



SFR-078/10
December 2010

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

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Prepared by
Field Operations Support Division

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Preface

House Bill 1, Article VI, Rider 17, 81st 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 funds appropriated by this Act be used in such a manner so that all reasonable steps are taken to minimize the illegal storage, transport, or disposal of waste or scrap tires. The TCEQ shall use funds appropriated by this Act to 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 use funds appropriated by this Act to seek opportunities for coordination with other agencies, such as the Comptroller of Public Accounts, through interagency agreements or contracts. Cooperating agencies shall use funds appropriated by this Act to 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, § 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, 2010, to the Legislative Budget Board and the Governor detailing the TCEQ's 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 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.

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.
- **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 the TCEQ considers input from local government and fire department officials.

- **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 upon 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 2009.

Table 1. Texas Scrap Tire Usage and Landfill Disposal 2009

Category	2009 Consumption		
	Pounds	Scrap Tire Units*	Percentage of Total
End Uses			
Land Reclamation	100,262,600	5,013,130	19%
Tire-Derived Fuel	166,195,200	8,309,760	32%
Crumb Rubber	29,743,080	1,487,154	6%
Septic/Leachate Drainage	58,413,660	2,920,683	11%
Other End Uses	26,706,060	1,335,303	5%
End Uses Subtotal	381,320,600	19,066,030	73%
Landfill Disposal	140,592,560	7,029,628	27%
Total	521,913,160	26,095,658	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 and outreach events; and
- developing guidance 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 sixteen tire vendors in calendar year 2010, 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 2009;
- 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 sixteen 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:

- Fifteen of the sixteen vendors audited utilized manifests to track and document the pickup and disposition of their scrap tires. One audited vendor did not have any tires to manifest for the audited year.
- Each of the vendors used registered transporters for scrap tire transport.
- All scrap tires removed from the active sites were transported to an authorized processing, end use, or disposal facility for disposition.

Findings of the Comptroller's Audit

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

- T & W Tire, Store #4, Burleson (1 page)
- T & W Tire, Store #5, San Antonio (1 page)
- T & W Tire, Store #14, Wichita Falls (1 page)
- T & W Tire, Store #15, Bridgeport (1 page)
- T & W Tire, Store #16, Robinson (1 page)
- T & W Tire, Store #25, Cleburne (1 page)
- Trans-Texas Tire, Inc., Stephenville (1 page)
- Autco Inc. dba Auto Inc., Amarillo (1 page)

- Clarence Roy Armstrong dba Re-Con Tire Co., Amarillo (1 page)
- Fred Boyd Kenedy, Lubbock (1 page)
- Jimmy L. Hays dba Hays Tire and Service, Abilene (1 page)
- Odessa Tire Center, Inc., Odessa (1 page)
- Southwest Houston Tire Sales, Inc., Houston (1 page)
- T & T Tire, LLC, Princeton (1 page)
- Luis M. Alvarez, Dallas (1 page)
- Abilene General Tire Co, Abilene (1 page)

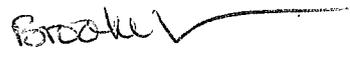
Store #4, T & W Tire, 605A East Renfro, Burleson, TX 73028
Tire Business Audit Questions

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. T & W uses the services of several companies to haul their scrap tires.**
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? **Approximately 350 tires.**
3. How many scrap tires were removed from the facility during the previous calendar year? **Approximately 7,000 tires.**
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. **Able Tire - 26303, Liberty Tire - 6025071, CTR - 6025279, Fast Recycling - 6200466, 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. **Ellis County Landfill - 01745, Skyline - 42C, Silver Creek Materials - 6079554.**

Store #5, T & W Tire, 5834 IH-10 East, San Antonio, TX 78219
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. T & W uses the services of several companies to haul their scrap tires.**
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? **Approximately 350 tires.**
3. How many scrap tires were removed from the facility during the previous calendar year? **Approximately 9,000 tires.**
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. **Able Tire - 26303, 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. **Location is not specified on the manifest.**

T & W Tire Store #5 uses Liberty Tire as a transporter and Liberty Tire processes and takes the tires to an authorized end user. TCEQ contacted Liberty Tire and confirmed that T & W Tire Store #5 is a customer.


