

Silent Running
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Board Members of the California Integrated Waste Management Board
1001 I Street
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Sacramento, CA 95812

RE: Comments on 5-Year Plan for the Waste Tire Recycling Management Program

Dear Board Members:

My name is Jim Dodenhoff and I am President of Silent Running, consulting and advising environmental and energy firms. Prior to forming Silent Running, I served for 4 ½ years as Vice President of GreenMan Technologies of California, Inc. a manufacturer of rubber products using scrap tires and rubber manufacturing scrap as its feedstock. During my tenure at GreenMan we collected nearly 2 Million Passenger Tire Equivalents per year and produced nearly 10 Million lbs per year of rubber products that were used in the playground, track and field, athletic surface, and ballistics vertical segments.

I appreciate the opportunity to address the Board today.

As you work to develop a new 5-Year Plan for the Waste Tire Recycling Management Program, I think now is a particularly good time to stand back from the trees and take a look at the forest.

A number of Board Members are new. Many of us in the private and public sector (particularly those with the grayer hair) can hardly believe that 17 years have passed since the passage of AB-939. It has been a long and winding road, but today the state of California has reached one of the major goals of AB-939; namely, the diversion of 50% of generated waste from landfills.

I believe that a tipping point has been reached and that a paradigm shift may be in order. Are environmental services firms (as Rosalie Mule' likes to call traditional waste haulers and recyclers) managing waste or are they producing raw materials for global consumption? How much of the Board's efforts should be spent on environmental protection and how much of the Board's efforts should be spent on facilitating the continued production of raw materials from waste feedstocks?

These are "blue sky" questions which are far broader than the scope of today's meeting; however, I hope they stimulate some thought.

This is the third 5-year Tire Plan I've had the opportunity to review and comment upon. Given the luxury of a bit more free time in my professional and personal life, I've had the chance to research some things I'd always wanted to know with respect to the CIWMB.

First, in the recently approved State Budget, the CIWMB's annual budget is approximately \$160 Million. In the five-year plan the estimated annual budget for the tire program is \$32 Million. I am not positive, but I believe that the \$32 Million for the tire program is part of the \$160 Million for the overall CIWMB.

Second, this state has been on a run rate of disposing approximately 40 Million tons of waste/year in either landfills or transformation facilities. Approximately 170,000 tons of tires are being disposed or transformed annually, amounting to 4/10 of 1% of the overall waste stream. If my numbers are in error, please correct me.

The implications, in my view, are relatively straight-forward. There is a significant amount of government money available to "manage" a relatively small amount of the waste stream. Furthermore, apart from the environmental

risk of tire fires-----which has been greatly mitigated in recent years by the outstanding remediation efforts performed by the Board and its contractors-----I do not believe that the environmental risk from tires is significantly greater than from Municipal Solid Waste (MSW).

SB 876 established the ground rules for the funding of the tire program, and those ground rules are unlikely to change. Consequently, I believe the Board's Tire Program should continue to be inspired and challenged to be a faithful steward of these monies, and to focus on the money's highest and best use. At a time when government funding is tight for most programs, there is ample funding in the State's Tire Program. I would hope that traditional governmental jurisdiction boundaries and turf wars would be cast aside and that the next 5-Year Tire Plan has, as one of its primary objectives, a focus that extends beyond California and emphasizes knowledge transfer that can benefit other states and, quite frankly, countries, which have less financial resources.

I also would hope that the Board might consider taking a bottom up approach to the development of the next 5-Year Plan. It is simple and expedient to simply tweak an existing plan, and the existing plan is sound. However, I would argue that both the Plan, and, in fact, today's agenda are upside down. Namely, the plan focuses on enforcement, manifesting, remediation, pure research on landfill alternatives for tire disposal, and Market Development; in that order. Now that the major illegal tire piles in the state have been remediated (or are on a path to being remediated) shouldn't these Agenda items be reversed? And so, too, shouldn't the proposed funding for each major program element be revisited to reflect a new reality in California.

