

STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Solid Waste Management William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 14th Floor Nashville, Tennessee 37243

June 21, 2022

Sid Brian Trinity Business Group (TBG) 5800 One Perkins Dr., Suite 6A Baton Rouge, LA 70808

RE: Permit-By-Rule for a Solid Waste Processing Facility

TBG Tire Processing and Reclamation Facility – SWP600001589

Dear Mr. Brian:

This letter will serve as official notice that the Tennessee Department of Environment and Conservation (TDEC), Division of Solid Waste Management (DSWM), has approved your Permit-By-Rule notification for the referenced facility located in Maury County at 2292 Monsanto Road, Columbia, TN 38402 (latitude 35.667106/longitude -87.115111). This facility shall be deemed to have a Permit-By-Rule provided the criteria of Rule 0400-11-01-.02(2)(a) of Tennessee's Solid Waste Processing and Disposal Regulations are met, including the permit conditions as submitted with your application. The approved maximum storage capacity for the facility is 7,800 cubic yards. The registration number for this facility is SWP600001589. This number should be used on all reports and correspondence to TDEC or DSWM regarding this facility.

Per Rule 0400-11-01.02(2)(b)1(XVIII) solid waste processing facilities must file a financial instrument with the state of Tennessee, prior to receiving solid waste for processing, in an amount sufficient to insure the proper closure of the facility. Financial assurance for this site is required in the amount of \$658,420.80. Please contact TDEC's Division of Fiscal Services (DFS) at (615) 532-0877 for assistance concerning financial assurance.

With the issuance of this permit, there is an annual maintenance fee required [pursuant to Tennessee Rule 0400-11-01-.07(3)] for this processing facility. You will receive an invoice for the next full fiscal year in the amount of \$3,000. If you have any questions about billing, please contact DFS at 615-532-0065 to arrange for payment.

If you have questions concerning this letter, please feel free to contact Brianna Rives of this office by email at <u>Brianna.Rives@tn.gov</u> or call 615-308-0104.

Sincerely,

Lisa A. Hughey, CHMM

Director

cc: Jason Repsher, Barge Design Solutions

Steven Wintheiser, DSWM, Columbia Environmental Field Office

Chuck Yoest, TDEC Regional Director for External Affairs, Columbia Environmental Field Office

Amy Katcher, Materials Management Program, DSWM Bassam Faleh, DSWM, Nashville Central Office Erini Ryad, TDEC Financial Responsibility Group

Ian Jakul, TDEC Financial Responsibility Group

Records.SWM@tn.gov



May 25, 2022

Jeremy Hooper Tennessee Department of Environmental Quality Division of Solid Waste Management 312 Rosa L. Parks Ave., 14th Floor Nashville, TN 37243

RE: Permit-By-Rule for a Solid Waste Processing Facility – Notice of Deficiency TBG Tire Processing and Reclamation Facility – SWP600001589

Mr. Hooper,

Barge Design Solutions, Inc. (Barge) received comments from TDEC on May 24, 2021, related to the proposed solid waste processing facility. This response letter serves to address the comments. We have provided a response that addresses each comment and have submitted a totally revised and complete Permit by Rule Notification Package.

Comment 1 -

Comments from TDEC:

1. In the Response to Criteria on page 3 under I) The propagation, harborage, or attraction of flies, rodents, or other disease vectors, it states that, "No whole tires will be stored for greater than 14 days uncovered or outside approved containers or shipping trailers to prevent mosquito larval development." Per a phone conversion on May 24, 2022, with the consultant, Barge Solutions, the only area that whole tires may be left uncovered is on the tire receiving/staging area next to the existing maintenance building and processing area. Please add this note to this response. Additionally, please add to the response that any whole tire left uncovered in this area must sprayed for mosquitoes at least once every 7 days.

Response from Barge:

 The two notes were added to the response stating that the only area whole tires may be left uncovered is on the tire receiving/stage area next to the existing maintenance building and processing area. Any whole tires left uncovered in this area must be sprayed for mosquitoes at least once every 7 days.

Comment 2 -

Comments from TDEC:

2. DSWM requests that the phased approach presented in the original application package be handled as an amendment to this request. That is, DWSM requests that you resubmit this PBR application for the main storage and processing areas, excluding Storage Areas 1 and 2. When Storage Areas 1 and 2 are ready to be utilized then DSWM requests that you submit a request to amend the PBR to add these areas to the approved PBR and address financial assurance for these portions at that time.



May 25, 2022 Page - 2

Response from Barge:

2. The response to the Permit By Rule Criteria xxiii has been amended to state that approval from TDEC DSWM will be required prior to the construction of Storage Areas 1 and 2 to address the financial assurance for these areas. In addition, the Appendix 4 - Facility Layout plans have been modified to refer to the storage areas as future and that approval from TDEC DSWM will be required prior to the construction of these areas within the facility.

If you have any questions or comments about the package please contact Jason Repsher at 615.252.4481.

Sincerely,

Barge Design Solutions, Inc.

Barge project # 3712220

CC:

Jason Repsher, Barge Design Solutions, Inc.



TBG Tire Processing and Reclamation Facility (SWP600001589)

Permit By Rule Notification Package

Prepared For: Trinity Business Group (TBG)

PREPARED BY



615 3rd Avenue South, Suite 700 Nashville, TN 37210 BARGE # 37122-20



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EXECUTIVE SUMMARY

1.0 INTRODUCTION

Barge Design Solutions, for Trinity Business Group (TBG), LLC is submitting this application for a Solid Waste Processing (SWP) permit for the processing of waste tires for metal recovery, tire derived aggregate, mineral aggregate substitution, leachate collection media, rubber mulch, animal bedding, sports field underlayment, recovered products and volume reduction. Used tire culling for reuse will also be utilized on some of the inbound loads. This site was formerly permitted for tire processing under SWP 600001514 by a previous owner.

This document provides a narrative of the TBG operations in conjunction with a new Permit-By-Rule Notification and topographic location map presented in Appendices 1 and 2 respectively.

The purpose of this processing facility is to sort and shred (via mechanical separation) the incoming tires and process the shreds into recovered materials and usable products. The existing site consists primarily of existing concrete pads and a building. The existing building will be used as offices, maintenance bays and restroom facilities for the processing facility. The existing concrete pads will be used as a tipping floor / processing area for the waste tires that are received by the site as shown on the attached facility layout plan in Appendix 3 with the addition of gravel parking areas for trailers for inbound tires.

The facility will be operated with trained personnel and clearly posted signs for entry locations, hours of operation and contact information. Personnel will be equipped with communication devices to maintain traffic control, facility security and immediate access to emergency personnel if needed. All records required by this Permit by Rule will be kept in order at the site.

The following narrative sections have been correlated to the Tennessee Department of Environment and Conservation – Division of Solid Waste Management regulations for ease of reference.



2.0 PERMIT BY RULE CRITERIA

- (a) All permit by rule facilities shall keep any records that are required by these rules and a copy of its permit by rule authorization at the facility or at another location approved by the Department. Notwithstanding any other provision of this rule, except for subparagraph (1)(c) of this rule, and provided they are not excluded pursuant to part (1)(b)3 of this rule, the following classes of activities shall be deemed to have a permit by rule if the conditions listed are met:
- i) The operator complies with the notification requirement of subparagraph (b) of this paragraph;
- ii) The facility is constructed, operated, maintained, and closed in such a manner as to minimize:
- I) The propagation, harborage, or attraction of flies, rodents, or other disease vectors;

This SWP will process non-hazardous materials for recycling and recovery from primarily roll-off boxes and delivery trucks on pads specifically designed to accept and allow for processing and transfer of the materials. Recycled products that are recovered from the process will also be stored in the tire processing area on concrete pads or in containers designed for recycled material storage and eventually transferred for beneficial reuse or disposal. Tire chips for aggregate and leachate collection will be stored on soil pads until sold or used at other operations at the overall site.

No whole tires will be stored for greater than 14 days uncovered or outside approved containers or shipping trailers to prevent mosquito larval development. The only area that whole tires may be left uncovered is on the tire receiving/stage area next to the existing maintenance building and processing area. Any whole tires left uncovered in this area must be sprayed for mosquitoes at least once every 7 days.

II) The potential for explosions or uncontrolled fires;

Tires will be stored in mobile units, trailers and other appropriate transport containers until ready for recycling on the tippling floor area within the on-site processing area. As such, no large piles of tires will be exposed at the site. The site grounds will be maintained on a regular basis to prevent accumulation of vegetation. No flammable materials will be stored near tire storage or shred / chip storage locations.

Shred / chip storage areas will be maintained at no greater than 75×100 feet in dimension with a 20-foot access / fire lane between each area. Separation of the storage piles will prevent fire spread to adjacent storage areas in the event of an accidental fire.

Procedures have been developed that address accidental fires in section xvi of this document.



