



# 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

October 22, 2009

BY ELECTRONIC MAIL

[tdsmro@msn.com](mailto:tdsmro@msn.com)

Jim Merrifield  
Tire Disposal Services  
P.O. Box 550  
Cottondale, 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 October 6, 2009. An inspection checklist is enclosed that notes pre-existing and pending areas of concern. 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.

To view specific solid waste management records for this site follow this link:  
[http://appprod.dep.state.fl.us/WWW\\_WACS/REPORTS/SW\\_Facility\\_Docs.asp?wacsid=6475](http://appprod.dep.state.fl.us/WWW_WACS/REPORTS/SW_Facility_Docs.asp?wacsid=6475)

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 850/872-4375, extension 110 or [thomas.dillard@dep.state.fl.us](mailto:thomas.dillard@dep.state.fl.us).

Sincerely,

Sally M. Cooley  
Panama City Branch Administrator

SMC/td

Enclosure: Inspection report 10-6-09

c: Marshall Seymore, P.E., DEP NWD Pensacola, [marshall.seymore@dep.state.fl.us](mailto:marshall.seymore@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: 10/06/2009  
On-Site Inspection End Date: 10/06/2009  
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

**INSPECTION TYPE:**

Routine Operation Inspection for Waste Processing - 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.

SECTION 1.0 - FILE REVIEW

SECTION 9.0 - WASTE TIRE FACILITIES

Inspection Date: 10/06/2009

**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.) Completed	Ok	Not Ok	Unk	N/A
1.1	For landfills, is the method and sequence of filling wastes according to plans? 62-701.500(2)(f)				✓
1.2	For landfills, are the following records being reported to the Department?(Check any that are Not OK.) <input type="checkbox"/> Waste reports (quarterly) 62-701.500(4) <input type="checkbox"/> Annual estimate of remaining life 62-701.500(13)(c)				✓
1.3	Is leachate sampled, tested and disposed as required? 62-701.500(8)(a) & 62-701.510(6)(c)				✓
1.4	Is gas monitoring being performed as required by the permit? 62-701.500(9) & 62-701.530(2)				✓
1.5	Are the results of the gas sampling reported to the Department quarterly? 62-701.530(2)				✓
1.6	Is water quality sampling and testing performed according to standard procedures and at the required frequencies? See 62-701.510(2) for landfills; 62-701.730(4)(b) & (10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.				✓
1.7	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) & (4)				✓
1.8	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? 62-701.610(3) & 62-701.730(9)(c)				✓
1.9	Is financial assurance adequate? See 62-701.630 for landfills; 62-710(7)(a) & (10)(a) for WPFs; 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.	✓			
1.10	Are cost estimates current and adjusted every year? See 62-701.630(4) for landfills; 62-701.710(7)(b) & (10)(a) for WPFs; 62-701.730(11)(b) for C&D debris facilities; 62-713.600(6)(b) & (c) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities.		✓		
1.11	For C&D debris disposal and disposal with recycling facilities, is an Annual Report submitted to the Department for the disposal operation by April 1st of each year? 62-701.730(12)				✓
1.12	For C&D recycling facilities with no disposal, is an Annual Report for the recycling operation submitted to the Department by April 1st of each year? 62-701.710(9)(b)				✓
1.13	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)				✓
1.14	For compost facilities, has the annual report been submitted by June 1st? 62-709.530(3)				✓

Inspection Date: 10/06/2009

**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.	✓			

Inspection Date: 10/06/2009

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: 10/06/2009

Rule: 62-711.500(3), 62-701.730(11)(b), 62-713.600(6)(b), 62-701.630(4), 62-701.710(7)(b), 62-701.710(10)(a), 62-713.600(6)(c)

Question Number: 1.10

Explanation: Annual updates not submitted as required. Current year recived but lacking previous years.

Corrective Action: Submit as requested and required to Department.

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**Pre-existing Area Of Concern:**

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.

**Comments:**

10/07/2009

On 10-6-09 the quantity of residuals in the schredded residual trailer loading area had decreased but the area remains flooded and residual continue in the water. Plans are to initiate changes to this area which will eliminate accumulation of water by diverting (draining) to other areas on property.

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**COMMENTS:**

10/06/2009

The following were observed on 10-6-09:

1. Tire residuals still in contact with water but condition has improved. Facility has plans to correct accumulation of water and should implement in next six months. 2. Tire Processor (Shredder) on-site on last visit has broken and has been replaced with a newer used unit. Improvement noted. 3. Tire residuals previously noted as scattered on-site have decreased and now different type residuals are segregated in piles prior to shipping off-site. 4. Required reporting to Department by TDS is as required. Improvement noted. 5. The previously noted lack of current decals on transport vehicles has been corrected with three trucks on-site bearing the required current Waste Tire Collector registration decals. Improvement noted. 6. Mr. merrifield explained that he has recently submitted an updated cost estimet but wasn't able to provide a copy for review. District personnel supported submittal but additional update information for all reporting years requested.

Recommendation: Tire Disposal Service (TDS) needs to complete planned elimination of storage of residuals in water by providing a drainage mechanism to area and /or install mechanisms which will keep residuals from being not deposited into the trailer. TDS needs to satisfy financial assurance cost updates for missing years as instructed by Department.

**ATTACHMENTS:**



Inspection Date: 10/06/2009

New and old tire processor



Residuals and trailer in water



Pile of tire residuals from water



1 of 3 trucks with current decals



Tires awaiting processing



Tire storage and receipt area



Inspection Date: 10/06/2009

Office and processing plant



Residuals fallen off conveyor





Inspection Date: 10/06/2009

**Signed:**

Thomas Dillard

**PRINCIPAL INSPECTOR NAME****PRINCIPAL INSPECTOR SIGNATURE**

Inspector

**PRINCIPAL INSPECTOR TITLE**

FDEP

**ORGANIZATION**

10/12/2009

**DATE**

Jim Merrifield

**REPRESENTATIVE NAME**

Owner / 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.