LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

2024

WASTE TIRE TOWN HALL

WASTE TIRE TOWN HALL REPORT

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Executive Summary

In 2024, the Louisiana Department of Environmental Quality (LDEQ) initiated a statewide Waste Tire Community Town Hall Tour to confront the ongoing challenge of illegal waste tire disposal. This initiative stemmed from extensive discussions with community members, associations, elected officials, and municipalities, which highlighted the diverse impacts of illegal tire dumping and the various strategies employed at regional levels to address this crisis. The tour aimed to assess the complexities surrounding waste tire dumping and the obstacles faced by citizens who wish to dispose of their tires responsibly.

Governor Jeff Landry underscored the importance of this initiative, stating, "Louisianans take pride in keeping the Sportsman's Paradise a clean and safe place to hunt, fish, and raise a family. Tackling the waste tire issue is a top priority and a critical step in maintaining our environment for future generations." The Town Halls created an open dialogue, enabling LDEQ to gather valuable insights and identify potential enhancements within the existing regulatory framework of its Waste Tire Program. Additionally, LDEQ sought to educate the public on its oversight of waste tires and the program's objectives, which are designed to mitigate chronic illegal dumping through effective regulation of tire disposal and recycling efforts.

The distinction between proper disposal and illegally dumped tires imposes significant burdens on infrastructure and budgets, degrades communities, and poses health hazards associated with vector-borne diseases. The Town Halls illuminated these impacts, revealing the unintended costs of illegal dumping borne by municipalities and the challenges faced by individuals dedicated to responsible tire disposal.

The Waste Tire Community Town Hall Tour was a collaborative effort involving LDEQ, the Governor's Office of Rural Revitalization, Lt. Governor Billy Nungesser's Keep Louisiana Beautiful program, the leadership of the Parish Presidents of Louisiana Association, and local elected officials. The feedback collected from these forums will be instrumental in developing a comprehensive strategy that incorporates best practices and regulatory enhancements, facilitating proper disposal and fostering collaboration with other authorities to combat illegal tire dumping effectively. This report outlines the key findings from the tour and establishes a foundation for actionable recommendations aimed at strengthening regulatory enforcement and reducing illegal waste tire dumping statewide.

Tire Technology

Tire technology has significantly evolved since its inception, driven by the rapid growth of the automobile industry. Early tires, primarily made of solid rubber, offered limited performance and durability. The introduction of inflatable tires in the late 19th century marked a pivotal shift, enhancing ride comfort and vehicle control. However, it was the launch of radial tires in 1949, featuring vertically aligned cords, which truly transformed the industry by improving fuel efficiency and overall performance. This innovation paved the way for advancements such as steel-belted layers and sophisticated carcass ply designs, further enhancing tire durability, safety, and performance.

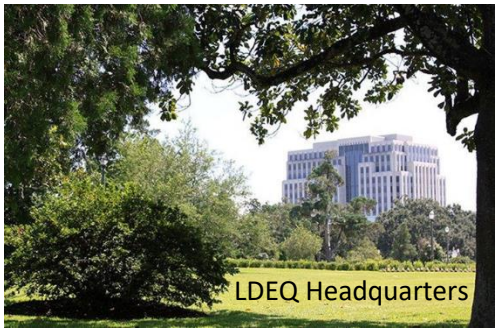
By the mid-20th century, mass production of tires became essential to the automotive sector, allowing manufacturers to meet increasing vehicle demand. However, this growth also brought environmental challenges related to tire waste. In the 1980s, tire production declined due to reduced car demand, but this trend reversed with the industrialization and lifestyle changes of the late 20th and early 21st centuries. Currently, approximately 1 billion tires become unusable each year, with projections indicating that global waste tire generation could reach 1.2 billion annually by 2030.

The surge in tire production has resulted in significant solid waste management challenges. Traditional circular economy models, which emphasize reduction, reuse, and recycling, have encountered substantial obstacles in effectively managing waste tires. This issue has prompted industry stakeholders and researchers to actively seek sustainable solutions to mitigate the environmental impact of waste tires, a persistent global concern.

Disintegrating tires presents notable challenges due to their complex composition and durable materials, primarily rubber, steel, and fabric. The resilience of these materials renders conventional disintegration methods, such as shredding and incineration, inefficient and often times can be harmful to the environment. For instance, shredding can release harmful chemicals and micro plastics, contributing to pollution, while incineration can emit toxic gases that pose health risks. Moreover, the presence of steel belts complicates recycling processes, requiring specialized equipment for effective separation.

Addressing these challenges necessitates innovative technologies, robust regulatory frameworks, and heightened public awareness to foster a more sustainable future in tire production and disposal. Ongoing efforts to develop more effective disintegration technologies face obstacles in scalability and cost-effectiveness. Therefore, finding sustainable solutions for tire disposal remains a pressing environmental challenge, requiring innovative approaches to minimize waste and mitigate ecological impact.

