



# 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

April 16, 2009

Sent Via Email to  
[tdsmro@msn.com](mailto:tdsmro@msn.com)

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

Dear Mr. Merrifield:

The purpose of this letter is to notify you that a compliance inspection of the Tire Disposal Services Waste Tire Processing Facility (WACS No. 6475; Permit No. 64386-003WT) located in Jackson County was performed on April 7, 2009. An inspection checklist is enclosed that notes a minor out-of compliance status. We would appreciate a written or email response within 14 days of receipt of this letter advising us of actions and time frames for correcting the noted areas of concern and addressing the recommendations.

Be advised that follow-up inspections will be performed to document that corrective actions have been taken to achieve compliance status. If you have questions, please contact Thomas Dillard by email at [thomas.dillard@dep.state.fl.us](mailto:thomas.dillard@dep.state.fl.us) or by phone at (850) 872-4375, extension 110.

Sincerely,

Sally M. Cooley  
Panama City Branch Administrator

SMC: td

Encl: Inspection report 4-7-09

c: Marshall Seymore, P.E., Pensacola, [marshall.seymore@dep.state.fl.us](mailto:marshall.seymore@dep.state.fl.us);  
Lynn Berry, Pensacola, [lynn.berry@dep.state.fl.us](mailto:lynn.berry@dep.state.fl.us);



**Florida Department of  
Environmental Protection  
Inspection Checklist**

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**FACILITY INFORMATION:**

**Facility Name:** TIRE DISPOSAL SERVICE

**On-Site Inspection Start Date:** 04/07/2009

**On-Site Inspection End Date:** 04/07/2009

**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:** Thomas Dillard, Inspector

**Other Participants:** Jim Merrifield, Owner Operator; Jason Merrifield, Operator

**ATTACHMENTS TO THE INSPECTION CHECK LIST:**

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

SECTION 9.0 - WASTE TIRE FACILITIES

Inspection Date: 04/07/2009

**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(16)) Completed	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)	✓			
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)	✓			
9.3	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?	✓			
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)	✓			
9.5	Unauthorized disposal/storage prohibited in any natural or artificial body of water including ground water? 62-701.300(2)(e)		✓		
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)	✓			
9.7	Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3)	✓			
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- <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)	✓			

Item No.	WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE Completed	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)				✓
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)				✓
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)				✓
9.12	Are fire protection services assured through notification to local fire protection authorities? 62-711.540(1)(d)			✓	
9.13	Is an annual fire safety survey conducted? 62-711.540(1)(d)	✓			
9.14	Is a copy of the annual fire safety report made part of the next quarterly report? 62-711.540(1)(d)	✓			
9.15	Does the facility have an Emergency Preparedness Manual (EPM) on-site? 62-711.540(1)(e)	✓			
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.	✓			

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Item No.	WASTE TIRE FACILITY - GENERAL REQUIREMENTS FOR STORAGE Completed	Ok	Not Ok	Unk	N/A
9.16	<input type="checkbox"/> List of emergency response equipment and locations on-site 62-711.540 <input type="checkbox"/> Procedures to be followed in the event of a fire 62-711.540(1)(e)3.	✓			
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)	✓			
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)	✓			
9.19	Is adequate communications equipment available at the site? 62-711.540(1)(i)	✓			
9.20	Is the owner or operator providing for control of mosquitoes and rodents so as to protect the public health and welfare? 62-711.540(1)(j)	✓			

Item No.	WASTE TIRE FACILITY - STORAGE INDOORS Completed	Ok	Not Ok	Unk	N/A
9.21	Are WT piles more than 50 feet in width? 62-711.540(2)(a)				✓
9.22	Are WT piles along a wall more than 25 feet in width? 62-711.540(2)(a)				✓
9.23	Are widths of main aisles between piles less than 8 feet? 62-711.540(2)(b)				✓
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)				✓
9.25	Is there less than 3 feet of clearance between waste tire piles and unit heaters, etc.? 62-711.540(2)(c)				✓
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)				✓
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 and its connections with other structural members have two hour FR? 62-711.540(2)(f)				✓
9.28	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 Completed	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)	✓			
9.30	Does the waste tire pile have a width < 50 feet? 62-711.540(3)(b)	✓			
9.31	Does the waste tire pile have an area < 10,000 sq. ft? 62-711.540(3)(b)	✓			
9.32	Does the waste tire pile have a height < 15 ft.? 62-711.540(3)(b)	✓			
9.33	Is there a 50 ft. wide fire lane around the perimeter of the waste tire pile? 62-711.540(3)(c)	✓			
9.34	Is there unobstructed access to the fire lane? 62-711.540(3)(c)	✓			
9.35	Is the access controlled through the use of doors, fences, gates, natural barriers or other means? 62-711.540(3)(d)	✓			
9.36	Is the site kept free of grass, underbrush, and other potentially flammable vegetation? 62-711.540(3)(f)	✓			
9.37	Is the site bermed or given other adequate protection to prevent liquid runoff from entering water bodies? 62-711.540(3)(e)	✓			
9.38	Are residuals contained on-site and disposed of in a permitted SW management facility? 62-711.540(5)		✓		
9.39	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 Completed	Ok	Not Ok	Unk	N/A
9.40	Are no more than 1500 tires at the CC at any one time? 62-711.550(1)(a)				✓
9.41	Are all waste tires, which are not used tires, removed from site yearly for recycling, processing, or disposal? 62-711.550(1)(b)	✓			

