

Waste Tires: The Bottom Line
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I had the pleasure of attending the CMAR Convention in September in Gurnee, Illinois. The convention was impeccably run, as always. Kudos to Michelle and the Board Members! Auto Parts City is a very impressive operation and they were great hosts! My 5-year old son, Adis, got to come along and he proceeded to wear his Key Lime Cove wristband, for weeks later, until it succumbed to natural causes. A good time was had by all!

I was part of the Environmental Panel with Theresa Bordenkecher from the Indiana Department of Environmental Management (IDEM) and Becky Jayne from the Illinois Environmental Protection Agency (IEPA). One of the things that came up during the panel was waste tires. Section F of IDEM's Auto Salvage Recyclers Workbook covers Waste Tire Management. It outlines the following questions:

1. Does your facility have over 1,000 waste tires stored outside or over 2,000 waste tires stored inside?
2. Does your facility have a valid certificate of registration as a waste tire storage facility?
3. Do you open dump waste tires at your facility?
4. Do you store waste tires in a manner that poses a fire hazard?
5. Do your waste tires have the potential to harbor vectors that pose a threat to human health?
6. Do you ship whole waste tires off-site?
7. Are your tires delivered to one or more of the approved locations?

The answers to the above questions are relatively straightforward. Most recyclers know all of the appropriate answers and conduct business as such. I have seen some staggering tire piles in my day, however, so I know there are still folks that need work in this department. One detail that I would like to point out is the definition of 'waste tire'. A waste tire is one that is no longer suitable for its original purpose. This can be determined by tread depth. If there is less than 2/32" of remaining tread the tire is considered a waste tire. Dry rot or deterioration is also a good signaler that tires are no longer usable.

Another criterion that can be used to identify waste tires from tires intended for use or resale is the manner of storage used. This to me, seems less straightforward. If tires are stored outdoors in a pile and there is vegetation growing through or around the pile the tires will most likely be considered waste tires by inspectors from IDEM. The storage method suggests that the tires are not something of value and therefore should be properly disposed – or stored in a more acceptable manner. Tire piles are also considered open dumping which is prohibited by Indiana law.

One last reminder about tires: keep all of your documentation. When you dispose of tires with an approved waste tire recycler you are provided with a Waste Tire Manifest. I encourage my clients to maintain copies of this documentation indefinitely. If there is ever any question as to where your waste tires went it is nice to have ample documentation. Plus, disposing of waste tires is not cheap. Keep the manifests to demonstrate your continuing commitment to good business practice and environmental stewardship.

Some of you may have noticed that I am no longer working for Fields Environmental, Inc. I opened my own business in early October. It is called VET Environmental Engineering, LLC. My father, Rudy Fields, and I are still working together on some projects but establishing two separate businesses has allowed for us both to focus on our passions. He continues to focus on environmental investigation and remediation work. Whereas I will be focusing more on permitting and environmental compliance work. So far it has been great and I am very excited to have the opportunity to become more involved with the recycling industry and other similar industries in Indiana.

As always, feel free to call me with ideas, questions, etc. I hope business is good and stays that way through the cold season. Have a great holiday!