Overview: Louisiana Waste Tire Program



The Louisiana Department of Environmental Quality (LDEQ) was established on February 1, 1984, with a mission dedicated to serving the citizens of Louisiana through comprehensive environmental protection. This mission aims to promote and safeguard public health, safety, and welfare while concurrently considering effective policies related to employment and economic development.

A key program within the LDEQ is the Waste Tire Management Program (WTMP), which was created under Louisiana's Solid Waste Recycling and Reduction Law, specifically outlined in Act 185 of the 1989 Regular Session and codified in Louisiana Revised Statute 30:2411. The primary objective of the WTMP is to remove waste tires from the solid waste stream and to mitigate the problem of illegal tire dumping. To achieve this, the program provides subsidies to waste tire processors who are tasked with managing and recycling eligible waste tires for approved projects that yield beneficial end uses.

These projects encompass the innovative application of tire materials in various contexts, including alternative fuel production, playground flooring, and backstops at shooting ranges. Through such initiatives, the WTMP not only addresses environmental concerns but also contributes to sustainable development within the state.

The Louisiana Waste Tire Program stands as a critical environmental program aimed at the effective management and beneficial re-use of recycled waste tires across the state. Its history and development are characterized by several key aspects:

- **Establishment**: The program was established to remove waste tires from the solid waste stream, with an indirect ability to combat illegal dumping tires and promote recycling efforts. This foundational goal reflects a commitment to environmental sustainability and public health.

- **Funding**: The program is financed through fees collected from the sale of new tires. Consumers are required to pay a fee for each new tire purchased, which is subsequently directed to the Waste Tire Management Fund. This fund serves to reimburse LDEQ permitted processors for their collection and recycling activities.

- **Impact**: Over the years, the Louisiana Waste Tire Program has been credited with removing illegal tire dumps throughout the state, and the program is preventative measure to reduce illegally dumped tires. The program has facilitated the recycling of millions of tires, repurposing them for a variety of beneficial applications, thus contributing to environmental conservation and resource management.

- **Challenges**: Despite its achievements, the program has faced several challenges, including inefficiencies in documentation processes and increased illegal dumping of waste tires.

Nonetheless, the program remains committed to evolving and enhancing its operations to better serve the communities and the State.

Louisiana's Waste Tire Management Rules & Regulations

This Program was established to regulate waste tires including the management of waste tire storage, transport, and disposal effectively, adhering to the stipulations set forth under Louisiana Revised Statutes §30:2418. The comprehensive regulations are designed to mitigate environmental impacts, reduce fire hazards, and prevent public health issues, such as mosquito breeding, which can arise from improperly managed waste tires.

While residents adhere to the proper procedures for recycling waste tires, the state continues to face a chronic issue of illegally dumped tires. These illegal practices not only contribute to urban blight but also impose additional financial burdens on property owners and businesses who grapple with the discovery and removal of these tires. Moreover, improperly disposed tires can adversely affect local infrastructure, such as culverts, exacerbating drainage issues and leading to further environmental concerns.

Key Legislative & Regulatory Framework

The relevant statutes under L.R.S. Subtitle II of Title 30:2418 explicitly prohibit the disposal of waste tires in Louisiana unless conducted at a permitted solid waste facility, a permitted waste tire processing facility, or a designated waste tire collection center. These regulations underscore the importance of responsible tire management to protect our communities and environment.

LDEQ has established guidelines that govern the activities of waste tire generators, transporters, and collection centers. These regulations, as outlined in LAC Title 33, Part VII, Chapter 105, specify both prohibitions and requirements essential for compliance.

Waste Tire Generators and Tire Dealers

A **Waste Tire Generator** is defined as any individual or entity whose actions, authorized or unauthorized, result in the generation of waste tires. This encompasses tire dealers, salvage yards, and others. A **Tire Dealer** is any person, or entity that engages in the sale of tires.

As part of their obligations, all tire dealers must accept one waste tire for each new or used tire sold. Additionally, purchasers have the option to retain their waste tires (LAC 33:VII.10519.B).

- **Notification Requirements:** Waste Tire Generators and Tire Dealers are required to submit a Waste Tire Generator Notification Form to LDEQ within 30 days of commencing operations (LAC 33:VII.10519.A).

- **Recordkeeping:** Detailed records of tire transactions must be maintained for a minimum of five years to ensure transparency and demonstrate compliance.

- **Fee Collection and Remittance:** Each tire dealers operating under an LDEQ approval are responsible for collecting waste tire fees upon each tire sale (LAC 33:VII.10519.C).

- **Storage Conditions:** Waste tire generators must store tires to prevent health hazards to the public, including water accumulation and mosquito breeding (LAC 33:VII.10519.I). A maximum of 150 tires are allowed to be stored on-site unless stored indoors, in a collection container, or using adequate cover to ensure vector and vermin control (LAC 33:VII.10519.K).

