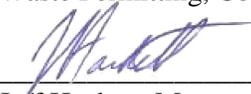


REQUEST FOR ACTION

To: Susan Markie, Chief
Permitting & Assistance Branch
Waste Permitting, Compliance & Mitigation Division

From: 

Jeff Hackett, Manager
Permits & Assistance South Section
Permitting & Assistance Branch

Request Date: June 5, 2014

Decision Subject: Approval of the Beneficial Use of Waste Tires at Lemans Karting,
Alameda County, TPID Number 1550582-01

Action Due Date: **August 13, 2014**

Summary of Request: On May 15, 2014, CalRecycle staff received a beneficial reuse request from Amanda Hurtado, of Lemans Karting for the use of waste tires in safety barriers at Lemans Karting located at 45957 Hotchkiss Street, in the City of Fremont. Lemans Karting has been using tires for safety barriers at their racing track since opening in 2005.

The Department of Resources Recycling and Recovery (CalRecycle) has regulatory oversight over the storage of 500 or more waste tires. Waste tire regulations address the storage, stockpiling, accumulation or discarding of waste tires to prevent the potential adverse effects. Title 14, California Code of Regulations, section 17346(f) provides a mechanism for CalRecycle to approve the beneficial uses of waste tires if the proposed use does not pose a threat to public health, safety and/or the environment. Each beneficial reuse proposal is to be considered on a case by case basis and a decision is to be made, within 90 days of receipt of an application, as to whether or not the use qualifies as a beneficial reuse of the waste tires. An approved beneficial reuse of tires is not considered tire disposal or tire storage and does not require the issuance of a waste tire facility permit.

In a memo dated May 29, 2014, Albert Johnson with CalRecycle's Statewide Technical & Analytical Resources Branch documented his review and determined the information provided is sufficient to demonstrate that the waste tire are being used in a legitimate engineering application, consistent with other similar race tracks around the state. Mr. Johnson confirmed that the information submitted for the beneficial reuse of waste tires meets the intent of 14 CCR 17346(f) and recommended approval of the proposed use/project.

In a letter dated April 15, 2014, Chris Gale, Building Official with the City of Fremont, Community Development Department, Building and Safety, confirmed that Lemans Karting is consistent with current regulations and approved planning permits.

Jacqueline Nomony, Hazardous Materials Unit with the City of Fremont Fire Department stated in a letter, dated May 2, 2014, that the Fremont Fire Department has no fire safety issues to the re-use of used tires for a safety barrier.

Recommendation: The applicant has met all the necessary requirements outlined in 14 CCR 17346(f) pertaining to the beneficial reuse of waste tires. Therefore, staff recommends the Branch Chief approve the beneficial reuse of waste tires in safety barriers at the Lemans Karting.

Branch Chief Action: On the basis of the information, findings, and analysis in this Request for Action, I approve the beneficial reuse of waste tires in safety barriers at Lemans Karting.

Dated: June 5, 2014

A handwritten signature in blue ink, appearing to read "S Markie", is written above a horizontal line.

Susan Markie, Chief
Permitting & Assistance Branch
Waste Permitting, Compliance & Mitigation Division