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SFR-078/08

Tracking the Fate of Scrap Tires in Texas: An Audit Report

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Field Operations Support Division

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Tracking the Fate of Scrap Tires in Texas: An Audit Report

Prepared by
Field Operations Support Division

SFR-078/08
December 2008



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Contents

Preface	v
Scrap Tire Management in Texas	1
Facilities Regulated	1
Monitoring These Activities.....	2
Manifests	2
Annual Reports	3
Enforcing Environmental Laws.....	4
Auditing the Effectiveness of This Program	4
Results of the Audit	5
Findings of the Comptroller’s Audit	5

Preface

House Bill 1, Article VI, Rider 17, 80th Legislature, Regular Session, states in part:

Waste Tires. Out of amounts appropriated above, the Texas Commission on Environmental Quality (TCEQ) shall enforce statutory requirements relating to waste, scrap, or used tires. It is the intent of the Legislature that all reasonable steps be taken to minimize the illegal storage, transport, or disposal of waste or scrap tires. The TCEQ shall audit or otherwise monitor businesses that sell, transport, or store such tires and identify illegal or improper activities as well as study methods for achieving a greater level of compliance for tire disposal within the State of Texas. The TCEQ also shall seek opportunities for coordination with other agencies, such as the Comptroller of Public Accounts, through interagency agreements or contracts. Cooperating agencies shall use routine contracts with taxpayers during audits or other activity to obtain copies of tire manifests or other information relating to tire transport or storage in accordance with Health and Safety Code, Section 361.112. Such agreements shall provide that the cooperating agency transmit such records to the commission for review and analysis and should be designed to have minimal costs for the cooperating agency. The TCEQ shall submit a report not later than December 1, 2008, to the Legislative Budget Board and the Governor detailing their efforts and findings in accordance with this provision.

This report to the Legislature is provided in compliance with Rider 17.

Scrap Tire Management in Texas

The Texas Commission on Environmental Quality (TCEQ) oversees the collection, processing, storage, and recycling or disposal of over 24 million tires discarded each year in Texas. Under this regulatory program, scrap tires must be hauled by a registered transporter to an authorized facility. All facilities must maintain manifests showing the disposition of the scrap tires. Additionally, all transporters and authorized facilities must annually provide a report to the TCEQ summarizing their tire management activities.

While this program focuses on the ongoing need to prevent the illegal disposal of scrap tires, it is separate from the TCEQ's efforts to reduce the large stockpiles created in years past. To learn more about the problems posed by current stockpiles and the steps that TCEQ is taking to ensure that these stockpiles are disposed of properly or put to beneficial use, see the *2007 Progress Report on Using Scrap Tires and Crumb Rubber in Texas Highway Construction Projects* (TCEQ publication SFR-069/07).

The program described in this report only monitors the handling of newly generated scrap tires and enforces environmental regulations to ensure that the illegal disposal of scrap tires is minimized throughout the state.

Facilities Regulated

Through this regulatory program, the TCEQ monitors the activity of these categories of scrap tire handlers:

- **Generators.** Generators are tire dealers, junkyards, fleet operators, and others who generate scrap tires. Most scrap tire generators are not required to register; nonetheless, all scrap tire generators must follow TCEQ rules regarding storage and recordkeeping.
- **Transporters.** Transporters must first register with the TCEQ if they wish to collect scrap tires from another business.
- **Processing or Recycling Facilities.** Any facility where scrap tires are chipped, shredded, baled, recycled, or burned as fuel must register with the TCEQ.
- **Storage Sites.** Any facility where the equivalent of more than 500 scrap tires are stored on the ground or 2000 scrap tires are stored in enclosed, lockable containers must be registered with the TCEQ. These facilities must be designed for safety by a registered professional engineer and

have adequate financial assurance in place to ensure their proper closure.

- **Transportation Facility.** Marine terminals, rail yards, or trucking facilities where the equivalent of more than 500 scrap tires are temporarily stored during the transport process must be registered with the TCEQ. These facilities must also be designed for safety by a registered professional engineer and must have financial assurance in place to ensure their proper closure.
- **Land Reclamation Projects Using Tires (LRPUTs).** When tire pieces or shreds are mixed with soil to restore land to its approximate original natural grade, the TCEQ must be notified and approve the operation. These facilities must be designed by a registered professional engineer and obtain local government and fire department officials written concurrence that the facility meets local codes and ordinances prior to operation.
- **Landfills.** As solid waste disposal facilities, landfills operate under the conditions of TCEQ permits. Split, quartered, baled, or shredded tires may be disposed of in a landfill. Tires may also be stored or processed at a landfill if its permit allows these activities.