- **Storage Duration:** LDEQ Registered generators can store waste tires for up to 120 days, or up to a maximum of 365 days if storing them for cost-effective transport and processing (LAC 33:VII.10519.J).

Waste Tire Transport

A **Waste Tire Transporter** is defined as any individual or entity involved in transporting waste tires, with specific regulations applying to those transporting more than 20 waste tires per load (LAC 33:VII.10523). Only **authorized transporters** may remove waste tires from designated locations.

- **Exemption:** Waste Tire Generators who generate less than 50 waste tires in a month may transport up to 20 of their own tires to a permitting processing facility without being an authorized transporter (LAC 33:VII.10519.L).

- **Manifest System:** Compliance with manifest requirements is crucial for ensuring traceability of waste tires from generation to processing (LAC 33:VII.10534.B.1-4). All Waste Tire Generators, Transporters and Processors must comply with the state's manifest provisions, ensuring traceability from the point of generation to the processing facility (LAC 33:VII.10534.B.1-4).

Prior to the tires leaving the generator's facility, the generator must complete the proper sections and secure the Transporters signature. After the transporter signs the manifest, the generator retains one copy for his files. The original and all other copies accompany the waste tire shipment. The transporter then completes the transporter information. Upon delivery of the waste tires to the designated processing facility, the transporter secures the signature of the designated processing facility operator. The transporter retains one copy for his files and gives the original and remaining copies to the

designated processing facility. The designated processing facility operator then completes their required section of the waste tire manifest and retains a copy for his files. The designated processing facility operator then submits the original manifest to LDEQ. The designated processing facility is also required to provide the completed copy of the generator waste tire manifest back to the appropriate waste tire generator. Generators, transporters, and processors shall certify that the information submitted in the generator manifest is true and correct to the best of his knowledge.

Motor Vehicle Dealers

A **Motor Vehicle Dealer** is any person or entity that sells or leases new vehicles that are required to be registered in or are intended for use in the state of Louisiana. This includes but is not limited to passenger vehicles, farm vehicles, transport vehicles, RVs and trailers. The dealer is required to register in Louisiana and must notify LDEQ of their business activities within 30 days of commencing operations (LAC 33:VII.10521.A). Dealers of used vehicles may not be subject to waste tire regulations unless they engage in wholesale tire transactions.

- All Motor Vehicle dealers are required to notify LDEQ of business activities within 30 days of commencement of business (LAC 33:VII.10521.A).

- Dealers of used motor vehicles doing business in Louisiana are not subject to the waste tire regulations. However, dealers of used motor vehicles who buy tires at wholesale and mount them on a used vehicle prior to sale are considered waste tire generators and are subject to the requirements of LAC 33:VII.10519.

- All motor vehicle dealers are required to keep and maintain records in order to demonstrate compliance with the regulations in accordance with LAC 33:VII.10509.H.

Waste Tire Transfer Stations

A **Waste Tire Transfer Station** is an authorized facility where waste tires are stored for greater than 24 hours and up to 10 days. Waste tires are accumulated at transfer stations as part of the transportation process and are transferred from transportation vehicles to other vehicles and/or storage containers, for transportation without processing.

Waste Tire Collection Centers

A **Collection Center** is a permitted or authorized facility where waste tires can be stored and/or collected. Waste Tire Collection Centers may be run by Government agencies. Government Agencies, local, parish, state, municipal, and federal governing authorities having jurisdiction over a defined geographic area. Waste Tire Collection Centers are subject to LAC 33:VII.10527 regulations.

- Each collection center shall accept no more than five unmanifested waste tires per individual, per day per vehicle. The collection center shall maintain a log which shall include the following: the name, address, phone number, and driver's license number of

the person delivering the waste tires, the license plate number with state of origin of the vehicle delivering the tires, the number and type of tires, the date, the signature of the person delivering the tires and an explanation as to how the waste tires were generated.

- Collection centers shall store no more than 3,000 waste tires at any time.
  Collection centers are subject to the manifest requirements for any offsite shipments of waste tires.

Enforcement and Penalties

LDEQ has established enforcement measures to address non-compliance, including fines for improper disposal or reporting. Inspection rights allow LDEQ to audit records related to tire transactions, ensuring adherence to regulations that safeguard public health and the environment.

- Violation Penalties: LDEQ has enforcement measures in place for non-compliance, including fines and other penalties for improper disposal, storage, or reporting of waste tires. These measures ensure that the rules are strictly followed to protect the environment and public health.

- Inspection Rights: LDEQ reserves the right to audit and inspect all records related to tire transactions and fee remittances to ensure compliance.

Waste Tire Fund

One significant aspect of the Waste Tire regulations pertains to the imposition and collection of fees by tire dealers, as well as the subsequent administration of these fees by LDEQ to support waste tire management initiatives. LDEQ-licensed tire dealers are obligated to impose fees on customers at the point of sale for all new and used tires. The fee structure, established by statute, is as follows: $2.25 per passenger or light truck tire, $5.00 per medium truck tire, $10.00 per off-the-road tire (OTR), and $1.25 per retreaded tire. These fees play a crucial role in funding the state's waste tire management efforts.