III) The potential for releases of solid wastes or solid waste constituents to the environment except in a manner authorized by state and local air pollution control, water pollution control, and/or waste management agencies;

Air pollution concerns result from exhaust (particularly diesel) mobile equipment such as trucks and loaders, driving on unpaved or dusty surfaces, and cleanup operations such as street sweeping. The following measures will be implemented to minimize the impact of potential air pollution at the site.

- Paved traffic carrying surfaces to and from the tire processing area
- Paved surfaces and tipping floor will be kept clean
- Street sweeping operations will use sufficient water to avoid dust. Water will be used only as necessary.
- Equipment engines will receive regular maintenance including tune-ups to minimize emissions.
- Truck bodies and tires will be cleaned as necessary to reduce tracking onto streets.

All inbound and outbound materials will be in appropriate containers with recovery processing occurring on the upper concrete pad. Shredding equipment is proposed to be covered with a fabric hoop structure to prevent weather from effecting operations but allow easy maintenance of the equipment. As this facility is just processing tires no additional collection controls are warranted. However, should removal of unwanted stormwater be necessary the water shall be tested and addressed with the local POTW or the on-site treatment system NPDES TN0001538 as appropriate.

A TMSP (Tennessee Multi-Sector Permit) will be submitted for the facility once operation commences. TMSP permitting for the site will require the site runoff to be monitored annual for COD and TSS and to verify compliance with requirements with quarterly visual inspections to document observations on any signs of pollution. The existing site drainage has two outfalls on the east boundary of the proposed facility and storage areas.

IV) The potential for harm to the public through unauthorized or uncontrolled access;

The facility is surrounded by a site fencing and gate system to prevent uncontrolled access to the property. Site personnel will also be trained to assist customers and visitors with access to the facility.

iii) The facility has an artificial or natural barrier which completely surrounds the facility and a means to control entry, at all times, through the gate or other entrances to the facility;

All vehicles entering the facility will access the site through the entrance at Monsanto Road. The existing gates, terrain, fences and vegetation will be utilized to restrict unauthorized access to the facility. The facility will be completely secured by suitable fencing and terrain barriers as necessary to restrict unauthorized access to the site.

iv) The facility, if open to the public, has clearly visible and legible signs at the points of public access which indicate the hours of operation, the general types of waste



materials that either will or will not be accepted, emergency telephone numbers, schedule of charges (if applicable), and other necessary information;

Signs will be posted at the entrance giving information about the facility operations. These signs shall contain information regarding the hours of operation, emergency telephone numbers, schedule of charges, and all other pertinent information. All waste traffic must cross in front of the attendant's office and trough the weight scales. Signs at the weight scales / check station will direct traffic to the transfer / processing station.

v) Trained personnel are always present during operating hours to operate the facility;

Trained personnel will be present on-site at all times so as to ensure that the processing facility complies with the TDSWM regulations regarding site operation.

vi) The facility has adequate sanitary facilities, emergency communications (e.g., telephone), and shelter available for personnel;

The processing facility will have a restroom, breakroom, and other facilities for staff and visitors in the existing building / office at the site.

Each employee is equipped with a cellular telephone or two-way radio(s) capable of summoning emergency assistance on-site.

vii) The facility's access road(s) and parking area(s) are constructed so as to be accessible in all weather conditions;

As previously stated, all roads to and from the tire processing area and parking areas are or will be paved or graveled in so much as is feasible to provide access in all weather conditions and to minimize unnecessary dust generation.

viii) Except for composting facilities utilizing landscaping and land clearing wastes only, all waste handling (including loading and unloading) at the facility is conducted on paved surfaces;

All loading or unloading of materials will occur within the designated areas which are designed or renovated for solid waste processing and recovery and on paved surfaces as required. Tires will be processed on the existing concrete, asphalt, and gravel pads associated with the previously property use as noted on the attached figures.

ix) There is no storage of solid wastes at the facility except in the containers, bins, lined pits or on paved surfaces, designated for such storage;

All materials will be stored within the tire processing area or in appropriate containers or paved storage areas. Tire receiving, processing and shred / chip storage areas have been designated on the facility layout in Appendix 3



x) Except for incinerators or energy recovery units, there is no burning of solid wastes at the facility;

No burning will be allowed at the facility.

xi) There is no scavenging of solid wastes at the facility and any salvaging is conducted at safe, designated areas and times;

Scavenging will not be allowed at the facility. Salvaging activities will be prevented after hours by the locked gate as well as the physical/natural barriers and perimeter fencing.

xii) Wind dispersal of solid wastes at or from the facility is adequately controlled, including the daily collection and proper disposal of windblown litter and other loose, unconfined solid wastes;

All loading, unloading and processing will be conducted within the processing areas. Tires are not known to create litter issues while being processed. However, any litter generated will be collected at the end of each day.

- xiii) All liquids which either drain from solid wastes or are created by washdown of equipment at the facility go to either:
 - I) A wastewater treatment facility permitted to receive such wastewaters under T.C.A. §§ 69-3-101 et seq. (Tennessee Water Quality Control Act, or
 - II) Other methods approved by the Commissioner.

While no added fluids are necessary for tire processing, any liquid generated from the processing of the materials for recycling and recovery will be collected and managed separate from stormwater should constituents of concern from the to be acquired TMSP permit indicate an issue with discharge. Should treatment be necessary the water will be pumped and hauled to the local POTW or disposed of through the City of Columbia sewer system under an industrial discharge permit or treated on site under NPDES permit TN0001538.

- xiv) The facility receives no special wastes unless:
 - I) Such receipt has been specifically approved in writing by the Department, and
 - II) Special procedures and/or equipment are utilized to adequately confine and segregate the special wastes;

No special wastes are anticipated to be received at the tire processing facility. Should a material source be designated by the Tennessee Department of Environment and Conservation as a special waste then all appropriate approvals shall be obtained prior to acceptance of the material at the designated facility. Such material would be handled as defined by that approval and confined from other operations as required.

xv) The operator can demonstrate, at the request of the Commissioner, that alternative arrangements (e.g., contracts with other facilities) for the proper processing or



disposal of the solid wastes his facility handles are available in the event his facility can not operate;

The Owner will have arrangements with other approved facilities to address any materials unable to be recovered or recycled by the facility as necessary and appropriate financial assurance on file with TDEC to allow proper cleanup of the site should activities cease.

xvi) The facility has properly maintained and located fire suppression equipment (e.g., fire extinguishers, water hoses) continuously available in sufficient quantities to control accidental fires that may occur;

Procedures have been developed to respond to accidental fires at the facility. The following paragraphs detail the equipment available for firefighting and the procedures developed for response to accidental fires and or potential explosions.

FIRE SUPPRESION EQUIPMENT

Fire extinguishers are located on each piece of heavy equipment and throughout the facility at locations and frequencies compliant with OSHA requirements for fire safety. The fire extinguishers will be properly maintained and recharged as necessary. Processing facility personnel will be properly trained in the use of the fire extinguishers.

FIRE RESPONSE PROCEDURES

In the case of a fire, the fire department will be notified via 911 and will subsequently be dispatched to the site. The nearest fire station to the site is the Columbia Fire & Rescue Station No. 2 at 711 Lion Parkway., which is approximately 4.5 miles from the site.

xvii)All waste residues resulting from processing activities at the facility are managed in accordance with this Chapter or Chapter 0400-12-01 (Hazardous Waste Management), whichever is applicable, and/or with any other applicable state or federal regulations governing waste management;

Not applicable, there will be no hazardous waste generated at the tire processing operation.

xviii) The facility is finally closed by removal of all solid wastes and solid waste residues for proper disposal. The operator must notify the Division Director in writing of his completion of closure of the facility. Such notification must include a certification by the operator that the facility has been closed by removal of all the solid waste and residues. Within 21 days of the receipt of such notice the Division Director shall inspect the facility to verify that closure has been completed. Within 10 days of such verification, the Commissioner shall approve the closure in writing to the operator. Closure shall not be considered final and complete until such approval has been made.

Should the facility close, the Owner shall remove all materials from the site for either reclamation or disposal to appropriate permitted facilities as required by this paragraph. All notifications shall also be filed with the Department in a timely manner.



xix) New solid waste processing facilities shall not be located in wetlands, unless the owner or operator makes the applicable demonstrations to the Commissioner as referenced at subparagraph (2)(p) of Rule 0400-11-01-.04.

The facility is not located in a wetland. A review of the U.S. Fish and Wildlife Service wetland location viewer did not identify any wetland as a part of the facility. The U.S. Fish and Wildlife Service map is attached as Appendix 4. Additionally, the site is part of the former Monsanto industrial facility which operated at the site since 1927.

- xx) The facility must not be located in a 100-year floodplain unless it is demonstrated to the satisfaction of the Commissioner that:
 - I) Location in the floodplain will not restrict the flow of the 100-year flood nor reduce the temporary water storage capacity of the floodplain.

The facility is not within a 100-year floodplain as shown in Appendix 5.

II) The facility is designed, constructed, operated, and maintained to prevent washout of any solid waste.

