

**Forrest, William**

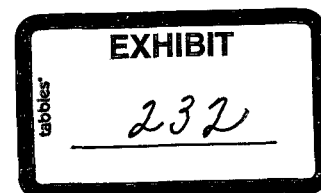
---

**To:** Jack Wilson (E-mail)  
**Cc:** Lurix, Joe; Christian, Krista  
**Subject:** Florida Tire Recycling Inspection of 10/23/2003

Attached please find the Inspection Checklist for subject inspection. You are requested to correct all violations within 45 days from this date. Your point of contact is William

thank you for your attention to this matter

Bill Forrest  
Environmental Specialist  
Southeast District Office  
SC 226-6725  
(561)681-6725  
400 N. Congress Ave Suite 200  
West Palm Beach, FL 33401





# FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## SOLID WASTE MANAGEMENT FACILITY

### INSPECTION CHECKLIST

Facility Name: Florida Tire Recycling, Inc.

WACS No. 00070963 GMS I.D. Number (if available): 5156P00818

Inspection Date: 10/23/2003 Permit No.: 41202-002-WT Expiration Date: 05/19/2008

Facility Address : 9675 Range Line Road

City: Port St. Lucie County: St. Lucie Zip: 34987

Permittee or Operating Authority Jack Wilson, Owner/Operator

Telephone Number (Permittee or Operating Authority): (772) 465-0477 (Jack Wilson)

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

Principal Inspector: William Forrest/FDEP, Joe Lurix E-IV/FDEP

Other Participants: Jack Wilson

**TYPE OF FACILITY (check all that apply):**

<b>Landfill:</b> <input type="checkbox"/> Class I <input type="checkbox"/> Class II <input type="checkbox"/> Class III	<b>C&amp;D Facility:</b> <input type="checkbox"/> Disposal <input type="checkbox"/> Disposal w/Recycling <input type="checkbox"/> Land Clearing	<b>Waste Processing Facility:</b> <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 <input checked="" type="checkbox"/> Other: <u>Waste Tire Processor</u>	<b>Other Facilities:</b> <input type="checkbox"/> Composting <input type="checkbox"/> WTE Facility <input type="checkbox"/> Incinerator/Trench Burner <input type="checkbox"/> Unauthorized Disposal <input type="checkbox"/> Other _____
---	--	---	--

**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 type="checkbox"/> Routine Inspection <input type="checkbox"/> Reinspection <input type="checkbox"/> Facility File Review	<input checked="" type="checkbox"/> Other <u>Follow-up from 09-03 fires</u>
--	---	---

**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.

I. SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(16))		YES	NO	Unk	N/A
1.	Unauthorized disposal/storage prohibited in areas lacking geological support? 62-701.300(2)(a)	X			
2.	Unauthorized disposal/storage prohibited, except yard trash, within 500' of a potable water well? 62-701.300(2)(b)	X			
3.	Unauthorized disposal/storage prohibited in a dewatered pit unless pit is lined and has leachate controls? 62-701.300(2)(c)	X			
4.	Unauthorized disposal/storage prohibited in an area subject to frequent and periodic flooding unless flood protection measures in place? 62-701.300(2)(d)	X			
5.	Unauthorized disposal/storage prohibited in any natural or artificial body of water including ground water? 62-701.300(2)(e)	X			

