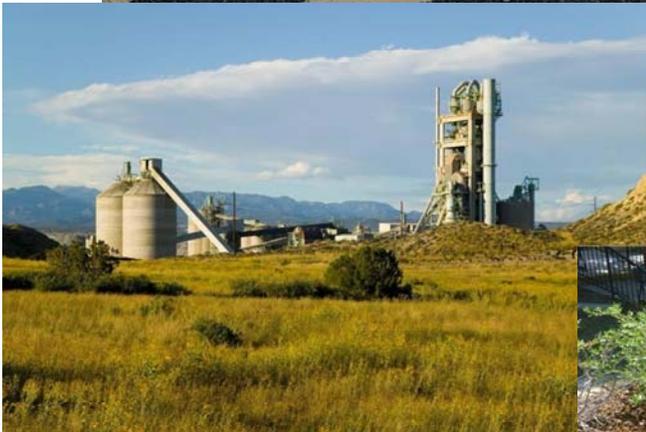


Colorado Waste Tire Market Development Plan Implementation



Prepared for:

Colorado Department of Public Health & Environment
Hazardous Materials & Waste Management Division

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APPENDIX

Appendix A: Regulators Meeting (Pre-Conference), and Conference Agendas

ACRONYMS AND ABBREVIATIONS

Acronyms/Abbreviations	Definition
ADEQ	Arkansas Department of Environmental Quality
CDPHE	Colorado Department of Public Health and Environment
CDOT	Colorado Department of Transportation
EPA	United States Environmental Protection Agency
IEPA	Illinois Environmental Protection Agency
KDHE	Kansas Department of Health and Environment
MDEQ	Michigan Department of Environmental Quality
NDEQ	Nebraska Department of Environmental Quality
NMED	New Mexico Environment Department
ND Department of Health	North Dakota Department of Health
Oklahoma DEQ	Oklahoma Department of Environmental Quality
RMA	Rubber Manufacturers Association
RTD	Regional Transportation District
SWANA	Solid Waste Association of North America
TCEQ	Texas Commission on Environmental Quality
TDA	Tire-Derived Aggregate
TDF	Tire-Derived Fuel
Tetra Tech	Tetra Tech, Inc.
Utah DEQ	Utah Department of Environmental Quality
Wyoming DEQ	Wyoming Department of Environmental Quality

1.0 INTRODUCTION

On behalf of Colorado Department of Public Health and Environment (CDPHE), Tetra Tech, Inc. (Tetra Tech) completed a Waste Tire Market Development Plan in May 2013. The Waste Tire Market Development Plan presented an approach for achieving 100 percent reuse or recycling of the state's stockpiled, monofilled, and annually generated waste tires by 2024.

Tetra Tech was awarded a contract by CDPHE in January 2014 to implement the approach described in the Waste Tire Market Development Plan, with the goal of advancing CDPHE's waste tire market development. As a follow on to the original contract, work was continued on this project through Amendment #1 (from July 1, 2014 through June 30, 2015) and Amendment #2 (from July 1, 2015 through June 30, 2016). This Annual Report summarizes work completed on the project from July 1, 2015 through June 30, 2016 under Amendment #2 to the original contract.

The Tetra Tech team in place for this work includes Terry Gray (TAG Resource Recovery), Mary Sikora (Recycling Research Institute), Dr. Dana Humphrey (University of Maine), Bob Farnes (Tetra Tech), and Karmen Griffith (Tetra Tech).

Priority was placed on tasks that would best advance the waste tire market development goal. The implementation steps taken thus far on the project are pursuant to the CDPHE and Tetra Tech contract, and are organized around four main tasks:

- Task 1: Technical Trainings
- Task 2: Technical Assistance and Identification
- Task 3: Annual Statewide Conference on the Use of Tire-Derived Materials
- Task 4: Assistance in the Development of the Waste Tire Fund Programs

The scope, timeframe, details, and results associated with the project tasks are presented in this Annual Report.

2.0 SCHEDULE

The May 2013 Waste Tire Market Development Plan lays out steps leading to the beneficial use of all waste tires produced and stored in the State of Colorado. As the program advances through the steps, results are regularly monitored to ensure that existing and new influences are taken into consideration. Many of the steps taken need to be advanced iteratively while monitoring the resulting change in waste tire beneficial use capacity. Some projects may lead to more beneficial use than predicted, while others may consume less waste tires than intended. Waste tire market development is a marathon, not a sprint, and requires a thoughtful plan, experience, and perseverance.

