



**RUBBER**  
manufacturers  
association

1400 K Street, NW • Washington, DC 20005 • tel (202) 682-4800 • fax (202) 682-4809 • www.rma.org

January 8, 2007

Ms. Margo Reid Brown  
Chair  
California Integrated Waste Management Board  
1001 I Street  
Sacramento, Calif. 95814

Re: 2006/2007 Revision to the CIWMB 5 Year Scrap Tire Plan

On behalf of the Rubber Manufacturers Association (RMA)<sup>1</sup> I would like to take this opportunity to submit our recommendations course of action for the California Integrated Waste Management Board's Five-Year Plan for the Waste Tire Recycling Management Program.

After carefully considering the scrap tire situation in California, RMA submits the following recommendations for current and future expenditures of the California scrap tire fund:

**(1) Stockpile Abatement:** According to the CIWMB there are a reported 1.5 million scrap tires in unlawful stockpiles remaining within the state. These piles are relatively small and scattered throughout the state.

Recommendation:

- The CIWMB should make the removal of the remaining stockpiles a priority and continue the program under PRC Section 42846, the directions provided by SB 876 and PRC section 42889.
- CIWMB also should reduce the number of tires in stockpiles to be abated to 500.

**(2) Market Development** (research directed at promoting and developing alternatives to the landfill disposal of tires): California has a unique situation pertaining to the land disposal of scrap tires and the tipping fees paid to scrap tire processors. Historically it has been assumed that scrap tire processors would have to lower their tipping fees to compete with landfills for the supply of scrap tires.

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<sup>1</sup> The Rubber Manufacturers Association (RMA) is the national trade association that represents the eight tire manufacturers with manufacturing operations in the United States. Our members include; Bridgestone Americas Holding Inc., Continental Tire North America, Cooper Tire & Rubber Company, The Goodyear Tire & Rubber Company, Michelin North America, Inc., Pirelli Tire North America, Toyo Tire North America, Inc. and Yokohama Tire Corp. RMA actively works with federal, state and local decisions makers across the nation to promote effective scrap tire management and end-use markets for recycled rubber.

In Southern California, major processors have a lower tipping fee than the nearby landfills, but there has not been a change to the number of scrap tires being landfilled. Apparently, scrap tire processors are unable to process any additional scrap tires.

While it may seem that a market-based solution would be to increase production capacity of these processing operations, processors have not already expanded their production capacity on their own.

RMA research indicates that scrap tire processor production capacity and the demand for scrap tire-generated products are at a point of equilibrium. Most of the higher value-added markets for scrap tire products are not expanding.

To address the demand side of this equation the CIWMB market development program should focus on the obstacles that are impeding the further expansion of these higher value added markets rather than increasing production capacity of the scrap tire processors.

Recommendation:

The CIWMB should use its scrap tire funds to:

- Identify the obstacles that impede or limit the expansion of the various end use markets for scrap tires (exclusive of tire-derived fuel) and;
- Develop appropriate informational documentation that addresses the obstacles that have been identified.

Examples of the obstacles that exist include, but are not limited to: concerns about latex, leachate from tire material, volatilization from rubber-derived products, a material safety data sheet, odors and ingestion concerns.

- Conduct a research program that will identify consumer purchasing behavior and how it relates to the purchase of recycled scrap tire rubber products.
- Fund a second phase study that would use the 2003 CIWMB supported *assessment of markets for fiber and steel produced from recycling waste tires*.
- Increase funding for market development program along the California/Mexico border region.

These programs should focus on the fundamentals of developing a self-sustaining scrap tire business, the fundamentals of processing scrap tires, an analysis of the potential markets in that region, and suggested approaches for developing these markets.

- Train law enforcement agents in the border region. Develop programs designed to understand how to assess and abate scrap tire piles and how to prevent, plan for and fight a scrap tire pile fire. These programs should be coordinated with the appropriate Mexican authorities and the Office of Solid Waste and Recycling at USEPA region 9.

### **(3) Enforcement Activities:**

#### Recommendation:

- The CIWMB should continue to fund the enforcement and regulations relating to the storage of waste and used tires pursuant to the direction provided by SB 876.
- RMA also suggests that the CIWMB continue with the waste and used tire hauler program and manifest system.

### **(4) A Tire Care and Maintenance Program:**

#### Recommendation:

- The CIWMB should engage in a long-term program to educate the driving public on the benefits of proper care and maintenance of tires. A program should emphasize the importance of proper tire inflation pressure, proper vehicle alignment, tire rotation and information on tread depth.
- RMA promotes tire care and maintenance education through its "Be Tire Smart – Play Your Part" program and is prepared to work with the CIWMB in a long-term partnership to achieve this mutually beneficial end.

**(5) Current and Allocated Funds:** RMA believes that the current allocation of funds by and through the CIWMB for scrap tire projects is not achieving the agency's stated goals.

#### Recommendation:

- CIWMB should terminate or phase out funding for programs that are not achieving its goals at the earliest possible time.
- The state's scrap tire fee on the sale of new tires should be reduced to \$0.50 from the current \$1.00 fee.
- If the funding level for CIWMB continues to far exceed the agency's expenditures on scrap tire programs, then a reduction in the scrap tire fee would be warranted.
- CIWMB should not fund programs for the following activities:
  - Increasing scrap tire production capacity
  - Subsidizing the purchase of scrap tire-derived products including but not limited to: rubber asphalt concrete, bound rubber products containing

recycled content, molded or extruded rubber products containing recycled rubber.

- o Subsidizing the collection or transportation of scrap tires.

I would be glad to provide additional information or answer any questions you might have about or recommendations.

Yours truly,

Michael Blumenthal  
Senior Technical Director

Cc:

Mr. Gary Peterson

Ms. Rosie Mule

Mr. Wesley Chesbro

Mr. Jeffrey Danzinger