Brooke Jackson, Tire Liaison
Field Operations Support Division
Texas Commission on Environmental Quality

Store #14, T & W Tire, 5011 Jacksboro Hwy, Wichita Falls, TX 76302
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. T & W uses the services of several companies to haul their scrap tires.**
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? **Approximately 350 tires.**
3. How many scrap tires were removed from the facility during the previous calendar year? **Approximately 7,000 tires.**
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. **Skyline - 42C.**

Store #15, T & W Tire, 1908 Chico Hwy, Bridgeport, TX 76426
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. T & W uses the services of several companies to haul their scrap tires.**
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? **Approximately 350 tires.**
3. How many scrap tires were removed from the facility during the previous calendar year? **Approximately 7,000 tires.**
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. **Able Tire - 26303, Fast Recycling - 6200466.**
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. **Location is not specified on the manifest.**

T & W Tire Store #15 uses Fast Recycling as a transporter and Fast Recycling processes and takes the tires to an authorized end user. TCEQ contacted Fast Recycling and confirmed that T & W Tire Store #15 is a customer.


Brooke Jackson, Tire Liaison
Field Operations Support Division
Texas Commission on Environmental Quality

Store #16, T & W Tire, 4650 S Loop 340, Robinson, TX 76706
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. T & W uses the services of several companies to haul their scrap tires.**
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? **Approximately 350 tires.**
3. How many scrap tires were removed from the facility during the previous calendar year? **Approximately 5,000 tires.**
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. **Able Tire - 26303, 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. **Location is not specified on the manifest.**

T & W Tire Store #16 uses Fast Recycling as a transporter and Fast Recycling processes and takes the tires to an authorized end user. TCEQ contacted Fast Recycling and confirmed that T & W Tire Store #16 is a customer.



Brooke Jackson, Tire Liaison
Field Operations Support Division
Texas Commission on Environmental Quality

Store #25, T & W Tire, 1917 S Main, Cleburne, TX 76033
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. T & W uses the services of several companies to haul their scrap tires.**
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? **Approximately 350 tires.**
3. How many scrap tires were removed from the facility during the previous calendar year? **Approximately 5,000 tires.**
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. **Fast Recycling - 6200466, 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. **Skyline - 42C, Silver Creek Materials - 6079554.**

Trans-Texas Tire, Inc., Stephenville
509 E. South Loop 377
Stephenville, TX 76401

TIRE BUSINESS AUDIT QUESTIONS

1. A. Was the audited facility registered with TCEQ as scrap tire "Generator"? No.
B. 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 site at any given time). Normally doesn't accumulate more than 350-400 tires before having them picked up.
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? Approximately 150 tires.
3. How many scrap tires were removed from the facility during the previous calendar year? 6,123.
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. A. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter? Yes.
B. If so, provide the registration number of each registered Transporter removing scrap tires from the facility.
 - a. Delgado Tire Disposal TCEQ# 6200154
 - b. McClure Transport, LLC TCEQ# 6200044
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.
 - A. VITI TCEQ# 6044115
 - B. Tex American TCEQ# 6200097
 - C. Able Tire TCEQ# 6200243
 - D. Nathaniel Energy TCEQ# 6044115
 - E. Ash Grove Texas, LP TCEQ# 76905
 - F. State Rubber TCEQ#6200195

Jimmy L. Wallace
Auditor
Fort Worth Audit Office
6/24/2010

Autco Inc., 2805 Virginia Circle, Amarillo, Texas 79109-1628
Db: Auto Inc.
TP# 17514974009

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).

This company currently has an inactive status. The taxpayer was permitted as a generator at one time but the TCEQ changed its requirements from 50 tires to 500 and there was no longer any need for the taxpayer to maintain an active status. The prior permit number(s) are listed below.

AUTCO INC, CN Number: CN6017012446, RN Number: RN101903862

2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? I only saw 6 to 8 tires in total that were being stored. Per Mark McCoy the tire transporter is really good about picking up tires which means there are usually very few that Autco Inc. keeps at their place of business.
3. How many scrap tires were removed from the facility during the previous calendar year? Mark McCoy estimated that approximately 15,000 based upon the number of tires sales in May 2010 times 12.
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

THOSHANOWASTI (RN102805140)
315 W FARMERS AVE, AMARILLO
Registration Status: ACTIVE
THOSHANOWASTI (CN601692635)

7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. SITE 6044157 as listed on the invoice

Clarence Roy Armstrong, 1201 NE 24th, Amarillo, Texas, 79107-6504
Db: Re-Con Tire Co.
TP# 1751046646

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? 300
3. How many scrap tires were removed from the facility during the previous calendar year? 3258 per manifest number for the year
4. Did the audited facility manifest the removed scrap tires? Monthly
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 (RN102805140)
315 W FARMERS AVE, AMARILLO
Registration Status: ACTIVE
THOSHANOWASTI (CN601692635)
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. SITE 6044157 as listed on the invoice

TP # 32007672713

Audit Period: Oct. 1, 2006 to Mar 31, 2010

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? 0
3. How many scrap tires were removed from the facility during the previous calendar year? 0
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. NO
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