A site plan has been provided with this application that depicts the location of the proposed location of the closed facility. See Appendix 3 for the facility site plan.

- xxi) The facility does not:
 - I) Cause or contribute to the taking of any endangered or threatened species of plants, fish, or wildlife; or
 - II) Result in the destruction or adverse modification of the critical habitat of endangered or threatened species.

This facility does not cause or contribute to the taking of any endangered or threatened species of plants, fish, or wildlife; or result in the destruction or adverse modification of the critical habitat of endangered or threatened species. See Appendix 6 for iPaC Resource List. Additionally, the site is part of the former Monsanto industrial facility which operated at the site since 1927 which fully mined the area and placed unused fill across the site.

xxii) The owner/operator may not store solid waste until the processing equipment has been installed on-site and is ready for use.

Prior to any recycling or recovery operations all necessary equipment will be on-site and operational at this SWP.

xxiii) The owner/operator of a solid waste processing facility which has a solid waste storage capacity of 1000 cubic yards or greater shall file with the Commissioner a performance bond or equivalent cash or securities, payable to the State of Tennessee. Such financial assurance is intended to ensure that adequate financial resources are available to the Commissioner to insure the proper operation, closure, and post closure care of the facility. The types of financial assurance instruments that are acceptable are those specified in subparagraph (3)(d) of Rule 0400-11-01- .03. Such financial assurance shall meet the criteria set forth in T.C.A. § 68-211-116(a) and at subparagraph (3)(b) of Rule 0400-11-01-.03.

The owner/operator shall provide financial assurance as required by the Tennessee Department



of Environment and Conservation for this SWP. Storage associated with the tire processing operations is limited to approximately 62,000 CY overall based upon the area of operations. However, the two chip storage areas will not be used immediately upon operation startup. Therefore, separate calculations for the main processing and storage area, Storage Area 1 and Storage Area 2 have been calculated to allow the phased opening and phased financial assurance posting for the two storage areas. Approval from TDEC DSWM will be required prior to the construction of Storage Areas 1 and 2 to address the financial assurance for these areas.

xxiv) The owners or operators proposing a new solid waste processing facility that handles putrescible wastes located within 10,000 feet (3,048 meters) of any airport runway end used by turbojet aircraft or within 5,000 feet (1,524 meters) of any airport runway end used only by piston-type aircraft must include in the permit-by-rule notification a demonstration that the facility does not pose a bird hazard to aircraft. The owners or operators proposing a new solid waste processing facility that handles putrescible wastes located within a five-mile radius of any airport runway end used by turbojet or piston-type aircraft must notify the affected airport and the appropriate Federal Aviation Administration (FAA) office.

The proposed site is approximately 41,000 feet from an airport runway and will not pose a threat to aircraft. No putrescible materials will be located or stored outside other than in appropriate containers, as such birds would not be attracted to the facility. Tires are not known to be a bird attractant.

3.0 Equipment **Process and** Description

Tennessee produces approximately 6 million waste tires every year and needs facilities to recycle the state's generation of waste tires. The TBG Tire Processing Facility will provide a legitimate tire disposal site to be able to accept waste tires on a consistent basis from the greater middle Tennessee area and process into a material for beneficial end use. The primary product produced by the tire processing facility will tire derived aggregate (TDA). TDA consists of scrap tires cut into pieces that have a basic geometrical shape and range between 3 inches and 12 inches in size and are intended for use in civil engineering applications. TDA can be used in many construction projects including road building, commercial and residential buildings, and landfill design and construction. The tire feedstock for TDA can be made from used tires ranging in size from passenger to truck tires.

TDA is produced by processing waste tires with a tire shredding machine that incorporates rotating cutting shears to produce clean cuts along whole tires. Single passes through shredding machines produce rough shreds that can be further reduced in size by utilizing multiple passes and screens in the shredding machines. The Star Hill Tire Processing Facility will operate two tire shredders to produce TDA sized 4-6 inches in size. The initial primary shredder, 4.9 Barclay Shredder, will operate at approximately 16-20 tons per hour and provide a rough shred of the scrap tires. The secondary shredder, CM Primary Shredder, will produce the 4-6 inch chips at approximately 10 tons per hour. The daily processing capacity for a 8-hour day will approximately 80 tons/day. This equals a yearly (261 operating days) processing capacity at 2.09 million tires that can be diverted from landfills with the current equipment.



The 4-6 inch chips will be stored and then further processed into crumb rubber. Tire crumb rubber is produced by reducing the chips into smaller sizes and removing 99 percent or more of the steel and fabric from them. Tire crumb rubber has many applications including new rubber products, playground and other sport surfacing, and rubber-modified asphalt. The Star Hill Tire Processing Facility will operate a wire separation machine, CM2R Liberator, that produces a 1.75 inch crumb rubber at approximately 4.5 tons per hour. This product will be offered for sale in bulk form.

Tire Derived Fuel (TDF) will also be produced at the site after initial startup and replacement of the former railroad spur to the facility. With the initiation of the TDF process chips in the ¾ to 2 inch range will be sold to various entities to offset rising fuel costs for coal and natural gas as TDF burns cleaner and provided a higher BTU value per ton that coal. TDF processing will require the 4-6 inch chips be re-run at a nominal rate of 15 tons per hour. An additional shredder is anticipated to be added to the process for full implementation of the TDF process once access to rail is completed at the site.

Equipment purchased for the operation includes:

- 4.9 Barclay Shredder with Feed Conveyor
- CM Primary Shredder
- CM 2R Liberator
- Doppstadt DW3060K Slow Speed Shredder and screen
- IMI Crossbelt Inline Magnet
- IMI Overband Magnet
- IMI Electro-Magnet
- Eagle Passenger Tire Derimmer
- Eagle Truck Tire Derimmer
- Mill Power Screen
- Tire Feed Hopper with incline conveyor
- Conveyor sets

	,,	
0	Con 1	70" x 35'
0	Con 2	60" x 40'
0	Con 5	36"x 30'
0	Con 6	36" x 26'
0	Con 7	24" x 14' (with Hopper)
0	Con 8	24" x 34'
0	Con 12	48" x 24'
0	Con 11	22" x 30'
0	Con 13	28" x 32' (with shaker deck)
0	Con 14	24" x 24'
0	Con 16	24" x 32'
0	Con 15	22" x 20'

Loading separation equipment will generally consist of 2 rubber tire loaders for material movement and a trackhoe with thumb attachments for whole tire feeding and collection.

Appendices Follow:

APPENDIX 1 – Permit By Rule Notification

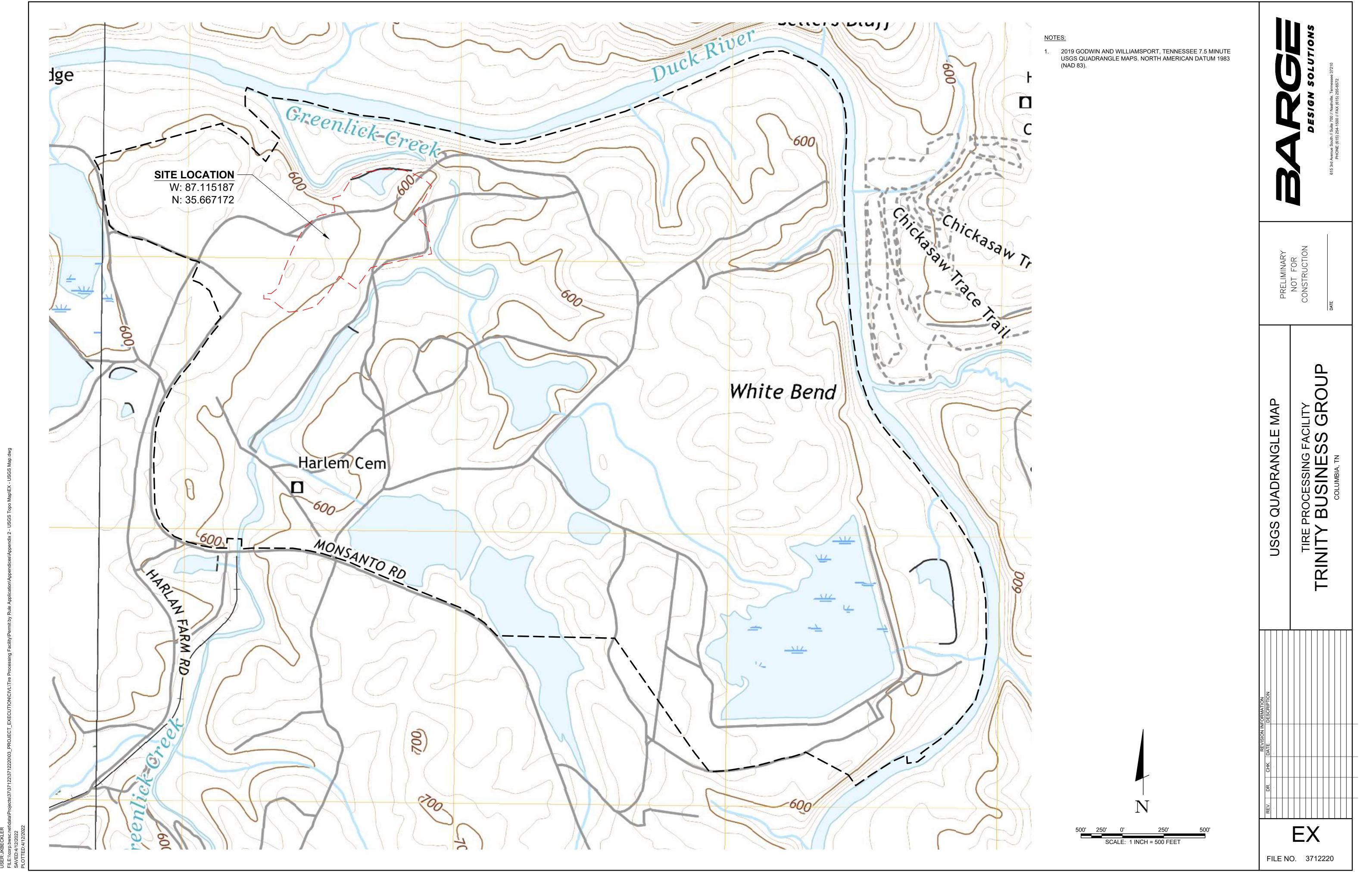


STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF SOLID WASTE MANAGEMENT
WILLIAM R. SNODGRASS TENNESSEE TOWER
312 ROSA L. PARKS AVENUE, 14TH FLOOR
NASHVILLE, TN 37243

SOLID WASTE PERMIT BY RULE NOTIFICATION

1. TYPE OF PERMIT- BY- RULE REQUESTED ID# TDEC USE ONLY					
COMPOST FACILITY	LAND APPLICATION	TIRE STORA	GE FACILITY		
CONVENIENCE CENTER	PROCESSING FACILITY	TRANSFER	STATION		
2. FACILITY INFORMATION				FACILITY LO	CATION COUNTY
FULL LEGAL NAME OF FACILITY				Maury	
TBG Tire Processing and Reclamation Facility					ECIMAL DEGREES)
PHYSICAL LOCATION OR ADDRESS OF FACILIT		STATE			(DECIMAL DEGREES)
2292 Monsanto Road	Colur	nbia TN	38402	-87.1151	
FACILITY MAILING ADDRESS	CITY	STATE	ZIP	FACILITY EM	AIL
5800 One Perkins Dr. Suit	te 6A Bator	Rouge LA	70808	info@trini	tybusinessgroup.net
FACILITY MANAGER OR SITE OPERATOR	PHONE (WITH AREA CO	DE) AFFILIATION OF	SITE OPERATOR (IF DIFFERENT	FROM PERMITTEE)
Blake Brian	(255) 766-144	General	Manager ⁻	TN Ope	rations
3. APPLICANT (PERMITTEE)					
APPLICANT NAME		(WITH AREA CODE)	EM		
Trinity Business Group (T	BG) (25	5) 766-1443	info@trini	tybusine	essgroup.com
RESPONSIBLE OFFICIAL / TITLE	PHONI	(WITH AREA CODE)	EMA	AIL	
Sid Brian, Owner	(25	5) 766-1443	sbrian@tri	nitybusir	nessgroup.com
RESPONSIBLE OFFICIAL MAILING ADDRESS		CITY	al sessi	STATE	ZIP
5800 One Perkins Dr., Su	ite 6A	Baton Ro	uge	LA	70808
LANDOWNER NAME	LANDOWNER MAILING		ITY		STATE ZIP
Star Hill, LLC (TBG subsidary)	5800 One Perkin	s Dr., Suite 6A	Baton Rou	uge	LA 70808
					112
LANDOWNER SIGNATURE	LANDOWNER SIGNATUR	E LAND	OWNER SIGNATU	JRE	4.12.22 DATE
4. WASTE HANDLING					
DESCRIPTION OF ACTIVITIES AND WASTES HAN	IDLED OR PROCESSED	AMOUNT OF WASTE	ANDLED, PROCE	SSED OR STO	RED
Tire processing for material reco	very and reuse	500.00			62,000.00
	,	WEIGHT		DLUME	STORAGE MAX
		TONS / DAY		DS / DAY	CU YARDS
5. CERTIFICATION REQUIRED		Garlet Auto		-15/8/FST	
I certify under penalty of law that this docume information is to the best of my knowledge and	nt and all attachments w	ere prepared by me, o	r under my direct	ion or supen	vision. The submitted
false information, including the possibility of		nu complete. Tamaw	are trial triefe are	Significant p	enaities for submitting
raise information, including the boarding	ne al d imprisonment.	s specified in Tenness	ee Code Annotat	ed Section 39	-16-702(a)(4), this
declaration is made under penalty of periun	ine all d imprisonment.	s specified in Tenness	ee Code Annotat	ed Section 39	-16-702(a)(4), this
declaration is made under penalty of perjury.	ne and imprisonment.	s specified in Tenness		ed Section 39	
declaration is made under penalty of perjury.	ne and imprisonment.	s specified in Tenness		ed Section 39	-16-702(a)(4), this
declaration is made under penalty of perjury. SIGNATURE OF RESP	ne and imprisonment.	s specified in Tenness	PRINTED NAME	ed Section 39	
declaration is made under penalty of perjury. SIGNATURE OF RESP	ne and imprisonment.	s specified in Tenness	FRINTED NAME 4.12	ed Section 39	
declaration is made under penalty of perjury STATE OF TENNESSEE NOTARY	ne and imprisonment.	s specified in Tenness		ed Section 39	
declaration is made under penalty of perjury. SIGNATURE OF RESP	ne and imprisonment.	s specified in Tenness	FRINTED NAME 4.12	ed Section 39	BRIAN
declaration is made under penalty of perjury STATE OF TENNESSEE NOTARY	SNSIBLE OFFICIAL	s specified in Tenness	FRINTED NAME 4.12	-23	

APPENDIX 2 –USGS Topographic Map



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APPENDIX 3 – FEMA Floodplain Map

37°7'8"W 35°40'21"N









Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT Without Base Flood Elevation (BFE) Zone A, V, A99

SPECIAL FLOOD HAZARD AREAS

Zone AE

Regulatory Floodway

With BFE or Depth Zone AE, AO, AH, VE, AR

FLOODWAY

0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average

areas of less than one square mile Zone X depth less than one foot or with drainage

Future Conditions 1% Annual

Area with Reduced Flood Risk due to Chance Flood Hazard Zone X

Levee. See Notes. Zone X

Area with Flood Risk due to Levee Zone D

OTHER AREAS OF FLOOD HAZARD

NO SCREEN Area of Minimal Flood Hazard Zone

Zone AE

Area of Undetermined Flood Hazard Zone D

OTHER AREAS

STRUCTURES | 1 1 1 1 1 1 1 Levee, Dike, or Floodwall GENERAL - - - Channel, Culvert, or Storm Sewer

Cross Sections with 1% Annual Chance

Water Surface Elevation Coastal Transect

Limit of Study Base Flood Elevation Line (BFE)

Coastal Transect Baseline Jurisdiction Boundary

Profile Baseline

OTHER

Hydrographic Feature

Digital Data Available

No Digital Data Available



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

The basemap shown complies with FEMA's basemap digital flood maps if it is not void as described below. This map complies with FEMA's standards for the use of

become superseded by new data over time. time. The NFHL and effective information may change or authoritative NFHL web services provided by FEMA. This map The flood hazard information is derived directly from the reflect changes or amendments subsequent to this date and

legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for elements do not appear: basemap imagery, flood zone labels, regulatory purposes. This map image is void if the one or more of the following map





TBG TIRE PROCESSING AND RECLAMATION FACILITY (SWP600001589)

FOR

TRINITY BUSINESS GROUP

COLUMBIA, TN

GENERAL NOTES

1. THE EXISTING INFORMATION SHOWN ON THE PLANS IS PER STATE OF TENNESSEE LIDAR, EFFECTIVE DATE 2018. THE CONTRACTOR SHALL VERIFY EXISTING CONDITIONS AND CONTACT THE ENGINEER IF DISCREPANCIES ARE NOTED.