I. SOLID WASTE PROHIBITIONS (CONTINUED)		YES X	NO	Unk	N/A
6.	Unauthorized disposal/storage prohibited, except yard trash, within 200' of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(f)				
7.	Unauthorized disposal/storage prohibited on the right of way of any public highway, road or alley? 62-701.300(2)(g)	X			
8.	Unauthorized disposal/storage prohibited, except yard trash, within 1000' of a potable water well serving a community water system? 62-701.300(2)(h)	X			
9.	Is open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3) ARSON INVESTIGATION IN PROGRESS		X		
10.	Is hazardous waste disposal prohibited? 62-701.300(4)				X
11.	Is PCB disposal prohibited except in accordance with Department requirements? 62-701.300(5)				X
12.	Unless specifically authorized, is the known disposal of untreated biomedical waste prohibited? 62-701.300(6)				X
13.	Is lead-acid battery disposal prohibited? 62-701.300(8)(a)				X
14.	Is yard trash disposal prohibited in lined landfills? 62-701.300(8)(c)				X
15.	Is the disposal of white goods prohibited? 62-701.300(8)(d)				X
16.	Is whole waste tire disposal prohibited except in accordance with Department requirements? 62-701.300(8)(e)	X			
17.	Is the known disposal of lead-acid batteries, mercury-containing devices, or spent mercury-containing lamps in waste-to-energy facilities prohibited? 62-701.300(9)				X
18.	Is the facility in compliance with the liquid restrictions on disposal? 62-701.300(10)				X
19.	Is the disposal of used oil or used oil mixed with wastes prohibited in landfills with the exception of: (1) oily wastes, sorbents or other materials used for maintenance or to clean up spills, leaks or accidental releases of used oil; and (2) soils contaminated with used oil from spills and accidental releases? 62-701.300(11) and 62-701.300(8)(b)				X
20.	Is the unauthorized storage/disposal of yard trash prohibited within the minimum setbacks for potable water wells (except on-site), water bodies and community water supply wells? 62-701.300(12)				X
21.	Is the storage of solid waste in an approved tank prohibited within 500 feet of any existing community water supply well or within 100 of any other existing potable water supply well? 62-701.300(13)				X
22.	Is the facility exempted from the prohibitions because of indoor storage in an area with an impervious surface and leachate collection system? 62-701.300(14)				X
24.	Is the facility exempted from the prohibitions because of storage in a vehicle that is enclosed or covered and the vehicle has been unloaded or moved over public highways within the previous seven days? 62-701.300(15)				X

II. CLASS I, II & III LANDFILLS		YES	NO	Unk	N/A
A. CONSTRUCTION VERIFICATION					X
1.	Subgrade or foundation adequately prepared? 62-701.400(3)(a)2				
2.	Liner construction/installation according to plans? 62-701.400(3)				X
3.	Leachate collection and removal system installed according to plans? 62-701.400(4)				X
4.	Disposal units constructed at planned intervals? 62-701.400(2)				X
5.	Gas management system installed according to plans (if currently required)? 62-701.530(3) & (4)				X
6.	Soil monitoring probes (for monitoring combustible gases) installed along property boundaries as needed? 62-701.530(2)(b)				X
7.	Surface water management system construction according to plans? 62-701.400(9)				X
8.	Ground water monitoring system constructed according to approved plan? 62-701.510(2)				X
9.	Leachate storage constructed according to plans? 62-701.400(6)				X
10.	Liner quality assurance plan followed? 62-701.400(7)				X
B. OPERATION AND MAINTENANCE					X
11.	Trained operator on-site at Class I and III landfills during operation? 62-701.500(1)				
12.	At least one spotter at each working face during operation at Class I and III? 62-701.500(1)				X

