



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION SOLID WASTE MANAGEMENT FACILITY INSPECTION CHECKLIST

Facility Name: Tire Disposal Services _____

WACS No. NWD/32/00006475 _____ Site I.D. Number : 64386 _____

Inspection Date: 24-Mar-05 _____ Permit No.: 0064386-001-WT _____ Expiration Date: 30-Jul-04 _____

Facility Address : 3053 Barnes Lane _____

City: Cottondale _____ County: Jackson _____ Zip: 32431 _____

Permittee or Operating Authority: Jim Merrifield _____

Telephone Number (Permittee or Operating Authority): 850-352-1044 _____

Inspection Participants (Include ALL Landfill and Department Employees Specifying Titles):

Principal Inspector: Thomas Dillard, Melissa Kennedy -Environmental Specialists, DEP. _____

Other Participants: Jim Merrifield – Owner TDS; Mike Jackson - TDS _____

TYPE OF FACILITY (check all that apply):

Landfill: <input type="checkbox"/> Class I <input type="checkbox"/> Class II <input type="checkbox"/> Class III <input type="checkbox"/> Compactor/Baling	C&D Facility: <input type="checkbox"/> Disposal <input type="checkbox"/> Disposal w/Recycling <input type="checkbox"/> Land Clearing	Waste Processing Facility: <input type="checkbox"/> Transfer Station <input type="checkbox"/> C&D Recycling <input type="checkbox"/> Class III MRF <input type="checkbox"/> MSW MRF <input type="checkbox"/> Pulverizer/Shredder <input type="checkbox"/> Compactor/Baling	Other Facilities: <input type="checkbox"/> Composting <input type="checkbox"/> WTE Facility <input type="checkbox"/> Incinerator/Trench Burner <input type="checkbox"/> Unauthorized Disposal <input checked="" type="checkbox"/> Other : <input checked="" type="checkbox"/> Waste Tire Processing Facility (WT2) <input type="checkbox"/> Small Waste Tire Processing Facility (WT6) <input type="checkbox"/> Waste Tire Collection Center(WT5) _____ <input checked="" type="checkbox"/> Other: Waste Tire Collector(WT1)
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TYPE OF INSPECTION (check all that apply):

<input type="checkbox"/> Construction Completion <input checked="" type="checkbox"/> Operation <input type="checkbox"/> Closure <input type="checkbox"/> Long-Term Care	<input type="checkbox"/> Complaint Investigation <input checked="" type="checkbox"/> Routine Inspection <input type="checkbox"/> Reinspection <input type="checkbox"/> Facility File Review	<input type="checkbox"/> Other - Followup Inspection (FUI) _____
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REQUIREMENTS:

THE REQUIREMENTS LISTED IN THIS INSPECTION CHECKLIST ARE BASED UPON RULES OF THE FLORIDA ADMINISTRATIVE CODE. A "NO" RESPONSE TO A REQUIREMENT (UNLESS OTHERWISE NOTED) REFLECTS A VIOLATION OF THE CORRESPONDING DEPARTMENT RULE(S). EACH VIOLATION IS DISCUSSED IN THE NARRATIVE SECTION OF THIS REPORT.

WASTE TIRE FACILITY	YES	NO	Unk	N/A
Storage 62-711(540)				
1. If the facility accepts tires from the public is a sign posted at the facility entrance stating operating hours, cost of disposal and site rules? 62-711.540(1)a				X
2. Are operations involving the use of open flames conducted no closer than 25 feet of a waste tire pile? 62-711.540(3)(a)	X			