Monitoring These Activities

The TCEQ regularly monitors the activities of scrap tire handlers by requiring transporters and scrap tire end use facilities to maintain manifests showing the disposition of the scrap tires and by completing annual reports to the TCEQ on their activities.

Manifests

A manifest is simply a generation-to-disposition record for each load of scrap tires removed from a generator's site. The generator and every facility handling the tires must keep a copy of the manifest for each load. Manifests are maintained in the following manner:

1. The generator completes and signs the first section of the manifest showing how many tires were picked up.
2. The transporter signs the manifest and leaves a copy with the generator.
3. When the tires are delivered to a permitted landfill or an authorized scrap tire facility, the final sections of the manifest are completed showing how many tires were delivered to the facility.

4. The completed manifest must be returned to the generator within 60 days after the scrap tires were transported off site.
5. Generators must notify the appropriate TCEQ regional office within 90 days of when the tires were picked up if any transporter or authorized scrap tire facility:
 - a. failed to complete the manifest,
 - b. altered the generator portion of the manifest, or
 - c. did not return the manifest to the generator within 60 days of when the tires were picked up at the generator's facility.

These facilities must keep on file the original manifests, work orders, invoices, or other documentation for a period of three years and make these documents available to TCEQ investigators on request.

Annual Reports

Scrap tire transporters, processing facilities, storage sites, and end-use or disposal facilities must report to the TCEQ each year the number of scrap tires they handle and the form of those tires (whole, cut pieces, bales, or shreds). The TCEQ compiles the reports and uses the information for planning purposes and makes the information available to state and local governments, the general public, and the regulated community. The TCEQ can initiate enforcement activity if an annual report is not filed or if information is improperly reported. Table 1 below, presents end use and disposal categories and the number of scrap tires consumed by each category during 2007.

Table 1. Texas Scrap Tire Usage and Landfill Disposal, 2007

<i>Category</i>	2007 Consumption		
	Pounds	Scrap Tire Units*	Percentage of Total
End Uses			
Land Reclamation	232,734,555	11,636,728	36%
Tire-Derived Fuel	211,311,280	10,565,564	33%
Crumb Rubber	50,917,250	2,545,863	8%
Rubber Mulch	8,309,880	415,494	1.25%
Septic/Leachate Drainage	5,603,280	280,164	.75%
Other End Uses	21,638,121	1,081,906	3.5%
End Uses Subtotal	530,514,366	26,525,719	82.5%
Landfill Disposal	111,844,847	5,592,242	17.5%
Total	642,359,213	32,117,961	100%

* Scrap Tire Unit. 1 STU = 20 pounds of scrap tire material. This unit is used because scrap tire material can take many different forms

Enforcing Environmental Laws

Although no specific funding is provided to the TCEQ for the management of activities relating to scrap tires, the agency pursues these and other activities to ensure that environmental laws are enforced:

- inspecting registered scrap tire storage sites, processing and recycling facilities, and LRPUs;
- investigating registered transporters, generators, and illegal sites when complaints are received;
- taking enforcement action as necessary if generators, transporters, or scrap tire facilities are not operating in compliance with TCEQ rules;
- cooperating with local officials to enforce against illegal dumping and encourage recycling projects;
- coordinating with local governments to take action as necessary to ensure that scrap tire handlers operate in compliance with scrap tire management regulations;
- participating in numerous educational or outreach events; and
- developing guidance, including the translation of related materials into Spanish, to meet a recognized need for clearer communications with this audience.

Financial support for these and related activities is primarily drawn from Solid Waste Disposal Fees, which are collected as a part of the tipping fees at municipal solid waste facilities.