II. CLASS I, II & III LANDFILLS (CONTINUED)		YES	NO	Unk	N/A X
B. OPERATION AND MAINTENANCE (CONTINUED)					
13.	Is the training plan maintained and available on-site and is it being followed properly? 62-701.320(15)(a)				
14.	Are training records maintained and available on-site at the facility? 62-701.320(15)(a)				X
15.	Approved operating plan and permit, operating and waste records maintained? 62-701.500(2), (3), (4), (8)(f), (8)(g), (13)				X
16.	Is the operation plan substantially complied with at all times and revised as needed? 62-701.500(2)				x
17.	Weighing or measuring of incoming waste? 62-701.500(4)(a)&(2)(d)				x
18.	Method and sequence of filling waste according to plans? 62-701.500(2)(f)				X
19.	Is access properly controlled to prevent unauthorized waste disposal? 62-701.500(5)				X
20.	Load checking program implemented? 62-701.500(6)				X
21.	Waste compaction as required? 62-701.500(7)(a)				X
22.	Working face and side grades above ground sloped no greater than 3-ft. horizontal to 1-ft. vertical rise? 62-701.500(7)(c)				X
23.	Is a narrow working face practiced? 62-701.500(7)(d)				X
24.	Are only permitted waste types disposed at facility? 62-701.340(3), 62-701.500(6)(a)&(2)(c)				X
23.	Is an adequate quantity of acceptable cover material available as stated in permit application? 62-701.330(3)(e)4, 62-701.530(1)(a)				X
25.	Frequency, amount and quality of initial cover, as required? 62-701.500(7)(e)				X
37.	Initial cover adequate to control birds, blowing wastes, disease vectors or fires? 62-701.500(7)(e)				X
26.	Frequency, amount and quality of intermediate cover, as required? 62-701.500(7)(f)				X
27.	Uncontrolled and unauthorized scavenging prohibited? 62-701.500(7)(h)				X
28.	Litter controlled and litter control devices maintained? 62-701.500(7)(i) and (11)(f)				X
29.	Adequate erosion control? 62-701.500(7)(j)				X
30.	Is leachate sampled and tested as required? 62-701.500(8)(a) & 62-510(6)(c)				X
31.	Leachate collection and removal system maintained and cleaned as required? 62-701.500(2)(j), 62-701.500(8)(b) & (h)				X
32.	Leachate disposed of or treated as required? 62-701.500(8)(b), (c) and (d))				X
33.	If leachate recirculation is practiced at the facility, is it done in accordance with Department requirements and the Operation Plan? 62-701.400(5)				X
34.	Gas monitoring according to permit? 62-701.500(9) & 62-701.530(2)				X
35.	Gas controlled to not cause objectionable odors beyond the property boundary? 62-701.530(3)(b)				X
36.	Gas controlled to not allow combustible gas concentrations to exceed specified limits? 62-701.530(3)(a)				X
37.	Gas pressures not interfering with or causing failure of the liner or leachate control system? 62- 701.530(1)(a) 4.				X
38.	Gas vents intact and functioning properly? 62-701.500(9) & 62-701.530(1)(a) 3.				X
39.	Mixing of leachate and stormwater prevented or minimized? 62-701.500(10) & 62-701.400(9)(c)				X
40.	Peak discharge stormwater run-on to unclosed portions of the landfill prevented as required? 62-701.500(10), 62-701.400(9)(b)				X
41.	Retention and/or detention ponds/ditches, culverts, berms maintained? 62-701.500(10)				x
42.	Sufficient operating equipment? 62-701.500(11)(a)				X
43.	Sufficient reserve equipment (or other arrangements)? 62-701.500(11)(b)				X
44.	Adequate communication facilities? 62-701.500(11)(c)				X
45.	Adequate approved dust control methods? 62-701.500(11)(d)				X
46.	Fire protection and fire fighting facilities adequate and operational? 62-701.500(11)(e)				X
47.	Required signs for operational directions and public information? 62-701.500(11)(g)				X
48.	Are all-weather access roads and inside perimeter roads properly maintained? 62-701.500(12)				X
49.	Ground water wells intact and functioning properly? 62-701.510(2)(b), 62-701.620(9)				X
50.	Water quality sampling and testing according to standard procedures and at required frequencies? 62-701.510(2)				X
51.	Is there proper control, management or disposal of special wastes? 62-701.520				X
52.	Are all specific conditions in the permit being followed? 62-701.320(1)				X

II. CLASS I, II & III LANDFILLS (CONTINUED)		YES	NO	Unk	N/A
<b>C. CLOSURE</b>					X
53.	Final cover installation according to approved design plans and does the present condition and function appear adequate? 62-701.600(5)(f)(2)				
54.	Gas pressures not interfering with or causing failure of the final cover? 62-701.530(1)(a) 4.				X
55.	Facility meets closure requirements prohibiting unauthorized dumping? 62-701.600(5)(l)				X
56.	All actions for closure completed satisfactorily according to approved closure operation plan? 62-701.600(6)				X
57.	Has a final survey or an as-built report with all survey monuments and other permanent markers for waste filled areas been received? 62-701.610(2) & (3)				X
58.	Authorized use of closed landfill and integrity of environmental protection measures maintained? 62-701.610(7)				X
59.	If waste is being relocated, is this performed according to the Department's requirements? 62-701.620(8)				X
60.	Long term care performed adequately? 62-701.620				X
61.	Financial assurance adequate? 62-701.630				X
62.	Are cost estimates current and adjusted every year? 62-701.630(4)				X