The steps presented on the Gantt chart (Figure 1) in the Waste Tire Market Development Plan, were used as a guideline to connect the organizations, people, information, and funding needed to capitalize on the opportunities presented in the Waste Tire Market Development Plan. All tasks were coordinated with CDPHE and based on the project timeline; priority was placed on those tasks which would have the most impact on advancing waste tire market development.

Each task is discussed in detail in the following sections.

3.0 TECHNICAL TRAININGS

Civil engineering applications represent a potentially high volume market for Colorado's waste tires. Development of civil engineering applications for tire derived aggregate (TDA) is an evolutionary process that starts with training sessions. Goals of the technical training session are two-fold: overall enhancement of the understanding of TDA usage in civil engineering applications (including highway, bridge, landslide stabilization, and light rail construction); and identification of potential projects where TDA use would offer technical and economic advantages over traditional materials.

In September 2015, three technical training sessions were conducted. Tetra Tech provided TDA training at the Annual Meeting for the Colorado Rocky Mountain Solid Waste Association of North America (SWANA) Chapter in Pueblo on September 21, 2015. The technical training session focused on constructive landfill applications using TDA. The team also conducted TDA training for the Colorado Department of Transportation (CDOT) on September 22, 2015, and TDA training for the Regional Transportation District (RTD) on September 23, 2015. The CDOT and RTD technical training sessions focused on highway and related applications for TDA.

The following tasks occurred to support the development and completion of the September 2015 technical training sessions:

- Tetra Tech worked with CDPHE, SWANA, CDOT, and RTD to develop a vision for the training seminars—when and where they would take place, invitees, and the general content of the material that was presented.
- Tetra Tech developed training materials including visual presentations and written materials. These materials included a TDA technical reference book that covers major applications and basic design data required for TDA usage.

During the TDA technical training sessions, Dr. Humphrey presented a short course that focused on civil engineering design properties of TDA. The short course covered several topics related to applications of TDA including the following:

- Introduction of TDA—how it is made and why its use can be beneficial depending on the application;
- Overview of TDA use in civil engineering;
- Engineering properties of TDA;
- Lightweight and conventional fill for highway embankments and landslide stabilization;
- Retaining wall and bridge abutment backfill;
- Drainage and insulation layers in roads;
- Use of whole tires in highway applications;
- Environmental considerations for use of TDA; and
- Self-heating reactions in TDA fills.

All three sessions were interactive with questions and comments from participants. Overall, the training sessions were viewed as a success by the attendees. Tetra Tech, in coordination with CDPHE, has offered subsequent technical assistance to attendees during their evaluation, development, design, and construction of specific applications.

4.0 TECHNICAL ASSISTANCE AND IDENTIFICATION

In the Waste Tire Market Development Plan, Tetra Tech identified basic characteristics of major waste tire product markets, proposed a plan to define existing and potential waste tire product markets in Colorado, and provided technical assistance and tools to accelerate development of multiple segments within each market. The technical training sessions previously discussed represent one component of the coordinated approach. Another part of the plan involved identifying entities for technical assistance in each market segment.

Per CDPHE's request, members of the Tetra Tech team visited the Ecolomondo facility in Montreal, Quebec. Ecolomondo's Thermal Decomposition Process converts tire-derived crumb rubber into marketable commodity products: carbon black substitute, oil, gas, and steel. The purpose of the visit was to gain a better understanding of Ecolomondo's operations and the potential for developing a similar facility in Colorado.

As pyrolysis technology and equipment companies seek to locate in Colorado and other states, there is a growing need for tools and resources that regulators can use to qualify these companies. The Tetra Tech team engaged a national expert on the Toxic Substance Control Act (TSCA) to address TSCA's role for state managers and pyrolysis facilities. He prepared a white paper, "The Intersection of TSCA Regulation of Scrap Tire Pyrolysis Manufacturing and State Regulatory Frameworks," that defines TSCA and why it applies to scrap tire pyrolysis. The white paper details EPA's regulatory review process, shows how TSCA intersects with state regulatory programs, and provides state regulators a checklist of information and supporting documents they can use to evaluate compliance.

CDPHE is regularly contacted by companies and individuals interested in promoting products, establishing facilities, and participating in Colorado's waste tire industry. At CDPHE's request, Tetra Tech has held discussions with approximately 15 entities, with the goal of offering assistance, comments, and suggestions.

