



FLORIDA DEPARTMENT OF Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

September 3, 2019

Mr. Jon E. Bischoff, President/Owner
Advanced Tire Recycling, Inc.
8369 SW County Road 313
Trenton, Florida 32693
TrentonTireMan1@aol.com

Re: Advanced Tire Recycling, Inc.
Facility WACS No.: 101060
Gilchrist County – Solid Waste

Dear Mr. Bischoff,

Department personnel conducted a compliance inspection of the above-referenced facility on July 23, 2019. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's Solid Waste rules and regulations. A copy of the inspection report is attached for your records. Non-compliance identified in the inspection report have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Jeff Schroer at (904) 256-1576 or via e-mail at Jeffrey.Schroer@dep.state.fl.us.

Sincerely,

A handwritten signature in cursive script that reads "Heather Webber".

Heather Webber
Environmental Administrator

Enclosures: Inspection Report dated July 23, 2019

Ec: Dep_Ned@FloridaDEP.gov



**Florida Department of
Environmental Protection
Inspection Checklist**

FACILITY INFORMATION:

Facility Name: ADVANCED TIRE RECYCLING, INC.

On-Site Inspection Start Date: 07/23/2019

On-Site Inspection End Date: 07/23/2019

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: Jon Bischoff, President/Owner; Cyn DeLee Dalton, Office Manager

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.

1.0 - SECTION 1.0 - FILE REVIEW

9.0 - SECTION 9.0 - WASTE TIRE FACILITIES

Inspection Date: 07/23/2019

1.0 - SECTION 1.0 - FILE REVIEW**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.	FILE REVIEW (Pre- or Post-Inspection, as appropriate.)	Ok	Not Ok	Unk	N/A
1.1	For landfills and C&D disposal facilities, does the facility have a current plan for the method and sequence of filling wastes? 62-701.500(2)(f) for landfills; 62-701.730(7)(a) for C&D debris sites	✓			
1.2	For landfills, are the following records being reported to the Department?(Check any that are Not OK) <input type="checkbox"/> Waste reports (annually) 62-701.500(4) <input type="checkbox"/> Annual estimate of remaining life 62-701.500(13)(c)				✓
1.3	Is gas monitoring being performed as required by the permit? 62-701.500(9), 62-701.530(2)				✓
1.4	Are the results of the gas sampling reported to the Department quarterly? 62-701.530(2)(c)				✓
1.5	Is water quality sampling and testing performed according to standard procedures and at the required frequencies? 62-701.510(2) for landfills; 62-701.730(8) and 62-701.730(10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.				✓
1.6	Do the results of the water quality testing suggest there may be adverse impacts to water quality from the operation of the solid waste facility? 62-701.510(3) and (4); 62-701.730(4)(c) and (10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.				✓
1.7	For closed landfills and C&D disposal facilities with final elevations higher than 20 feet above grade, has a final survey report verifying the final elevations and contours of the facility been submitted to the Department? 62-701.600(6)(b), 62-701.730(9)(e)				✓
1.8	Is financial assurance adequate? 62-701.630 for landfills; 62-701.710(7)(a) and 62-701.710(1)(d)1. for waste processing facilities; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(a) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities. NOTE: The Solid Waste Financial Coordinator in Tallahassee can assist with this information.	✓			
1.9	Are cost estimates current and adjusted every year? 62-701.630(4) for landfills; 62-701.710(7)(a) and 62-701.710(1)(d)1. for waste processing facilities; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(b) and 62-713.600(6)(c) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities.	✓			
1.10	For C&D debris disposal and disposal with recycling facilities, is an Annual Report submitted to the Department for the disposal operation by February 1st of each year? 62-701.730(12)				✓
1.11	For C&D recycling facilities with no disposal, is an Annual Report for the recycling facility submitted to the Department by February 1st of each year? 62-701.710(8)(b)				✓
1.12	For compost facilities, has the compost product been sampled and analyzed every 20,000 tons or every 3 months (whichever is sooner)? 62-709.530(1)				✓
1.13	For compost facilities, has the annual report been submitted by June 1st? 62-709.530(3)				✓

Inspection Date: 07/23/2019

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)				✓

Inspection Date: 07/23/2019

Current Violations:

Rule: 62-711.540(1)(d)

Question Number: 9.10

Explanation: An Annual Fire Safety Survey has not been conducted since July 11, 2018. Rule 62-700.540(1)(d), Florida Administrative Code (Fla. Admin. Code) provides "A fire safety survey shall be conducted at least annually and the survey report shall be made part of the next quarterly report."

Corrective Action: Facility staff verbally agreed to have a fire safety survey conducted and to submit the report to the Department within 30 days.

Rule: 62-711.540(2)(a)

Question Number: 9.18

Explanation: Tire pile width located in the southeast corner of the bulk storage area measured approximately 75' in a north to south direction and abutted the south warehouse wall and runs continuously lengthwise down the southern warehouse wall. Rule 62-711.540(2)(a) Fla. Admin. Code provides "Tire piles may not be more than 50 feet in width, except that piles along a wall shall not be more than 25 feet in width."

