



**Florida Department of
Environmental Protection
Inspection Checklist**

FACILITY INFORMATION:

Facility Name: WEBBER RECYCLING, LLC
On-site Inspection Start Date: 01/12/2022
On-site Inspection End Date: 01/12/2022
WACS No.: 106211
Facility Street Address: 2203 HAMILTON STREET
City: JACKSONVILLE
County Name: DUVAL
Zip: 32210

INSPECTION PARTICIPANTS:

(Include ALL Landfill and Department Personnel with Corresponding Titles)

Principal Inspector: Jeff Schroer, Inspector

Other Participants: Lynn Roesser, Shareholder; Ronald Bassett, Site Manager;

INSPECTION TYPE:

Routine Closure Inspection for WPF - Waste Tire Processing Facility

ATTACHMENTS TO THE INSPECTION CHECKLIST:

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

Note: Checklist items with shaded boxes are for informational purposes only.

1.0 - SECTION 1.0 - FILE REVIEW

9.0 - SECTION 9.0 - WASTE TIRE FACILITIES

Inspection Date: 01/12/2022

1.0 - 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.)	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 gas monitoring being performed as required by the permit? 62-701.500(9), 62-701.530(2)				✓
1.4	Are the results of the gas sampling reported to the Department quarterly? 62-701.530(2)(c)				✓
1.5	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(8) and 62-701.730(10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.				✓
1.6	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.				✓
1.7	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)(e)				✓
1.8	Is financial assurance adequate? 62-701.630 for landfills; 62-701.710(7)(a) and 62-701.710(1)(d)1. 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.				✓
1.9	Are cost estimates current and adjusted every year? 62-701.630(4) for landfills; 62-701.710(7)(a) and 62-701.710(1)(d)1. for waste processing facilities; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(b) and 62-713.600(6)(c) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities.				✓
1.10	For C&D debris disposal and disposal with recycling facilities, is an Annual Report submitted to the Department for the disposal operation by February 1st of each year? 62-701.730(12)				✓
1.11	For C&D recycling facilities with no disposal, is an Annual Report for the recycling facility submitted to the Department by February 1st of each year? 62-701.710(8)(b)				✓
1.12	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)				✓
1.13	For compost facilities, has the annual report been submitted by June 1st? 62-709.530(3)				✓

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9.0 - 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))	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	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)				✓

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Item No.	WASTE TIRE FACILITY - STORAGE INDOORS	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 high, do walls between adjacent warehouse areas and between manufacturing and warehouse areas have at least a four-hour fire rating? 62-711.540(2)(e)				✓
9.24	If waste tires are stored over 15 feet high, do walls between manufacturing and warehouse areas have a fire rating of not less than six hours and do steel columns have one-hour fireproofing? If the top of storage exceeds 20 feet in height, do columns and their connections with other structural members have two-hour fireproofing? 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	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	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)				✓

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Pre-existing Violations:

Rule: 62-701.300(1)(a)

Question Number: 9.1.1

Explanation: A large pile of tire shreds, estimated by the facility to be 240 tons, was observed east of the shredder building with a small pile at the discharge end of the shredder. A total of 18 stacks, estimated to be 8 tons, of tractor trailer tire sidewalls were observed adjacent to the south and east sides of the shredder building. An estimated 1500, 16.5 tons, whole waste tires, were observed along the south, east and north perimeters of the property. Total waste tires are estimated to be 264.5 tons. The permit provides that a passenger car tire equivalent weight standard is 22 lbs/tire. Section 2, Specific Condition C.2.4., of Permit Number 378243-001-WT-02, provides "The maximum amount of waste tires to be stored on sited at any time shall not exceed 4,000 whole waste tires (44 tons) plus 2,000 shredded tires (22 tons)." The estimated 264.5 tons exceeds the maximum permitted tonnage of 66, however, based on the notification that the facility is ceasing operations, the facility is no longer authorized to store waste tires. Additionally, a total of 62 Off-Road Tires were observed scattered over the entire property. Off-Road Tires or non-motor vehicle tires do not meet the definition of waste tires, but are considered a solid waste. Rule 62-701.300(1)(a) Florida Administrative Code (Fla. Admin. Code) provides "No person shall store, process, or dispose of solid waste except as authorized at a permitted solid waste management facility or a facility exempt from permitting under this chapter."