Tetra Tech will continue to assist CDPHE with follow-up and analysis of potential diversification of the Colorado waste tire marketplace.

The following sections discuss the major areas of focus with regard to technical assistance and identification.

4.1 TIRE-DERIVED AGGREGATE

CDPHE and Tetra Tech worked with SWANA to promote the value of TDA and identify avenues for including TDA information in SWANA programs and materials.

A RTD-specific training session was conducted in September 2015, to coincide with the SWANA training. To further broaden educational and technical assistance, CDPHE is exploring opportunities to conduct a short course for county and city engineers to assist them in evaluating TDA for local projects.

TDA usage was promoted through the 2016 Waste Tire Conference in a session that presented case studies on the use of TDA as building foundation backfill, as a material to support underground stormwater retention, and as a subgrade stabilizer and geothermal insulation. This session also gave an overview of a Colorado project in which TDA was used as a cap enhancement in converting a closed landfill to athletic fields. The conference helped further expand the market reach for TDA by qualifying the conference for educational credits for SWANA members. To support CDPHE's interest in broadening civil engineering applications for TDA beyond traditional uses in highways and landfills, the Tetra Tech team prepared the following:

1. Developed a list of applications and reached out to other states for information and examples of their experience with these applications, including:
 - Building foundation backfill
 - Underground stormwater storage
 - Expansive soil interface material
 - Levee core material on unstable soils
 - Alternative septic system drainfield aggregate

2. Created two informational TDA fact sheets addressing TDA usage in residential construction applications:
 - Tire-Derived Aggregate as Insulation for Horizontal Ground Source Heat Pump System
 - Tire-Derived Aggregate as Backfill for Residential Foundation

These fact sheets are intended to provide talking points and support for initial discussions with participants in each of these market segments. The objective is to develop market understanding allowing analysis of these potential markets. Plans and additional marketing resources will be identified and initiated to further develop these markets as appropriate. Additional markets including expansive soil buffer and underground stormwater storage substrate will also be explored; additional engineering data requirements may be identified and studied to support these markets.

Economics ultimately dictate the viability of the TDA market. Tetra Tech will continue to focus on identifying projects that use TDA to displace higher cost alternatives. Major challenges include an understanding of the logistics and economics associated with processing, storing, and transporting potentially large quantities of TDA for use in a short period of time for major projects. The inherent lag time associated with these projects requires planning and coordination of resources, materials, and public and private sector project participants locally, regionally, and often statewide. Smaller initial applications can help develop the infrastructure and experience required for larger projects and serve as a baseline for development of this market.

Additional discussions of TDA applications will continue to be explored in the next fiscal year.

4.2 TIRE-DERIVED FUEL

Energy utilization is currently the largest waste tire market in Colorado. Expansion of the tire-derived fuel (TDF) market can play an important role in abatement of monofills and stockpiles. The Tetra Tech team visited current and potential waste tire energy users in Colorado. Tetra Tech will continue to assist this market segment with the goal of advancing market development for the beneficial end use of tires.

Tetra Tech has visited all three of Colorado's cement plants and has discussed design and operational considerations associated with efficient and environmentally sound use of TDF. The Tetra Tech team has had numerous discussions with pyrolysis proponents exploring potential operation in Colorado. Future discussions and site visits are anticipated for the next fiscal year.

Steel mills are considered to be a material recovery application because they use tires primarily for their carbon content required in steel composition, as well as their energy content. Colorado has one steel mill that may represent an opportunity for use of processed tires as a carbon source. Additional discussions and information gathering are expected during the next fiscal year.

4.3 CRUMB RUBBER

The Tetra Tech team visited a crumb rubber manufacturer and a rubber molding facility in June 2015. The visit provided a better understanding of the capabilities and needs for further developing and expanding this emerging market. Tetra Tech also had outreach to entities related to these markets, including but not limited to processors, manufacturers, end users, compounders, product designers, and testing facilities.

Tetra Tech's outreach and technical assistance resulted in helping Rubberosion, a Colorado recycled rubber products manufacturer, gain access to a molding consultant with expertise in tire-derived products. Working with the consultant, Rubberosion fabricated new molds, refined the mix design, and began the process of making a prototype for recycled rubber products being developed for CDOT. Rubberosion transitioned its molding expertise into TIRVA (formerly MikaTech), a Colorado-based startup company developing a recycled rubber block/barrier, that had commissioned Rubberosion to mold the barrier. Rubberosion remains a Colorado recycled rubber products company manufacturing recycled rubber erosion control products.