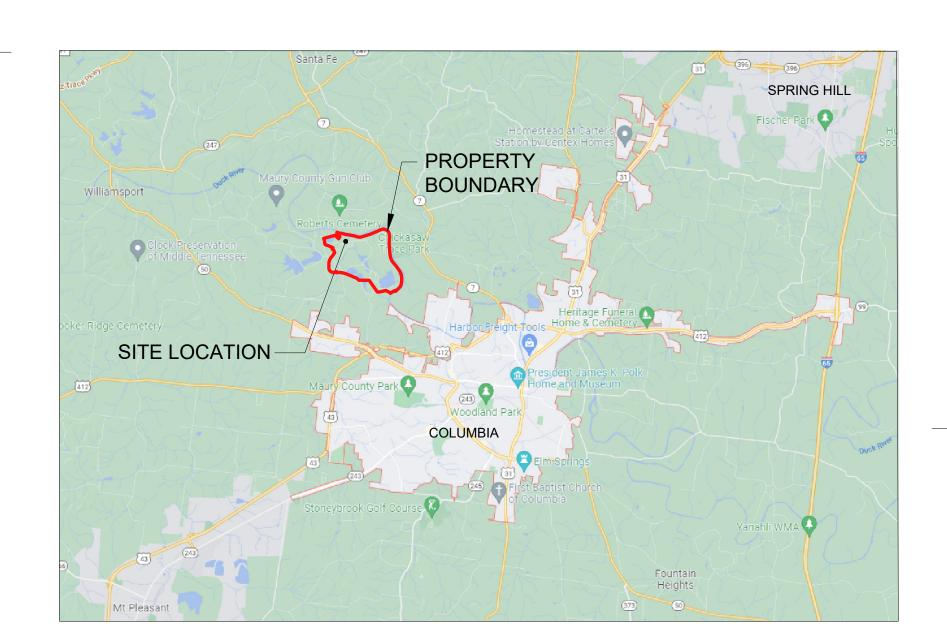
CONTACTS

OPERATOR:

TRINITY BUSINESS GROUP 5800 ONE PERKINS PLACE DR., SUITE 6A BATON ROUGE, LA 70808 CONTACT: SIDNEY BRIAN OFFICE: (225) 776-1443

ENGINEER:

BARGE DESIGN SOLUTIONS 615 3RD AVENUE SOUTH // SUITE 700 NASHVILLE, TN 37210 CONTACT: JASON REPSHER OFFICE: (615) 252-4481



LOCATION MAP

NOT TO SCALE

INDEX OF DRAWINGS

COVER SHEET
FACILITY SITE PLAN
FACILITY LAYOUT
DETAILS
WB-62 TURNING MOVEMENT
SU-30 TURNING MOVEMENT

SHEET NO.

PROJECT INFORMATION

PROJECT NAME	TIRE PROCESSING FACILITY
PARCEL ID NUMBER	077 001.00
ADDRESS	2200 MONSANTO ROAD COLUMBIA, TN 38401

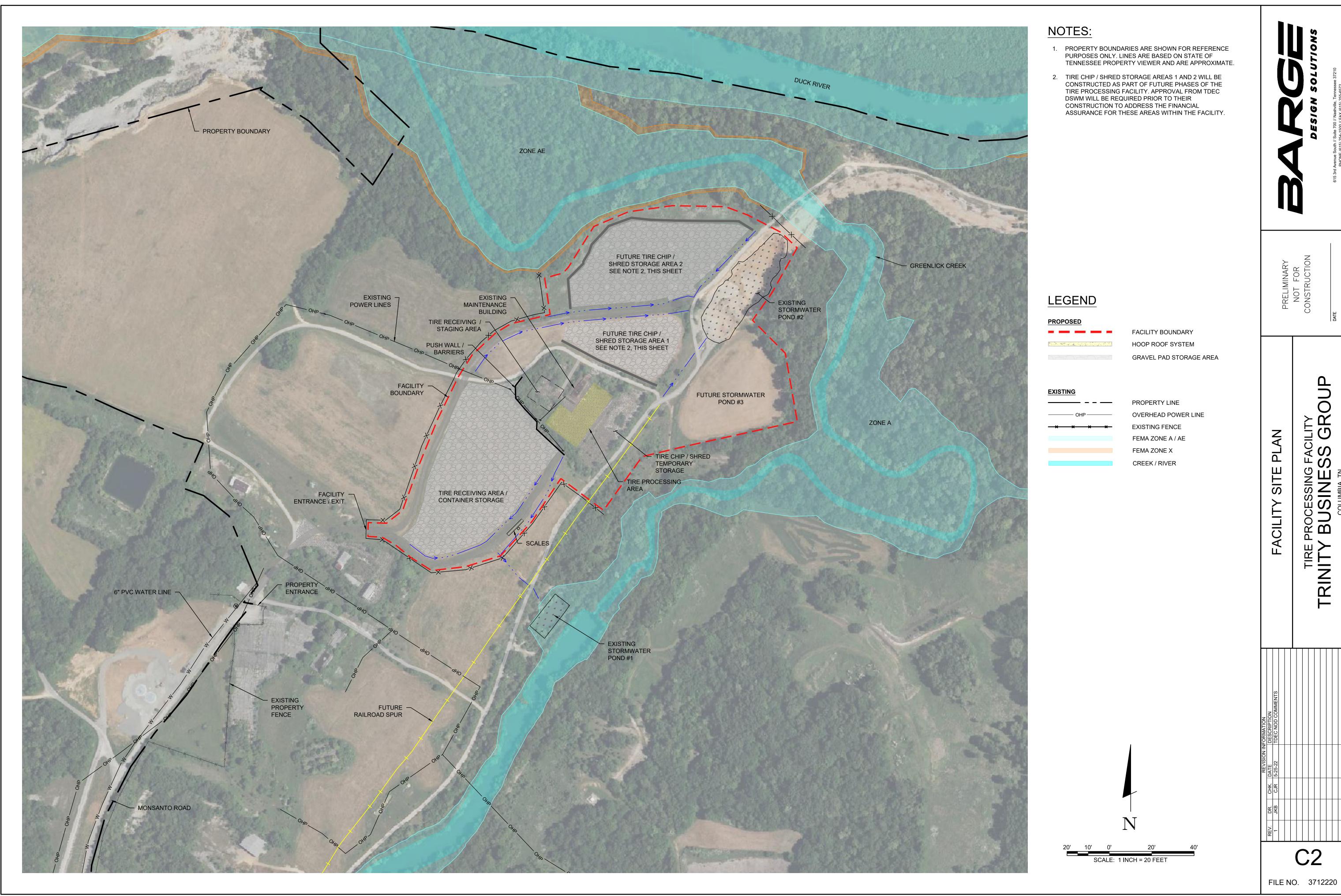


615 3rd Avenue South // Suite 700 // Nashville, Tennessee 37210 PHONE (615) 254-1500 // FAX (615) 255-6572