To ensure transparency and consumer awareness, new and used tire dealers are required to prominently display the LDEQ fee notification. The waste tire fee must be clearly indicated on the retail sale invoice, listed as “LDEQ Waste Tire Fee” on a separate line, and should not include any additional charges or taxes. Notably, fees are exempt for tires weighing 500 pounds or more, solid tires, or those categorized as de minimis, such as lawn mower tires, bicycle tires, and golf cart tires.

In addition to collecting fees, LDEQ-licensed tire dealers must submit a monthly Waste Tire Fee Report to LDEQ by the 20th of the month following the fee collection. This report details tire sales and associated waste tire fees, even if no fees were collected during that period. Timely submission is essential, as late fees may be imposed for delayed reporting.

The fees collected by tire dealers are remitted to the State Treasury and credited to the Bond Security and Redemption Fund. The LDEQ Secretary administers these funds to address proper disposal of waste tire issues in Louisiana, including providing subsidies to LDEQ-permitted waste tire processors for the delivery of eligible waste tire materials to approved beneficial end-use projects.

Beneficial end-use projects encompass various engineering and environmental initiatives, such as slope stabilization, the production of tire-derived fuel for industrial boilers and furnaces, rubber-modified asphalt, landfill leachate collection systems, and de-polymerization processes. These projects not only contribute to effective waste tire management but also promote sustainable practices that benefit our communities and environment.

Tire Disposal: Legal vs. Illegal Dumping

The Louisiana Environmental Quality Act ("LEQA"), La. R.S. 30:2011 et seq. establishes the LDEQ as the primary agency in the state concerned with environmental protection and regulation, and gives LDEQ jurisdiction over the regulation of solid waste disposal, and the regulation of programs which encourage the reduction of wastes generated in Louisiana. La. R.S. 30:2011(A)(1).

The Solid Waste Recycling and Reduction Law ("SWRRL"), La. R.S. 30:2411 et seq. is designed to encourage the diversion of materials from landfills, particularly waste tires, and governs the disposal of waste tires. La. R.S. 30:2411(A)(1). The purpose of the SWRRL is, in part, to "[e]ncourage the development of the state's recycling industry, thereby conserving the natural resources and energy through reuse" and to "[e]ncourage the expansion of businesses located in Louisiana and to whatever extent possible, to look favorably on Louisiana businesses in the recycling industry…." La. R.S. 30:2411(B)(2) and (7). Pursuant to the SWRRL and La. R.S. 30:2418, the LDEQ established the Louisiana Waste Tire Program for the disposal and recycling of waste tires. LAC 33:VII.Chapter 105.

The Louisiana Waste Tire Program was implemented "for the stated purpose of removing waste tires from the solid waste stream going into landfills, in order to protect the environment, and for the public's safety and welfare." LAC 33:VII.10501.

Under the program, a waste tire fee is imposed on new tires sold in Louisiana, which is collected by the tire or motor vehicle dealer at the time of retail sale. La. R.S. 30:2418(I); LAC 33:VII.10535.B This fee is remitted to the Waste Tire Management Fund, and is disbursed to waste tire processors for whole waste tires and/or waste tire material that is recycled, or that reaches an LDEQ approved end-market use. La. R.S. 30:2418(G); LAC 33:VII.10535.D. These payments are "meant to temporarily supplement the business activities of processors and are not meant to cover all business expenses and costs associated with processing and marketing." LAC 33:VII.10535.E.

Unfortunately, the challenges associated with waste tire management extend beyond regulatory frameworks. Municipalities bear the cost and burden of maintaining clean areas to prevent blight and other detrimental community impacts resulting from illegal tire dumping. The presence of illegally dumped tires not only mars the landscape but also poses serious environmental and health risks, including the potential for hazardous tire fires and the proliferation of disease-carrying vermin.

LDEQ plays a crucial role in authorizing and issuing permits to individuals and entities engaged in the generation, storage, transport, processing, or disposal of tires. Permit holders must adhere to established laws and regulations and provide financial assurances to ensure compliance and safe operational closure without harm to human health or the environment.

The permitting process is thorough and involves public participation. When an application is submitted, LDEQ technical staff reviews it for completeness before issuing a draft decision, which is then opened for public notice and comment. Community input is vital, as LDEQ considers all public comments when making final permitting decisions. This collaborative approach ensures that the voices of concerned citizens are heard and integrated into the decision-making process.

Cottonport Monofill Waste Tire Fire, 2022.