The Tetra Tech team continues to provide technical assistance to both TIRVA and Rubberosion.

In fiscal year 2015-16, the Tetra Tech team assisted TIRVA in sourcing potential research grant opportunities and potential testing partners.

Tetra Tech's team worked with Rubberosion to identify distribution channels for its products in highway transportation, maintenance, and safety markets. The team provided access to a California recycled rubber and plastics manufacturer and distributor of transportation-related products.

The Tetra Tech team's outreach and technical assistance is helping another Colorado recycled rubber products manufacturing startup company further the development of a prototype recycled rubber molded irrigation module. The team identified and provided sources for configuring specific design features and engineering requirements. This resulted in the company introducing the prototype at the Colorado Waste Tire Conference.

Three Colorado recycled rubber manufacturers, a supplier of recycled rubber to a Colorado municipality, and a potential installer of porous pavement surfacing were featured speakers at the Colorado Waste Tire Conference to increase awareness of ground rubber markets in Colorado.

Tetra Tech identified tools and resources to assist in development of ground rubber markets in the future, including:

- Assisting in the evaluation and documentation of product testing, and appropriate modification of equipment and/or operating procedures.
- Defining additional molding or processing equipment needed to initiate commercial production and use.
- Exploring tools to enhance acceptance of ground rubber products by public and private purchasers. For instance, some states have evaluated products and applications using ground rubber, developed written summaries, and recognized the products for procurement under applicable state-wide procurement or subsidy programs.
- Identifying and participating in local recycling exhibits or meetings to expose a broad range of commercial products made from scrap tires in Colorado. Notifying Colorado waste tire processors, end users, and product manufacturers of these opportunities.
- Assisting product manufacturers in improving product quality to broaden product acceptability. Helping product manufacturers identify which standards or accreditations are needed and how to get their product evaluated.
- Featuring markets and products at the conference and other venues (i.e. Colorado Recycling Association, Municipal Recycling Groups, etc.)
- Raising public awareness of the benefits of tire recycling to the state's economy through infographics and brochures, billboard and other signage, and through media and social media statements.

4.4 OUTLOOK FOR 2016–2017

Tetra Tech will continue to expand the technical assistance program and will consider using alternate approaches to outreach including webinars, development of best practices, and marketing training sessions.

5.0 STATEWIDE CONFERENCE ON THE USE OF TIRE-DERIVED MATERIALS

This task involved organizing and conducting a third annual statewide conference for the promotion and market development of tire-derived materials. The conference, titled *2016 Waste Tire Market Development Conference: The Value of Tire Recycling* was held on June 22 and 23, 2016, at the Double Tree Hotel located at 7801 East Orchard Road in Greenwood Village, Colorado. The overarching goal of the conference was to provide a forum for all sectors of the waste tire industry to

network, while congruently promoting the increased beneficial use of waste tires in Colorado.

Tetra Tech and CDPHE worked to thoroughly develop the vision, scope, location, time, invitees, conference themes, speaker possibilities, content, and schedule for the conference. Entities invited to attend the conference included, but were not limited to, waste tire processors, end users, tire derived product manufacturers, government agencies, and other interested parties approved by CDPHE.

Approximately 115 attendees were present and allowed for ample networking opportunities with the goal of enhancing the rate of beneficial end use for waste tires in Colorado. As part of the conference, 10 sessions involving waste tire market development areas were presented. A program agenda is provided in Appendix A. Conference sessions included the following:

- Colorado's Waste Tire Program
- Not Just a Monofill
- U.S. Scrap Tire Markets
- How TSCA Regulation of Scrap Tire Pyrolysis and State Regulatory Frameworks Intersect
- Capturing Value in Tire-Derived Products
- Tracking the Status of the California and U.S. EPA Crumb Rubber Turf Studies
- Tire-Derived Aggregate: A Cost Saving Construction Material
- Doing Business With CDOT
- Dry Process Rubberized Asphalt: A Cost-Effective Tool for Asphalt Pavements
- State Regulators Panel

Similar to the 2014 and 2015 conferences, the 2016 conference allowed waste tire industry vendors an opportunity to exhibit their abilities, products, services, etc. through exhibitor booths located outside the main conference area. Exhibitors included: Columbus McKinnon Corporation, Connect2DOT, ECO Green Equipment, Front Runner Rubber Mulch, Front Range Tire Recycle, Inc., Granutech-Saturn Systems, Rubberosion, Inc., Seneca Radiant Technologies, Scrap Tire News, and Tire Recycling Consultants.

