTAL AMT
100760	SHEET IRON	791206	425099	366207	5500 RUBBER/TIRES	366207	250.0000 FT	1890.00

House Use Items

ALL WEIGHTS ARE REPORTED IN POUNDS UNLESS OTHERWISE INDICATED. ALL NON-POUND WEIGHTS ARE ASSUMED TO BE METRIC WEIGHTS

TOTALS    W. BARG    366207    5500    1890.00

Track Comment: 100760-N1137496

SHIPMASTER SIGNATURE: SANDRA M.

RESERVED    PERSCALE 2    RESCAL 3    4-SCALE 4    REMANUAL WEIGHT



Metal Manag  
540  
Mer  
6  
BILL

**SHIPPER**  
SHIPPER: KOOL METAL  
ORIGIN: WYNNE AR  
LOC: 100  
TIME: \_\_\_\_\_  
BY: \_\_\_\_\_

**COMMODITY**  
4 2x10x13 TIR

**CONSIGNEE**  
CONSIGNEE: \_\_\_\_\_

**DRIVER**  
CONTAINER: \_\_\_\_\_  
DRIVER NAME: \_\_\_\_\_

Date: 2-13-13    Lot # 19580  
Invoice # \_\_\_\_\_  
Trk. No. #125    100760  
Bush \_\_\_\_\_    Holes 4  
Sk. Clips \_\_\_\_\_    Waste Cars \_\_\_\_\_  
Lho. Bush \_\_\_\_\_    Bars \_\_\_\_\_  
Sheet Im \_\_\_\_\_    Msd. Bulbs \_\_\_\_\_  
Traps \_\_\_\_\_    Lockdowns \_\_\_\_\_  
LMS \_\_\_\_\_    Washers \_\_\_\_\_  
IC Prep \_\_\_\_\_    When Guts with \_\_\_\_\_  
UNIT PDS \_\_\_\_\_    P&S \_\_\_\_\_  
Wire \_\_\_\_\_    HB Cast \_\_\_\_\_

**BILL OF LADING #**  
100760

**SHIPPER WEIGHT  
LBS**  
17806  
2668



SMM South Corporation

Invoice # TXCMRE

Invoice Date 02/19/13

Order # 2024 EQ 12

Customer Name

Order # 2024 EQ 12 Supplier Invoice # 10213

QUANTITY	UNIT	DESCRIPTION	GROSS	TARE	NET	ADJ. REASON	PD WT	PRICE LN	TOTAL AMT
27940	LB	5503 RUBBER/TIRCS	77800b	44160a	33640		27940	25.1000 NT	3452.50

Handwritten: 5503 Wire Tires

TOTALS			33640	5503			27940		3452.50
--------	--	--	-------	------	--	--	-------	--	---------



Metal Manager  
540  
Met  
9  
BILL  
SHIPPER

Date: 2-19-13  
 From: [Handwritten]  
 To: [Handwritten]  
 Unit: [Handwritten]  
 Weight: [Handwritten]

Handwritten initials

BILL OF LADING #  
105803

Handwritten: Real Metal Rec  
WYNN AR

SHIPPER WEIGHT  
85

COMMODITY

CONTAINER

DRIVER

DRIVER

## **Attachment H**

### **Revised Closure Plan and Closure Cost Estimate**

# **CLOSURE PLAN**

## **PROCESSING FACILITY**

*Kool Metal Recycling, LLC*

*Revised 2-27-13*

### **CLOSURE MANDATE**

Kool Metal Recycling, LLC fails to meet the requirements of Regulation 14, or if this facility will no longer accept, collect or process tires, the facility will be closed within sixty (60) days in accordance with Reg. 14, Chapter 15.

### **CLOSURE PLAN**

In closing this facility, The Kool Metal Recycling, LLC. will:

- (1) Stop public access to the site within 30 days of facility closure.
- (2) Immediately post a notice on all entrance locations indicating the site is closed and the nearest site(s) where waste tires can be deposited.
- (3) Immediately notify ADEQ and any local government having jurisdiction of the onset of closure.
- (4) Remove all waste tires, processed tires, equipment and residuals to a permitted waste tire processing facility, permitted solid waste management facility or a legitimate user of waste tires as approved by ADEQ within 90 days.
- (5) Make such repairs to the site to effectively promote surface water flow within 30 days.
- (6) Notify ADEQ when closure is complete and arrange for inspection of the site.
- (7) Seek approval of the closure from ADEQ and release of financial instruments which may have been required to prove financial responsibility. [Reg.14.1502 thru 1504]

### **CLOSURE ESTIMATES**

Signs and barricades will be installed to prevent the public from accessing the facility. The largest volume of processed and/or unprocessed waste tires which would require disposal during closure of the facility is 500 tires or approximately 25 Tons. Delivery and disposal to be performed by The White River Regional Solid Waste Districts permitted waste tire monofill and recycling operation near Bald Knob, AR.

