



Florida Department of Environmental Protection

South District Office
Post Office Box 2549
Fort Myers, FL 33902-2549

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary



February 4, 2011

Robert Reisig
E-mailed to: tirebob@digital.net
400 Feagin Street
Avon Park, FL 33825

RE: Highlands County - SW
Florida Tire Terminal
400 Feagin Street
Avon Park, FL 33825
Permit No. 0245850-001-WT/02
Alternative Procedures Case No. SWAP-04-02
WACS ID No. 94452

Dear Mr. Reisig:

A Compliance Inspection was conducted at your facility on January 27, 2011. A copy of the inspection report, including the fire control requirements in the Avon Park Fire Department letter of November 9, 2004, for the facility is attached for your perusal. This inspection was conducted under the authority of Section 120.57(5), Florida Statutes.

During the inspection, four potential violations were noted.

Specific Condition No. 8 of the permit states the facility shall comply with the fire control requirements of the City of Avon Park Fire Department and the National Fire Protection Association (NFPA) Standard 231D. The Facility was in violation of this specific condition and the following fire control requirements:

1. **NFPA231D-3 Storage Arrangement 3-1.2** states that the main aisle width between piles must not be less than eight (8) feet. The main aisle width between piles was less than eight feet.
2. **NFPA231D-3 Storage Arrangement 3-4** states that tires shall be segregated from other storage by aisles at least eight (8) feet wide. Tires were not segregated from other storage by aisles at least 8 feet wide.

3. **Additional Fire Safety Requirement No. 1** states that no storage will be allowed between the buildings and a clear distance of 25 feet will be maintained around the building perimeters. Tire storage between the buildings was noted and a clear 25 foot distance was not maintained around the building perimeters.
4. **Additional Fire Safety Requirement No. 2** states fire lanes within the outside storage area will be maintained for firefighting access. All fire lanes within the outside storage area were not maintained for firefighting access.

The Department will re-inspect the facility on March 8, 2011 for compliance with the aforementioned requirements.

Whenever possible, please submit written documentation to James.Standiford@dep.state.fl.us. If you have any questions, please feel free to contact Jay Standiford at (239) 344-5697 or Bill Krumbholz at (239) 344-5657.

Sincerely,



Charles Emery III
Environmental Administrator

Attachment
CE/JAS/se



Florida Department of
Environmental Protection
Inspection Checklist



FACILITY INFORMATION:

Facility Name: FLORIDA TIRE TERMINAL

On-Site Inspection Start Date: 01/27/2011

On-Site Inspection End Date: 01/27/2011

WACS No.: 94452

Facility Street Address: 400 FEAGIN STREET

City: AVON PARK

County Name: HIGHLANDS

Zip: 33825

INSPECTION PARTICIPANTS:

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: James Standiford, Environmental Specialist II

Other Participants: Mark Sautter, Environmental Specialist II; Bob Reisig, Manager; Bill Krumbholz, Environmental Manager

INSPECTION TYPE:

Routine Operation Inspection for Other Facilities - Waste Tire 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: 01/27/2011

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 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 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)(c)				✓
1.6	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(4)(b) and (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) and (4); 62-701.730(4)(c) and (10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.				✓
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? 62-701.600(6)(b), 62-701.730(9)(d)				✓
1.9	Is financial assurance adequate? 62-701.630 for landfills; 62-701.710(7)(a) and (10)(a) 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.	✓			
1.10	Are cost estimates current and adjusted every year? 62-701.630(4) for landfills; 62-701.710(7)(b) and (10)(a) for waste processing facilities; 62-701.730(11)(b) and (c) for C&D debris facilities; 62-713.600(6)(b) and (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 facility 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: 01/27/2011

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)) Completed	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 Completed	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)	✓			

Item No.	WASTE TIRE FACILITY - STORAGE INDOORS Completed	Ok	Not Ok	Unk	N/A
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Inspection Date: 01/27/2011

Item No.	WASTE TIRE FACILITY - STORAGE INDOORS Completed	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 in height, do walls have at least a 4- hour fire rating? 62-711.540(2)(e)				✓
9.24	If waste tires are stored more than 15 feet in height, do walls have a fire rating of not less than 6 hours and columns one hour FR? If more than 20 feet, do columns and its connections with other structural members have two hour FR? 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 Completed	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 Completed	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)				✓

COMMENTS:

02/01/2011

The facility operates under Permit No. 0245850-001-WT/02 and Alternative Procedures Case No. SWAP-04-02 which expires on 8/31/2012.