Networking opportunities were strategically provided throughout the conference and attendees were able to learn more about key industry players in shredding equipment, waste tire processing, rubber molded products, and professional services for the waste tire industry.

In addition to the main conference, a pre-conference regulatory meeting was held on June 21, 2016, at the Double Tree Hotel. Agencies present for the pre-conference regulatory meeting included most Rocky Mountain regional states and other states with recognized waste tire management program experience:

- Arkansas Department of Environmental Quality (ADEQ)

- Kansas Department of Health and Environment (KDHE),
- Michigan Department of Environmental Quality (MDEQ),
- Nebraska Department of Environmental Quality (NDEQ),
- North Dakota Department of Health (ND Department of Health),
- New Mexico Environment Department (NMED),
- Oklahoma Department of Environmental Quality (Oklahoma DEQ),
- Utah Department of Environmental Quality (Utah DEQ),
- Texas Commission on Environmental Quality (TCEQ)
- Wyoming Department of Environmental Quality (Wyoming DEQ)
- United States Environmental Protection Agency (EPA).

Additionally, a representative from the Colorado Attorney General's Office and the Rubbers Manufacturers Association attended. Each state was invited to present information on their waste tire program for discussion. Additional technical topics included:

- An overview of TSCA certification for pyrolysis operations and its interaction with state regulatory programs,
- A discussion of the Zika virus and its relationship to waste tire management,
- A discussion of a California study evaluating potential health and environment impacts of human exposure to crumb rubber,
- A summary of non-hazardous secondary materials regulatory impact on TDF waste.

The agenda for the pre-conference regulatory meeting is provided in Appendix A. The forum provided the states an opportunity to discuss successes and challenges within the regulatory framework to continue to understand the regional demands in the waste tire industry. The meeting continued to provide a framework for future meetings, and the opportunity to learn and work together was welcomed by all regulators.

A fourth waste tire conference including a pre-conference regulatory meeting, is anticipated for June 2017.

6.0 ASSISTANCE IN THE DEVELOPMENT OF WASTE TIRE FUND PROGRAMS

Tetra Tech assisted in the review of previous statutes and regulations, identified alternatives for consideration during development of statutory revisions, and assisted CDPHE during legislative preparation and discussion. The new statutes passed and were signed by Governor Hickenlooper on June 6, 2014.

Tetra Tech was tasked to assist CDPHE in the initial development of regulations required to implement the statutory framework. Under this task, Tetra Tech was charged with research, data collection and analysis, and asked to make recommendations regarding modification of existing programs. Tetra

Tetra Tech has also been tasked to provide input on the development of future programs created under the CDPHE Waste Tire Program.

6.1 ASSIST IN THE DEVELOPMENT OF THE WASTE TIRE CLEANUP FUND

CDPHE is charged with developing and implementing a coordinated statewide program. Legislation is in place regarding the cleanup of illegally disposed waste tires. The cleanup program is designed to provide a mechanism for removal of existing stockpiles as well as amnesty events to encourage proper disposal of miscellaneous tires accumulated by local residents. CDPHE encourages recycling and constructive reuse of these waste tires. Waste tire funds can be used to pay for the retrieval, transport, and recycling of waste tires at approved storage, disposal, or recycling facilities.

Under this task, Tetra Tech conducted research, and collected and analyzed data to assist CDPHE in developing regulations and procedures for implementation of these new statutes. The Tetra Tech team conducted the following tasks:

- Provided a stockpile tire quantity estimation tool for use by CDPHE.
- Maintained an abatement list which has been initiated and will continue to evolve as additional stockpiles are identified and prioritized for cleanup. Coordination and collaboration with statewide entities will assist in identification of stockpiles.
- Characterized identified waste tire stockpiles which is important to forward movement of this task. While characterizing stockpiles, special attention is paid to factors related to their environmental and population impact, as well as practical factors associated with their subsequent stabilization and abatement. Tetra Tech and CDPHE visited Roberts Ranch in Larimer County in September 2014 and June 2015. The stockpile is disperse and topography makes tire retrieval difficult. CDPHE has selected a vendor to remediate the stockpile. Two stockpiles in Logan County were visited in June and October 2015; characterization of the piles is complete. Two stockpiles in Douglas County were visited in late 2014 and a characterization of the piles is ongoing.
- Developing procedures and supporting materials for selecting prequalified stockpile abatement contractors is also an important step in stockpile management. Initial procedures and associated materials have been completed. Examples of similar programs in other states were evaluated and representative documents were obtained to assist in developing specific documents and procedures for Colorado. A suitable Request for Qualifications has been prepared and related contractual documents have been prepared by CDPHE for abatement contractors.
- Tetra Tech advised CDPHE during its initiation of a community cleanup events program. The objective is to provide a mechanism for proper disposal of small quantities of tires in public hands on a one-time basis while preventing potential abuse. CDPHE participated in a small collection event in May 2015 as a learning experience, and has conducted additional events in fiscal year 2015-16.

