



Florida Department of Environmental Protection

Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Ryan E. Matthews
Interim Secretary

April 18, 2017

Mr. Jim Merrifield
Tire Disposal Services
Post Office Box 550
Cottdale, Florida 32431
tdsmro@msn.com

Re: Tire Disposal Services – Waste Tire Processing Facility
WACS ID No.: 6475
Jackson County

Dear Mr. Merrifield:

Department personnel conducted a solid waste compliance inspection of the above-referenced facility on April 13, 2017. Based on the information collected during the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. If you have any questions or comments, please contact Mike Stephen at (850) 595-0653 or by e-mail at Mike.Stephen@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink that reads "Bradley T. Hartshorn".

Bradley T. Hartshorn
Environmental Manager
Compliance Assurance Program

BTH/ms

Enclosure: Inspection Report



**Florida Department of
Environmental Protection
Inspection Checklist**

FACILITY INFORMATION:

Facility Name: TIRE DISPOSAL SERVICE
On-Site Inspection Start Date: 04/13/2017
On-Site Inspection End Date: 04/13/2017
WACS No.: 6475
Facility Street Address: 3053 BARNES LANE
City: COTTONDALE
County Name: JACKSON
Zip: 32431

INSPECTION PARTICIPANTS:

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: Mike Stephen, Inspector

Other Participants: Jim Merrifield, Owner

INSPECTION TYPE:

Routine Operation Inspection for Other - Waste Tire Collector

Routine Operation Inspection for WPF - Waste Tire Processing Facility

ATTACHMENTS TO THE INSPECTION CHECK LIST:

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

9.0 - SECTION 9.0 - WASTE TIRE FACILITIES

14.0 - SECTION 14.0 - WASTE TIRE COLLECTORS

Inspection Date: 04/13/2017

9.0 - SECTION 9.0 - WASTE TIRE FACILITIES**Requirements:**

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

| Item No. | SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(18)) | Ok | Not Ok | Unk | N/A |
|----------|--|----|--------|-----|-----|
| 9.1.1 | Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted solid waste management facility or other exempt facility? 62-701.300(1)(a) | ✓ | | | |
| 9.1.2 | Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b) | ✓ | | | |
| 9.2 | Unauthorized storage or 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 from potable water wells (except on-site)? <input type="checkbox"/> 50 feet from water bodies? | ✓ | | | |
| 9.3 | Unauthorized disposal or storage prohibited in any natural or artificial body of water including ground water and wetlands? (Does not apply to standing water after a storm event) 62-701.300(2)(d) | ✓ | | | |
| 9.4 | Unauthorized disposal or storage prohibited, except yard trash, within 200 feet 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)(e) | ✓ | | | |
| 9.5 | Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3) | ✓ | | | |
| Item No. | WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE | Ok | Not Ok | Unk | N/A |
| 9.6 | 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) | | | | ✓ |
| 9.7 | Are operations involving the use of open flames conducted no closer than 25 feet of a waste tire pile? 62-711.540(1)(b) | ✓ | | | |
| 9.8 | 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) | | | | ✓ |
| 9.9 | Are fire protection services assured through notification to local fire protection authorities? 62-711.540(1)(d) | ✓ | | | |
| 9.10 | Is an annual fire safety survey conducted? 62-711.540(1)(d) | ✓ | | | |
| 9.11 | Is a copy of the annual fire safety report made part of the next quarterly report? 62-711.540(1)(d) | ✓ | | | |
| 9.12 | Does the facility have an Emergency Preparedness Manual (EPM) on-site? 62-711.540(1)(e) | ✓ | | | |
| 9.13 | 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 | ✓ | | | |
| 9.14 | Is the operator at the facility maintaining records of the quantity of waste tires received at the site, stored at the site, and shipped from the site? 62-711.540(1)(g) and 62-711.400(5) | ✓ | | | |
| 9.15 | 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) | ✓ | | | |
| 9.16 | Is adequate communications equipment available at the site? 62-711.540(1)(i) | ✓ | | | |