III. WASTE PROCESSING FACILITIES		YES	NO	Unk	N/A
<b>A. OPERATION AND MAINTENANCE</b>		X			
1.	Do the tipping, processing, sorting, storage and compaction areas that are in an enclosed building or covered area have ventilation systems? 62-701.710(3)(a)				
2.	Are areas of the facility that are not enclosed equipped with litter control devices and visual screening? 62-701.710(3)(a)				X
3.	Except for C&D Recyclers, is the facility designed with a leachate control system to prevent discharge of leachate and mixing of leachate with stormwater, and to minimize the presence of standing water? 62-701.710(3)(b)				X
4.	If the facility is a C&D Recycler, is it designed with a leachate control system to prevent discharge of leachate and mixing of leachate with stormwater, and to minimize the presence of standing water or are all areas where waste is stored or processed covered by an approved ground water monitoring program? 62-701.710(10)(b)				X
5.	Is an Operation and Maintenance Manual available at the facility and is it being followed? 62-701.710(4)(a) 1.	X			
6.	Are there procedures available at the facility to handle unauthorized wastes? 62-701.710(4)(a)2.	X			
7.	Is a Contingency Plan available at the facility which addresses operational interruptions and emergencies such as fires, explosions or natural disasters? 62-701.710(4)(a)3.	X			
8.	Are putrescible wastes not allowed to be stored unprocessed longer than 48 hours or longer than seven days if adequate vector and odor controls are provided? 62-701.710(4)(b)				X
9.	Are areas where waste is stored or processed cleaned at least weekly to prevent odor and vector problems? 62-701.710(4)(b)				X
10.	Are all drains and leachate conveyances kept clean so that leachate flow is not impeded? 62-701.710(4)(b)				X
11.	Are the operating hours posted at the facility? 62-701.710(4)(c)1.	X			
12.	Is a trained operator on duty whenever the facility is operating? 62-701.710(4)(c)1.				X
13.	Is at least one trained spotter on duty at all times that waste is received at the facility to inspect the incoming waste? 62-701.710(4)(c)2.				X
14.	Are prohibited materials removed from the waste stream and placed into appropriate containers for disposal at a permitted facility? 62-701.710(4)(c)2.				X
15.	Is the facility operated to control objectionable odors? 62-701.710(4)(d)				X
16.	Is adequate fire protection equipment available at all times? 62-701.710(4)(e)	X			
17.	Is access to the facility controlled by fencing or other effective barriers to prevent disposal of unauthorized waste? 62-701.710(4)(f)	X			
18.	Except for Transfer Stations, is financial assurance for the facility adequate? 62-701.710(7)(a)		X		
19.	Except for Transfer Stations, are cost estimates current and adjusted as required? 62-701.710(7)(b)		X		

III. WASTE PROCESSING FACILITIES (CONTINUED)		YES	NO	Unk	N/A X
A. OPERATION AND MAINTENANCE (CONTINUED)					
20.	If the facility is a Transfer Station, is it exempt from providing financial assurance because it accepts primarily household waste, commercial waste or recovered materials and manages the waste on a first-in, first-out basis and stores waste for no greater than 7 days? 62-701.710(10)(a)				
21.	Is stormwater controlled in accordance with Department requirements? 62-701.710(8)		X		
22.	Are adequate operational records available at the facility and maintained for at least three years? 62-701.710(9)(a)	X			
23.	If the facility is a C&D Recycler, is an Annual Report for the recycling operation submitted to the Department by April 1 of each year? 62-701.710(9)(b)				X
24.	Are all specific conditions in the permit being followed? 62-701.320(1)		X		
B. CLOSURE					X
25.	Are all wastes removed or disposed of in accordance with the approved Closure Plan within 30 days of receiving the final solid waste shipment? 62-701.710(6)(c)				
26.	Are stored putrescible wastes managed in accordance with Rule 62-701.710(4)(b)? 62-701.710(6)(c)				X
27.	Has closure been completed within 180 days after receiving the final solid waste shipment? 62-701.710(6)(d)				X

IV. C&D DEBRIS FACILITIES		YES	NO	Unk	N/A X
A. DISPOSAL					
1.	Is the facility only disposing of C&D wastes and are prohibited wastes properly managed? 62-701.730(4)(c), (6) & (7)(d)				
2.	Ground water wells intact and functioning properly? 62-701.510(2)(b), 62-701.730(4)(b)				X
3.	Water quality sampling and testing according to standard procedures and at required frequency? 62-701.730(4)(b) & (10)				X
4.	Is stormwater controlled in accordance with Department requirements? 62-701.730(5)				X
5.	Are wastes compacted and sloped as necessary for later closure? 62-701.730(7)(b)				X
6.	Is access to the facility properly controlled? 62-701.730(7)(c)				X
7.	Is a trained operator on duty at the facility at all times the facility is operating and are there a sufficient number of spotters on duty at the working face to inspect the incoming wastes at all times waste is being accepted? 62-701.730(7)(d)				X
8.	Are objectionable odors controlled in accordance with Department requirements? 62-701.730(7)(e)				X
9.	Are fuels, solvents, lubricants, etc. safely stored in areas separate from disposal or sorting areas? 62-701.730(7)(f)				X
10.	Are plastic buckets empty before disposal? 62-701.710(7)(g)				X
11.	Are the spotters or operators properly trained? 62-701.730(8)				X
12.	Are areas of the facility requiring final cover properly closed? 62-701.730(9)				X
13.	Is financial assurance adequate? 62-701.730(11)(a)				X
14.	Are cost estimates current and adjusted as required? 62-701.730(11)(b)				X
15.	Are Annual Reports submitted to the Department for the disposal operation by April 1? 62-701.730(12)				X
16.	If an air curtain incinerator is also used at the facility, is it properly operated? 62-701.730(14)				X
17.	Is the facility operated so that adverse environmental and public health impacts, such as blowing litter and vectors, are minimized? 62-701.730(18)				X
18.	Are asbestos-containing waste materials regulated pursuant to 40 CFR Part 61, Subpart M, prohibited from disposal at the facility? 62-701.730(19)				X
19.	Are all specific conditions in the permit for the disposal operation being followed? 62-701.320(1)				X