Auditing the Effectiveness of This Program

The TCEQ coordinated with the Office of Public Accounts to obtain information regarding tire manifests and other information regarding scrap tire transport, processing, storage, and disposition. While conducting scheduled Comptroller's audits of twenty-seven tire vendors in calendar year 2008, the auditor also obtained the following information:

- Determining if the tire vendor is registered with the TCEQ as a scrap tire generator, transporter, processor, or end use facility and the tire vendor's registration number if applicable.
- The number of scrap tires present on the vendor's facility during the audit and the number of tires removed during 2007.
- Verification that the tire vendor completed and retained manifests documenting scrap tire pickup and disposition.

- The name and/or TCEQ transporter registration number of the companies that removed scrap tires from the vendor's facility.
- The name, location and/or TCEQ authorization numbers of the facilities where the vendor's scrap tires were transported to for disposition.

Results of the Audit

The results of the audit support the TCEQ's contention that the vast majority of scrap tires are being properly managed from generation through end use or disposal. All of the twenty-seven audited vendors provided information indicating that they used manifests to track and document the pickup and disposition of their scrap tires and used registered transporters to remove their scrap tires to authorized processing, end use, or disposal facilities for disposition. Specifically, the audit information indicated:

- All of the 27 tire vendors audited utilized manifests to track and document the pickup and disposition of their scrap tires.
- Each of the vendors used registered transporters for scrap tire transport.
- All scrap tires removed from the sites were transported to authorized processing, end use, or disposal facilities for disposition.

Findings of the Comptroller's Audit

The following pages contain the Comptroller's audit reports as delivered to the TCEQ which include:

- Moore's Retread & Tire Company of Dallas, Inc.
- Wingfoot Commercial Tire Services, Location #015, Tyler
- Wingfoot Commercial Tire Services, Location #038, Longview
- Wingfoot Commercial Tire Services, Location #041, Pharr
- Wingfoot Commercial Tire Services, Location #170, Houston
- Wingfoot Commercial Tire Services, Location #011, League City
- Wingfoot Commercial Tire Services, Location #057, El Paso
- Wingfoot Commercial Tire Services, Location #203, Fort Worth
- Wingfoot Commercial Tire Services, Location #168, Dallas
- Wingfoot Commercial Tire Services, Location #418, Anthony
- Wingfoot Commercial Tire Services, Location #233, Denton

- Wingfoot Commercial Tire Services, Location #050, Bryan
- Wingfoot Commercial Tire Services, Location #042, Round Rock
- Wingfoot Commercial Tire Services, Location #040, Laredo
- Wingfoot Commercial Tire Services, Location #039, Corpus Christi
- Wingfoot Commercial Tire Services, Location #033, Abilene
- Wingfoot Commercial Tire Services, Location #020, Lubbock
- Wingfoot Commercial Tire Services, Location #019, Amarillo
- Wingfoot Commercial Tire Services, Location #017, San Antonio
- Wingfoot Commercial Tire Services, Location #016, Katy
- Wingfoot Commercial Tire Services, Location #014, Beaumont
- Wingfoot Commercial Tire Services, Location #008, Dallas
- Pilot Truck Care Center, Location #421, Robinson
- Martin Tire Company, El Paso
- Southern Tire Mart, Amarillo
- SLT Dealer Group (Allied Chevrolet), LaPorte
- Moore's Retread & Tire Company of Ark-La-Tex, Inc.

Moore's Retread & Tire Company of Dallas, Inc.
TP# 17527497576

Note: *The audit was performed and the Moore's retread facility in Springdale, AR. The contact at Springdale was Kelly Pickett, the manager there. Moore's Retread & Tire Company of Dallas, Inc. has outlets in Irving and Temple.*

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time). *B 43473*
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? *1,000 (waiting for JBH rep)*
3. How many scrap tires were removed from the facility during the previous calendar year? *14,400*
4. Did the audited facility manifest the removed scrap tires? *Yes*
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? *Yes*
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. *Yes, Transporter # 26303*
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.
Midlothian, TX
TXI Operations
245 Ward Rd., 76065

Disposition # 6200431

Wingfoot Commercial Tire Systems, LLC

TP# 13117354020

Location TYLER, TEXAS #015

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time). 13965
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 48
3. How many scrap tires were removed from the facility during the previous calendar year? 1600
4. Did the audited facility manifest the removed scrap tires? YES
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? YES
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. 6200221
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. N/A

Wingfoot Commercial Tire Systems, LLC

TP# 13117354020

Location LONGVIEW, TEXAS #038

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time). 13964
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 29
3. How many scrap tires were removed from the facility during the previous calendar year? 1400
4. Did the audited facility manifest the removed scrap tires? YES
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? YES
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. 6200871
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.

