



Florida Department of Environmental Protection

Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 17, 2010

Sent via e-mail to:
tdsmro@msn.com

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

Dear Mr. Merrifield:

The current permit for your Waste Tire Processing Facility known as Tire Disposal Services (DEP File No. 0064386-003-WT, Facility Identification Number 6475) located 3053 Barnes Lane, Cottdale, Jackson County, Florida 32431, will expire on **September 12, 2010**. In accordance with **Rule 62-4.090, Florida Administrative Code (F.A.C.)**, to be timely and sufficient, submit your permit renewal application on or before **July 14, 2010**.

The Department has compiled two documents (enclosed):

1. A top ten list of problem areas with permit applications
2. A list of sample Request for Additional Information (RAI) comments

These two documents represent some of the more common issues encountered and are intended to be a tool for use in preparation of a more complete application.

You can view this and other documents for this facility in the OCULUS database at the following link.

http://appprod.dep.state.fl.us/WWW_WACS/REPORTS/SW_Facility_Docs.asp?wacsid=6475

As always, Department personnel are available for pre application meetings or phone calls to discuss any issues you may have.

Mr. Jim Merrifield
Tire Disposal Services
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If you have any questions, please contact Dawn Templin, P.E., by phone at (850) 595-8360, extension 1260 or by e-mail at dawn.templin@dep.state.fl.us.

Sincerely,



Marshall Seymore, P.E.
Solid Waste Section Supervisor

MSS/dktb

Enclosures: Top Ten List
Sample RAI Comments

c: Lee Martin, Solid Waste Management, Tallahassee, lee.martin@dep.state.fl.us
Mike Stephen, NWD Solid Waste Section, mike.stephen@dep.state.fl.us
Dawn Templin, P.E., NWD Solid Waste Section, dawn.templin@dep.state.fl.us
Susan Eldredge, Solid Waste Management, Tallahassee, FA, susan.f.eldredge@dep.state.fl.us
Fred Wick, Solid Waste Management, Tallahassee, FA, fred.wick@dep.state.fl.us

Ten Items Most Likely to Be Omitted or Incomplete For Solid Waste Management Facility Permit Applications

1. Documentation (Part E of app)
 - a. Ensure accurate information on permit application
 - b. Documentation of signature authority for Applicant (LLCs especially)
 - c. ensure proper sigs & seals for app and technical documents
 - d. Publish notice of application
 - i. Notice to elected officials for Class I & III
2. N/C – No substantial change for renewals
 - a. List and reaffirm information is still valid [Rule 62-701.320(10) (c), F.A.C.]
3. Siting requirements (Part D of app)
 - a. Potable wells
 - b. Wetlands and water bodies
4. Site/plot plan (Part F of app)
 - a. Current toe
 - b. Current elevation
 - c. Monitor wells
 - d. Relevant features
5. Surveys
 - a. Boundary survey (Part E of app)
 - b. Topographic survey (Part F of app)
6. Reports and plans
 - a. Engineering report (Part E of app)
 - b. Operation plan (Part E & L of app)
 - i. Erosion control
 - ii. Odor control
 - c. Closure plan (Part E, P, & Q of app)
 - i. final cover
 - ii. Erosion control
 - iii. Closure steps
7. Construction (Part H of app)
8. Stormwater management (Part H of app)
9. Hydrogeological and Geotechnical investigations (Part I & J of app)
 - a. Water Quality monitoring plan (Part M of app)
10. Cost estimates and Financial Assurance (Part S of app)

* All items above that are applicable to Construction and Demolition Disposal Facilities, Waste Processing Facilities and Land Clearing Debris Disposal Facilities can be found in Parts A and B of the respective applications.

** This is not a comprehensive list of requirements, just some of the more problematic areas. All requirements must be addressed in each application.