Inspection Date: 04/13/2017

| Item No. | WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE | Ok | Not Ok | Unk | N/A |
|----------|---|----|--------|-----|-----|
| 9.17 | Is the owner or operator providing for control of mosquitoes and rodents so as to protect the public health and welfare? 62-711.540(1)(j) | ✓ | | | |
| Item No. | WASTE TIRE FACILITY - STORAGE INDOORS | Ok | Not Ok | Unk | N/A |
| 9.18 | Are waste tire piles more than 50 feet in width? 62-711.540(2)(a) | | | | ✓ |
| 9.19 | Are waste tire piles along a wall more than 25 feet in width? 62-711.540(2)(a) | | | | ✓ |
| 9.20 | Are widths of main aisles between piles less than 8 feet? 62-711.540(2)(b) | | | | ✓ |
| 9.21 | Is there less than 3 feet of clearance between the top of storage to sprinkler detectors or roof structures? 62-711.540(2)(c) | | | | ✓ |
| 9.22 | Is there less than 3 feet of clearance between waste tire piles and unit heaters, etc.? 62-711.540(2)(d) | | | | ✓ |
| 9.23 | If waste tires are stored up to 15 feet high, do walls between adjacent warehouse areas and between manufacturing and warehouse areas have at least a four-hour fire rating? 62-711.540(2)(e) | | | | ✓ |
| 9.24 | If waste tires are stored over 15 feet high, do walls between manufacturing and warehouse areas have a fire rating of not less than six hours and do steel columns have one-hour fireproofing? If the top of storage exceeds 20 feet in height, do columns and their connections with other structural members have two-hour fireproofing? 62-711.540(2)(f) | | | | ✓ |
| 9.25 | Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(2)(h) | | | | ✓ |
| Item No. | WASTE TIRE FACILITY - STORAGE OUTDOORS | Ok | Not Ok | Unk | N/A |
| 9.26 | Is the waste tire site operated within 200 feet from a body of water? 62-711.540(3)(a) | ✓ | | | |
| 9.27 | Does the waste tire pile have a width less than 50 feet? 62-711.540(3)(b) | ✓ | | | |
| 9.28 | Does the waste tire pile have an area less than 10,000 sq. ft? 62-711.540(3)(b) | ✓ | | | |
| 9.29 | Does the waste tire pile have a height less than 15 feet? 62-711.540(3)(b) | ✓ | | | |
| 9.30 | Is there a 50 feet wide fire lane around the perimeter of the waste tire pile? 62-711.540(3)(c) | ✓ | | | |
| 9.31 | Is there unobstructed access to the fire lane? 62-711.540(3)(c) | ✓ | | | |
| 9.32 | Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(3)(d) | ✓ | | | |
| 9.33 | Is the site kept free of grass, underbrush, and other potentially flammable vegetation? 62-711.540(3)(f) | ✓ | | | |
| 9.34 | Is the site bermed or given other adequate protection to prevent liquid runoff from entering water bodies? 62-711.540(3)(e) | ✓ | | | |
| 9.35 | Are residuals contained on-site and disposed of in a permitted solid waste management facility or properly recycled? 62-711.540(5) | ✓ | | | |
| 9.36 | Does the waste tire site qualify for the exceptions to the technical and operational standards as allowed by rule? 62-711.540(6) | | | | ✓ |
| Item No. | WASTE TIRE FACILITY - COLLECTION CENTER | Ok | Not Ok | Unk | N/A |
| 9.37 | Are no more than 1,500 tires at the collection center at any one time? 62-711.550(1)(a) | ✓ | | | |
| 9.38 | Are all waste tires, which are not used tires, removed from site yearly for recycling, processing, or disposal? 62-711.550(1)(b) | ✓ | | | |