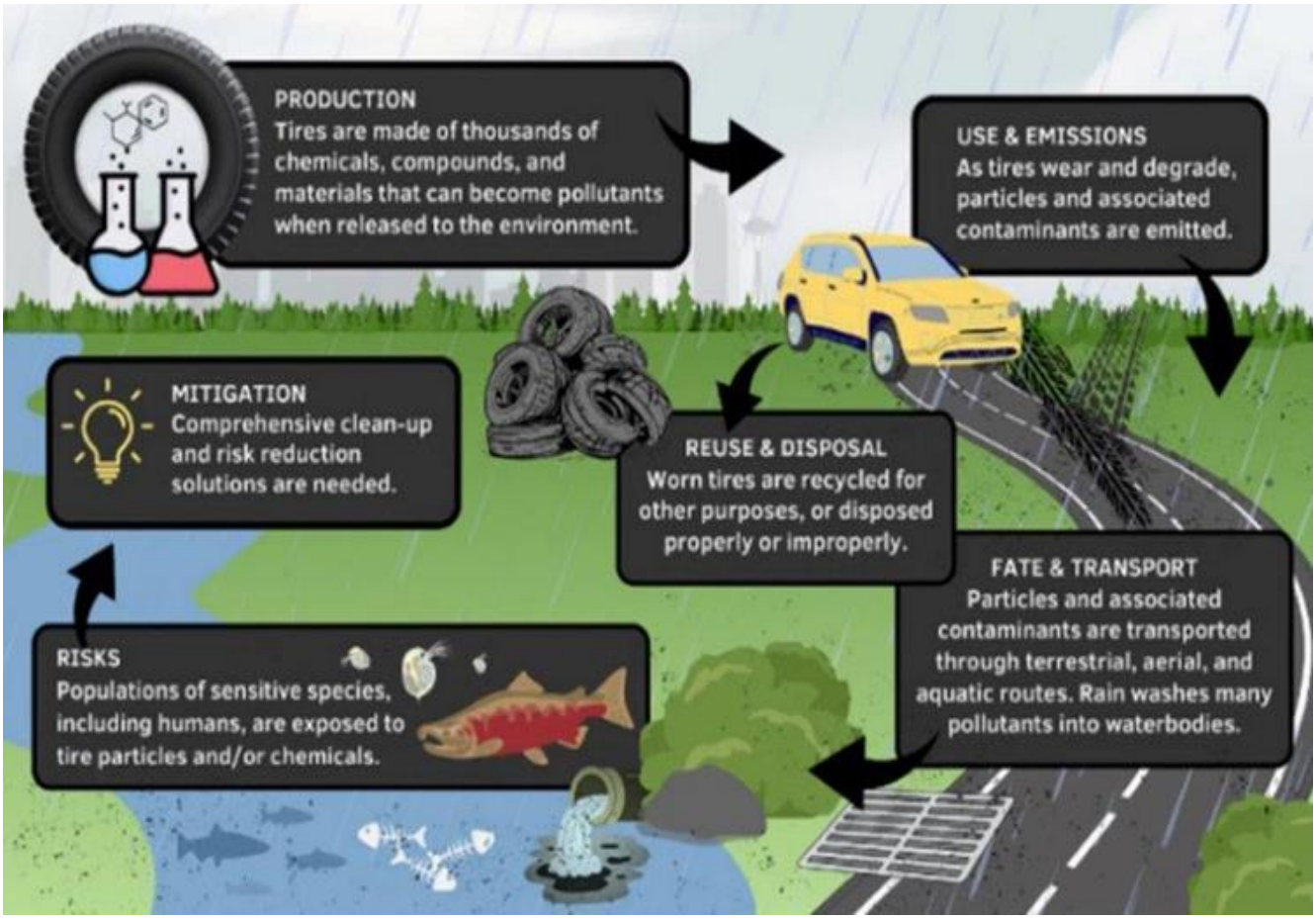
LDEQ permitting decisions are required to balance a number of factors and essentially do a cost benefit analysis, which includes weighing social and economic considerations against the possibility of environmental harm and impacts to human health.

The Department aims to make a decision that is best for the people of the state under its regulatory authority:

- The permitted tire generators, transporters, and processors, operate within the framework of LDEQ's regulatory authority and add to the ecosystem of the State's environmental protection.

- Illegal tire dumpers operate without permits or licenses. Improper disposal of waste tires can have many negative consequences for the environment and human health, including waste tire fires that can burn for weeks, releasing toxic smoke and oil that pollutes the ground and water, and tire piles provide a warm, dark environment that's ideal for mosquitoes, rodents, and other vermin, which can carry diseases. Tire piles are also an eyesore that can affect communities and economic development. Enforcement and prosecution efforts can be particularly challenging.

To address these challenges, community engagement is essential. Recent town halls provided a platform for constituents to discuss the systemic, costly issues surrounding illegal tire disposal. These gatherings allowed residents to share their experiences and collaborate on innovative solutions to reduce waste tire pollution, minimize fire hazards, and prevent the spread of vector-borne illnesses associated with tire storage areas.



