



Florida Department of Environmental Protection

Northwest District – Panama City Branch Office
2353 Jenks Avenue
Panama City, Florida 32405

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 31, 2008

Sent Via Email to
tdsmro@msn.com

Mr. Jim Merrifield
Tire Disposal Services, Inc.
P.O. Box 550
Cottdendale, Florida 32431

Dear Mr. Merrifield:

The purpose of this letter is to notify you that a routine compliance inspection of the Tire Disposal Services, Inc. Waste Tire Processing and Collector Facility on Barnes Lane in Jackson County was performed on February 21, 2008. An inspection checklist noting a minor out of compliance status with areas of concern during that visit is attached. It is requested that areas of concern receive immediate attention.

If you have any questions, please contact Mr. Thomas Dillard in this office at (850) 872-4375, extension 110.

Sincerely,

Marlane Castellanos
Branch Office Manager

MC:td

Encl: Inspection Report 2-21-08

Cc: Mr. Marshall Seymore, P.E., Solid Waste Section Supervisor, DEP NWD
Pensacola



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION INSPECTION CHECKLIST

Inspection Date: **2-21-08**

Facility Name: **Tire Disposal Services**
NWD/32/000

WACS No.: **06475** COMET Project No.: _____ COMET Site No.: **64386**

Permit No.: **64386-003WT** Permit Expiration Date: **12-Sep-10**

Facility Street Address: **3053 Barnes Lane**

City: **Cottdale** County: **Jackson** Zip: **32431**

Permittee or Operating Authority: **Jim Merrifield** tdsmro@msn.com

Telephone Number (Permittee or Operating Authority): **(850)352-1044 cell (850)209-2336**

Inspection Participants (Include ALL Landfill and Department Personnel with Corresponding Titles)		
Inspection Participant	Company	Title
Jim Merrifield	Tire Disposal Services	Owner/ Operator
Thomas Dillard	Florida Department of Environmental Protection – Northwest District – Panama City Branch –	Environmental Specialist II

TYPE OF FACILITY (check all that apply):

- | | | | |
|--|---|--|--|
| Landfill
<input type="checkbox"/> Class I
<input type="checkbox"/> Class II
<input type="checkbox"/> Class III | Construction And Demolition Facilities
<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
<input type="checkbox"/> Other _____ | Other Facilities
<input type="checkbox"/> Composting Facility
<input type="checkbox"/> WTE Facility
<input checked="" type="checkbox"/> Waste Tire Facility
<input type="checkbox"/> Yard Trash Processing Facility
<input type="checkbox"/> Stationary Soil Treatment Facility
<input type="checkbox"/> Incinerator/Trench Burner
<input type="checkbox"/> Unauthorized Disposal
<input checked="" type="checkbox"/> Other <u>Waste Tire Collector</u> |
|--|---|--|--|

TYPE OF INSPECTION (check all that apply):

- | | | |
|--|---|--------------------------------------|
| <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"/> Follow-up Inspection | <input type="checkbox"/> Other _____ |
|--|---|--------------------------------------|

ATTACHMENTS TO THE INSPECTION CHECKLIST:

This Cover Page to the Inspection Checklist may include any or all of the following attachments as appropriate.

SECTION 9.0 – WASTE TIRE FACILITIES	2
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FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION INSPECTION CHECKLIST

SECTION 9.0 – WASTE TIRE FACILITIES

REQUIREMENTS:

The requirements listed in this inspection checklist are based upon rules of the Florida Administrative Code. A **"Not Ok"** response to a requirement (unless otherwise noted) reflects a possible violation of the corresponding Department rule (s) at the time of the inspection. Each possible violation is discussed in the narrative section of this report. Some requirements may be identified as **"OK"** but are discussed further in the "areas of concern" portion of the narrative section.