Pending Area Of Concern:

Inspection Date: 04/07/2009

Rule: 62-701.300(2)(e)

Question Number: 9.5

Explanation: Processed tire residuals were observed in the water submerged trailer bin area.

Corrective Action: Remove all tire residuals from contact with the accumulated water in the bin area and install control measures to keep rain water from accumulating in this covered area.

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Rule: 62-711.540(5)

Question Number: 9.38

Explanation: Processed tire residuals visibly scattered on the ground around the site and not policed.

Corrective Action: Initiate actions to police and contain all tire residuals on site on an ongoing basis.

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## COMMENTS:

04/07/2009

The following were noted during the visit:

Tire Disposal Services (TDS) continues to manage administrative requirements to support operations.. Required paperwork being managed in a manner that can be more readily provided for review by Department. Improvement noted. Quantity of tires on-site around maximum permitted of 5000 due to disposal site in Andalusia too wet to receive tires. All but a few tires just received were in trailers. Mr. Merrifield said two loads (approx. 2000 of waste tires) going out tomorrow. Also going out tomorrow is one load of processed tires to Waste Managements Springhill Landfill. Tire residuals visible scattered on the ground around the site in many areas not just in close proximity to the processing building. The trailer attached to a tractor with an expired decal was sitting in th covered bin area surrounded by water from recent heavy rains. Processed tire residuals falling off the conveyor feed were visible in the water and not removed. Mr. Merrifield said when they pull the trailer out they will remove all remnant residuals. TDS provided for review a Emergency Preparedness Manual (EPM) and a copy of the 2008 Fire Safety Survey (FSS) with no deficiencies noted. The FSS for 2009 hasn't been done yet but he has requested it from the fire inspector and will send it to the Department with the next Quarterly Report. TDS has been sending in required quarterly and annual reports to the Department and improvement noted. TDS provided documentation that the annual registration had been sent in listing four trucks with three trucks on-site. Mr. Merrifield checked and said the check submitted to the Department with the application had cleared. He said decals were probably at the post office and he hadn't picked them up yet. Department personnel pointed out that the truck he had currently on the road picking up tires had an expired decal and would be in violation of State Law. All vehicles lacked current waste tire collector decals.

## Recommendations:

TDS needs to police up all residuals on-site from the ground and take initiate ongoing measures to properly manage residuals.

TDS needs to insure that all vehicles that transport tires over the Sate Roads have current waste tire collector registration decals affixed. If decals not received yet then a copy of the annual registration listing that vehicle should be kept in the glove compartment and available as proof of registration until the current decal is affixed.

TDS needs to remove all tire residuals from contact with water around the processor trailer and



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take measures to keep water from accumulating in this bin area.

TDS needs to provide the Department an Annual Cost Adjustment as notified.

Observed status of facility observed during visit: Minor out-of compliance

#### ATTACHMENTS:

Tire residuals visible @ entrance



Tires staged on-ground



Vehicle showing expired decal



Vehicle without decal



Processing area



Trailer for processed tires



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Processed tires in water



Trailer with tire tubes



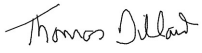
Inspection Date: 04/07/2009

**Signed:**

Thomas Dillard

**PRINCIPAL INSPECTOR NAME**

Inspector

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

4/14/2009

**DATE**

Jim Merrifield

**REPRESENTATIVE NAME**

Owner Operator

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

TDS

**ORGANIZATION**

Jason Merrifield

**REPRESENTATIVE NAME**

Operator

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

TDS

**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.