

Texas Commission on Environmental Quality Scrap Tire Program Stakeholder Meeting Handout

August 21, 2025

TCEQ Staff Present

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Agenda

- 10:00 am – Welcome and Introductions
- 10:10 am – Program Overview
- 10:20 am - Presentation of Discussion Topics & Questions
 - Discussion throughout
- 11:00 am – 10 Minute Break
- 12:00 pm - Additional Stakeholder Comments/Questions
- 12:30pm – Closing Remarks

Background Information

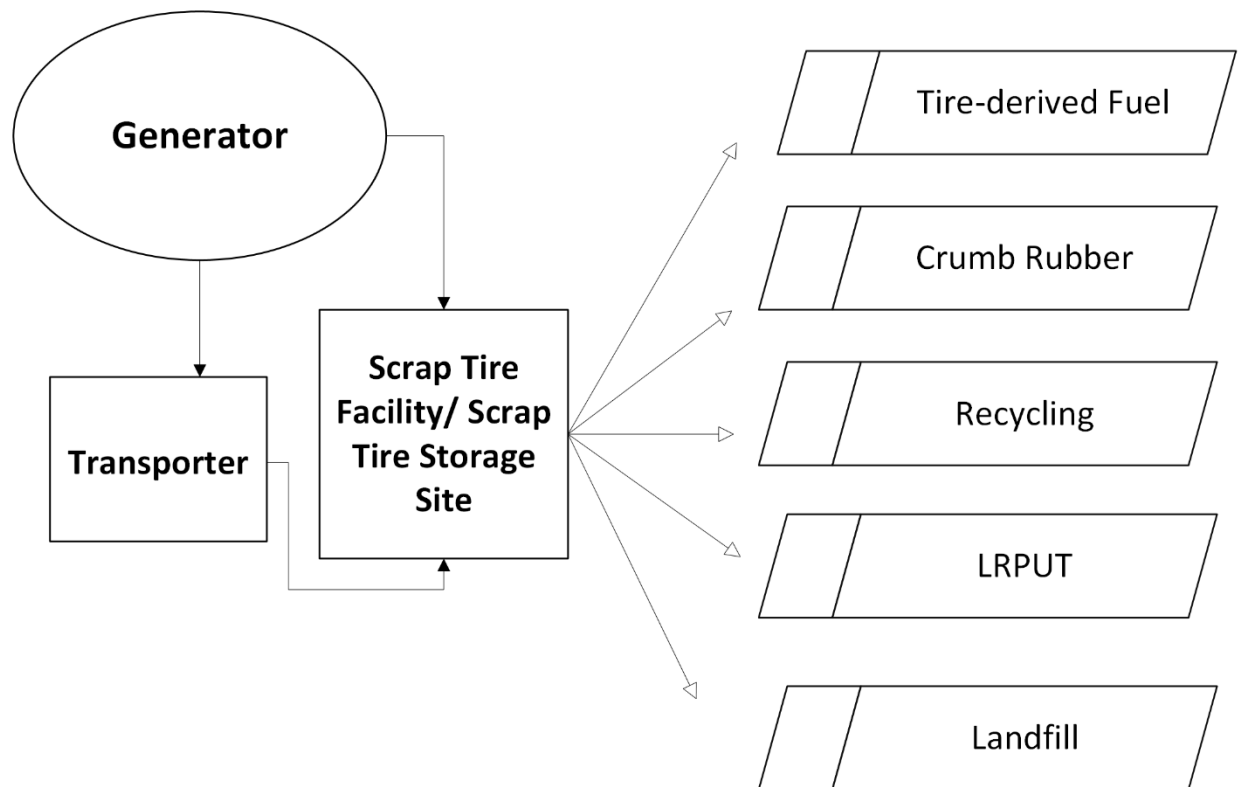
TCEQ's Scrap Tire Program is seeking input on near-term and future rulemaking topics, including annual reporting, manifesting, emergency response involvement, mobile processing, illegal dumping, etc. The Scrap Tire Program also welcomes feedback and comments regarding inefficiencies, redundancies, or impediments in the Scrap Tire Program and will take these comments into consideration.

Discussion Topics

Market Trends and Common Practices

The TCEQ Scrap Tire Program seeks to understand the current market trends and most common practices for scrap tire management in Texas. This information will be used to inform decision making related rulemaking and TCEQ's general messaging regarding

scrap tire management in Texas. The graphic below shows the flow of scrap tires, according to the Scrap Tire Program's understanding.



