



**Florida Department of  
Environmental Protection  
Inspection Checklist**

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**FACILITY INFORMATION:**

**Facility Name:** ADVANCED TIRE RECYCLING, INC.

**On-Site Inspection Start Date:** 07/11/2018

**On-Site Inspection End Date:** 07/11/2018

**WACS No.:** 101060

**Facility Street Address:** 8369 SW COUNTY ROAD 313

**City:** TRENTON

**County Name:** GILCHRIST

**Zip:** 32693

**INSPECTION PARTICIPANTS:**

(Include ALL Landfill and Department Personnel with Corresponding Titles)

**Principal Inspector:** Jeff Schroer, Inspector

**Other Participants:** Scott Mendoza, Warehouse Supervisor; John Bischoff, President/Owner

**INSPECTION TYPE:**

Routine Operation Inspection for WPF - Waste Tire Processing Facility

**ATTACHMENTS TO THE INSPECTION CHECKLIST:**

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

**Note: Checklist items with shaded boxes are for informational purposes only.**

9.0 - SECTION 9.0 - WASTE TIRE FACILITIES

14.0 - SECTION 14.0 - WASTE TIRE COLLECTORS

Inspection Date: 07/11/2018

**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)	✓			
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)	✓			

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Item No.	WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE	Ok	Not Ok	Unk	N/A
		✓			
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)				✓

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**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
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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: 07/11/2018

**Current Violations:**

Rule: 62-701.300(1)(a)

Question Number: 9.1.1

Explanation: Approximately 13 tire piles of various sizes are scattered and intermingled with trailers over the southern half of the site in an open field. In addition, 20 bales of tires are located along the southern property boundary. Although the facility is a permitted Waste Tire Processor and has a maximum authorized capacity of 125,000 tires, outdoor storage is not authorized in the permit. Rule 62-701.300(1)(a), Fla. Admin. Code provides "No person shall store, process, or dispose of solid waste except at a permitted solid waste management facility or a facility exempt from permitting under this chapter."

Corrective Action: The facility verbally agreed to properly dispose of, or move into trailers or the warehouse, all tires currently stored outdoors, on the ground on the southern end of the site within 30 days. Report corrective action to the Department via email immediately upon completion to arrange for a confirmatory inspection.

**Attachments:**

Tire Pile Cluster



Northwest Tire Pile



West Tire Piles



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Rule: 62-711.540(3)(b)

Question Number: 9.27

Explanation: The collection of tire piles on the west central sector of storage area had inadequate interior aisles between them and measured in excess of 90 feet wide. Rule 62-711.540(3)(b), Fla. Admin. Code provides "An outdoor waste tire pile shall have no greater than the following maximum dimensions: 1. Width: 50 feet:"

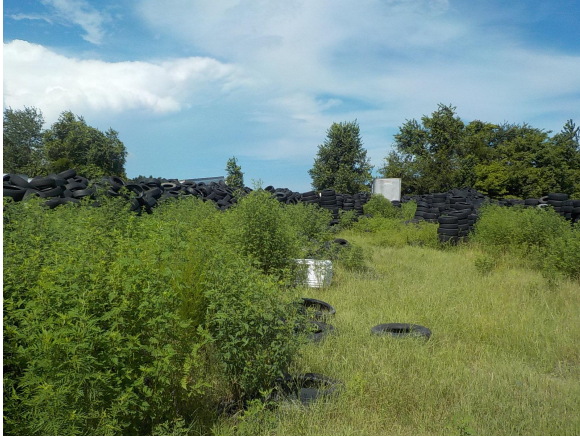


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**Corrective Action:** The facility verbally agreed to remove or reshape the tire piles to widths of no greater than 50 feet within 30 days. Report corrective action to the Department via email immediately upon completion to schedule a confirmatory inspection.

**Attachments:**

Excessive Width Photo 2



Excessive Width Photo 1



Excessive Width Photo 3



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**Rule:** 62-711.540(3)(c)

**Question Number:** 9.30

**Explanation:** The facility lacked 50 foot wide fire lanes around each of the outdoor tire piles. Additionally, tire piles were stored against trailers which would further inhibit fire-fighting efforts. Rule 62-711.540(3)(c), Fla. Admin Code provides "A 50-foot wide fire lane shall be placed around the perimeter of each outdoor waste tire pile."

**Corrective Action:** The facility verbally agreed to establish 50 foot wide fire lanes around the perimeter of each tire pile within 30 days or until the unauthorized storage violation is resolved. Report corrective action to the Department via email immediately upon completion to schedule a confirmatory inspection.