Initial progress has been made on all of these tasks, and progress will accelerate in the next fiscal year, including cleanup of existing waste tire stockpiles.

6.2 ASSIST IN THE DEVELOPMENT OF THE WASTE TIRE MARKET DEVELOPMENT FUND

The Waste Tire Market Development Fund was impacted by the June 2014 statutes. Tetra Tech conducted activities in support of recommendations, legislative discussions, and possible future fund development. Strengths and weaknesses of other states' programs and their applicability to Colorado's unique conditions and needs, were identified and evaluated.

Tetra Tech worked with CDPHE in formulating criteria for the Market Development Grant Application and Directions for the market development fund. The Market Development grants will be funded up to \$50,000 per grant and are designed to provide limited funding to end users to assist in the research and development of new and existing waste tire recycling technologies and applications; and to provide limited funding to end users to assist in the incorporation of tire-derived materials into one or more tire-derived products including ground rubber, TDA and TDF.

Tetra Tech assisted CDPHE in identifying the first applicant for the 2015 Market Development Grant and reviewing the application for testing of a recycled rubber transportation-related product.

Benefits and drawbacks of a "Loan to Grants" Program were identified and discussed. Additional effort may focus on identifying advantages and practical limitations of these programs in the limited number of states with this experience.

Depending on the future viability and resources of this fund, Tetra Tech may continue to assist CDPHE in the development of grant programs for this fund. The objective is to maximize the long term market development value of the grants. Examples that have been identified include conducting research to develop required data and demonstrate innovative products and applications that offer significant potential expansion of waste tire usage in Colorado. Another alternative involves multiple grants for similar installations within a defined period of time to achieve geographic diversity, or create a critical market mass to encourage processor investment to serve the emerging market. Tetra Tech reviewed and commented on a draft Market Development Grant Application and related program components

6.3 ASSIST IN THE DEVELOPMENT OF THE LAW ENFORCEMENT GRANT FUND AND WASTE TIRE FIRE PREVENTION FUND

Specific tasks, including the evaluation of the benefits of developing and implementing a training curriculum on law enforcement and fire prevention as it relates to waste tires, were initially envisioned for these two funds; however, the new statutes merged and significantly changed these funds. Tetra Tech will assist CDPHE in reviewing the optimum restructuring of objectives, priorities, and plans. These funds were combined with the Waste Tire Cleanup Fund.

6.4 ASSIST IN THE DEVELOPMENT OF THE END USERS' FUND

Under this task, Tetra Tech historically assisted CDPHE in developing regulations and a rebate structure for this Fund to increase consistency and predictability. States with rebate programs were identified and their historical performance was assessed. Discussions were conducted to develop a regulatory framework and rebate mechanism for Colorado that alleviated some historical shortcomings. A rebate model was to reflect historical experience, allow for significant future market changes, and provide a predictable rebate without exceeding Fund resources.

Tetra Tech will continue to assist CDPHE with this task.

6.5 STATUTORY AND REGULATORY REVIEW OF THE WASTE TIRE PROGRAM

Quarterly regulator teleconference calls fall within this task. Calls occurred on September 16, 2015, December 9, 2015, and March 17, 2016. Regulators met in person during the June conference.

7.0 CONCLUSION

The Waste Tire Program operates within the Hazardous Materials & Waste Management Division of CDPHE, to allow the program to streamline and increase efficiency. Through technical trainings, technical assistance and identification, annual educational and networking forums, and further development of the Waste Tire Program funds, substantial progress will continue in the promotion and advancement of the waste tire industry for the beneficial end use of waste tires.

APPENDIX A
REGULATORS MEETING (PRE-CONFERENCE), AND CONFERENCE AGENDAS
(Four Sheets)

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