IV. C&D DEBRIS FACILITIES (CONTINUED)		YES	NO	Unk	N/A X
B. <u>RECYCLING OPERATION AT A DISPOSAL FACILITY</u> (if applicable)					
20.	Are Annual Reports submitted to the Department for the recycling operation by April 1? 62-701.730(12)				
21.	Do the tipping, processing, sorting, storage and compaction areas that are in an enclosed building or covered area have ventilation systems? 62-701.710(3)(a)				X
22.	Are areas of the recycling operation that are not enclosed equipped with litter control devices and visual screening? 62-701.710(3)(a)				X
23.	Is the recycling operation designed with a leachate control system to prevent discharge of leachate and mixing of leachate with stormwater, and to minimize the presence of standing water or are all areas where waste is stored or processed covered by an approved ground water monitoring program? 62-701.710(10)(b) and 62-701.730(4)(b)				X
24.	Is an Operation and Maintenance Manual available for the recycling operation and is it being followed? 62-701.710(4)(a) 1.				X
25.	Are there procedures available at the recycling operation to handle unauthorized wastes? 62-701.710(4)(a) 2.				X
26.	Is a Contingency Plan available at the recycling operation which addresses operational interruptions and emergencies such as fires, explosions or natural disasters? 62-701.710(4)(a) 3.				X
27.	Are putrescible wastes not allowed to be stored unprocessed longer than 48 hours or longer than seven days if adequate vector and odor controls are provided? 62-701.710(4)(b)				X
28.	Are areas where waste is stored or processed cleaned at least weekly to prevent odor and vector problems? 62-701.710(4)(b)				X
29.	If applicable, are all drains and leachate conveyances kept clean so that leachate flow is not impeded? 62-701.710(4)(b)				X
30.	Are the operating hours posted at the facility? 62-701.710(4)(c) 1.				X
31.	Is a trained operator on duty whenever the recycling operation is operating? 62-701.710(4)(c) 1.				X
32.	Is at least one trained spotter on duty at all times that waste is received at the recycling operation to inspect the incoming waste? 62-701.710(4)(c) 2.				X
33.	Are prohibited materials removed from the waste stream and placed into appropriate containers for disposal at a permitted facility? 62-701.710(4)(c) 2.				X
34.	Is the recycling operation operated to control objectionable odors? 62-701.710(4)(d)				X
35.	Is adequate fire protection equipment available at all times? 62-701.710(4)(e)				X
36.	Is access to the recycling operation controlled by fencing or other effective barriers to prevent disposal of unauthorized waste? 62-701.710(4)(f)				X
37.	Is financial assurance for the facility adequate? 62-701.710(7)(a)				X
38.	Are cost estimates current and adjusted as required? 62-701.710(7)(b)				X
39.	Is stormwater controlled in accordance with Department requirements? 62-701.710(8)				X
40.	Are adequate operational records available at the facility and maintained for at least three years? 62-701.710(9)(a)				X
41.	If applicable, are all wastes removed or disposed of in accordance with the approved Closure Plan within 30 days of receiving the final solid waste shipment? 62-701.710(6)(c)				X
42.	If applicable, has closure been completed within 180 days after receiving the final solid waste shipment? 62-701.710(6)(d)				X
43.	Are all specific conditions in the permit for the recycling operation being followed? 62-701.320(1)				X
C. <u>LAND CLEARING</u>					X
44.	Is stormwater controlled in accordance with Department requirements? 62-701.803(4)				
45.	Is the facility only disposing of authorized wastes and are prohibited wastes properly managed? 62-701.803(5) & (8)				X
46.	Are wastes compacted and sloped as necessary for later closure? 62-701.803(6)				X
47.	Is access to the facility properly controlled? 62-701.803(7)				X
48.	Is at least one spotter on duty at the working face when wastes are being accepted? 62-701.803(8)				X
49.	Are areas of the facility requiring final cover properly closed? 62-701.803(10)				X
50.	If an air curtain incinerator is also used at the facility, is it properly operated? 62-701.803(12)				X