Market Trends Discussion Questions:

1. In your experience, what is the typical life cycle of a scrap tire from generation to disposal/end-use? Do you have suggestions on what can be done to lessen the time or steps of this process while still safely disposing of scrap tires?
2. What have been the most prominent changes in the scrap tire market in the past five years?
3. What are the current price ranges for transportation, processing, or disposal?
4. What's the costliest part of staying in compliance?
5. Why would facilities accept more tires than authorized by their registration?

Application Questions:

1. Which parts of the application process are most costly or difficult to complete?
2. What are the necessary steps to obtain financial assurance?
 - A. Do financial assurance requirements prevent new entities from obtaining proper authorization?
 - B. Would removing financial assurance requirements increase the number of facilities that seek authorization?

3. How can TCEQ get notified when facilities move or close?

Annual Reporting

Scrap tire transporters, storage sites, and facilities are required to submit an annual activity report detailing the number of tires transported and the tires' end uses or destinations.

Scrap tire transporters, as well as owners or operators of scrap tire facilities must submit an annual report to TCEQ and include information related to their tire management activities during the calendar year.

The annual report for the preceding calendar year is due on or before March 1 on a form prescribed by TCEQ. Owners or operators fail to submit timely annual reports and often fail to notify the agency of changes in contact information or business operations.

In 2023, 23% of scrap tire transporters reported, 46% of scrap tire facilities, and 75% of storage sites reported.

Annual Reporting Discussion Questions:

1. What challenges do you face in completing and submitting the report?
2. What other information or data should be reported that is not already captured in the report?
3. What support do you need from the Scrap Tire Program to complete your report?
4. Would an electronic reporting system be helpful?
 - A. Estimate the percentage of your customers that would be capable of using an electronic reporting system
5. Would quarterly reporting result in a more accurate number of tires? And would it be burdensome for businesses to change reporting frequency or due date?
6. What can TCEQ do to make reporting easier?

Manifesting

A tire manifest is a tracking mechanism that follows the transfer of tires from the point of generation to their end-use or final destination. The manifest is a five-part form whose format and content is prescribed by the TCEQ.

The Scrap Tire Program may revise the manifest template in the future and is seeking feedback on what works well and what does not work with the existing template. Additionally, the Scrap Tire Program is exploring the advantages and limitations of an electronic manifest system and is seeking input before taking action.

Manifesting Discussion Questions:

1. What is the biggest challenge in completing manifests?
2. How do you return the original white manifest to the generator?

3. What improvements would you like to see in the manifesting process?
4. Generators: Do you consistently receive the original (white) manifest? At what point?
 - A. If not, how do you track the scrap tires you've sent out?
5. What are your printing costs?
6. Are you currently using electronic manifests?
7. Would you be interested in switching to electronic manifests? Why or why not?
8. What can TCEQ do to make manifesting easier?

Local Official/Emergency Response Involvement

Scrap tire facility, storage site, and LRPUR registrations require coordination and approval from local officials. TCEQ is seeking to better understand how scrap tire management businesses interact with local officials during the application process, and during ongoing operations. The Scrap Tire Program intends to host meetings with local officials in the future, and having input from the scrap tire industry beforehand will help inform those discussions.

Local Official/Emergency Response Discussion Questions:

1. What's your experience coordinating with local officials?
2. If required, what's the biggest challenge in getting fire marshal approval?
3. How often do emergency responders inspect your facility for access readiness?
4. Does coordinating with local officials help?
5. How difficult is it to publish in a newspaper?
 - A. How much does it cost per publication?

Mobile Processing

Recently, TCEQ has received an increasing number of inquiries about requirements for mobile scrap tire processing. The rules for management of scrap tires in Texas do not currently allow mobile processing because the registrations are site-specific.

The Scrap Tire Program recognizes that mobile processing may be more efficient and logistically feasible and would like your input on how it should be regulated. Information related to how mobile processing works, advantages, and challenges would be greatly beneficial.

Mobile Processing Discussion Questions:

Processors:

1. If allowed, would you consider switching to mobile processing?
2. Could you retrofit your current equipment, or would new equipment be needed?