It is premature to pick apart or comment upon the 5-year Plan in great detail. I would ask; however, that the Board consider a continued and expedited movement along a continuum from study and analysis to execution and action. As with all large private and public sector institutions I can't help but think that the \$32 Million dollars allocated to the State's tire program can produce better, greater, and more noble results.

I'd ask you to consider allocating a greater level of human and financial resources to the following areas of the tire program:

1. Completing the job of optimizing and enhancing the Waste Tire Manifest Program so that it can provide meaningful and reliable data with respect to tire flows. In my view as a former operator, the program has been used primarily as an enforcement tool. The database is rich and can provide immensely valuable information with respect to where scrap tires are generated, where they are recycled or transformed, and where they are disposed. I am aware of the Board's Annual Waste Tire Survey, but believe that an informed collation and analysis of the Waste Tire Manifest data will greatly enhance the tire program's ability to navigate in the coming years.
2. Movement from study and knowledge transfer of US-Mexico Scrap Tire Border initiatives to clean-up, recycling, transformation, and environmentally compliant disposal of illegally dumped scrap tires. Ample data exists with respect to existing illegal tire piles along the border. The Board has commissioned a study to focus on tire flows and root causes of scrap tire "issues" on the Border. Greater amounts of money should be allocated to actually assisting government entities in moving forward on establishing programs for providing higher and better use for scrap tires generated in Border Areas. I would encourage each of the Board Members to visit Tijuana and Mexicali. A noble and beneficial use for tires can be found in Baja California given the enormous number of unpaved streets, its need for additional affordable fuel, its shortage of affordable building materials, and its continued demand for used tires. Baja California's "tire problem" is, in fact, also California's tire problem.
3. The Board needs to move beyond market development and incorporate economic development into its programs. The rubber manufacturing and scrap tire collection industry provides economic development benefits to communities which are simply not appreciated. In many California jurisdictions, scrap tire collection, storage, processing, and rubber manufacturing are seen as dirty and unattractive industries by local planning and community development agencies. The Board can provide greater assistance to industry by moving beyond market development to economic development.
4. The Board should continue to work hard, as it has been doing, to close the loop for tires. The traditional closed loop paradigm; namely the recycling of tires to make rubber products that are, in turn, used to make new tires may not be technically feasible at this time. However; the Board should continue to work closely with Cal-Trans and local jurisdictions that do roadwork to maximize the use of recycled tires for RAC, sound walls, road and highway related civil engineering projects, and road and highway structures. There is a correlation between tire use and road construction projects. It is natural and intuitive that the Board

should focus considerable efforts on stimulating demand for recycled tires in new road building projects and road maintenance projects.

5. The Board, working with the Governor, State legislators, and the California Energy Commission should seek to develop new legislation which provides greater support for use of tires as fuel and as a source of power generation. Amidst \$60-\$70/barrel oil prices, global warming, and limits to power generation capacity, there is a convergence occurring between environmental management issues, and energy development. It seems illogical to me that in the face of objective science which clearly shows the superiority of tires as a fuel source compared with certain other fuels like coal, that today there is virtually no board support or funding for use of tires as fuel. The current situation is driven, to a large degree, by political factors. I'd like to challenge the age-old paradigm of "we can't change the law" and respectfully ask the Board to revisit this issue and to seek creative ways to use its resources to rekindle the potential use of scrap tires as a fuel source.

In closing, I appreciate having the opportunity to address the Board. I also have greatly appreciated the opportunity to work with Board Staff on Tire Issues over the past 5 years. It is a good and highly qualified staff that brings, for the most part, a practical perspective to most issues in the Tire Program. Armed with ample funding and a highly qualified staff, the CIWMB's Tire Program has a rare opportunity to assist in being a governmental and knowledge leader in the management of scrap tires, not only for the State of California, but for the entire country.

Sincerely,

Jim Dodenhoff
President
Silent Running