Corrective Action: The facility shall immediately properly dispose of all waste tires, including shreds, sidewalls and whole tires, and Off-Road Tires. Provide legible receipts documenting proper disposal within 14 days of completion. Report corrective action to the Department, via email, immediately upon completion to arrange for a confirming inspection.

Attachments:

Sidewalls South of Building



Sidewalls East of Building



Inspection Date: 01/12/2022

Shred Pile From West



Shred Pile from East



Shred Pile from Northeast



Shreds Adjacent to Shredder



SE Corner Tire Pile



East Boundary Tire Pile



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West Boundary Tires



West Boundary Tires Photo 2



Off-Road Tires Photo 1



Off-Road Tires Photo 2



Off-Road Tires Photo 3



Rule: 62-701.300(2)(e)

Question Number: 9.4

Explanation: All whole waste tires, shreds and sidewalls stored outside and on the ground south of a diagonal line from the northwest corner to the southeast corner of the property are within 200 feet of minor tributaries of the Ortega River. Rule 62-701.300(2)(e), Florida Administrative Code (Fla. Admin. Code) provides no person shall store or dispose of solid waste "Within 200 feet of any natural or artificial body of water..."

Corrective Action: The facility shall immediately properly dispose of all waste tires, including shreds, whole tires and sidewalls, and Off-Road Tires and submit receipts documenting proper disposal within 14 days of completion. Report corrective action to the

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Department, via email, immediately upon completion to arrange for a confirming inspection.

Attachments:

Tributary at Southwest Corner



COMMENTS:

On December 27, 2021 Department Financial Group staff contacted the District informing them that a Webber Recycling, LLC representative had informed them that the Facility was ceasing operations in the near future and were inquiring about the financial Guarantee bond.

On January 12, 2022 Shareholder Lynn Roesser contacted the District seeking a meeting to discuss clean-up and closure activities and the financial guarantee bond. An inspection and subsequent meeting was conducted the same day. Existing violations and corrective actions were discussed. Ms. Roesser indicated that they while they desired to clean up the site, they no longer had the funds to do so.

The inspection showed that while considerable progress had been made in processing and removing tires, it was estimated that 264.5 tons remain in shreds, whole tires and sidewalls, well exceeding the permitted maximum of 66 tons. Additionally the clean-up activities revealed 62 oversized non-motor vehicle tires (Off-Road Tires) stored by the facility. While Off-Road Tires are not regulated as waste tires, they are regulated as solid waste and require proper disposal.

Although financial assurance is inadequate, Item Nos. 1.8 and 1.9 concerning financial assurance are N/A since the site is ceasing operations and will not be adjusting the cost estimate nor the financial assurance mechanism.

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On January 18, 2022, the Facility notified the Department that they ceased operations effective January 17, 2022.

Item Nos. 9.26-9.36 are marked as N/A, because outside storage was not authorized in the permit.

Item Nos. 9.6 though 9.25 are marked N/A because the site has ceased operations and will no longer be under permit.

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Signed:Jeff SchroerInspector**PRINCIPAL INSPECTOR NAME****PRINCIPAL INSPECTOR TITLE**DEP01/24/2022**PRINCIPAL INSPECTOR SIGNATURE****ORGANIZATION****DATE**Lynn RoesserShareholder**REPRESENTATIVE NAME****REPRESENTATIVE TITLE**NO SIGNATURE REQUIREDWebber Recycling, LLC**REPRESENTATIVE SIGNATURE****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.

Ronald BassettSite Manager**REPRESENTATIVE NAME****REPRESENTATIVE TITLE**NO SIGNATURE REQUIREDWebber Recycling, LLC**REPRESENTATIVE SIGNATURE****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.

Report Approvers:**Approver:** Jeff Schroer**Inspection Approval Date:** 01/25/2022