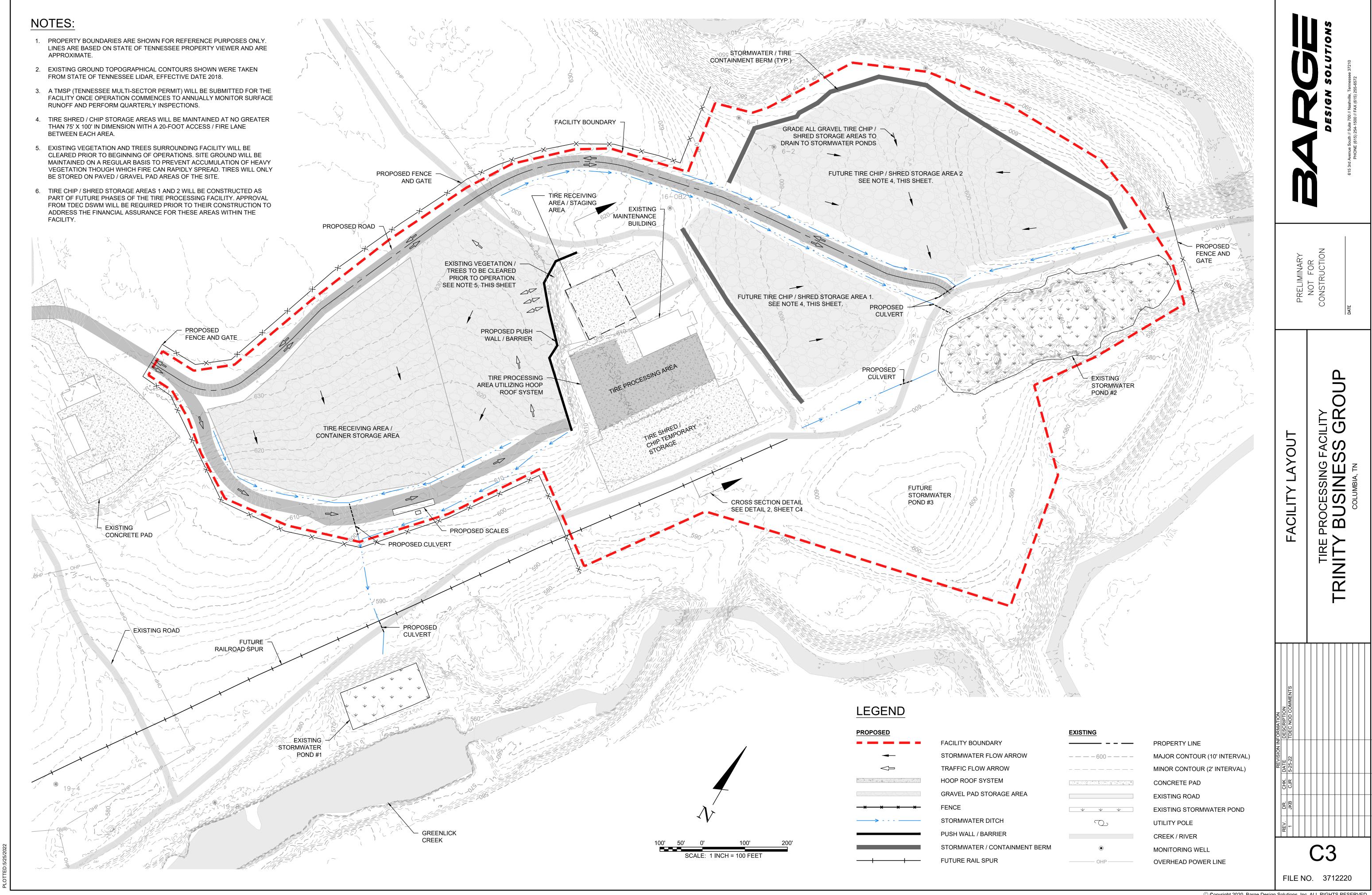


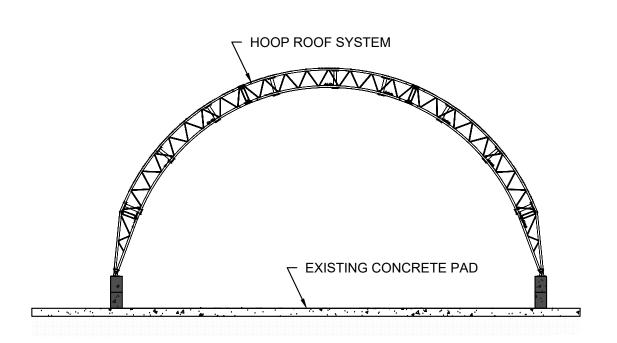
MAY 25, 2022 PROJECT No. 37122-20 REV 1

PROJECT No. 37122-20

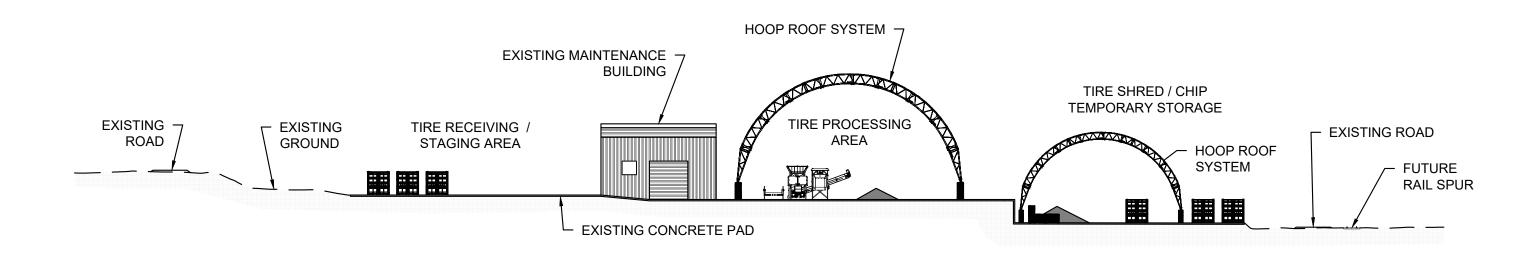


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HOOP ROOF SYSTEM - TYPICAL



CROSS SECTION DETAIL

NTS

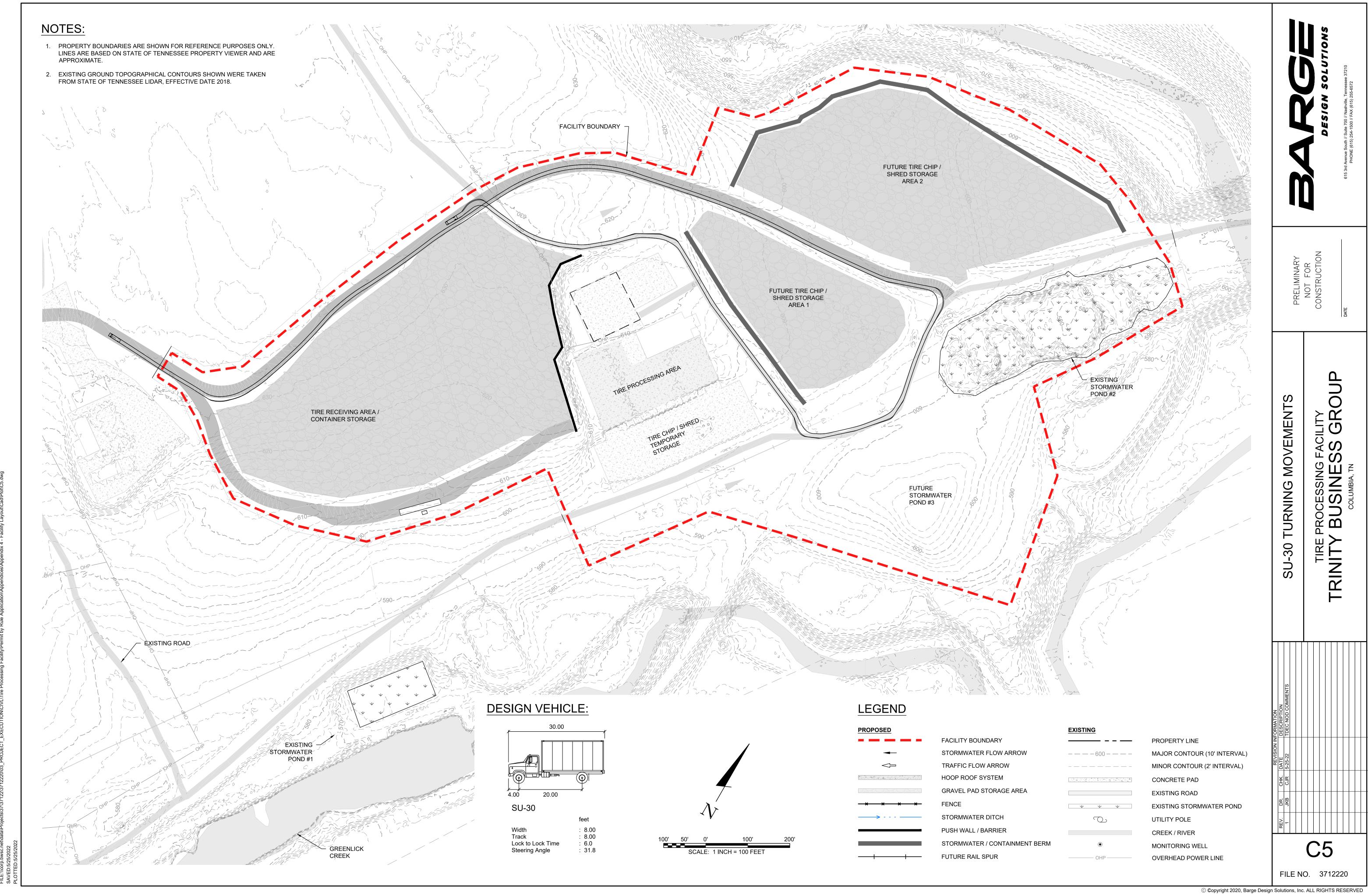
PROCESSING FACILITY

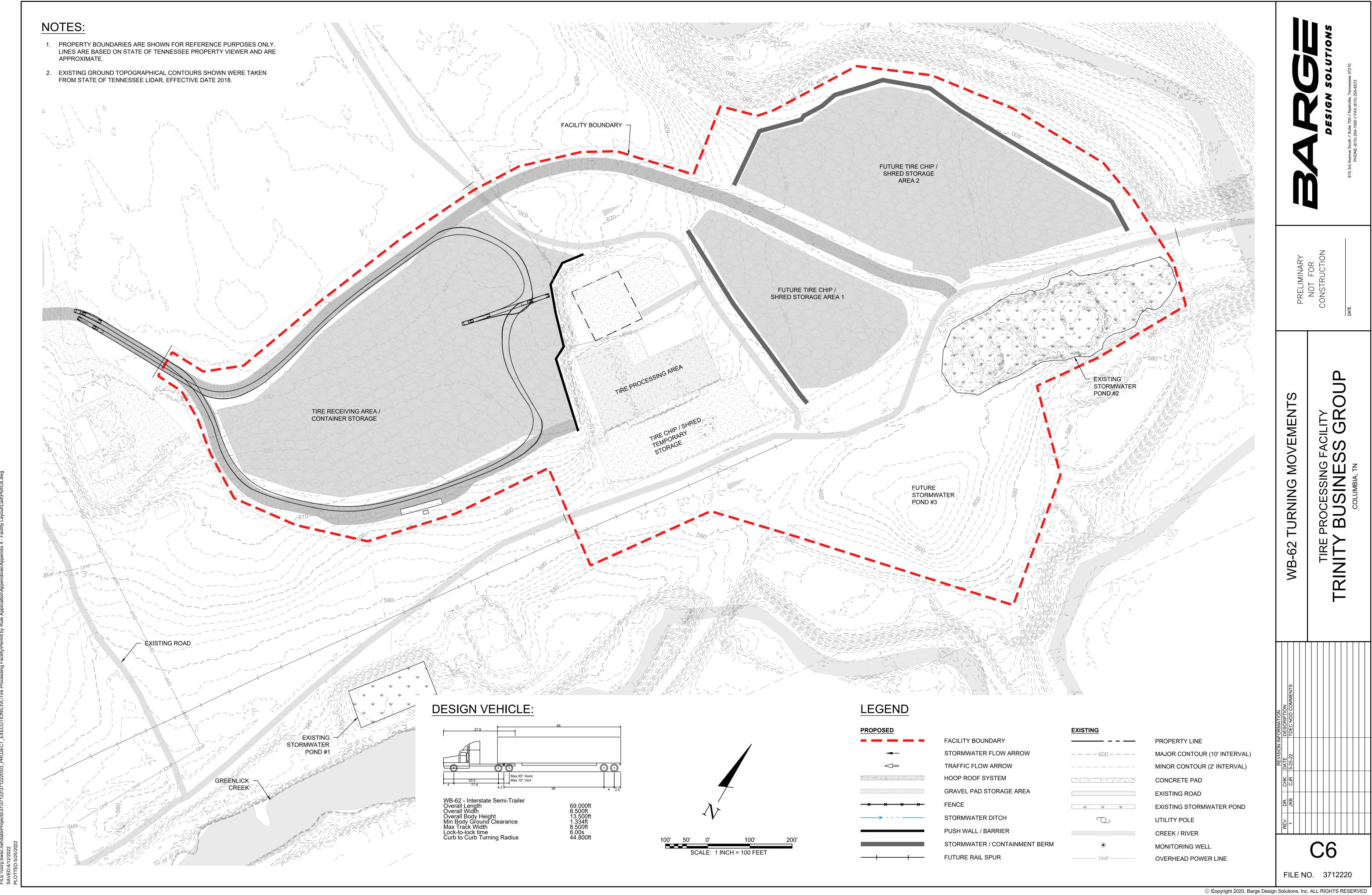
BUSINESS GROUP

COLUMBIA, TN

TRINITY

FILE NO. 3712220



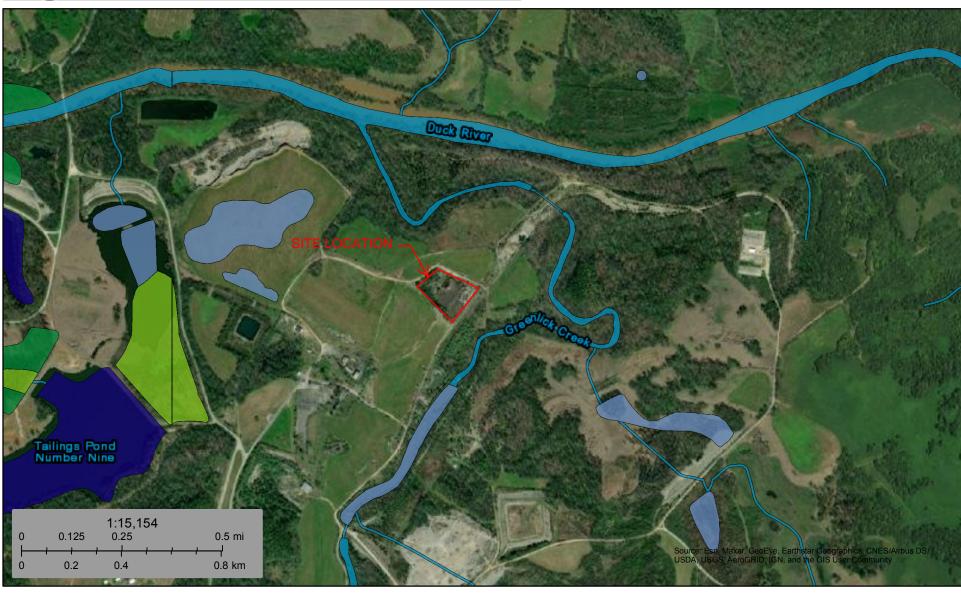


APPENDIX 5 – Wetland Mapping

U.S. Fish and Wildlife Service

National Wetlands Inventory

Wetland Mapping



March 22, 2022

Wetlands

Estuarine and Marine Deepwater

Estuarine and Marine Wetland

Freshwater Emergent Wetland

Freshwater Forested/Shrub Wetland

Freshwater Pond

Lake



Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

APPENDIX 6 – Endangered Species Information

IPaC

U.S. Fish & Wildlife Service

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Maury County, Tennessee



Local office

Tennessee Ecological Services Field Office

\((931) 528-6481

(931) 528-7075

446 Neal Street Cookeville, TN 38501-4027

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

- 1. Draw the project location and click CONTINUE.
- 2. Click DEFINE PROJECT.
- 3. Log in (if directed to do so).
- 4. Provide a name and description for your project.
- 5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the <u>Ecological Services Program</u> of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact <u>NOAA</u> <u>Fisheries</u> for <u>species under their jurisdiction</u>.

- 1. Species listed under the <u>Endangered Species Act</u> are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the <u>listing status page</u> for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
- 2. <u>NOAA Fisheries</u>, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME **STATUS Endangered** Gray Bat Myotis grisescens Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/6329 Endangered Indiana Bat Myotis sodalis Wherever found There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/5949 Northern Long-eared Bat Myotis septentrionalis **Threatened** Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9045 **Fishes** NAME STATUS

Pygmy Madtom Noturus stanauli

Endangered

Wherever found

No critical habitat has been designated for this species.

https://ecos.fws.gov/ecp/species/7873

Clams

NAME STATUS

Birdwing Pearlymussel Lemiox rimosus

EXPN

No critical habitat has been designated for this species.