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(Samples of Common Request for additional Information)

1. Provide four complete sets of permit documents and any responses to the request for information. Each document should be signed, sealed and dated by the appropriate professional as required. Provide an unlocked complete electronic copy of the permit documents and RAI responses.
2. Submit the history and enforcement actions of this facility as required per **Rule 62-701.320(7) (i), F.A.C.**
3. Mr. **Applicant Agent Name** signed the application as the applicant's agent for **Applicant Name**. Upon review of the Florida Department of State Division of Corporations data base, the indicated managing member for **Applicant Name** is **Managing Member Name**; however, **Managing Member Name** is not listed as an active entity in the Florida Department of State Division of Corporations data base.

Provide documentation that Mr. **Applicant Agent Name** is the person authorized by **Managing Member Name** to act on behalf of **Applicant Name**.

If Mr. **Applicant Agent Name** is not the person authorized by **Managing Member Name** to act on behalf of **Applicant Name**, provide documentation indicating the authorized person and resubmit the application with authorized person's signature, title, email address, mailing address and date in Paragraph C.1 of application.

4. Submit a site plan of a scale not greater than 200 feet to the inch that meets the requirements of **Rule 62-701.730(2) (a) 1, F.A.C.** Identify all relevant features that should include but not be limited to:
 - Existing/ proposed disposal units
 - Total acreage of the site and of the proposed disposal units
 - Existing/ proposed Zone of Discharge (ZOD) location.
 - Existing/ proposed toe of waste and property boundary clearly labeled.
 - Distance of existing/ proposed disposed waste from property boundary and zone of discharge to the toe of the proposed disposed waste.
 - Distance of water bodies and wetlands from the toe of the existing/ proposed disposed waste.

- Existing Monitoring Wells and existing Surface Water monitoring locations and designations which include distance from toe of waste and distance from ZOD.
 - Distance of potable water wells and community supply wells from the toe of the existing/proposed disposed waste.
5. Publish a Notice of Application in accordance with **Rule 62-701.320(8), F.A.C.** in a newspaper of general circulation in the area where the facility is located and provide proof of publication to the Department.
 6. Provide documentation that the applicant either owns the property or has legal authorization from the property owner to use the site for a construction and demolition debris disposal facility.
 7. Provide location (Latitude & Longitude in degrees, minutes & seconds) and elevation of top of well casing (NAVD in Feet) of each ground water monitoring well as required by **Rule 62-701.510(3)(d), F.A.C.** and location (Latitude & Longitude in degrees, minutes & seconds) of each surface water monitoring site as required by **Rule 62-701.510(4)(c), F.A.C.**
 8. The groundwater-monitoring plan should include but not be limited to:
 - Background water quality data
 - Vertical permeability information
 - The depth to and lithology of the first confining bed
 - Vertical permeability
 - Thickness and extent of any confining beds
 - Present and reasonably expected future pollution sources located within one-mile radius of the site
 - Chronological information on surface water flows and water quality upstream and downstream from the site.
 9. Provide a description of means and methods to be utilized to minimize erosion on side slopes as part of the closure and long term care plan. The description should include but not be limited to:
 - Reverse sloping benches or terraces, into the side slope
 - Drainage ways with water flow energy dissipaters
 - Access for maintenance equipment.
 - Description of susceptibility for erosion of the earthen material that is proposed for final cover relative to historical rainfall patterns for the area, the period between the patterns for the area, the period between the

application of the final cover and establishment of vegetation, and maintenance procedures.

10. Cost estimates, on **DEP Form 62-701.900(28)** must be signed and sealed by a professional engineer licensed in Florida.
11. Closing Cost and Long-term Care Cost Estimates should include but not be limited to:
 - The area to be covered with soil must be calculated based on closure dimensions for the site. The cubic yards of soil material indicated in Item 3 and Item 4; the acres for seeding in Item 5; mowing acres in Item 9 is for a non-high-rised site. Please provide actual areas to be covered with soil, areas to be seeded and areas to be mowed.
 - Include all cost associated with liner and leachate collection and removal system.
 - Third party quotes for each unit cost indicated in cost estimate. Quotes should be on third party letter head.
 - No third party quotes were submitted for professional and administrative services.

