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24-WTM-01-00

P/A

## STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR  
SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES  
JEFFREY R. VONK, DIRECTOR

November 17, 2004

Randy Lilleholm  
Lilleholm Tire Recycling  
2075 290<sup>th</sup> Street  
Denison, IA 51442

**Re: Waste Tire Processing Permit #24-WTM-01-00P-PRT  
Permit Renewal Requirements**

Dear Randy,

This letter is a reminder that the following items must be submitted prior to renewing your waste tire processing permit. Failure to submit these items by December 10, 2004 may result in the department revoking your permit.

- ✓ Site Closure Plan in accordance with Iowa Administrative Code (IAC) 567 Chapter 117.6(1) "f". The plan shall describe the actions that would be taken to properly dispose of all waste tire materials, in whole or processed form, at the site 30 days prior to any intent to discontinue operations at the site so that, upon discontinuance of the operation, no violations of waste tire or solid waste disposal laws and regulations will exist.
- ✓ Emergency Response and Remedial Action Plan (ERRAP) in accordance with IAC 567-117.6(1) "g". Within the changes made to the permitting process for waste tire facilities, a requirement has been added for permittees to complete and file an Emergency Response and Remedial Action Plan (ERRAP). The ERRAP shall be filed with this department and other local government agencies that may be involved in the event of an emergency condition such as a fire, spill or other disaster at your facility. The ERRAP is designed to provide additional protection to you, as well as the environment, and to aid emergency response workers with critical information in such times. The enclosed ERRAP checklist may be used to assist you in developing your plan.

As discussed previously, a provision will be added to the permit requiring that pre-processed tires be removed from the ditch along your driveway by January 1, 2005 and organized through stacking in rows to prevent the collection of water, dirt or debris within the tires. Once the tires are organized, the immediate area around the tires shall be maintained in a manner that is clear of trees and brush. As agreed upon, pre-processed whole waste tire storage shall be limited in the permit to 2,500 tires at one time and any single waste tire shall not be stored on site for more than 30 days before the tire is processed.

If you have questions you may contact me at 515-281-6807.

Sincerely,

Alex Moon  
Environmental Specialist Senior  
Energy & Waste Management Bureau

cc: Kirk Mathis, Iowa DNR Field Office #4, Atlantic, IA