https://ecos.fws.gov/ecp/species/6636

Cracking Pearlymussel Hemistena lata

Endangered

No critical habitat has been designated for this species.

https://ecos.fws.gov/ecp/species/4130

Cumberland Monkeyface (pearlymussel) Quadrula intermedia

iterritedia

No critical habitat has been designated for this species.

https://ecos.fws.gov/ecp/species/6999

Cumberlandian Combshell Epioblasma brevidens

There is **final** critical habitat for this species. The location of the critical habitat is not available.

https://ecos.fws.gov/ecp/species/3119

Endangered

Orangefoot Pimpleback (pearlymussel) Plethobasus cooperianus

Endangered

Wherever found

No critical habitat has been designated for this species.

https://ecos.fws.gov/ecp/species/1132

Oyster Mussel Epioblasma capsaeformis

Endangered

There is **final** critical habitat for this species. The location of the critical habitat is not available.

https://ecos.fws.gov/ecp/species/2099

Pale Lilliput (pearlymussel) Toxolasma cylindrellus

Endangered

Wherever found

No critical habitat has been designated for this species.

https://ecos.fws.gov/ecp/species/3118

Rabbitsfoot Quadrula cylindrica cylindrica

Threatened

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.

https://ecos.fws.gov/ecp/species/5165

Slabside Pearlymussel Pleuronaia dolabelloides

Endangered

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.

https://ecos.fws.gov/ecp/species/1518

Turgid Blossom (pearlymussel) Epioblasma turgidula

No critical habitat has been designated for this species.

https://ecos.fws.gov/ecp/species/7659

Endangered

Insects

NAME STATUS

Monarch Butterfly Danaus plexippus

Wherever found No critical habitat has been designated for this species.

https://ecos.fws.gov/ecp/species/9743

Candidate

Endangered

Flowering Plants

NAME **STATUS**

Leafy Prairie-clover Dalea foliosa

Wherever found

No critical habitat has been designated for this species.

https://ecos.fws.gov/ecp/species/5498

Threatened Prices Potato-bean Apios priceana

No critical habitat has been designated for this species.

https://ecos.fws.gov/ecp/species/7422

Short's Bladderpod Physaria globosa **Endangered**

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.

https://ecos.fws.gov/ecp/species/7206

Tennessee Yellow-eyed Grass Xyris tennesseensis

Wherever found

No critical habitat has been designated for this species.

https://ecos.fws.gov/ecp/species/6010

Endangered

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act^{1} and the Bald and Golden Eagle Protection Act^{2} .

