



February 26, 2020

The Honorable Kumar Barve
Chairman, Environment and Transportation Committee
Maryland House of Delegates
House Office Building, Room 251
Annapolis, Maryland 21401

RE: OPPOSE H.B. 1032 (Smith) concerning Solid Waste Management – Refuse Disposal Systems – Incinerators, Scrap Tires, and Local Authority

Dear Chairman Barve,

The U.S. Tire Manufacturers Association¹ (USTMA) is writing to express concern with H.B. 1032, which seeks to eliminate current markets for scrap tires. Eliminating markets for scrap tires, without identifying new markets to consume annually generated scrap tires, significantly increases the likelihood of illegal dumping and stockpiles, which present fire hazards and threat of vector-borne diseases.

USTMA members share a common aspirational goal that 100% of scrap tires enter sustainable end-use markets. We work with states and numerous partners to grow sustainable scrap tire markets to consume annually generated scrap tires. Ensuring scrap tires are used in sustainable markets instead of ending up in piles is a never-ending job. We support the existing free market, shared responsibility system for scrap tire management.

USTMA is the national trade association for tire manufacturers that produce tires in the U.S. Our 13 member companies operate 58 tire-related manufacturing facilities in 17 states and generate over \$27 billion in annual sales. In Maryland, the tire manufacturing industry directly supports nearly 2,600 jobs, generating \$169.78 million in direct industry wages and \$95.90 million in annual state and local tax revenue.

Overview of scrap tire management in Maryland

Maryland has been successful in cleaning up scrap tire stockpiles and ensuring markets exist to consume annually generated scrap tires. The 2018 Maryland Scrap Tire Annual Report specifies that since the inception of the Maryland's Scrap Tire Program in 1992, over 11 million scrap tires have been recovered from 1,119 stockpile cleanup sites.² Roughly 126,952 scrap tires remain in piles throughout the state awaiting remediation, according to the report.

¹ USTMA members include Bridgestone Americas, Inc., Continental Tire the Americas, LLC; Cooper Tire & Rubber Company; Giti Tires USA, Ltd.; The Goodyear Tire & Rubber Company; Hankook Tire America Corp.; Kumho Tire U.S.A., Inc.; Michelin North America, Inc.; Nokian Tyres; Pirelli Tire North America; Sumitomo Rubber Industries, Ltd.; Toyo Tire Holdings of Americas Inc. and Yokohama Tire Corporation.

² <https://mde.maryland.gov/programs/LAND/Documents/Scrap%20Tire%20FY18%20annual%20report.pdf>

In 2019, an estimated 6.1 million scrap tires were generated in Maryland. For 2019, approximately 77% (4,689,535) of Maryland generated scrap tires were recycled in facilities and the remaining 21% (1,311,769) were exported to other states. Roughly 2% (98,696) of Maryland-generated scrap tires were used as fuel in state facilities. The Lafarge Holcim cement facility in Hagerstown is permitted to burn tire-derived fuel (TDF) and in 2019, that facility consumed over 270,000 scrap tires as TDF, which includes both Maryland-generated and imported scrap tires from other states. In addition to the Lafarge Holcim cement facility in Hagerstown, two additional facilities in the state are permitted to combust incidental scrap tires with waste.

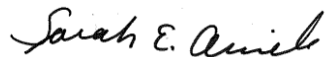
Need for sustainable scrap tire markets and market development

USTMA supports state activities to develop circular and sustainable markets for scrap tires. For example, we are encouraged by the potential of using scrap tires in asphalt which we understand has only been used in a demonstration project in Maryland. The use of scrap tires in asphalt creates a more durable pavement than traditional asphalt, preventing cracking, rutting and shoving of pavement. Additionally, it makes roads and traffic quieter and can reduce the need for expensive sound walls. We welcome opportunities to discuss ways to grow new and existing markets for scrap tires in Maryland.

We appreciate your considerations of our concerns with H.B. 1032. Absent new markets for scrap tires in Maryland, H.B. 1032 will have the effect of increasing the number of scrap tires being exported from the state and increase the likelihood of illegal dumping. Until more sustainable and circular markets are available to consume scrap tires and prevent illegal dumping, we oppose H.B. 1032.

For follow-up questions please contact Sean Moore, USTMA's Director of Government Relations, at smoore@ustires.org.

Sincerely,



Sarah E Amick
Vice President of EHS&S and Senior Counsel

CC: The Honorable Stephanie Smith, Maryland House of Delegates
Members, Maryland House Environment and Transportation Committee