Wingsfoot Commercial Tire Systems, LLC
TP# 13117354020
Location 041-Pharr

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 346
3. How many scrap tires were removed from the facility during the previous calendar year? 4,692
4. Did the audited facility manifest the removed scrap tires? Yes
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? Yes
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. Yes # 26303
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.

Green Tree San Antonio Truck
Green Tree Houston Truck
Cemex Truck San Antonio
Cemex Balcones San Antonio

Wingfoot Commercial Tire Systems, LLC
TP# 13117354020
Location 6355 to 170

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).
2. How many ^{N/A} scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit?
15
3. How many scrap tires were removed from the facility during the previous calendar year?
4,158
4. Did the audited facility manifest the removed scrap tires?
Yes
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility?
Yes
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility.
Yes
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.
Yes

Wingfoot Commercial Tire Systems, LLC

TP# 13117354020

Location 011

LEAGUE CITY

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 160
3. How many scrap tires were removed from the facility during the previous calendar year? 2100
4. Did the audited facility manifest the removed scrap tires? yes
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? yes
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. 26303
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. yes 6200174

Wingfoot Commercial Tire Systems, LLC
 TP# 13117354020
 Location 057 EL PASO

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 72
3. How many scrap tires were removed from the facility during the previous calendar year? 4500
4. Did the audited facility manifest the removed scrap tires? * No
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? * No
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. 040798R
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. UNKNOWN

* Wingfoot #057 Scrap tires are picked up by Chapparal Sand and Gravel, 140 U.S. Hwy 54, Chapparal, New Mexico 88001, Permit # 319003 (Disposal). Scrap tires are manifested by Chapparal and a copy of the manifest for each load maintained at the store (#057). Tires are manifested on a New Mexico manifest which is very similar to Texas manifest. TCEQ contact with Chapparal verified they manifest and dispose of Wingfoot El Paso Store #057 Tires.

John Forehand, Tire Liaison
 TCEQ

479-788-6269

Wingfoot Commercial Tire Systems, LLC
TP# 13117354020
Location 203-Font Warren, Tx.

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time). 01893
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 388
3. How many scrap tires were removed from the facility during the previous calendar year?
10,565
4. Did the audited facility manifest the removed scrap tires?
YES
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility?
YES
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility.
TIRETEX #6026486
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.
TIRETEX #6026486

Wingfoot Commercial Tire Systems, LLC

TP# 13117354020

Location #168 DALLAS

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time). *LESS THAN 500 SCRAP TIRES*
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? *288 TIRES ON PROPERTY*
3. How many scrap tires were removed from the facility during the previous calendar year? *LARGE TRUCK 10,400 LT. TRUCK & PASSENGER 11,500*
4. Did the audited facility manifest the removed scrap tires? *YES*
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? *YES*
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. *YES TCEQ # 6026486*
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. *ME COMMAS LAND FILL TCEQ # 0162 DALLAS, TX*

Wingfoot Commercial Tire Systems, LLC

TP# 13117354020

Location 418 Anthony Texas

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).

2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit?

3. How many scrap tires were removed from the facility during the previous calendar year? 260 Approx

4. Did the audited facility manifest the removed scrap tires? Yes

5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? Yes
TCEQ # 6044153

6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. Yes only one 6044153

7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. #
#6044153 N/A

I Answered to the Best of
my Knowledge

Ernest John Delgado
418

479-788-6206
6269

Wingfoot Commercial Tire Systems, LLC

TP# 13117354020

Location 333 Denton, TX

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 48
3. How many scrap tires were removed from the facility during the previous calendar year? 1720
4. Did the audited facility manifest the removed scrap tires? yes
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? yes
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. #6026486 & #6025279
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. CC Crawford Retreading DBA C.T.R. 101 W. Ave D Emma, Tex 75119 972-875-8427
Tire Tex (Jerry Waller) 305 W. Samonda Rd. Seagoville, Tex 75159 972-287-3000

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 Larry R. Soward, *Commissioner*
 Glenn Shankle, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 1, 2005

