

AI 24831
PER 20080001

original to IOSW
RS
copy to SW/H/Townsel
PAAR

§523

PART III: ADDITIONAL SUPPLEMENTARY INFORMATION

The following supplementary information is required for all solid waste processing and disposal facilities. All responses and exhibits shall be identified in the following sequence to facilitate the evaluation:

- (1) **a discussion demonstrating that the potential and real adverse environmental effects of the facility have been avoided to the maximum extent possible;**

The location for the Tire Processing Facility is 1223 Delhomme Avenue, Section 25, Township 9S, Range 3E and 4E and is approximately 16 acres in size located in Scott, Louisiana (Lafayette Parish) and is accessible by LA Highway 93. Scrap Tires brought onto the site are immediately shredded/processed, thus ensuring long term storage of whole tires does not occur, hence avoiding any real adverse Environmental effects. What are potential real adverse Environmental effects?

- (a) Odor and Vector – the Tire Processing Facility will not emit harmful or offensive odors because the tires will not be burned or chemically broken down. The waste tires will be shredded and placed directly into trailers awaiting delivery to approved (by the Administrative Authority) markets. Because the Tire Processing Facility

RECEIVED

JAN 29 2008

DEPT. OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES
PERMIT DIVISION

limits the storage of whole tires and the grass is cut, sprayed and fogged on a regular basis the problem of nesting mosquitoes and other insects should be minimal.

(b) Site Drainage – The Tire Processing Facility operates under a standard Water Discharge Permit #LA0095761

(2) a cost-benefit analysis demonstrating that the social and economic benefits of the facility outweigh the environmental-impact costs;

The proposed Tire Processing Facility – Colt, Inc. would provide definite benefits both social and economic, to the State of Louisiana as a cost benefit analysis shows that it is more economical to start a facility with an existing permitted site. This Tire Processing Facility – Colt, Inc. will provide approximately (40 to 50) jobs, and will service most all of Louisiana. The State of Louisiana has a large number of waste tires that are problems for landfills, as well as new and used tire dealers. The Tire Processing Facility – Colt, Inc. would provide for the processing and storage of waste tires from the overall solid waste stream, and will provide avenues and or markets for these tires and/or tire material to be recycled into useable end products that are approved by the local governing authority.

(3) a discussion and description of possible alternative projects that would offer more protection to the environment without unduly curtailing nonenvironmental benefits;

There are no alternative projects that would offer more protection to the environment than the proposed Tire Processing Facility, as this is a renewal application. The facility is located in a nonresidential, agricultural zone and is easily accessible by waste tire transporters. Environmental precautions will be the number one priority as the facility outlines its operation procedures. The Louisiana Department of Environmental Quality will be monitoring the Tire Processing Facility to ensure compliance of all aspects. Therefore, because of the methods to be used at this Tire Processing Facility, there are no know alternative projects, which might offer more protection to the environment without also forfeiting non-environmental benefits.

(4) a discussion of possible alternative sites that would offer more protection to the environment without unduly curtailing nonenvironmental benefits;

As this application is a permit renewal, no alternative facilities would offer any greater degree of Environmental protection. A cost benefit analysis shows that it is more economical to start with an existing permitted site already established. The scrap tire units are shredded/processed without the involvement of chemical extraction, high heat thermal process or complex physical separation techniques. This site is not located in nor will it adversely affect any wetlands, critical habitats or historical significant areas.

- (5) a discussion and description of the mitigating measures which would offer more protection to the environment than the facility, as proposed, without unduly curtailing nonenvironmental benefits**

The proposed Tire Processing Facility's standard operations and procedures are to be implemented with Environmental precautions as the main priority. With these Environmental precautions in mind there are no other mitigating measures that could be taken, that would result in a higher degree of protection to the Environment. Since recycling is one of the most environmentally friendly options available we feel that there are no mitigating measures, which would offer any more protection to the Environment than the Tire Processing Facility as submitted.