Inspection Date: 04/13/2017

14.0 - SECTION 14.0 - WASTE TIRE COLLECTORS

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

| Item No. | SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(18)) | Ok | Not Ok | Unk | N/A |
|----------|--|----|--------|-----|-----|
| 14.1 | Unauthorized storage, processing, or disposal of solid waste except as authorized at a permitted solid waste management facility or other exempt facility? 62-701.300(1)(a) | ✓ | | | |
| 14.2 | Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b) | ✓ | | | |
| 14.3 | Unauthorized storage or 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 from potable water wells (except on-site)? <input type="checkbox"/> 50 feet from water bodies? | ✓ | | | |
| 14.4 | Unauthorized disposal or storage prohibited in any natural or artificial body of water including groundwater and wetlands? (Does not apply to standing water after a storm event) 62-701.300(2)(d) | ✓ | | | |
| 14.5 | Unauthorized disposal or storage prohibited, except yard trash, within 200 feet 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)(e) | ✓ | | | |
| 14.6 | Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3) | ✓ | | | |
| Item No. | WASTE TIRE COLLECTOR OPERATION | Ok | Not Ok | Unk | N/A |
| 14.7 | Is the waste tire collector registration current? 62-711.520(3) | ✓ | | | |
| 14.8 | On each vehicle used to transport tires, is the waste tire collector decal affixed to the outside of the driver's front door? 62-711.520(3) | ✓ | | | |
| 14.9 | Are the following records current and available on-site? (Check any that are Not OK) <input type="checkbox"/> The total quantity of waste tires collected and expressed in tons. 62-711.520(6)(a) <input type="checkbox"/> Where or from whom the waste tires were collected and the quantity, in tons, collected from each. 62-711.520(6)(b) <input type="checkbox"/> Where the waste tires were deposited and the quantity, in tons, deposited at each location. The waste tire collector shall keep receipts or other written materials documenting where all waste tires were deposited, stored or disposed of for at least three years. 62-711.520(6)(c) | ✓ | | | |
| 14.10 | Are Annual Reports submitted to the Department as required? 62-711.520(7) | ✓ | | | |
| 14.11 | Is the waste tire collector disposing of waste tires only at a permitted solid waste management facility? 62-711.520(10) | ✓ | | | |
| 14.12 | Are waste tires being stored on property that is not a waste tire collection center, permitted waste tire processing facility, permitted solid waste management facility, or other exempt facility? 62-711.400(4) | ✓ | | | |
| 14.13 | Are persons only contracting with registered or exempt waste tire collectors for the transportation, disposal, or processing of waste tires? 62-711.400(5) | ✓ | | | |
| 14.14 | Are any persons contracting with a waste tire collector for the transportation of more than 25 waste tires per month from a single business location maintaining records for that location and making them available for review by the Department or by law enforcement officers? 62-711.400(5) | ✓ | | | |
| 14.15 | Are all additional specific conditions (not otherwise addressed above) in the permit, registration, Department order, or other certification, if any, being followed? 62-701.320(1), 403.161, F.S. | ✓ | | | |

Inspection Date: 04/13/2017

COMMENTS:

On April 13, 2017 a routine inspection of the Tire Disposal Services Waste Tire Processing Facility was conducted. The facility, owned by Jim Merrifield, is allowed to have 6000 whole waste tires on site and 2000 processed waste tires on site according to the facility's Waste Tire Processing permit. There are approximately 4000 whole waste tires on site and approximately 2000 processed waste tires on site. Several of the waste tires are loaded on trucks and will be taken to Little's Tire Recycling Landfill in Andalusia, Alabama in the near future. Concerning the waste tire collector registration that Jim Merrifield has, he sent in the registration form on March 6, 2017 and has not received the new decal yet. I contacted Hope Thigpen with FDEP on April 13, 2017 and asked her if she had processed the registration for Mr. Merrifield yet. She stated that she just finished processing it and will send out his new decal that afternoon. Mr. Merrifield is in compliance with both the processing facility and the waste tire collector requirements.

Photo Attachments:

- Photo 1 shows waste tires stored on site in a trailer.
- Photo 2 shows waste tires stored toward the back of the property.
- Photo 3 shows waste tires stored in a truck on site.
- Photo 4 shows the waste tire processing machine (grinder).
- Photo 5 shows the open top truck and conveyor from the processing machine.
- Photo 6 shows the lockable gate as required.

ATTACHMENTS:

Photo 1 - taken 4/13/2017



Photo 2 - taken 4/13/2017



Photo 3 - taken 4/13/2017



Photo 4 - taken 4/13/2017



Inspection Date: 04/13/2017

Photo 5 - taken 4/13/2017



Photo 6 - taken 4/13/2017



Inspection Date: 04/13/2017

Signed:

Mike Stephen

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

04/18/2017

DATE

Jim Merrifield

REPRESENTATIVE NAME

Owner

REPRESENTATIVE TITLE

NO SIGNATURE REQUIRED

REPRESENTATIVE SIGNATURE

Tire Disposal Services

ORGANIZATION

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.

Report Approvers:

Approver: Brad T Hartshorn

Inspection Approval Date: 04/18/2017