Mr. Jerry Waller
 Jerry Waller Tire Service
 301 Carolyn
 Bedford, TX 76021

Re: Scrap Tire Management Registration Issuance for:
 Jerry Waller Tire Service, 305 W. Simmonds Road, Scagoville, Dallas County, Texas
 TCEQ Tire Registration ID Number 6026486

Dear Mr. Waller:

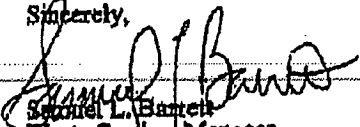
The Texas Commission on Environmental Quality (TCEQ) has completed the review of your Scrap Tire Facility Registration Application. The application was determined to be complete and has been approved for registration. Your Registration Identification Number is 6026486, which should be used on all correspondence and documentation related to this registration. This registration identifies you as a generator and authorizes you to process and transport used or scrap tires and/or tire pieces in the State of Texas in accordance with the rules for scrap tire management. This registration allows you to store a maximum of 500 used or scrap tires (or the equivalent in tire pieces) on the ground or 2,000 used or scrap tires (or the equivalent in tire pieces) in an enclosed lockable container. This registration is issued for an indefinite period and will remain valid as long as you file an annual report and adhere to the rules for scrap tire management.

The TCEQ is incorporating a new numbering system that assigns one number for all tire registrations listed at a facility. It is important to note that Generator Registration Number 17176 and Transporter Registration Number 26486 have been inactivated and incorporated with Registration ID Number 6026486. Please begin using this new registration immediately.

Please be aware that the manner in which used or scrap tires are stored should not create a hazard to the health and safety of the public or the environment. If the operating conditions of your site change, please contact the DFW Region Office for guidance on amending your registration. A copy of the rules for management of used or scrap tires has been included as an enclosure to this letter. By registering you have agreed to become familiar with and to comply with the rules governing scrap tire management. Failure to comply could result in revocation of your registration.

If you have questions regarding registration requirements, please contact Ms. Cynthia Hackathorn, Scrap Tire Management Registration Coordinator, at 817-588-5817.

Sincerely,


 Samuel L. Barnett
 Waste Section Manager
 DFW Region Office

Enclosure

REPLY TO: REGION 4-DALLAS/FORT WORTH • 2309 GRAVEL DR. • FORT WORTH, TEXAS 76118-6951 • 817/588-0800 • FAX 817/588-5700

P.O. Box 13087 • Austin, Texas 78711-3087 • 512/239-1000 • Internet address: www.tceq.state.tx.us

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Lindsay Conley

From: Bonnie Wolfe [bonniewolfe@wingfootct.com]
Sent: Tuesday, April 15, 2008 4:29 PM
To: lconley@wingfootct.com
Subject: RE: Texas Audit - Scrap Tire Questionnaire

Our answers to the enclosed Questionnaire for Location 050 Bryan Store:

1. N/A - we do not have more than 500 tires on our site at any given time.
2. We currently have between 250 and 300 tires in the scrap trailer.
3. Approximately 2800 to 2900 were removed in the year 2007.
4. Yes, we manifested the removal of the scrap tires.
5. Yes, we have copies of the scrap tire manifests.
6. Yes, their numbers are as follows: 26303; 6025141 & 6200350
7. The TCEQ authorization number for the disposition facilities is as follows: 6044095; 6200188 and 6200189

-----Original Message-----

From: Lindsay Conley [mailto:lconley@wingfootct.com]
Sent: Tuesday, April 15, 2008 11:06 AM
To: 'Bonnie Wolfe'; jsouthern@wingfootct.com
Subject: Texas Audit - Scrap Tire Questionnaire

We are currently being audited by the state of Texas. The auditor has requested that your location fill out the attached questionnaire regarding your scrap tires. The audited facility these questions refer to is your location.

Please return to me as soon as possible, by fax (479-788-6269) or email.

If you have any questions, please let me know.

Thank you!