Jimmy L. Hays
TP# 12003432569
Hays Tire and Service
633 Pine Street
Abilene, Texas 79601
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: Yes, Registration # 6200517
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? Answer: 28 as of 06-14-10
3. How many scrap tires were removed from the facility during the previous calendar year? Answer: 994
4. Did the audited facility manifest the removed scrap tires? Answer: Yes
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? Answer: 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. Answer: McClure Transport, LLC Registration # 6200044
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. Answer: AEL registration number 6200361 at 1984 FM 3034 Abilene, Texas, and BUZZI registration number 6200227 at CR 306 Mary Neal, Texas.

Odessa Tire Center, Inc.
TP# 17516146333
1906 E. 8th Street
Odessa, Texas 79761
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? 40-50 tires were stored at the location as of 06/15/10.
3. How many scrap tires were removed from the facility during the previous calendar year? 1203 tires were moved from the Odessa location last calendar year due to the Midland location being sold and tires moved to the Odessa location for disposal.
4. Did the audited facility manifest the removed scrap tires? Yes, the facility keeps records detailing the weight of the tires cut and disposed of and taken to the City of Odessa landfill.
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility? Yes-see above comment.
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. No, Odessa Tire removes their own tires to the landfill.
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available. Transportation was provided by Odessa Tire.

From: Phillip Barrera
Sent: Tuesday, June 15, 2010 4:25 PM
To: Debbie Maha
Subject: TCEQ Questions - Scrap Tire Audit - TP# 17417260068 Southwest Houston Tire Sales

Scrap Tire Audit - TP# 17417260068 Southwest Houston Tire Sales, 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).
 - a. No
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit?
 - a. 270
3. How many scrap tires were removed from the facility during the previous calendar year?
 - a. 8878
4. Did the audited facility manifest the removed scrap tires?
 - a. Yes
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility?
 - a. 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.
 - a. Liberty - 6044095
 - b. Able -- 23036
7. Where were the audited facility's scrap tires transported for disposition? Provide the TCEQ authorization number for the disposition facilities if available.
 - a. #6200477 - Able Tire - Green Tress Resorts 6710 S Lake Houston Parkway Houston, Texas 77049
 - b. #6044095 - Liberty Tire - 5302 Wade Rd Baytown, Texas 77521

T.T. Tire, LLC

301 W Hwy 380, Princeton, TX 75407-0956

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"?

Yes No 3

If so, what is the audited facility's Generator registration number? 0796

2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 30

3. How many scrap tires were removed from the facility during the previous calendar year? 625

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

Yes No

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

Yes No

6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter?

Yes No TNRCC

If so, provide the registration number of each registered Transporter removing scrap tires from the facility.

25-347

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

TNRCC Processor / recycler
6026986

Storage / Disposal
062
42C

Luis M. Alvarez
TP: A 32018006729
TAX CODE 26
Audit period 0701-1003

Tire Business Audit Questions

1. Was the audited facility registered with the TCEQ as a scrap tire "Generator"?
Yes No
If so, what is the audited facility's Generator registration number?
2. How many scrap tires were stored at the facility (on the ground or in trailers) at the time of the audit? 120 Tires
3. How many scrap tires were removed from the facility during the previous calendar year? 1923
4. Did the audited facility manifest the removed scrap tires?
 Yes No
5. Were completed scrap tire manifests (documenting "cradle to grave" handling of the scrap tires) maintained by the audited facility?
 Yes No
6. Were the companies used to remove the scrap tires from the audited facility registered with the TCEQ as a scrap tire Transporter?
 Yes No
If so, provide the registration number of each registered Transporter removing scrap tires from the facility. 6200309

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

6200380 Registration #

TDSA
1125 WOLF Spring Rd
Dallas, TX 75175
972-217-1182

Tire Business Audit Answers For
Abilene General Tire Co.
1517 South First Street
Abilene, Texas 79605
Taxpayer # 17509952606

1. The audited facility's Generator registration number is 000180.
2. There were 219 scrap tires stored at the facility on the ground on 06/08/2010.
3. There were 2,008 scrap tires removed from the facility during the previous calendar year.
4. Yes, the facility manifested the scrap tires.
5. Yes, the manifests were complete and maintained in a file by the facility.
6. The transporter was registered as McClure Transport LLC. Their registration number is 6200044.
7. There were two disposition locations. The most went to BUZZI registration number 6200227 at 202 CR 306 Maryneal, Texas 79535. The other location was AEL registration number 6200361 at 1984 FM 3034 Abilene, Texas 79601.