3. Would your fees for processing go up, down, or stay the same if you moved to a mobile processing system?

Generators

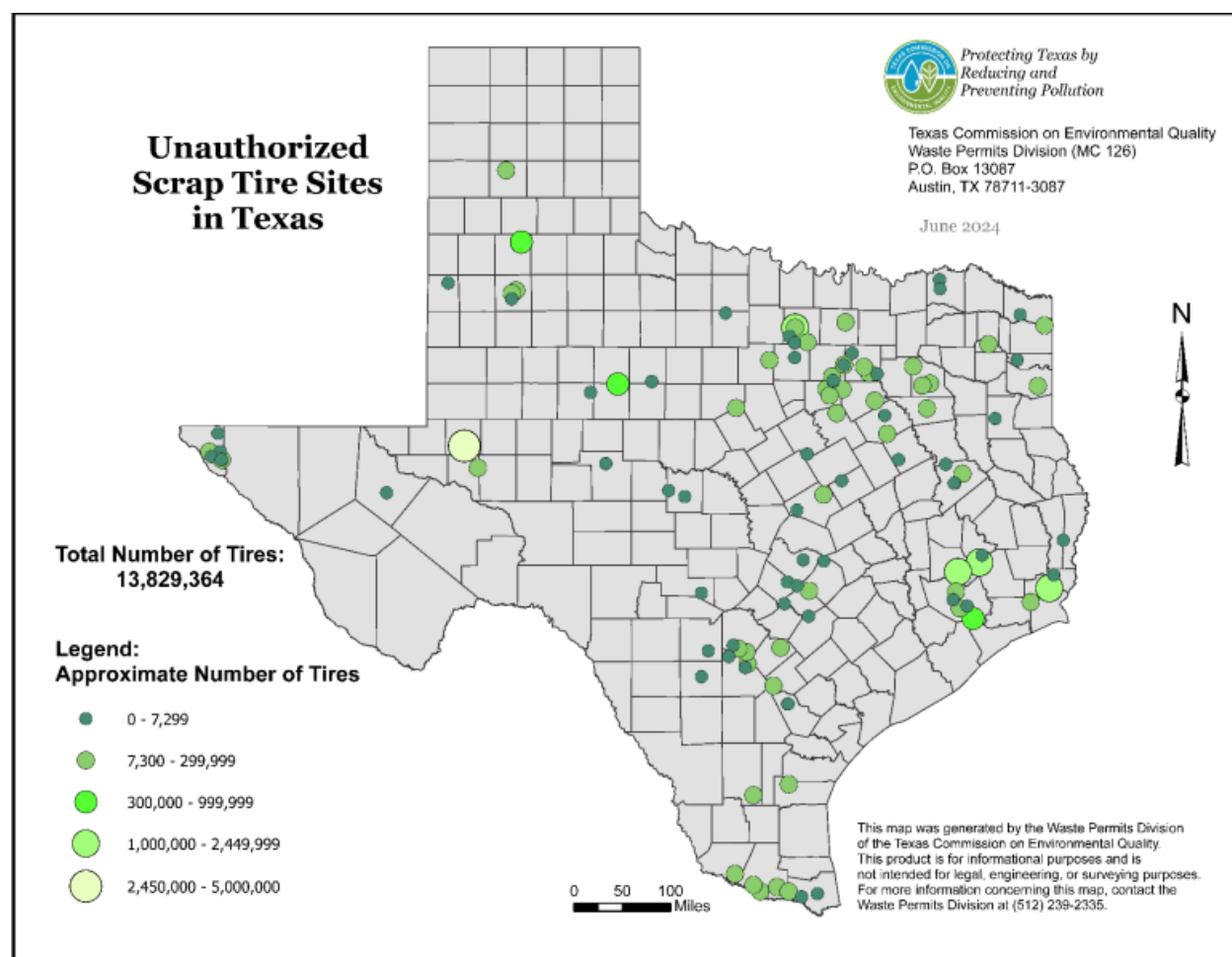
1. Is it feasible to allow mobile processors to process scrap tires at your location, and ensure no tire pieces are left behind?
2. Do you have any concerns with allowing mobile processing?

Illegal Dumping Prevention

TCEQ maintains a list of known unauthorized scrap tire sites in the state. The number of tires at such sites ranges from a few hundred to a few million, for a total of approximately 13.8 million tires across 112 sites.

Although TCEQ does not have funding to directly clean up unauthorized scrap tire sites, the agency remains committed to monitoring the sites and providing regulatory guidance to those cleaning up scrap tire sites.

The Scrap Tire Program is seeking input on how to prevent illegal dumping of scrap tires and creative ideas for getting unauthorized scrap tire sites cleaned up.



Illegal Dumping Prevention Discussion Questions:

1. Would stronger authorization requirements decrease illegal dumping?
2. Would simpler authorization requirements decrease illegal dumping? If simpler, in what manner?
3. How do you learn about and report unauthorized tire piles?
4. What do you think is the main cause of illegal dumping?
5. How could TCEQ help prevent illegal dumping?
6. Would you be willing to help clean up unauthorized scrap tire sites?

Rules for Scrap Tire Management in Texas

Chapter 328, Subchapter F: https://texas-sos.appianportalsgov.com/rules-and-meetings?chapter=328&interface=VIEW_TAC&part=1&subchapter=F&title=30.