LDEQ Town Halls

At each town hall meeting, the Governor's Office of Rural Revitalization, the Lt. Governor's Office of Keep Louisiana Beautiful and the elected officials spoke about their efforts and commitment to clean Louisiana. LDEQ distinguished between proper disposal efforts by residents and illegal tire dumping that is degrading the communities, damaging critical infrastructure, and burdening municipal governments with unanticipated clean-up costs.

These town halls served as an essential platform for:

- Educating the public about regulatory authority and distinguishing between legal and illegal waste tire processing.
- Gathering valuable feedback from participants.
- Identifying the common challenges related to waste tire disposal across the State.

This report encapsulates the insights and sentiments expressed by elected officials, public works employees, and business owners.

Gonzales: August 30, 2024
(Gonzales Civic Center)
Officials: West Baton Rouge Parish President Jason Manola

Carencro: September 3, 2024
(Carencro Community Center)
Officials: Carencro Mayor Charlotte Stemmans Clavier, Abbeville Mayor Roslyn White, Sunset Mayor Charles "Cha Cha" James, Iberia Parish President Larry Richards

Pineville: September 24, 2024
(Main Street Community Center)
Officials: Ball Mayor Gail Wilking

Metairie: September 25, 2024
(Joseph Yenni Building)

West Monroe: September 26, 2024
(West Monroe Convention Center)
Officials: West Monroe Mayor Staci Albritton Mitchell, Richwood Mayor Gerald Brown

Shreveport: September 26, 2024
(Council Chambers)
Officials: Shreveport Mayor Tom Arceneaux

Summary of Public Comments from Town Halls

The public comment segment of the LDEQ Waste Tire Town Hall elicited a wealth of innovative ideas and recommendations regarding the advancement of waste tire management.

Applications for Waste Tires

Steel Recovery and Reuse: Participants proposed the extraction of steel from waste tires for repurposing in various industrial applications. Neighboring states, such as Texas and Arkansas, have effectively implemented this strategy, utilizing the steel in the heating processes of cement production in kilns.

Beneficial End Uses: Under La. R.S. 30:2418(H)(3) and (9), along with LAC 33: VII. 10515 and LAC 33: VII. 10532, LDEQ offers technical assistance and incentives to encourage market research and development projects. The agency also supports waste tire processing facilities to facilitate the reuse of waste tires as raw materials, products, or fuel sources. There was considerable support for leveraging waste tires in beneficial projects, including:

- Utilization as fuel for kilns
- Creation of artificial reefs and barriers to combat coastal erosion
- Continued applications in landscaping as edging and mulch
- Production of tire pellets for recycling into new products

Tire Pyrolysis: The process of tire pyrolysis, which involves the thermal decomposition of waste tires in the absence of oxygen, was suggested as a method to convert scrap tires into valuable products such as pyrolysis oil, synthetic gas, and char. Attendees advocated for engaging a tire incineration company to help decommission existing stockpiles of used tires, acknowledging that this method would reduce tires to ash but not constitute a reuse scenario.

Road Construction: Future road construction projects can integrate a higher percentage of waste tire materials, thereby enhancing our transportation infrastructure. The use of rubberized asphalt has demonstrated improved resistance to cracking, rutting, and potholes, as well as better performance under extreme temperatures and heavy traffic loads compared to conventional asphalt. However, some participants stated that this technology is still in research, as the lifespan of roads is decreased with waste tire material.

Enhancing Waste Tire Collection and Tracking

Collection Center Storage: Currently, Louisiana has 120 collection centers that are managed by the parish, municipalities, or for-profit company for public to drop off their waste tires for disposal. Attendees recommended establishing additional waste tire collection centers statewide. Expanding beyond the 100 local government-approved sites could enhance accessibility for residents and extend storage durations.

Tire Tracking System: A tracking program to monitor waste tires from their point of origin to their end-use or disposal site was suggested by members of the public as another potential avenue to mitigate illegal waste tire dumping.

Surveillance Cameras: Participants suggested the installation of surveillance cameras along state roads and bridges, particularly in known dumping areas. Many noted that repeat offenders often return to the same sites. LDEQ has previously and still continues to work in collaboration with the Department of Transportation and Development (DOTD). DOTD's mission is to plan, design, build, and maintain a safe and reliable multimodal transportation system that enhances mobility and economic opportunity, thus holding authority over roadway and right-of-way matters. Therefore, waste tires located on roads, right-of-ways, bridges are under the jurisdiction of DOTD.

Strengthening Enforcement and Compliance

EPA Grants for Waste Tire Audits: Participants across the town halls recommended seeking EPA grants to support waste tire audits to increase compliance across the board.

Enhanced Enforcement and Prosecution: Allocate additional resources for the enforcement and investigation of illegal tire dumping. Participants emphasized that stronger prosecution of

offenders could serve as a significant deterrent to such unlawful activities. Furthermore, integrating local law enforcement, including Sheriff's Offices, into these efforts could enhance the effectiveness of our initiatives.

