June 20, 2018

Texas Commission on Environmental Quality
Air Quality Division
Implementation Grants Section, MC-204
12100 Park 35 Circle
Austin, TX 78753

ATTN: Robin Habben, Steve Dayton
VW Settlement recommendations

Dear Ms. Habben and Mr. Dayton:

On behalf of Houston-based TreadWright, I wish to provide important comments to the TCEQ regarding the Texas Volkswagen (VW) Beneficiary Mitigation Plan.

By way of background, TreadWright (TW) has been manufacturing remolded light truck tires in the United States for approximately 30 years. Realizing that tire costs were going to be a real issue for many businesses and government agencies as oil prices continued to rise the owners set out to create the most environmental and affordable tire that could be made in the United States.

TreadWright has developed a superior remolded tire that uses 70 percent recycled material, costs 40 percent less than new tires, and is approved by the U.S. Department of Transportation. Each TW tire uses approximately 6 gallons of oil compared to 18 gallons for a new tire. In addition to the 12 gallons of oil saved per tire produced, TW ensures used tires are not taking up space in landfills or polluting our nation’s lakes and rivers. TW reinvests the money saved from recycled casings to design stronger tread compounds to improve the life of each tire. The result is a sustainable tire that is 40% less expensive than traditional brands with increased performance and wear characteristics. These remolded tires support Executive Order 13693, which requires implementation of “opportunities to improve agency fleet sustainability” and outlines measures to make the federal government’s operations more sustainable, including that “to improve environmental performance and Federal sustainability, priority should first be placed on reducing energy use and cost.”

The U.S. generates approximately 242 million scrap tires each year. An additional 67 million tires lie in stockpiles or illegal dumps, causing environmental threats and public health hazards like mosquito-borne illness and fire risk. Although there are tire recycling opportunities across North America, more than half the tires diverted from disposal are burned as tire-derived fuel (TDF). Although TDF produces energy, the process is more resource intensive than reuse or recycling scrap tires into new tires and other products, and is a missed opportunity to create additional recycling jobs. TDF is also producer of NOx and SOx emissions as well as heavy metal pollutants. Treadwright’s process eliminates these emissions and creates jobs in Texas.
The technological innovation developed by TreadWright to achieve goals of sustainability, performance, and cost, as well as how to support market development for higher end uses of scrap tires through procurement and other policies is a perfect fit for the goal of reducing harmful NOx in the VW Beneficiary Mitigation Plan.

TreadWright strongly encourages the TCEQ to ensure our technology is seriously considered and deployed for eligible projects for NOx reduction that fits well into the Clean Air Act (CAA) Certification as well as the EPA’s criteria in the Diesel Emissions Reduction Act (DERA) focus as it pertains specifically to airport ground support equipment and light duty zero emissions vehicle supply equipment categories outlined in the EPA’s June 2017 DERA Mitigation Plan 1-9 Office of Transportation and Air Quality Detailed Comparison of VW Eligible Mitigation Action 1-9 and Eligible Mitigation Action #10 (DERA Option).

TreadWright welcomes the opportunity to meet with you and your staff to provide further information regarding the NOx reducing aspects of our technology. Please contact Anthony Showen CEO - TreadWright Tires at [redacted] or by email at [redacted]. I look forward to future communication.

Sincerely,

[Signature]

Anthony Showen

CC: The Honorable Greg Abbott, Governor