Lindsay Conley
Tax Accountant
(479) 788-6206

Wingfoot Commercial Tire Systems, LLC

TP# 13117354020

Location WINGFOOT #042 ROUND ROCK TX 78664

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? **36**
3. How many scrap tires were removed from the facility during the previous calendar year? **7000**
4. Did the audited facility manifest the removed scrap tires? **YES.**
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? **YES.**
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. **YES LIBERTY TIRE - 6025071**
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. **YES. 6044095.**

Wingfoot
Commercial
Tire

Wingfoot Commercial Tire Systems, LLC
TP# 13117354020
Location 040 - LAREDO

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 258
3. How many scrap tires were removed from the facility during the previous calendar year? 11,532
4. Did the audited facility manifest the removed scrap tires? YES
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? YES
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. YES. REG.# 27055
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. YES. REG.# 27055

Wingfoot Commercial Tire Systems, LLC
TP# 13117354020
Location 039 - Corpus Christi, TX.

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time). Yes, #40157 Wingfoot Tire.
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 62 tires.
3. How many scrap tires were removed from the facility during the previous calendar year? 8761 tires removed.
4. Did the audited facility manifest the removed scrap tires? Yes
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? Yes
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. Yes, Able Tire Co. #26303
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. Yes,

End Users: Green Tree Resorts #6200188 + 6200189
CEMEX #6200152.

Wingfoot Commercial Tire Systems, LLC
TP# 13117354020
Location 033 Abilene Tx

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 125
3. How many scrap tires were removed from the facility during the previous calendar year?
4. Did the audited facility manifest the removed scrap tires? 3000
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? yes
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. yes 6200097
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. 6200097

6200097

Tex-American
Recycling Inc.

Inc.

CALL TOLL FREE 1-800-593-2328
SERVING IN OKLAHOMA, TEXAS, KANSAS, NEW MEXICO, ARKANSAS
AND MISSOURI

Wingfoot Commercial Tire Systems, LLC

TP# 13117354020

Location WINGFOOT # 020, Lubbock

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time). **YES.**
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? **43**
3. How many scrap tires were removed from the facility during the previous calendar year? **1000**
4. Did the audited facility manifest the removed scrap tires? **YES.**
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? **YES.**
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. **6027064**
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. **PLAINVIEW TX 79072**

Wingfoot Commercial Tire Systems, LLC
TP# 13117354020
Location 019 Amarillo TX

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time). *NO*
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? *12*
3. How many scrap tires were removed from the facility during the previous calendar year? *1,941*
4. Did the audited facility manifest the removed scrap tires? *Yes*
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? *Yes*
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. *Thoshanowasti # 26943*
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.

Thoshanowasti # 6044157

Wingfoot Commercial Tire Systems, LLC
TP# 13117354020
Location 017 - San Antonio

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator, if they maintain less than 500 scrap tires on the site at any given time). Yes - Generator # 2178
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 202
3. How many scrap tires were removed from the facility during the previous calendar year? 4620
4. Did the audited facility manifest the removed scrap tires? Yes
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? Yes
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. Yes - J + M Truck Tire Shop Reg. #25033
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.

To: J + M Truck Tire Shop · Reg #79543
11420 Hwy 16 South
San Antonio, Tx 78224

Wingfoot Commercial Tire Systems, LLC
TP# 13117354020
Location 016 KATY, TX

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 186
3. How many scrap tires were removed from the facility during the previous calendar year? 5,100
4. Did the audited facility manifest the removed scrap tires? YES
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? YES
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. YES
GREEN TREE RESOURCES LLP # 6200174
& LIBERTY TREE RECYCLING # 6025071
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.
Disposal Site # 6200188
Disposal Site # 6004091

Wingfoot Commercial Tire Systems, LLC
TP# 13117354020
Location: Beaumont, Texas WF014

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration Number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).

Answer: The Generator number for WF014 Beaumont, Texas is **H42351**

2. How many scrap tires were stored at the facility (on ground or in trailers) at the time of the audit?

Answer: **90** total scrap tires are stored at WF014 Beaumont, Texas on **04/15/2008** waiting for disposal.

3. How many scrap tires were removed from the facility during the previous calendar year?

Answer: There were **23,263** total tires removed from WF014 Beaumont, Texas from **January 2007 thru December 2007** by Able Tire for disposal.

4. Did the audited facility manifest the removed scrap tires?

Answer: **YES**, WF014 Beaumont, Texas does have a manifest for all removed scrap tires.