**Attachments:**

Inspection Date: 07/11/2018

Lack of Fire Lane West Piles



Lack of Fire Lane South Bales



Tire Piles Against Trailers



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Rule: 62-711.540(3)(c)

Question Number: 9.31

Explanation: The random arrangement and number tire piles and trailers prevent unobstructed access to fire lanes throughout the storage area. Rule 62-711.540(3)(c), Fla. Admin. Code provides "A 50-foot wide fire lane shall be placed around the perimeter of each outdoor waste tire pile. Access to the fire lane for emergency vehicles must be unobstructed at all times."

Corrective Action: The facility verbally agreed to rearrange tire piles and trailers to provide unobstructed access to fire lanes around each tire pile within 30 days or until the unauthorized storage violation is resolved. Report corrective action to the Department via email immediately upon completion to schedule a confirmatory inspection.

Attachments:



Inspection Date: 07/11/2018

Lack of Fire Lane Access Photo 1



Lack of Fire Lane Access Photo 2



Lack of Fire Lane Access Photo 3



Rule: 62-711.540(3)(f)

Question Number: 9.33

Explanation: Heavy vegetation was observed throughout the tire storage area and in the tire piles. Rule 62-711.540(3)(f), Fla. Admin. Code provides "The waste tire site shall be kept free of grass, underbrush, and other potentially flammable vegetation at all times."

Corrective Action: The facility verbally agreed to cease outdoor storage within 30 days and to limit future tires on the ground to temporary, sorting activities, in accordance with their approved operations and Site Plan. Report corrective action to the Department via email immediately upon completion to schedule a confirmatory inspection.

#### Attachments:

Vegetation Photo 1



Vegetation Photo 2





Inspection Date: 07/11/2018

Vegetation Photo 3



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**COMMENTS:**

This facility is a permitted Waste Tire Processor, with maximum capacity of 125,000 waste tires. The facility's business plan is to remove (cull) car and light truck tires, with resale value, from the waste stream for sale as used tires in retail and wholesale in both national and international markets. The source of the waste tires is primarily major tire retailers in Jacksonville and Ocala who contract with Liberty Tires of Jackson, Georgia for disposal of these waste tires. Liberty contracts with Advanced Tires to run these routes, providing four trucks for the route service and trailers for transport to the Jackson facility for processing/disposal. The cull rate for saleable tires from these routes is about 30%.

The Advanced Tires operation includes emptying trailers and sorting good from "trash" tires. Trash tires go into trailers for storage until transported for disposal and saleable tires are sorted by size and stored in separate trailers or in the warehouse. Although eventual sorting activities are planned to be conducted in the warehouse, currently sorting is conducted in the open field on the southern half of the property. Sorting is intended to be a temporary stage of the process and as a result, no outdoor storage, with its Rule requirements for berms, areas free from vegetation, ect. is authorized in the permit.

As documented in a Liberty Tire letter dated December 17, 2017 to their customers operating Waste Tire Collection Centers, "...the markets for scrap tires, mulch, crumb rubber and tire derived fuel have declined...." this has caused Liberty to seek other end markets. As a result of this diminished demand, Liberty, who regulates the numbers of tires coming into the Jackson facility by the number of trailers they provide to Advanced Tires, has exacerbated the storage issue which has resulted in the unauthorized solid waste storage violation.

In addition to Liberty Tires as addressed above, trailers of waste tires go to Argos, a cement batch plant in Trenton Florida, for use as energy in their mixing kiln. While Argos has expressed an interest in increasing the use of tires as fuel, anticipated increased demand for these tires have not yet been experienced.

In order to resolve the unauthorized, outdoor storage of waste tires, the facility should increase disposal activities or obtain more trailers for storage of unsorted tires.

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Inspection Date: 07/11/2018

**Signed:**

Jeff Schroer

**PRINCIPAL INSPECTOR NAME**

Inspector

**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**

DEP

**ORGANIZATION**

08/01/2018

**DATE**

Scott Mendoza

**REPRESENTATIVE NAME**

Warehouse Supervisor

**REPRESENTATIVE TITLE**

NO SIGNATURE REQUIRED

**REPRESENTATIVE SIGNATURE**

Advanced Tire Recycling, Inc.

**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.

John Bischoff

**REPRESENTATIVE NAME**

President/Owner

**REPRESENTATIVE TITLE**

NO SIGNATURE REQUIRED

**REPRESENTATIVE SIGNATURE**

Advanced Tire Recycling, Inc.

**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: Jeff Schroer

Inspection Approval Date: 08/28/2018