The bi products generated from the pyrolysis operation are scheduled to be sold as generated and not to be stockpiled. A three month stockpile of bi-products generated from the pyrolysis operation will be used as a worse case estimate for closure cost. The tire derived fuel (3600 gal) will be removed from the site at no cost by a used fuel/oil company. The estimated amount of steel (3.5 tons) will have a value exceeding the hauling fee in scrap metal price. The estimated amount of black carbon (12.6 tons) will be disposed of at the Crittenden County

landfill. The pyrolysis unit and the fuel storage tanks will be cleaned and the washing fluids will be disposed as hazardous waste. The hazardous waste landfill, Hickory Ridge Landfill, is located in Baylis, IL 400 miles from the facility. The machine and its components will also be disposed of at the Crittenden County Landfill. Any dikes or berms to control stormwater will be removed and spread out as topsoil on site. Initial Analytical testing of surfaces that may be contaminated on site will be performed by Anderson Engineering. Any contaminated soil will be removed and replaced. If testing results in contamination, additional testing will be performed after site restoration has been completed.

Kool Metal Recycling, LLC will increase the closure cost estimate and the amount of financial assurance provided if changes to the closure plan or permitted facility conditions increase the maximum cost of closure at the time during the remaining active life.

#### **FINANCIAL ASSURANCE**

Kool Metal Recycling, LLC will provide adequate financial assurance to satisfy the requirements of Regulation 14.

### Kool Metal Recycling, LLC - Closure Cost Estimate for Tire Processing Facility

	Description	Labor required hrs	Rate	Supervision hrs	Rate	Rental Equipment hrs	Rate	Purchased materials	Transportation Cost at \$5.00/mile	Offsite Disposal	Total Step Cost	Comments
1	signs and barricades	6	\$20	2	\$30	0	\$100	\$200	\$0	\$0	\$380	
2	official notification	0	\$20	1	\$30	0	\$100	\$0	\$0	\$0	\$30	Phone calls
3	On site tires disposal	64	\$20	16	\$30	4	\$100	\$0	\$750	\$2,850	\$5,760	Dispose of 36 tons of waste tires to monofill (quoted to be picked up and disposed for \$100/ton)
4	clean reactor	16	\$20	4	\$30	4	\$100	\$500	\$0	\$0	\$1,340	
5	clean building	16	\$20	8	\$30	4	\$100	\$200	\$0	\$250	\$1,410	
6	clean Tire Derived Fuel Tank	16	\$20	8	\$30	4	\$100	\$500	\$0	\$0	\$1,460	
7	Dispose of tank washing	16	\$20	4	\$30	4	\$100	\$200	\$2,000	\$275	\$3,315	Dispose of 20 drums of liquid hazardous waste to Baylis, IL
8	Dispose of black carbon	8	\$20	8	\$30	8	\$100	\$0	\$175	\$350	\$1,725	Dispose 12.5 tons of black carbon to Crittenden county landfill
9	Notify utilities	0	\$20	1	\$30	0	\$100	\$0	\$0	\$0	\$30	Phone calls
10	Disposal of Unit	4	\$20	4	\$30	4	\$100	\$0	\$175	\$112	\$887	Dispose 4 ton unit to Crittenden county landfill
11	Remove Dikes and berms	32	\$20	16	\$30	8	\$100	\$200	\$0	\$0	\$2,120	Uncontaminated soil to be spread out on site and seeded
12	Remove Tire Derived Fuel	16	\$20	8	\$30	0	\$100	\$0	\$0	\$0	\$560	To be bought by company identified in waste stream
13	Initial Analytical testing of surfaces and media	0	\$20	0	\$30	0	\$100	\$10,000	\$0	\$0	\$10,000	Performed by Anderson Engineering
14	Contaminated soil removal/restoration	16	\$20	8	\$30	8	\$100		\$2,000	\$1,250	\$4,610	75 tons to Baylis, IL
15	Final Analytical for cleanup	0	\$20	0	\$30	0	\$100	\$10,000	\$0	\$0	\$10,000	Performed by Anderson Engineering

Subtotal	\$43,627
Contingency 25%	\$10,906.75
<b>Total</b>	<b>\$54,533.75</b>