

REQUEST FOR ACTION

To: Mark de Bie, Deputy Director
Waste Permitting, Compliance & Mitigation Division

From: 
Susan Markie, Chief
Permitting & Assistance Branch

Request Date: August 7, 2012

Decision Subject: Beneficial Use of Waste Tires at Altamont Raceway, Alameda County, TPID Number 1307512-01

On June 3, 2012, the Department of Resources Recycling and Recovery (CalRecycle) staff received a beneficial reuse request from Melvin T. Andrews for the use of waste tires in safety barriers at Boomers Livermore Race Track located at 17001 Midway Road, in the City of Tracy, Alameda County. Altamont Raceway has been using tires for safety barriers at their racing track since opening in 1966.

CalRecycle has regulatory oversight over the storage of 500 or more waste tires. Waste tire regulations address the storage, stockpiling, accumulation or discarding of waste tires to prevent the potential adverse effects. Title 14, California Code of Regulations, §17346(f) provides a mechanism for CalRecycle to approve the beneficial uses of waste tires if the proposed use is approved by a civil engineer and does not pose a threat to public health, safety and/or the environment. Each beneficial reuse proposal is to be considered on a case by case basis and a decision is to be made, within 90 days of receipt of an application, as to whether or not the use qualifies as a beneficial reuse of the waste tires. An approved beneficial reuse of tires is not considered tire disposal or tire storage and does not require the issuance of a waste tire facility permit.

The use of tires was approved for this site in 2006. However the beneficial use was issued to the management firm that operated the track and not the track owner. The issue of whether or not the beneficial use exemption could continue under another party was discussed with staff of the legal office, tire enforcement and permits, (i.e., Heather Hunt, Barbara Strough, Mary LeClaire, Robert Holmes, and Patrick Snider) on May 3, 2012. It was staffs' determination that the beneficial use could continue under the supervision of the track's owner. Additionally, staff requested the track owner remove waste tires on site not being used beneficially and implement a vector control program.

The additional tires have been removed and verified by the tire enforcement staff via the Comprehensive Trip Log; the June 3, 2012 request from Mr. Andrews provided an adequate vector control plan.

In the initial request for the beneficial reuse of tires at the Altamont Raceway dated September 13, 2006, the following approvals were verified:

- Bonnie S. Terra, Acting Fire Marshal, Alameda County Fire Department, stated in a letter dated April 3, 2006, that the tires used at the Altamont Motorsports Park (now Altamont Raceway) in the tire wall safety barrier does not negatively impact the level of fire safety at the track.
- In a letter dated April 14, 2006, Mr. John R. Rusmiser, District Manager, Alameda County Mosquito Abatement district, stated that he does not expect a mosquito problem at the track with the tire barriers as long as the districts recommendations are followed.
- In a letter dated July 13, 2006, Mr. Chris Bazar, Planning Director, Alameda County Community Development Agency, Planning Department, approved the use of tires in the safety walls at the Altamont Motorsports Park Racetrack.
- Mr. Jim Xu, a Civil Engineer with Golden Valley Engineering & Surveying, approved drawings of the tire crash cushions design for racing. Mr. Xu signed and stamped his letter of approval.

Staff determined that these met and continue to meet the requirements of §17346(f).

Staff Recommendation: The new applicant has met all the necessary requirements outlined in 14 CCR 17346(f) pertaining to the beneficial reuse of waste tires. Therefore, staff recommends the Deputy Director find the use of waste tires in safety barriers at the Altamont Raceway to be a beneficial reuse.

Deputy Director Action: On the basis of the information, findings, and analysis in this Request for Action I concur with the finding that the use of waste tires in safety barriers at the Altamont Raceway is a beneficial reuse.

Dated: August 7, 2012



Mark de Bie, Deputy Director
Waste Permitting, Compliance & Mitigation Division
Department of Resources Recycling & Recovery (CalRecycle)