5. Were completed scrap tire manifest (documenting "cradle to grave" handling of the scrap tires)

Answer: **YES**, Scrap tire manifest are maintained at WF014 Beaumont, Texas.

6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility.

Answer: Able Tire Disposal was used to remove all scrap tires from WF014 Beaumont, Texas and their registration/transporter number is **26303**.

7. Where was the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.

Answer: The scrap tires were transported by Able Tire Disposal to 7829 Miller Road #2 Houston, Texas 77049, and the TCEQ authorization number is **6200174**.

Wingfoot Commercial Tire Systems, LLC

TP# 13117354020

Location 008 Dallas, TX

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time). Maintain less than 500 tires on site @ any given time
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 227 tires
3. How many scrap tires were removed from the facility during the previous calendar year? 17,248 Truck
924 Passeng
4. Did the audited facility manifest the removed scrap tires? yes
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? Yes - annually reviewed by City of Dallas code enforcement Dept
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. TCEQ # 602486
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.
McCommas Landfill TCEQ # 062
City of Dallas
5100 Youngblood Dr
Dallas, TX 75241

Wingfoot Commercial Tire Systems, LLC

TP# 13117354020

Location

421 PILOT TRUCK CARE - ROBINSON

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time). **NO**
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? **47**
3. How many scrap tires were removed from the facility during the previous calendar year? **102**
4. Did the audited facility manifest the removed scrap tires? **YES**
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? **YES**
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility. **WINGFOOT LOCATION 224**
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. **WINGFOOT LOCATION 224**

Lindsay,

All my scrap tires are taken to the Wingfoot 224 location for disposal.

Thanks,

Michael Donner-General Manager

Wingfoot Commercial Tire System, LLC

DBA Pilot Truck Care Center #421

Robinson, TX

Work: 254-662-5500

Cell: 254-290-4437

Fax: 254-662-5503

Email: mdonner@wingfootct.com

Teamwork, Enthusiasm and Commitment

"ONE TEAM ONE FIGHT"

Martin Tire Company

TP #17418049759
El Paso, TX

Date: August 26, 2008
Audit Period: 10-1-04 thru 3-31-08
Auditor: Rosalva A. Ortega

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).

No

2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit?

Approximately 150

3. How many scrap tires were removed from the facility during the previous calendar year?

See attached spreadsheet by location

4. Did the audited facility manifest the removed scrap tires?

Yes

5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility?

Yes

6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility.

Tres Pesetas, Inc. Registration #26869

7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.

Transported to: Tres Pesetas, Inc.
14636 Montana Ave.
El Paso, TX 79938
Registration #6044153

APRIL 07 MAY 07 JUNE 07 JULY 07 AUGUST 07 SEPT. 07 OCT. 07 NOV. 07 DEC. 07 JAN. 08 FEB. 08 MARCH 08

	APRIL 07	MAY 07	JUNE 07	JULY 07	AUGUST 07	SEPT. 07	OCT. 07	NOV. 07	DEC. 07	JAN. 08	FEB. 08	MARCH 08	TOTAL
LEE TREVINO	1043	931	1328	1179	1455	1017	346	1336	1000	911	1144	1171	12861
TEXAS	320	325	270	337	397	325	84	299	234	221	279	247	3338
MONTANA	430	365	347	386	545	251	407	329	175	277	265	232	4009
MESA	565	499	528	673	722	512	557	561	406	548	637	506	6714
ALAMOGORDO	276	275	493	842	427	326	447	346	402	256	401	392	4883
LAS CRUCES	578	408	348	403	450	412	182	374	330	109	291	309	4194
MONTWOOD	320	264	330	426	304	244	217	222	165	316	277	166	3251
TRANS. MNTN.	370	580	482	430	467	349	411	348	277	383	372	373	4842
TOTAL	3902	3647	4126	4676	4767	3436	2651	3815	2989	3021	3666	3396	44092

