

Lurix, Joe.vcf (4 KB)

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From: Clark, Jan Rae
Sent: Wednesday, November 05, 2003 10:57 AM
To: McGuire, Chris; Lurix, Joe; Tedder, Richard
Cc: Carpenter, Jessie; Terry A. Gray (tagray@flash.net); Clark, Jan Rae
Subject: RE: FTR

Chris,

The molten mass is a result of a very bad tire fire on this site the extent of which resulted, in part, from improper storage of tire processing residues in the pile that burned. As you recall, things are a bit different for tires. Any parts of a tire that is processed is a "processed tire" that is regulated. In the past, the districts have rightly chosen not to require FA for processed tires that are of a size and spec that makes them sellable in the marketplace. However, while stored at the processing facility, the processed tires still have to meet the storage requirements of 62-711.540. FTR did not provide proper storage on the pile that caught fire. Proper storage is not being maintained for the other metal processing residues in the pile that remains. The metals in this pile are only marketable to the steel industry if properly processed, by compressing them into appropriate sized briquettes. As they stand now, the metal piles are a significant fire liability. If a fire starts in a metals pile, it is very difficult to extinguish, as evidenced by the recent extended and difficult fire fighting effort at FTR. There is a reason to require proper storage and FA for these piles.

Jan Rae Clark

<< File: Clark, Jan Rae.vcf >>

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From: McGuire, Chris
Sent: Tuesday, November 04, 2003 11:17 AM
To: Lurix, Joe; Clark, Jan Rae; Tedder, Richard
Subject: RE: FTR

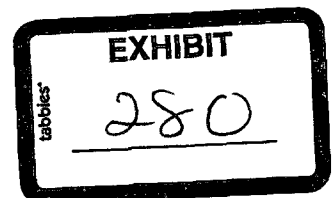
Memo #SWM 09.4 (on our web page) discusses financial assurance for recovered materials at MRFs. In essence it says that you don't have to include the costs of transportation or disposal of recovered materials as long as they are actually being recycled or are reasonably likely to be recycled within the year, that they are separated from other solid waste, and that they are not being managed so as to pose a threat to the environment. It seems to me that if this were a MRF, we wouldn't require FA for the steel pile. This isn't a MRF, but I don't know why the same "logic" wouldn't apply here. As for the molten mass, that will have to be a judgment call as to whether it has value as a recovered material without further processing. If it is a liability until the tire bits are removed, then I would say it is like a mixed waste stream and should have FA. If it could be sold as is, but is merely having value added by removing the tire bits, you could consider it a recovered material.

I don't buy the argument that the molten mass is not regulated under the tire rule. I assume that the source of this material is waste tires that were thermally processed to remove most of the combustible materials. Until and unless it is turned into scrap metal that is sold as a raw product, I think it should be considered processed tires and that the tire rule should apply to it. Now whether it is really necessary to have fire lanes around it and size limitations I don't know - depends on whether there is any chance it might burn again - but as long as it's on the site it must at least not interfere with the fire lanes around the piles of tires. I think I would agree that the pile of separated steel would not have to meet the pile size limitations or fire lanes, because the steel would no longer be considered a processed waste tire.

Just my random thoughts.

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

From: Lurix, Joe
Sent: Tuesday, November 04, 2003 8:36 AM



To: Clark, Jan Rae; Tedder, Richard; McGuire, Chris
Subject: FTR

During our inspection on 10-23-03 after the fire, there is a large molten mass of steel left north of the pond and the shell rock road. This mass use to contain small bits of tires with the steel. The bits/steel were being reprocessed into steel cubes after removing the tire bits and sold to steel markets. There is also a pile of steel only in the southwest corner of the site. I told FTR that they had to bond for the molten mass and remove it as solid waste. I also told them to bond for the steel in the southwest corner of the site. FTR claims that neither the molten mass nor the steel are regulated under the tire rule and the steel pile is a recovered material and is exempt from solid waste or the tire rule. In the inspection I told FTR that they had to have fire lanes for the piles and comply with the size requirements of 62-711. FTR claims that the rule doesn't apply to the molten mass or the steel. Do you have an opinion on this?
<< File: Inspection Checklist 10 23 031.pdf >>

<< File: FTR 11 03 03 014.jpg >>

Engineer IV
Solid Waste
561/681-6668
SC 226-6668

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