Item No.	SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(16))	Ok	Not Ok	Unk	N/A
9.1	Unauthorized disposal/storage prohibited, except yard trash, within 500' of a potable water well? 62-701.300(2)(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.2	Unauthorized disposal/storage prohibited, except yard trash, within 1000' of a potable water well serving a community water system? 62-701.300(2)(h)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.3	Is the unauthorized storage/disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not Ok): 62-701.300(12) <input type="checkbox"/> 100 feet for potable water wells (except on-site)? <input type="checkbox"/> 50 feet for water bodies? <input type="checkbox"/> 200 feet for community water supply wells?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.4	Unauthorized disposal/storage prohibited in an area subject to frequent and periodic flooding unless flood protection measures in place? 62-701.300(2)(d)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.5	Unauthorized disposal/storage prohibited in any natural or artificial body of water including ground water? 62-701.300(2)(e)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.6	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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.7	Is open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.8	Are the following prohibited wastes or special wastes properly managed? (Check any that are Not Ok) <input type="checkbox"/> Hazardous waste 62-701.300(4) <input type="checkbox"/> Biomedical waste 62-701.300(6) <input type="checkbox"/> Yard trash 62-701.300(8)(c) <input type="checkbox"/> Whole waste tires 62-701.300(8)(e) <input type="checkbox"/> Used oil, except as exempted 62-701.300(11) <input type="checkbox"/> Lead-acid batteries, mercury-containing switches and lamps in WTEs 62-701.300(9) <input type="checkbox"/> PCB wastes 62-701.300(5) <input type="checkbox"/> Lead-acid batteries 62-701.300(8)(a) <input type="checkbox"/> White goods 62-701.300(8)(d) <input type="checkbox"/> Liquids 62-701.300(10)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Item No.	WASTE TIRE FACILITY – GENERAL REQUIREMENTS FOR STORAGE	Ok	Not Ok	Unk	N/A
9.9	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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.10	Are operations involving the use of open flames conducted no closer than 25 feet of a waste tire pile? 62-711.540(1)(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.11	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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.12	Are fire protection services assured through notification to local fire protection authorities? 62-711(540)(1)(d)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9.13	Is an annual fire safety survey conducted? 62-711.540(1)(d)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.14	Is a copy of the annual fire safety report made part of the next quarterly report? 62-711.540(1)(d)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.15	Does the facility have an Emergency Preparedness Manual (EPM) on-site? 62-711.540(1)(e)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9.16	Does the EPM contain the following information? (Check all that are Not Ok) <input type="checkbox"/> Contact names and numbers 62-711.540(1)(e) 1. <input type="checkbox"/> List of emergency response equipment and locations on-site 62-711.540(1)(e) 2. <input type="checkbox"/> Procedures to be followed in the event of a fire 62-711.540(1)(e) 3.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



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Item No.	WASTE TIRE FACILITY – GENERAL REQUIREMENTS FOR STORAGE	Ok	Not Ok	Unk	N/A
9.17	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) and 62-711.400(5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9.18	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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.19	Is adequate communications equipment available at the site? 62-711.540(1)(i)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.20	Is the owner or operator providing for control of mosquitoes and rodents so as to protect the public health and welfare? 62-711.530(1)(j)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Item No.	WASTE TIRE FACILITY – STORAGE INDOORS	Ok	Not Ok	Unk	N/A
9.21	Are WT piles more than 50 feet in width? 62-711.540(2)(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.22	Are WT piles along a wall more than 25 feet in width? 62-711.540(2)(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.23	Are widths of main aisles between piles less than 8 feet? 62-711.540(2)(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.24	Is there less than 3 feet of clearance between the top of storage to sprinkler detectors or roof structures? 62-711.540(2)(c)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.25	Is there less than 3 feet of clearance between waste tire piles and unit heaters, etc.? 62-711.540(2)(c)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.26	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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.27	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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.28	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(2)(h)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Item No.	WASTE TIRE FACILITY – STORAGE OUTDOORS	Ok	Not Ok	Unk	N/A
9.29	Is the waste tire site operated >200 feet from a body of water? 62-711.540(3)(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.3	Does the waste tire pile have a width < 50 feet? 62-711.540(3)(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.31	Does the waste tire pile have an area < 10,000 sq. ft? 62-711.540(3)(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.32	Does the waste tire pile have a height < 15 ft.? 62-711.540(3)(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.33	Is there a 50 ft. wide fire lane around the perimeter of the waste tire pile? 62-711.540(3)(c)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.34	Is there unobstructed access to the fire lane? 62-711.540(3)(c)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9.35	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(3)(d)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.36	Is the site kept free of grass, underbrush, and other potentially flammable vegetation? 62-711.540(3)(f)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.37	Is the site bermed or given other adequate protection to prevent liquid runoff from entering water bodies? 62-711.540(3)(e)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.38	Are residuals contained on-site and disposed of in a permitted SW management facility? 62-711.540(5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9.39	Does the waste tire site qualify for the exceptions to the technical and operational standards as allowed by rule? 2-711.540(6)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



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SECTION 13.0 – NARRATIVE AND SIGNATURES

REQUIREMENTS:

This section provides an opportunity for the department inspector to add a narrative explaining any requirements identified as "Not Ok" at the time of the inspection. Some requirements may be identified as "Ok" but are discussed further in the "areas of concern" portion of the narrative section.

