



**Florida Department of
Environmental Protection
Inspection Checklist**

FACILITY INFORMATION:

Facility Name: ADVANCED TIRE RECYCLING
On-Site Inspection Start Date: 12/19/2017
On-Site Inspection End Date: 12/19/2017
WACS No.: 101060
Facility Street Address: 8369 SOUTHWEST 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: Scott Mendoza, Facility Manager

INSPECTION TYPE:

Complaint Investigation Inspection for WPF - Waste 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.

13.0 - SECTION 13.0 - COMPLAINT INVESTIGATIONS

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13.0 - SECTION 13.0 - COMPLAINT INVESTIGATIONS

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
13.1	Unauthorized storing, processing, or disposing of solid waste except as authorized at a permitted solid waste management facility or a facility exempt from permitting under this chapter? 62-701.300(1)(a)	✓			
13.2	Authorized or unauthorized storing, processing, or disposing of solid waste in a manner or location that causes air quality standards to be violated or water quality standards or criteria of receiving waters to be violated? 62-701.300(1)(b)	✓			
13.3	Unauthorized disposal or storage prohibited, except yard trash, within 500 feet of a potable water well? 62-701.300(2)(b)	✓			
13.4	Unauthorized disposal or storage in a dewatered pit without liner or leachate controls? 62-701.300(2)(c)	✓			
13.5	Unauthorized disposal or storage prohibited in any natural or artificial body of water including groundwater and wetlands? (Does not apply to standing water after a storm event.) 62-701.300(2)(d)	✓			
13.6	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)	✓			
13.7	Unauthorized storage or disposal on the right of way of any public highway, road or alley? 62-701.300(2)(f)	✓			
13.8	Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62-701.300(3)	✓			
13.9	Are the following unauthorized wastes or special wastes properly managed? (Check any that are Not OK)				
13.9.1	CCA treated wood being ground into mulch, compost, or any wood product that is applied to the ground or burned 62-701.300(14)				✓
13.10	Unauthorized storage or disposal of yard trash within 100 feet of potable water wells (except on-site), and/or 50 feet of water bodies? 62-701.300(12)	✓			
13.11	Waste tire prohibitions:				
13.11.1	Maintaining a waste tire site consisting of more than 1500 tires that is not an integral part of a permitted waste tire processing facility. 62-711.400(1)	✓			
13.11.2	Disposing of waste tires except as permitted at a permitted solid waste management facility. 62-711.400(2)	✓			
13.11.3	Storing waste tires only as a part of a waste tire collection center, permitted waste tire processing facility, permitted solid waste management facility, or other exempt facility. 62-711.400(4)	✓			
13.11.4	Contracting with only registered or exempt waste tire collectors for the transportation, disposal, or processing of more than 25 waste tires. 62-711.400(5)	✓			
13.12	Are all additional specific conditions (not otherwise addressed above) in the permit, registration, Department order or certification, if any, being followed? 62-701.320(1), 403.161, F.S.	✓			

COMMENTS:

This investigation was in response to a complaint alleging "...dumped thousands of old tractor and semi tires on the ground of their property..." and the complaint further alleges that the tires are piled to 20' high and many are very old and disintegrating. The complainant has a further concern that the toxins from the tires are impacting surrounding crops and the water supply.

The facility is permitted Waste Tire Processing Facility, authorized to have a maximum of 125,000 waste tires on site. Their operations include running routes to collect waste tires from Jacksonville and Ocala retailers.

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Trailers are unloaded on to the ground where, useable tires are removed for resale and placed in trailers and the remaining tires are reloaded and sent to Argos (Cement Batch Plant) for use as fuel or to Liberty Tires (Jackson Georgia) for disposal. Liberty Tires provides the trailers used to transport the tires to their facility controlling the inbound flow.

The investigation determined that there were no greatly deteriorated tires, nor any tractor or semi-tractor trailer tires on site. Further, tire piles do not represent an environmental threat to the groundwater or surrounding crops. This permitted facility conducts a mosquito control program in accordance with their permit. While the number of tires on the ground greatly exceeds that of typical operations, the total number of tires on site does not appear to exceed the permitted maximum. This increase of tires on the ground is due to a temporary reduction of trailers provided by Liberty for disposal operations. Existing route trailers must be offloaded, in order to continue servicing contracted retail routes. No tire pile exceeded the 15' maximum. The quarterly report, due in January 2018, will document the total number of tires on site.

While the concerns alleged are considered invalid, several storage issues were observed. These include 1) piles greater than 50' wide, 2) piles greater than 10,000 square feet, 3) lack of a 50' wide perimeter road and 4) unobstructed access to the fire lane was not available. Per Department document "Guidelines for Characterizing Solid Waste Violations," single instances of each of these conditions do not represent violations. Should these conditions be observed during the next Level of Service inspection, they will be documented as violations. The Facility was advised to correct these issues within 30 days. No negative impacts to the environment were observed and no further action is considered necessary with regard to this complaint.

ATTACHMENTS:

North Tire Pile



South Tire Pile