District Attorney (DA) Involvement: Encourage local governments and District Attorneys to prioritize waste tire violations and significantly strengthen enforcement efforts at the community level. It is essential to identify and address the barriers that hinder effective action, including financial constraints and the prioritization of more high-profile environmental cases.

Bolstering Enforcement at the Parish Level: In light of the original lawsuit addressing widespread illegal tire dumping, the costs associated with storing waste tires was increased, reflecting public concerns over illegal dumping activities. Participants acknowledged that parishes divert time and resources to enforce regulations and, when necessary, apply measures like that to tighten up illegalities.

Prosecution: In 2019, Orleans Parish resident Bryant Joseph Ballard pleaded guilty in Orleans Parish Criminal District Court to illegal disposal of waste tires and unauthorized use of a movable. Ballard was arrested by New Orleans Police Department officers for theft of a U-Haul truck and an outstanding Louisiana Department of Environmental Quality warrant for illegal disposal of waste tires in New Orleans East. As the result of an extensive investigation and numerous hours of covert surveillance, investigators with the LDEQ Criminal Investigation Section concluded that Ballard was using rented U-Haul trucks to collect and illegally dispose of waste tires in New Orleans East. Ballard was sentenced to statutory maximum of two years in prison for unauthorized use of a movable and to the statutory maximum of one year for illegal disposal of waste tires consecutively for a total of three years.

Infrastructure Improvements and Funding

Incentives for Recycling: Providing financial incentives for tire recycling in the form of grants for parishes that could use them toward removing illegally dumped tires.

Increasing Fees: Increase the Waste Tire fee.

Reduce Travel Distance to Collection Sites: The distance to waste tire collection sites should be decreased, making it more convenient for individuals to dispose of bulk waste properly.

Funding for Near-Landfill Operations: Participants proposed allocating funds to establish new landfill operations closer to major waste generation points to facilitate more efficient waste management.

Small Businesses: Attendees discussed the small resale tire shops that are deleterious to local neighborhoods and where illegal operations often represent a significant problem that needs to be addressed.

Governmental and Legislative Support

Permit Exemptions for Government Agencies: Allowing government entities to collect waste tires without needing a permit for household hazardous waste days is a way to expedite cleanup efforts and reduce administrative burdens.

Increased Funding for Tire Conversion: Advocates called for higher funding levels to support waste tire dumping prevention and the need for insurance to facilitate the conversion of waste tires into rubber products.

Recycling Efforts Scaling: Participants encouraged supporting tire recycling initiatives capable of processing between 800 and 1,500 tires per month, increasing Louisiana's recycling capacity.

Household Hazardous Waste Days: Another idea suggested was for the State to hold more Household Hazardous Waste Days — and to have that day also be for waste tires to be dropped off at those events.

Passing Waste Tire Specific Penalties: Attendees suggested creating a unique penalty solely for waste tire dumping that was separate from littering laws and penalties already enforced.

Waste Tire Bounty: Participants also suggested creating a financial incentive for those who bring in large cache of waste tires.

Parishes: Waste Tires by the Statistics

LDEQ worked in collaboration with parishes to understand the resource burden, find budget numbers, and the negative effect on cities, and the downstream harm to infrastructure.

The details those sets of information provided by each parish are listed here.

Calcasieu Parish*:* Calcasieu Parish uses Colt, Inc. as its waste tire processor, with costs for regular auto tires set at $2.00 per tire, while larger tires can cost anywhere from $8.00 to over $90 per tire. The parish runs its tire collection within its Solid Waste Convenience Center, with an estimated annual cost of $60,000 for handling this initiative, excluding the processing fees (a fee paid by consumers when they purchase new tires.) This reflects a concerted effort by the parish to manage waste tire disposal efficiently while balancing the financial impact of handling larger tires.

Iberville Parish: Iberville Parish utilizes Environmental Industries Recycling, Inc. in Port Allen as its processor. The parish pays $1.50 per tire for passenger truck tires, $5.00 per tire for medium trucks, and $20 per tire for off-road trucks. In 2023, the parish spent approximately $12,000 to carry out its waste tire program, covering the costs of collection, transportation, and

disposal. This figure highlights the ongoing efforts to manage waste tire disposal while keeping costs manageable for the community.

Iberia Parish: Iberia Parish reports an annual total cost of $18,100 for its waste tire program. The breakdown includes $11,000 for processing fees, $6,000 for employee time, $1,000 for building costs, and $100 for supplies. These costs reflect the parish's commitment to properly handling waste tires through a well-rounded approach that includes both operational costs and labor.

Orleans Parish*:* Orleans Parish works with Colt, Inc. for waste tire processing, with no charges for tires collected by LDEQ-permitted Orleans Parish vehicles. The city incurs approximately $300,000 annually to pick up waste tires from public rights-of-way and drainage ditches. This significant investment reflects the parish's focus on maintaining clean public spaces and addressing the widespread issue of waste tire disposal in the community.