Corrective Action: Facility staff verbally agreed to reconfigure the southeast corner tire pile to a width of not more than 25 feet from the wall or not more than 50 feet if the pile no longer abutts the wall within 30 days. Report corrective action to the Department via email immediately upon completion to arrange a confirming inspection.

Attachments:

Southeast Pile Photo 1



Southeast Pile Photo 2



Rule: 62-711.540(2)(a)

Question Number: 9.19

Explanation: The tire pile at the east end of the pile along the north warehouse wall measured approximately 50 feet out from the wall it abutted. The tire pile along the south warehouse wall measured from approximately 75 feet out from the wall and tapered to approximately 44 feet toward the western wall of the warehouse. Rule 62-711.540(2)(a) Fla. Admin. Code. provides "Tire piles may not be more than 50 feet in width, except that piles along a wall shall not be more than 25 feet in width."

Corrective Action: Facility staff verbally agreed to reconfigure piles along the north and south walls to widths of no more than 25 feet within 30 days. Report corrective action to the Department via email immediately upon completion to schedule a confirming inspection.

Inspection Date: 07/23/2019

Attachments:

SW Greater than 25 Feet from Wall



SW Pile Width > 25' From Wall



Rule: 62-711.540(2)(b)

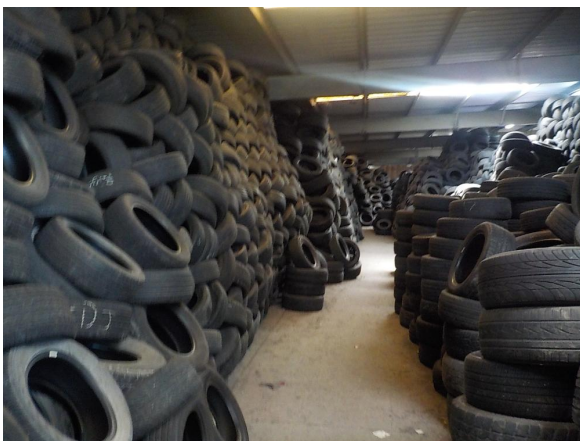
Question Number: 9.20

Explanation: The north main aisle running east and west, immediately adjacent to the tires piled against the north warehouse wall averages approximately 6 feet in width. Rule 62-711.540(2)(b) Fla. Admin. Code provides "The width of main aisles between tire piles shall be not less than eight feet."

Corrective Action: Facility staff verbally agreed to reconfigure the north main aisle to a width of not less than eight feet within 30 days. Report corrective action to the Department via email immediately upon completion to arrange a confirming inspection.

Attachments:

Narrow Main Aisle Photo 1



Narrow Main Aisle Photo 2



Rule: 62-711.540(3)(f)

Question Number: 9.33

Explanation: Multiple tire piles were observed stored on grassy fields while some were covered with large amounts of vegetation. 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: Facility staff verbally agreed to remove tires from the field within 30 days. Further they agreed to cease open field storage by limiting activities to sorting, where tires are discharged, sorted and promptly placed in appropriate trailers. Report corrective action to the Department via email immediately upon completion to arrange a confirming inspection.

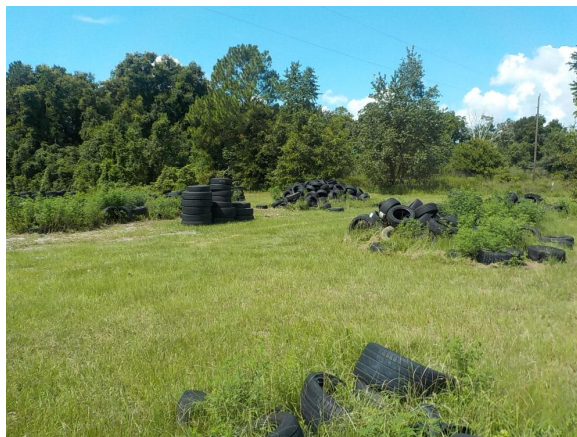
Inspection Date: 07/23/2019

Attachments:

Tires in Vegetation Photo 1



Tires in Vegetation Photo 2



Tires in Vegetation Photo 3



Current Areas Of Concern:

Rule: 62-711.540(2)(c)

Question Number: 9.21

Explanation: The distance between the interior tire pile tops and the roof structure appeared to be less than three feet in several areas. Rule 62-711.540(2)(c) Fla. Admin. Code provides "The clearance from the top of storage to sprinkler deflectors or roof structures shall not be less than three feet."

Corrective Action: Recommend the facility confirm that no tire pile tops are less than three feet from the roof structure.

Attachments:

Inspection Date: 07/23/2019

Potential Pile Top <3' From Roof



COMMENTS:

With respect to the current storage of tires in the sites grassy fields, if activities can not be limited to sorting, consideration of creating a outdoor storage area, with a semi-permeable floor and surrounding berm, where vegetation could be easily eliminated. This could be considered in the current renewal process.

Financial Assurance is marked as OK as it is being addressed through the permit renewal.

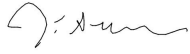
Inspection Date: 07/23/2019

Signed:

Jeff Schroer

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

DEP

ORGANIZATION

07/24/2019

DATE

Jon 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.

Cyn DeLee Dalton

REPRESENTATIVE NAME

Office Manager

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:** 08/08/2019