In violation of Specific Condition #8 of the permit, the facility did not meet all of the fire control requirements of the Avon Park letter of November 9, 2004, copy attached.

NFPA231D-3 Storage Requirements

Inspection Date: 01/27/2011

3-1.2 Main isle width between all piles was not less than 8 feet.

3-4 Tires were not segregated from other storage by aisles at least 8 feet wide.

Additional Fire Safety Requirements

1) Tire storage between buildings was noted, and a clear distance of 25 feet was not maintained around the building parameters.

2) All fire lanes within the outside storage area were not maintained for firefighting access.

The Department also recommended that the facility place the Used Oil Container in Secondary Containment as a precautionary measure and to label Transfer Pans "Used Oil."

Avon Park Fire Department performed a fire survey on 2/5/2010 and 8/4/2010.

The Closure Cost Estimate dated 1/5/2010, received by the Department on 2/17/2010 was approved on 2/18/2010.

The Department will perform a Re-Inspection within 30 days.

Inspection Date: 01/27/2011

Signed:

James Standiford

PRINCIPAL INSPECTOR NAME

Environmental Specialist II

PRINCIPAL INSPECTOR TITLE**PRINCIPAL INSPECTOR SIGNATURE**

FDEP

ORGANIZATION

1/27/2011

DATE

Mark Sautter

REPRESENTATIVE NAME

Environmental Specialist II

REPRESENTATIVE TITLE

NO SIGNATURE

REPRESENTATIVE SIGNATURE

FDEP

ORGANIZATION

Bob Reisig

REPRESENTATIVE NAME

Manager

REPRESENTATIVE TITLE**REPRESENTATIVE SIGNATURE**

Florida Tire Terminal

ORGANIZATION

1/27/2011

DATE**Report Approvers:**

Bill Krumbholz

SUPERVISOR NAME

Environmental Manager

SUPERVISOR TITLE

NO SIGNATURE

SUPERVISOR SIGNATURE

FDEP

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.



Fire Safety Survey

Avon Park Fire Department

Date: November 09, 2004

To: Bob Reisig
Florida Tire Terminal
400 Feagin Avenue
Avon Park, FL 33825

From: David Cloud
Fire Safety Inspector
98 S. Delaney Avenue
Avon Park, FL 33825

Subject: Fire Control

The Florida Fire Prevention Code NFPA 1 requires storage of rubber tires to comply with NFPA Standard 231D, Standard for Storage of Rubber Tires. It also grants an exception for *existing buildings*. Due to access concerns within and around the buildings I feel it is necessary to follow the guidelines of chapter three of NFPA231D dealing with storage arrangements.

NFPA231D-3 Storage arrangements

- 3-1.1 Piles shall not be more than 50 ft wide.
- 3-1.2 Main aisle width between piles not less than 8 ft.
- 3-2.2 Clearance in all directions from roof structures not less than 18 inches.
- 3-2.4 Storage clearance from heaters and ducts shall be at least 3 ft or according to equipment manufacturer's guidelines.
- 3-2.5 Maintain a clearance from light fixtures to prevent possible ignition.
- 3-3.1 On-tread piles are not to exceed 25 ft in the direction of the wheel hole.
- 3-3.2 Acceptable storage arrangements shall include:
 - A) On-floor, on-side up to 12 ft high.
 - B) On-floor, on-tread up to 5 ft high.

C) Double-row or multi-row fixed or portable rack storage up to 5 ft high.

D) Single-row fixed or portable rack storage up to 12 ft high.

E) Laced tires in racks up to 5 ft high.

3-4 Tires shall be segregated from other storage by aisles at least 8 Ft wide.

Additional Fire Safety Requirements:

1. No storage will be allowed between the buildings and a clear distance of 25 feet will be maintained around the building perimeters.
2. Fire lanes within the outside storage will be maintained for firefighting access.
3. Piles will be controlled by a non combustible barrier
4. Measures will be taken to control and contain run-off from hose streams.
5. Vegetation will be controlled around fences and walls.
6. All buildings will require a supervised alarm system for early detection of smoke and fire. The system should identify the building involved. A means of access will be provided to the alarm panel for quick location of fire.


These requirements apply to existing buildings. Any renovations and new construction will be subject to current code requirements.

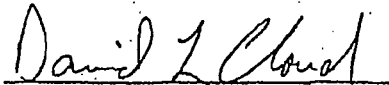
Pile dimensions also apply to outside storage.

Inventory:

Inventory shall be limited to 15000 tires.

Approved by:


Terry Feickert, Chief


David Cloud, Inspector