V. OTHER SOLID WASTE FACILITIES		YES	NO	Unk	N/A X
1.	WTE facility in compliance with all permit conditions and applicable requirements? 62-701.320(1)				
2.	Compost facility in compliance with all permit conditions and applicable requirements? 62-701.320(1)				X

## VI. NARRATIVE

Explanation for all "NO" responses and other comments (continue on separate sheet if necessary)

I.9 Four fires have occurred on-site in the processed waste tire piles in the northern portion of the site since Sept. 2003. Arson is suspected and the cause of the fires are being investigated.

III.A.18 and III.A.19 - Permit Specific Condition #2 requires you to comply with Rule 62-711.500(3) FAC regarding closure cost estimates. The owner shall provide the Department with proof of financial assurance issued in favor of the State of Florida in the amount of the closing cost estimates for the facility at its most costliest point in time. New closure costs must be submitted due to the recent fires. The estimate must be signed and sealed by a professional engineer registered in the State of Florida by a third party performing the work. Third party estimates must be included with the submittal. An updated site plan shall accompany the closure cost estimate due to the fires and subsequent relocation of waste tires/processed waste tire piles at this site.

III.A.21 - Permit Specific Condition #8 requires the permittee to submit written notification to DEP within one week in the event of damage or failure of any site facilities. The permittee has contacted the DEP via telephone numerous times since the fires, but has not submitted a detailed written notification explaining the remedial measures to be taken and time needed for repairs. Please submit this written notification as soon as possible.

III.A.21 - Permit Specific Condition #12 requires the permittee to construct and operate the surface water management system in accordance with your ERP Permits. Processed waste tires are being stored in the stormwater dry retention area. The processed waste tire chips shall be removed from the storm water management system and comply with Rule 62-711.540(3)(b) and (c), FAC.

III.A.24 Rule 62-711.540(3)(b) and Rule 62-711.540(3)(c) FAC define the size of waste tire/processed waste tire piles and width of fire lanes. Some processed waste tire piles in the north and southwest portions of the facility do not meet these requirements. Piles are too large and fire lanes are too narrow or non-existent. You need to establish fire lanes and configure the waste tire/processed waste tire piles to meet the Rule requirements.

III.A.21 - Permit Specific Condition #10 requires the permittee to maintain the facility in compliance with the fire safety survey prepared by Lt. Lowell J. Nance, dated February 12, 2003. An updated fire safety survey shall be conducted and submitted to the DEP due to the recent fires.

All violations described above in this inspection report shall be completed within 45 days from the date of this inspection, except specific condition #8 (written notification). The due date for compliance with this inspection report is December 4, 2003.

Signed: William J. Nance / 10/23/03  
DEP Representative Date

Received: \_\_\_\_\_ / \_\_\_\_\_  
Site Representative Date



LT. LOWELL J. NANCE  
3006 W. DEER RUN AVE  
OKEECHOBEE, FL 34974

January 4<sup>th</sup>, 2010

John J. Wilson  
Liberty Tire Recycling, LLC.  
9675 Range Line Road  
Port St. Lucie, FL 34987

*Already i*

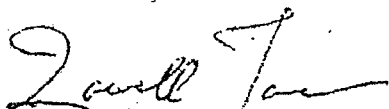
Re: Liberty Tire Recycling, LLC.  
Facility Fire Risk Inspection

Dear Mr. Wilson,

In accordance with your request, on 1/4/10 I conducted an inspection of Liberty Tire Recycling's facility in Port St. Lucie, Florida to determine compliance with NFPA 231D as published by the National Fire Protection Association. I have found Liberty Tire Recycling, LLC. to be in compliance with all relevant sections of NFPA 231D.

Please feel free to contact me if you have any questions.

Sincerely,



Lt. Lowell J. Nance  
Martin County Fire & Rescue Dept.