3. If the facility accepts tires from the public is an attendant always present on site when the site is open for business? 62-711(540)(1)c				x
4. Are fire protection services assured through notification to local fire protection authorities? 62-711(540)(1)d		X		
5. Is an annual fire safety survey conducted? 62-711(540)(1)d		X		
6. Is a copy of the annual fire safety report made part of the next quarterly report? 62-711(540)(1)d		X		
7. Does the facility have onsite an emergency preparedness manual (EPM)? 62-711(540)(1)e	x			
8. Does the EPM contain a list of names and numbers to be contacted in case of a fire, flood, or other emergency? 62-711(540)(1)(e)1	X			
9. Does the EPM contain a list of emergency response equipment at the site, its location and how it should be used in case of a fire or other emergency? 62-711(540)(1)(e)2	X			
10. Does the EPM contain a description of procedures that should be followed in the event of a fire, including procedures to contain and dispose of the oily material generated by the combustion of large number of waste tires. 62-711(540)(1)(e)3	X			
11. Is the operator at the facility maintaining records of the quantity of WT received at the site, stored at the site, and shipped from the site? 62-711(540)(1)g, 62-711.400(5)	X			
12. If the operator of the site is not the owner of the property has written authorization been obtained from the property owner to operate the facility? 62-711(540)(1)h				X
13. Is the owner or operator providing for control of mosquitoes and rodents so as to protect the public health and welfare? 62-711(530)(J)	x			
14. (INDOORS) Are WT piles less than 50 feet in width? 62-711(540)(2)a	X			
15. Are WT piles along a wall less than 25 feet in width? 62-711(540)(2)a	X			
16. Are width of main aisles between piles more than 8 feet? 62-711(540)(2)b				X
17. Is there more than 3 feet of clearance between the top of storage to sprinkler detectors or roof structures? 62-711(540)(2)c	X			
18. Is there more than 3 feet of clearance between WT piles and unit heaters, etc ? 62-711(540)(2)c				X
19. If Waste Tires are stored up to 15 feet in height do walls have at least a 4 hour fire rating? 62-711(540)(2)e				X
20. If Waste tires are stored >15 feet in height do walls have a fire rating of not less than 6 hours and columns one hour FR? If > 20 feet do columns have two hour FR? 62-711(540)(2)f				X
21. Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 540(2)h	X			
22. (OUTDOORS)				
23. Is the WT site operated >200 feet of a body of water? 62-711(540)(3)a	X			
24. Does the WT pile have a width < 50 feet? 62-711(540)(3)b	x			

25. Does the WT pile have an area < 10,000 sq. ft? 62-711(540)(3)b	X			
WASTE TIRE PROCESSING FACILITY 62-711.530	X			
26. Are records regarding activities maintained for three years? 62-711.530(4)	X			
27. Do records contain required information regarding activities? 62-711.530(4)(a) thru (c)	X	x		
28. Are quarterly reports submitted to the Department summarizing information collected under 62-711.530(4)(a) thru(c)? 62-711.530(5)				
WASTE TIRE FACILITY	YES	NO	UNK	NA
a. Storage 62-711(540) Continued				
29. Does the WT pile have a height < 15 ft.? 62-711(540)(3)b	x			
30. Is there a 50 ft. wide fire lane around the perimeter of the WT pile? 62-711(540)(3)c	X			
31. Is there unobstructed access to the fire lane? 62-711(540)(3)c	X			
32. Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711(540)(3)d	X			
29. Is the site kept free of grass, underbrush, and other potentially flammable vegetation? 62-711(540)(3)f	x			
30. Is the site bermed or given other adequate protection to prevent liquid runoff from entering water bodies? 62-711(540)(3)e	x			
31. Are residuals controlled of on-site and disposed of in a permitted SW management facility? 62-711(540)(5)	x			
32. Does the WT site have exceptions to technical and operational standards? 62-711(540)(6)	x			
33 Are WT stored on-site for no more than one month? 62-711(540)(6)a		x		
34. Is the local fire authority satisfied that the site has sufficient fire suppression equipment to extinguish any potential waste tire fire within an acceptable length of time? 62-711(540)(6)b			X	
35. Are no more than 1500 WT stored on-site? 62-711.300)9)(c)		X		
WASTE TIRE COLLECTOR 62-711.520				
36. Is a current decal affixed to each vehicle with the waste collector registration number? 62-711.520(3)	X			
37. Does the waste tire collector have a current waste collector registration? 62-711.520(4)	X			
38. Does the facility operate all vehicles from the same location? 62-711.520(5)	X			
39. Does the WT collector record and maintain information regarding its activities for each 3 month period of operation? 62-711(520)(6) (a) thru (c)		X		
40. Has the waste tire collector submitted an annual summary report to the Department by March 1? 62-711.520(7)		X		
41. Along with the annual report has the waste tire collector submitted an annual registration fee and renewal application by March 1? 62-711.520((7)		X		

NARRATIVE

A joint waste compliance inspection was performed at the facility addressing both solid and hazardous waste compliance. Mr. Merrifield owns and operates two companies on-site and they are Merrifield Recycled Oil (MRO) and Tire Disposal Services (TDS). MRO is a registered used oil hauler and operates a permitted used oil processing facility. Melissa Kennedy addressed compliance as to hazardous waste. Tire Disposal Services is a registered waste tire collector and operates a waste tire processing facility.

