

**DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY**

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P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

April 29, 2016

Jack Akop Oganian, JTR  
12025 Branford Street  
Sun Valley, CA 91352

RE: Rejection of Major Waste Tire Facility Permit Application for JTR,  
TPID No. 1842617

Dear Mr. Oganian:

Staff of the Department of Resources Recycling and Recovery (CalRecycle) have completed our review of the Major Waste Tire Facility Permit application package received on April 4, 2016 for JTR. CalRecycle staff have determined that the application content **does not** conform to applicable requirements of Title 14, California Code of Regulations (CCR), Section 18431, and we are **rejecting the application as incomplete**.

The following comments describe the areas of deficiency that must be corrected prior to CalRecycle staff's acceptance of the application:

- CalRecycle Form 500 (Waste Tire Facility Permit Application)
  - Page 1 of 2, Section III, There is an inconsistency of correctly identifying which Assessor's Parcel Number(s) (APN) the site is located on. Based on the zoning maps and diagrams provided, the site appears to be located on both APN 253-7017-024 and 253-7017-025. The site acreage of 1.51 acres includes both APNs.
- CalRecycle Form 501 (Waste Tire Facility Operation Plan)
  - Page 2 of 6, Section III, Subsection A, This section is asking for the distance from the tire storage area to the water source that can provide 1,000+ gallons per minute (gpm). Also, do not add information in the grayed boxes. Provide any explanations in the space provided or attach additional sheets. See the comment on Form 503 (Emergency Response Plan) as well.
  - Page 3 of 6, Section IV, Subsection A, Pile #B, The calculations should be demonstrated as length x width x height not length x width x width. Also within this section the total cubic feet was miscalculated to 1,500 cubic feet and should be 3,000 cubic feet since the calculation was representing two rows.
  - Page 4 of 6, Section IV, Subsection B, Identify the distances between Pile A and Pile C from the building as approved by the local fire authority.
- CalRecycle Form 502 (Waste Tire Facility Environmental Information)
  - Page 2 of 4, Governmental Requirements, Should the Assessor's Parcel Number(s) include 253-7017-024, and 025? Also within this section the Certificate of Occupancy referenced here identifies the APN as parcel 2537-017-025. The legal description has APNs 253-7017-024 and 025. This discrepancy needs to be clarified

and to include all parcels that the site is located on consistently throughout all application forms and documents.

- Page 3 of 4, Governmental Requirements Con't, Include the SCH # for the EIR – 1994071030. Also within this section, delete that the EIR is available for purchase.
- CalRecycle Form 503 (Waste Tire Facility Emergency Response Plan)
  - Page 1 of 2, Section I, Edward Arensdorf is the agent, provide the same property owner information of Gregory and Lisa Ross Baker, Baker Trust as was stated on Form 500.
  - Page 1 of 2, Section III, Both emergency response equipment available choices were checked off on the form, please choose and be clear of which option is being chosen.
  - Page 2 of 2, Section III, A garden hose was described in the additional emergency equipment to meet the 500' requirement, yet the requirement refers to a 500' fire hose that can deliver 1,000 gpm, which a garden hose could not do. See the comment on the Operations Plan (Form 501) as well.
  - Page 2 of 2, Section IV, This section does not provide the required description on containment of pyrolytic oil. Provide a description for containment of pyrolytic oil.
- CalRecycle Form 504 (Waste Tire Facility Closure Plan)
  - Page 1 of 3, Part B, "Board" is referenced here, clarify which board, if referring to CalRecycle then please state CalRecycle, and correctly identify any references in subsequent sections.
  - Page 2 of 3, Part B, Azusa Landfill is located at 1211 West Gladstone Street, Azusa, CA 91702. The address stated in this form should be corrected.
  - Page 2 of 3, Part B, All in accordance with 18441 guidelines is stated in this section but should state all in accordance with 18441 regulations.
  - Attachment Part C, Correct Azusa Landfill address; The calculation used for Transportation Costs should equal out to \$4.10 considering that it costs \$100 per hour at 2.75 hours per load divided by 67 miles round trip. Also the contingency factor used for the total closure cost should be 1.20 not 1.10 for both the Azusa Landfill and CRM options.
- Property Lease Agreement
  - The Standard Sublease is stamped "DRAFT", a final version of this paperwork needs to be submitted as part of the permit application.

Within 30 days of receipt of a complete application package, CalRecycle will either accept or reject the application. Please note that if more than 499 waste tires are observed on site during the application review process, CalRecycle staff will reject the application package. Within 180 days of accepting a complete application, CalRecycle will issue or deny the issuance of a Waste Tire Facility Permit (WTFP).

Additionally, you are not allowed to store more than 499 waste tires at the site until a WTFP has been issued by CalRecycle.

Please be advised that should you decide to resubmit a formal application for a new Major WTFP, CalRecycle is highly likely to deny the issuance of the WTFP pursuant to Public Resources Code Section (PRC) Section 42843, due to your prior chronic non-compliance with waste tire laws and regulations. If the WTFP is subsequently denied by CalRecycle, you are afforded due process rights associated with the denial, which may include a hearing, as specified by PRC Section 42843.

If you have any questions, please call me at (916) 341-6363 or via email at [megan.emslander@calrecycle.ca.gov](mailto:megan.emslander@calrecycle.ca.gov).

Sincerely,



Megan Emslander, Environmental Scientist  
Permitting and Assistance Branch, South Unit  
CalRecycle

cc: Frank Simpson, Waste Tire Compliance South Unit Supervisor  
Virginia Rosales, Permits and Assistance South Unit Supervisor  
Steve Dolan, Waste Tire Compliance South Unit Agent