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

- 1. The Migratory Birds Treaty Act of 1918.
- 2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php
- Measures for avoiding and minimizing impacts to birds http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/
 conservation-measures.php
- Nationwide conservation measures for birds http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf

The birds listed below are birds of particular concern either because they occur on the <u>USFWS Birds of Conservation Concern</u> (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ <u>below</u>. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the <u>E-bird data mapping tool</u> (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the

relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found <u>below</u>.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A BREEDING
SEASON IS INDICATED FOR A BIRD ON
YOUR LIST, THE BIRD MAY BREED IN YOUR
PROJECT AREA SOMETIME WITHIN THE
TIMEFRAME SPECIFIED, WHICH IS A VERY
LIBERAL ESTIMATE OF THE DATES INSIDE
WHICH THE BIRD BREEDS ACROSS ITS
ENTIRE RANGE. "BREEDS ELSEWHERE"
INDICATES THAT THE BIRD DOES NOT
LIKELY BREED IN YOUR PROJECT AREA.)

Bald Eagle Haliaeetus leucocephalus

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626

Breeds Sep 1 to Jul 31

Eastern Whip-poor-will Antrostomus vociferus

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 1 to Aug 20

Kentucky Warbler Oporornis formosus

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds Apr 20 to Aug 20

Prairie Warbler Dendroica discolor

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 1 to Jul 31

Rusty Blackbird Euphagus carolinus

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Breeds elsewhere

Wood Thrush Hylocichla mustelina

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds May 10 to Aug 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

- 1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
- 2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the

probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (=)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (I)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

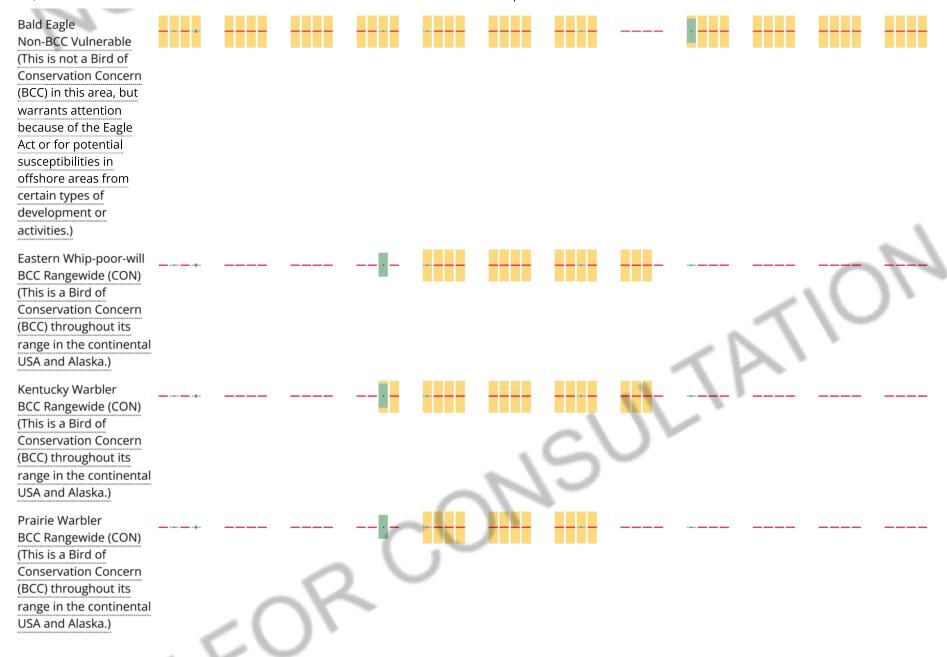
No Data (-)

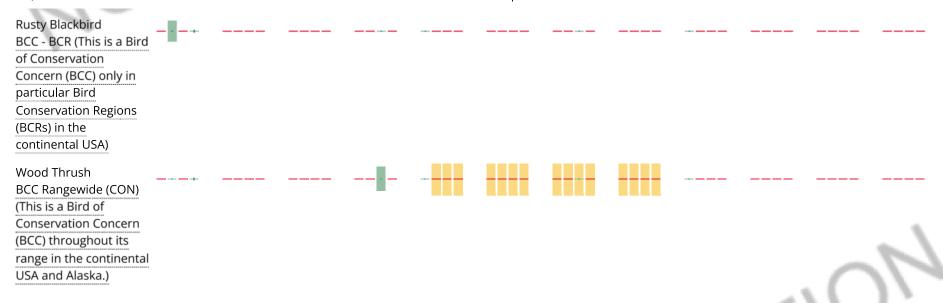
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.







Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS <u>Birds of Conservation Concern (BCC)</u> and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the <u>Avian Knowledge Network (AKN)</u>. The AKN data is based on a growing collection of <u>survey</u>, <u>banding</u>, <u>and citizen science datasets</u> and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (<u>Eagle Act</u> requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the <u>AKN Phenology Tool</u>.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the <u>Avian Knowledge Network (AKN)</u>. This data is derived from a growing collection of <u>survey, banding, and citizen science datasets</u>.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: The Cornell Lab of Ornithology All About Birds Bird Guide, or (if you are unsuccessful in locating the bird of interest there), the Cornell Lab of Ornithology Neotropical Birds guide. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

- 1. "BCC Rangewide" birds are <u>Birds of Conservation Concern</u> (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
- 2. "BCC BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
- 3. "Non-BCC Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the <u>Eagle Act</u> requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the <u>Diving Bird Study</u> and the <u>nanotag studies</u> or contact <u>Caleb Spiegel</u> or <u>Pam Loring</u>.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to <u>obtain a permit</u> to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the <u>National Wildlife Refuge</u> system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to <u>NWI wetlands</u> and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local <u>U.S. Army Corps of Engineers District</u>.

WETLAND INFORMATION IS NOT AVAILABLE AT THIS TIME

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the <u>NWI map</u> to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

APPENDIX 7 – Financial Assurance

Financial Assurance – TBG Tire Processing and Reclamation Facility at Star Hill

The proposed permit for the tire processing facility is broken into three parts based upon the initial use / processing areas and two tire chip storage areas, Storage Area 1 and Storage Area 2 to allow for the phased use of the site. Initial operations will include the used tire delivery area, processing area and lower pad for shred out / temporary storage for reruns through the system. The tire delivery area is just under 8 acres and can hold approximately 148 fifty three-foot storage tailers in the parking and unloading area while the shred out / temporary storage area could hold, at 12 feet height, approximately 7,800 CY of material. All material calculations are provided at the end of this document.

Both storage areas will be limited to 75 foot by 100 foot areas with a 20 foot access/fire lane to allow ease of movement and prevent spread of fire. As such, Storage Area 1 at 2.5 acres can accommodate <u>nine</u> 75 x 100 stacks which at a 15-foot height would equate to 20,084 CYs each or approximately 18,750 CY for Storage Area 1. Storage Area 2 at 5.3 acres could accommodate 17 stacks or approximately 35,500 CY of storage at 15-feet high. Neither Storage area is part of the initial construction therefore the size of the area is for reference but not included in the calculations below.

Gate Rates are from a quote from B&B Disposal in Hayden, Alabama for whole tires at \$0.60 per passenger tire, \$2.00 per tractor trailer tire. DennisonUSA / City of Milan demolition landfill quoted tire shreds at \$12.00 per ton. TDEC requested \$50 per ton to match other site financial assurance for similar sites. For the purposes of this analysis the possible 148 trailers full of tires are assumed to be passenger tires with a greater amount in each trailer per standard industry averages for each trailer. Each trailer can hold 1,100 tires at 22.5 lbs. each or 12.4 tons.

Shreds and Chips average 1400 lbs. per cubic yard per EPA and industry averages. As such one ton of tire shreds equals 1.43 CY of tires.

Main Processing area	7,800 CY =	5,460 tons of tire shreds
Storage Area 1	18,750 CY =	13,125 tons of tire shreds
Storage Area 2	35,500 CY =	24,850 tons of tire shreds

MAIN PROCESSING AREA

Mobilization/Project Scoping		\$1	5,000.00	
Transportation 148 trailers	\$350.00 each	\$5	1,800.00	
Disposal (1,100 tires per trailer = 164,280 tires)	\$50.00 per ton	<u>\$9</u>	8,568.00	
Total Haul/Disposal				\$165,368.00
Contingency (20%)				\$ 33,073.60
Tire Loading hand (various loose tires – 9 tons)	\$20.00 per ton	\$	180.00	
Grinding	\$40.00 per ton	\$	360.00	
Transportation	\$14.00 ton	\$	126.00	
Tire Disposal (9 tons)	\$50 per ton	\$	450.00	

Total Load/Haul/Disposal			\$ 1,116.00
Contingency (20%)			\$ 223.20
Tire Shred Loading (7,800 CY or 5,460 tons)	\$4.00 per ton	\$21,840.00	
Transportation	\$16.00 per ton	\$87,360.00	
Tire Disposal	\$50.00 per ton	\$ <u>273,000.00</u>	
Total Load/Haul/Disposal			\$382,200.00
Contingency (20%)			<u>\$76,440.00</u>
TOTAL FA Processing areas and Parking			\$658,420.80