On March 16, 2000 the issued waste tire processing permit was transferred from Barnes Tire Processing to Tire Disposal Services. Mr. Merrifield has operated TDS under this permit expired on July 30, 2004. Since July 30, 2004 Mr. Merrifield has been operating an unpermitted waste tire processing facility and was doing so on the date of inspection.

As a registered waste tire collector TDS collects tires from customer sites and transports to the TDS Barnes Road facility for processing. TDS processes whole tires by either shredding on-site for disposal at the Springhill Class 1 Landfill or shipping off-site for incineration at the Bay County WTE facility or to Little Tire in Dothan for disposal.

The following deficiencies were noted:

- **Operation of a waste tire processing facility without a permit** - Waste tire processing facilities shall obtain a permit and shall meet the requirements for waste tire processing facilities in Rule 62-711.530 , F.A.C. -TDS's waste tire processing permit expired on July 30, 2004 and since that date TDS has operated a WTPF without a permit.
- **Are waste tire processing quarterly reports submitted to the Department summarizing information collected under 62-711.530(4)(a) thru(c)? 62-711.530(5)** - Mr. Merrifield said he has never submitted these reports. Records provided documented he has reported annually his collector information and reports for 2003 and 2004.
- **Are WT stored on-site for no more than one month? 62-711(540)(6)a** -Tire Disposal had a pile of waste tires on rims that Mr. Merrifield said he was going to cut the tires off and crush the steel. Accumulation of this quantity of tires on rims has taken more than one month. Records reflected that waste tires off-rims were being moved off-site in less than a month.
- **Is an annual fire safety survey conducted? 62-711(540)(1)d** - An annual fire safety report was unavailable. Documentation as to any fire inspection performed was not observed and Mr. Merrifield said one hasn't been done.
- **Are no more than 1500 WT stored on-site? 62-711.300(9)(c)** -The WT processing facility was observed to have a quantity of waste tires on-site exceeding the maximum quantity allowed of 1500. A rough estimate reflected showed 2000 waste tires on rims present on the ground, roughly 800 tires off-rims mostly in trailers and approximately 200 truck and off-road tires on the ground for approximately 3000 Waste tires on-site. The TDS annual collector report for 2004 states that 15 tons of waste tires were still on the yard being processed and this calculates using 100 tires to a ton at 1500 tires.
- **Has the waste tire collector submitted an annual summary report to the Department by March 1? 62-711.520(7)** - DEP records as of March 22, 2005 failed to record receipt of TDS waste tire collector annual summary report. However during the inspection Mr. Merrifield provided a copy of said report dated March, 2005. He said that he mailed it on March 22, 2005.
- **Along with the annual report has the waste tire collector submitted an annual registration fee and renewal application by March 1? 62-711.520((7))** - Not received by DEP as of March 22, 2005.
- **Does the WT collector record and maintain information regarding its activities for each 3 month period of operation? 62-711(520)(6) (a) thru (c)** - A review of records reflected that TDS was recording and maintaining records of processed tires but records documenting location and specifics of pickups was not provided. The annual report noted see attached list but Mr. Merrifield couldn't provide the list.

Observed Facility Status at time of inspection: **Significantly Not-in compliance**

Recommendations:

1. Recommend TDS cease waste tire processing operations until it is properly permitted.
2. Recommend TDS remove all waste tires and waste tire residues from the facility until proper permitting is accomplished as a waste tire processing facility.
3. Recommend TDS take measures to insure that required waste tire collector annual reports and registrations are submitted to the Department by the March 1 deadline.
4. Recommend TDS only store waste tires on-site up to seven days in trucks or vehicles prior to shipping tires off-site for processing or disposal.
5. Recommend TDS, when permitted as a waste tire processing facility, perform required quarterly reporting to the Department of waste tire processing activities.
6. Recommend TDS, when permitted as a waste tire processing facility, store no more than 1500 tires on-site as allowed in a waste tire processing permit.
7. Recommend TDS as a waste tire collector record and maintain information regarding its activities for each 3 month period.

Thomas F. Dillard

Signed: _____ 03-25-05
Thomas Dillard



Photographs taken during inspection:

Entrance to TDS and MRO



Stake body truck with ½ load of approx.. 600 tires



Waste tire tubes – approx. 25-35 tons



Waste Tires on rims – approx. 2000



waste tires on ground



Waste tires on rims



Tire shredding building



Tire Shredding Equipment



Shredded tires in trailer