12. Once closing and long-term care cost estimates are approved, proof of financial assurance for this facility in the name of the permit applicant must be provided. Documentation from the Tallahassee Solid Waste Financial Coordinator will be used to determine if financial assurance instruments required by Rule have been submitted and approved. Submittals for this item shall be sent to:

Florida Department of Environmental Protection
Financial Coordinator
Solid Waste Section
Bob Martinez Center
2600 Blair Stone Road
MS 4565
Tallahassee, Florida 32399-2400.

Contact Susan F. Eldredge at (850) 245-8740 or
susan.f.eldredge@dep.state.fl.us for further assistance with this item.

13. Liner and Leachate Collection and Removal System Required.

- a. The Department has determined that a liner and leachate collection and control system is required in accordance with **Rule 62-701.730(4) (a)**, **F.A.C.** and **Section 403.707(9) (b)**, **F.S.** because:

- Ground water contaminants have been detected and confirmed in detection wells MW-**x** and MW-**x** and assessment wells MW-**x** and MW-**x** which exceed both background levels and Department water quality standards or criteria at your facility. **(Existing Facilities)**
- Ground water contaminants have been detected and confirmed in compliance wells at most other construction and demolition debris disposal facilities and they exceed both background levels and Department ground and surface water quality standards or criteria.

Possible Source Of Ground Water Contaminants	
Contaminant	Construction and Demolition (C&D) Debris Material as defined in Rule 62-701.200(27), F.A.C. shall include but not be limited to:
Iron	Sheet metal, steel fasteners (Nails, Screws, Bolts, etc.), structural components, light fixtures, piping, electrical enclosures, etc.
Aluminum	Sheet metal, aluminum fasteners, structural components, light fixtures, piping, electrical enclosures, etc.
Sulfate	Gypsum wall board
Total Dissolved Solids	Crushed and pulverized C&D material
Arsenic	Treated wood products
Chromium	Treated wood products
Vinyl Chloride	PVC materials

Based on a Final Report issued for a project titled “Impact of Landfill Leachate on Iron Release from Northwest Florida Iron Rich Soils” dated August 1, 2006 to July 1, 2007 submitted by Mr. Gang Chen, Ph D. to the Hinkley Center for Solid and Hazardous Waste Management, it was concluded that:

“Based on the laboratory experiments of iron release when landfill leachate reacted with iron rich soil under chemistry and biology conditions of Northwest Florida landfills, ferrous iron was found to be released when landfill leachate contacted with iron rich Norwest Florida soil in the presence of cultured iron reducing bacteria. On the other hand, minimal ferrous iron release was observed in the absence of the cultured iron reducing bacteria. This indicated that iron release by landfill leachate reacting with iron rich soil was a microbial mediated process.”

A copy of the Final Report is available at the following link:

<http://www.eng.fsu.edu/~gchen/Report5.pdf>

- b. Please submit all design and supporting documentation for Department review and approval necessary to install a liner and leachate collection and removal system at your facility. The liner and leachate system shall be designed for all areas in which solid waste has been and will be disposed. The design and supporting documentation shall include but not be limited to:
 - Type liner system components and associated component specification information.
 - Type leachate collection and removal system components and associated component specification information.
 - c. Submit an updated and revised closure plan in accordance with **Rule 62-701.600, F.A.C.** and **Rule 62-701.730(9), F.A.C.** which address the bottom liner, barrier layer, leachate collection and removal system components, final cover design and any other closure related issues associated with the permit application.
14. The facility is currently in corrective action as required by **Rule 62-701.510(7), F.A.C.** and is required to submit a completed Site Assessment Report in accordance with **Chapter 62-780, F.A.C.** To date, the Site Assessment Report has not been completed.
15. Because of unanswered questions on actual water quality, we plan to process the permit application without requiring a liner and leachate collection system design at this time. To proceed however, the permit will be issued as a one-year permit, renewable each year, for a total of five years from the date of permit issuance. The determination for requiring a liner and leachate collection system will be made upon review of the completed Site Assessment Report and review of routine water quality sampling results before each one-year permit renewal period. If we determine that a liner and leachate collection system is required, you will be informed and asked to submit a permit modification to provide a liner and leachate collection system in accordance with **Rule 62-701.730 (4)(a), F.A.C.**