



OFFICE OF THE COUNTY FIRE MARSHAL

County Of Hidalgo

July 19, 2012

Ms. Kendra Riffe
Scrap Tire Management Registration Coordinator
TCEQ, DFW Region Office
2309 Gravel Drive
Fort Worth, TX 76118

Re: Application for extension of LRPUT Registration for Santa Anita LLC, Scrap Tire Registration No. 6200592

The Hidalgo County Fire Marshals Office has received correspondence of the above referenced registration indicating a request for extension to operate a land reclamation project utilizing tires in accordance with Texas Administrative Code 328.66. The Hidalgo County Fire Marshals Office submits the following concerns regarding this application for your review and consideration:

Fire Protection: The Hidalgo County Fire Marshals Office does not provide direct fire suppression through a County Fire Department, all fire services are contracted via city fire departments who respond to all areas of rural Hidalgo County. The immediate concern from our office is the lack of a fully staffed fire department within a reasonable response time. The Linn San Manuel Fire Department is currently non compliant with our recognized standards and therefore may not be able to respond to fires in the Linn San Manuel area. The nearest fire response available would be from the Edinburg Fire Department approximately 20 miles away. Additionally, neither department has been contacted and asked if they would be able to mitigate a fire involving up to approximately 80,000 tires, which the facility has indicated that the 80,000 tire figure is their 30-day supply of tires that they are allowed to have on site. This figure was used as a response to TCEQ for violations identified during a December, 2011 field investigation by the Harlingen Region 15 office.

Lack of Water Supply: The Santa Anita Reclamation, LLC has not provided an adequate water supply source within 500 feet of the facility as required for commercial businesses by recognized fire codes. Currently, if a fire occurs, water shuttle operations would be explicitly necessary to maintain adequate firefighting activities. This would require the activation of several fire departments to provide the required flow of water into portable tanks for supply and operations in response to a fire of this potential magnitude.

Tire Fire History: The Hidalgo County Fire Marshals Office has assisted and overseen the incident management and mitigation of two major tire fires within our jurisdiction in the last two years. In these responses we have learned of the resources that are required to mitigate a large tire fire. In the Alton tire fire, over ten (10) fire departments and multiple law enforcement agencies were required for continuous operations over a three day period. In comparison the Alton tire fire was estimated at 100,000 tires, while the Santa Anita Reclamation Project has a potential to hold up to 80,000 tires.



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Environmental Concerns: Mitigating large tire fires has shown that it takes over one million gallons of water to suppress the heat and flames of such fires which leads to a significant potential for run off of contaminated water. Furthermore, the environmental factors and dynamics of this area pose additional hazards and threats to life and property due to the possible fire that could engulf the endless acreage of drought primed brush-land that surrounds this operational area.

In addition, this site is located adjacent to several caliche pits with depths of 15-25 feet. Processed tire pieces are being deposited to reclaim one of these pits. The facility's two groundwater monitoring events on April 14, 2011 and October 4, 2011 indicate that depth to ground water was the following:

Monitoring Wells	Sampling Dates	Depth to Groundwater in feet
1	4/14/2011	3.7
	10/4/2011	5.0
2	4/14/2011	4.8
	10/4/2011	6.9
3	4/14/2011	4.9
	10/4/2011	7.0

Since the monitoring wells are situated at the bottom of the pit where tires are being placed and the adjacent pit where tires are being stored in containers, any fire fighting activities would result in the potential for contaminated water impacting groundwater.

The Hidalgo County Fire Marshals Office is charged with the safety and preservation of life and property throughout Hidalgo County, therefore based on the inherent dangers associated with the continued or extended operation of the Santa Anita Reclamation Project has areas of serious concern of which merit our time and attention. Re-certifying this project will come with a potential of detrimental impacts to both life and property in our respective jurisdiction.

Sincerely,

Juan Martinez
Fire Marshal
Hidalgo County

STATE OF TEXAS