Lafayette Parish: In Lafayette Parish, Colt Scrap Tire Center is the designated processor, with the parish paying about $3,500 annually for tire disposal. The cost structure includes $2 per auto tire, $8 per 18-wheeler tire, and $16 for tractor tires under 500 lbs. The parish is also exploring grant options to help combat tire disposal issues, though it is awaiting further determination on staff time contributions to the overall program. This cost structure shows the parish's proactive approach to waste tire management.

Lafourche Parish: Lafourche Parish also uses Colt, Inc. as its processor and spends approximately $5,000 per year to dispose of tires. Additionally, the parish estimates $24,840 in labor costs, based on 10 hours of weekly collection work. These efforts bring the total yearly cost to approximately $29,840. The parish is exploring grant options to offset some of these costs and improve the overall efficiency of its waste tire collection program.

Jefferson Parish*:* Jefferson Parish relies on Colt, Inc. as its sole processor and has a $35,000 annual contract for tire collection from illegal dumping, public works facilities, and parish drop-off sites. Additional costs include $16,575 for curbside pick-up by River Birch and $139,605 for staff time related to inspections, investigations, and administrative duties. Jefferson Parish's comprehensive program also includes costs related to illegal tire dumping and ongoing compliance efforts, highlighting the scale of the parish's waste tire management operations.

Plaquemines Parish: Plaquemines Parish is registered as a transporter with LDEQ, certified to transport used tires to Colt, Inc. for processing. The parish incurs minimal costs, with no charges for regular tires, but a fee applies for larger tires. The primary costs are related to labor and hauling, demonstrating the parish's efficient handling of waste tire disposal through partnerships and transportation logistics.

St. Charles Parish: St. Charles Parish's waste tire disposal program costs a total of $25,099 annually. The breakdown includes $3,529 for an Equipment Operator, $1,656 for a Laborer, and $5,514 for the Grabber Truck. Additionally, tire disposal fees amount to $2,400 for 30-yard dumpsters, while $12,000 is spent on dumpster costs. This comprehensive analysis highlights the multifaceted approach taken by St. Charles Parish in managing its waste tire disposal costs.

Tangipahoa Parish: Tangipahoa Parish transports its waste tires to Colt, Inc. with minimal costs associated with regular tire disposal. The only expenses are for ineligible or oversized tires, which occur infrequently. However, the parish incurs $9,500 monthly for a roll-off truck lease, $5,500 per roll-off box, and $125 per trip for fuel, totaling substantial ongoing logistical costs. This reveals the significant operational investment needed to manage waste tires in the parish.

Terrebonne Parish: In Terrebonne Parish, waste tires are transported to Environmental Industries Recycling in Port Allen. The total cost for 2023 was $17,296.50, including $7,946.50 for recycling and $9,350 for transportation. In 2024, costs through May were $7,809.00. The parish hauled 22 loads containing 6,528 tires in 2023, reflecting a consistent and ongoing commitment to tire recycling and disposal across the parish.

West Baton Rouge Parish: West Baton Rouge Parish works with Environmental Industries Recycling, Inc. as its processor, with costs of $1.50 per light truck tire, $5.00 per medium truck tire, and $20 per off-road tire. The parish's average annual cost for tire disposal over the past three years is approximately $5,500, which highlights a relatively low-cost waste tire management system compared to other parishes in the state.

Conclusion

The Louisiana Department of Environmental Quality (LDEQ) is steadfast in its commitment to protecting human health and the environment throughout our state. In alignment with Governor Landry's pledge to uphold accountability, LDEQ will utilize its authority to proactively address the waste tire issues and engage with the permitted facilities, elected officials, communities and stakeholders to assist in proper disposal and combat illegally dumped waste tires. Central to this initiative was LDEQ's 2024 Waste Tire Town Hall Tour, which fostered a constructive dialogue between community members, public officials, and regulated facilities. Participants appreciated the town halls as a vital platform to share their unique experiences regarding proper waste tire disposal and to express the significant strain imposed by illegally dumped tires. Together, we have explored the challenges and discussed innovative strategies for enhancing waste tire management practices in Louisiana.

The insights gleaned from these town hall meetings will play a pivotal role in providing this report to Governor Landry. This report delineates changes that are unique to regions of Louisiana, proposed solutions, aimed at addressing the myriad challenges posed by waste tires in our state –

from both proper disposal and illegal dumping. Participants expressed considerable optimism to have this open dialogue, viewing the town halls as a crucial step toward illuminating the detrimental impacts of improper waste tire disposal across Louisiana. LDEQ expresses their sincere appreciation for the support of Governor Landry, the Office of Rural Revitalization, Lt. Governor Billy Nungesser's Keep Louisiana Beautiful initiative, the Parish Presidents of Louisiana Association, and all participants who contributed to this important dialogue.