Southern Tire Mart

- > 1. Was the audited facility registered with the TCEQ as a scrap
> tire "Generator"?
>
> Southern Tire Mart is not a "generator" of scrap tires, however the
> person who disposes of the tires "THOSHANOWASTI" is a generator and
> completes a TNRCC Whole Used or Scrap Tire Manifest - Generator form
> on a monthly basis. "THOSHANOWASTI" also is the registered
> transporter on the same TNRCC Manifest.
>
> 2. How many scrap tires were stored at the facility at the time of
> the audit?
>
> An onsite inspection on (4/10/08) showed that the taxpayer had 75
> scrap tires on hand.
>
> 3. How many scrap tires were removed from the facility during the
> previous calendar year?
>
> The person who keeps track of these disposals estimates approximately
> 20 scrap tires per week (20 X 52 = 1040).
>
> 4. Did the audited facility manifest the removed scrap tires?
>
> The transporter and generator "THOSHANOWASTI" manifested the removal
> of scrap tires under their TNRCC number.
>
> 5. Were completed scrap tire manifests maintained by the audited
> facility?
>
> The taxpayer keeps a copy of the Scrap Tire Manifests but it appears
> that it is the generator/transporter - "THOSHANOWASTI" who is
> responsible for maintaining these records for the TNRCC per the
> instructions at the bottom of the form.
>
> 6. Were the companies used to remove the scrap tires from the audited
> facility registered with the TCEQ as a scrap tire Transporter?
>
> Freddie Langston, owner of "THOSHANOWASTI", has three separate numbers
> registered with the TNRCC
> * TNRCC Transporter #26943
> * TNRCC Processor #6044157
> * TNRCC Storage #6044157
>
> 7. Where were the audited facility's scrap tires transported for
> disposition? Provide the TCEQ authorization number for the disposition
> facilities if available.
>
> The storage/process site listed on the Manifest is 315 West Farmers,
> Amarillo, Texas 79118. See #6 above for TCEQ numbers.
>
>
>
> George Wood, Auditor
> Texas Comptroller of Public Accounts
> 7120 I 40 W, Bldg. A, Ste. 240

> Amarillo, TX 79106
> (806)358-0148, ext. 40222
> Fax (806) 355-5901

>

>

> *****

> *

>

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>

Below you will find answers to questions relating to

12035868335 SLT Dealer Group (Alliance Chevrolet)

From: Karl Stovall

Sent: Thursday, May 01, 2008 2:50 PM

To: Treva Sullivan

Subject: Scrap Tire Audit

1. Was the dealer registered with TCEQ as a scrap tire "Generator"? No
2. How many scrap tires were stored at the facility at the time of the audit? 176
3. How many scrap tires were removed from the facility during the year? 176
4. Did the collection facility manifest the removed scrap tires. Yes
5. Were completed manifests maintained at the tire dealer? Yes
6. Was the company used to remove the scrap tires registered with the TCEQ as a transporter? Yes If so what was their registration number? 6625071
7. Where were the scrap tires for disposition? Liberty Tire Recycling #6044095.

Karl P. Stovall

Houston South Audit Office

Office phone: (713)314-5776

Treva M. Sullivan
Houston South Audit Office
Office (713) 314-5700
Direct (713) 314-5718
Fax (713) 660-6406

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Moore's Retread & Tire of the Ark-La-Tex, Inc.

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"? If so, what is the audited facility's Generator registration number? (Note: Tire dealers and other scrap tire facilities are not required to be registered as a Generator if they maintain less than 500 scrap tires on the site at any given time).

Yes. See attached.

2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit?

154

3. How many scrap tires were removed from the facility during the previous calendar year?

10,812

4. Did the audited facility manifest the removed scrap tires?

No - Transporter prepares manifest

5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility?

No - Manifest only given to our facilities

6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? If so, provide the registration number of each registered Transporter removing scrap tires from the facility.

*Yes- Able Tire- 6200109
Benson Environmental- 6200221
Foster & Sons- 6200295*

7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.

*Able Tire delivers to Green Tree Resorts- #6200188 & #6200189- Receives and Shreds
Benson Environmental- they receive and shred tires in Sibley, LA
Foster & Sons - no info available*

MOORE'S

TIRE & SERVICE CENTERS

8901 LINWOOD AVE (71106)

P.O. BOX 8510

SHREVEPORT, LA 71138-8510

1-800-848-TIRE (8473)



Attn: Jennifer Wood
Tyler Audit Office
(903)581-2659 Fax

**Texas Tire Disposal
Generator Registration**

#51 Longview	B39968
#57 Tyler	E40009
#85 Lufkin	H27367

Lauree Bosch