The following observations were made during the inspection:

- The waste tire shredder was operational but quarterly records reviewed showed that tires have not been processed (shredded) for the last year.
- Waste tires were observed being stored primarily in trailers but some tires were on the ground from unloading operations.
- Mr. Merrifield estimated that he had about 3,000 waste tires on-site.
- Waste Tire Processing Facility Records and reports as required by Rule 62-711.530 F.A.C. were available for review with no deficiencies observed. The report for the second quarter of 2006 was not available for review but a copy of the report, dated 7-28-06 was provided during the last inspection on 8-11-06. This copy will be sent to District and also sent to TDS.
- Evidence of an annual fire safety survey being performed was not provided for review. The last survey documented occurred on 5-31-05. **RECURRING.** Mr. Merrifield expressed difficulty in getting this performed by a fire safety official
Rule 62-711.540 (d) Fire protection services for the site shall be assured through notification to local fire protection authorities. A fire safety survey shall be conducted at least annually and the survey report shall be made part of the next quarterly report.
- Evidence of an Emergency Preparedness Manual was not provided for review. Rule 62-711.540 (e) The operator of the site shall prepare and keep at the site an emergency preparedness manual. A copy of the current manual shall be kept at an off-site location designated by the operator. The manual shall be updated at least once a year and upon changes in operations at the site. In the previous inspection a EPM was provided for review but this time not available.
- Waste Tire Collector records and reports as required by Rule 62-711.520 F.A.C. were available for review with no deficiencies noted.
- Residuals from tire shredding were present in a trailer attached to the chute mechanism.
- Waste tire decals were observed on two vehicles with one vehicle having current decal and the other an expired decal. This was a tractor which has been used for pulling used oil tankers and not for waste tires as the shredder has not operated for the last 12 months but now when the trailer is full it will be pulled by this vehicle. Current decal applied during visit.

13.1 EXPLANATION FOR ALL "NOT OK" RESPONSES

(Continue on separate sheet if necessary).

Item No.	Description
9.13	Is an annual fire safety survey conducted? 62-711.540(1)(d) – Annual fire safety surveys not being performed and documented. (RECURRING)
9.14	Is a copy of the annual fire safety report made part of the next quarterly report? 62-711.540(1)(d)

13.2 EXPLANATION FOR ALL "AREAS OF CONCERN"

(Continue on separate sheet if necessary).

Item No.	Description
	Vehicles used to transport waste tires in quantities greater than 25 must be registered and have a current decal affixed – One tractor was hooked up to a trailer holding processed tires and did not have a current decal affixed. CORRECTED during visit with current decal.
	Does the facility have an Emergency Preparedness Manual (EPM) on-site? 62-711.540(1)(e) – EPM not available for review.



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	Does the EPM contain the following information? (Check all that are Not Ok .) <input type="checkbox"/> Contact names and numbers 62-711.540(1)(e) 1. <input type="checkbox"/> List of emergency response equipment and locations on-site 62-711.540(1)(e) 2. <input type="checkbox"/> Procedures to be followed in the event of a fire 62-711.540(1)(e) 3. EPM not available for review.
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Observed Facility Status at time of inspection: Minor out of compliance

RECOMMENDATIONS:

1. TDS needs to have an annual fire safety survey performed and submitted with the next WTPF summary quarterly report.
2. TDS needs to have an emergency preparedness manual prepared and have on-site for review as required.
3. TDS needs to insure that all vehicles registered to haul waste tires has its current decal affixed as required.

Thomas F. J. J. J.

3-18-08

DEP Representative

Date

Photographs taken:



Vehicle with current decal



Vehicle with expired decal and after current decal affixed



Waste tire processing area



Storage of tires in trailers and temp on ground

