



RUBBER
manufacturers
association

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May 9, 2008

Mr. Matthew Hale
Director, Office of Solid Waste
Border 2012 Waste Policy Forum Co-Chair
Environmental Protection Agency
1200 Pennsylvania Ave, NW
Mailcode: 5304P
Washington, DC 20460

Mr. Edgar Del Villar Alvelais
Coordinador de Asesores
Subsecretaría de Fomento y Normatividad Ambiental
SEMARNAT
Av. Revolución 1425
Col. Tlacopac, San Ángel
Obregón 01040, D. F. México

RE: Letter of Understanding on U.S.-Mexico Border Scrap Tire Integrated
Management Initiative

Dear Mr. Hale and Mr. Del Villar:

The Rubber Manufacturers Association (RMA) is committed to providing long-term solutions to address the problem of U.S.-Mexican border scrap tire piles. Since 2000, RMA has been dedicated to the border region by being a leading source of information, building infrastructure and developing tire markets along the border. We understand that the U.S.-Mexico Border Scrap Tire Integrated Management Initiative (hereinafter the "Tire Initiative") provides concrete actions that when employed have great potential to contribute significantly to the prevention of future border scrap tire piles.

RMA will continue to address the border scrap tire issue by joining the U.S. Environmental Protection Agency (EPA) and the Mexican Ministry of Environment and Natural Resources (SEMARNAT) in implementing the *Tire Initiative* with the Border States, municipalities and other governmental and nongovernmental entities. RMA understands the importance of the Tire Initiative considering:

- The interest of the U.S. and Mexico to promote policies that enhance environmental quality and sustainable development through the implementation of initiatives like the Tire Initiative;
- That scrap tire stockpiles throughout the border region comprise a significant issue that deserves management attention for the development of both short term and long term solutions;
- That scrap tire piles, if left in place, may house insect and rodent pests and may be ignited by vandals or other causes. If ignited, tire piles present safety, environmental and financial problems. These risks are readily abated, however, and should be addressed proactively.

Therefore, RMA is signing this letter of understanding to collaborate with Federal, State and local governments on the *Tire Initiative*, a framework defining the principles and actions fundamental to developing sustainable scrap tire management plans.

The *Tire Initiative* was signed by the U.S. Environmental Protection Agency (EPA) and the Mexican Ministry of Environment and Natural Resources (SEMARNAT) in October 2006 as a result of commitments made by the United States and Mexico during the 2004 Binational Commission meeting to develop an environmentally sustainable scrap tire management framework.

The *Tire Initiative's* **PRINCIPLES and ACTIONS** follow:

- Principle 1:** Better understand the problems contributing to scrap tire generation;
 - Principle 2:** Prevent new tire piles;
 - Principle 3:** Clean-up "legacy" (existing) tire piles using environmentally sound and cost effective solutions; and
 - Principle 4:** Involve stakeholders and communities in creating solutions.
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- Action 1:** Gather information to better understand scrap tire generation (including sources of substandard tires and illegal tire entry into Mexico), illegal scrap tire dumping, and methods for effective management of scrap tires.
 - Action 2:** Consider federal, state, and local-level regulatory options to administer scrap tire management programs.
 - Action 3:** Encourage development and implementation of a variety of environmentally acceptable and economically promising end-use markets for scrap tires to increase recycling and

reuse. (Our plan is that this will be done through economic, regulatory, and technology development incentives.)

- Action 4:** Abate tire piles by seeking funding to eliminate existing scrap tire piles, and invest in management systems and infrastructure to facilitate recycling and/or reuse of scrap tires, thereby preventing new tire piles.
- Action 5:** Involve the U.S. and Mexican governments, the private-sector, academics, and non-governmental organizations in the implementation of the Scrap Tire Integrated Management Initiative.
- Action 6:** Establish and implement educational outreach programs on scrap tire recycling and reuse opportunities geared towards a diverse audience of stakeholders.

By signing this letter of understanding, RMA is:

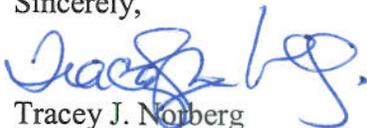
INDICATING our awareness and understanding of the *Tire Initiative* and its Principles and Actions which are stated in full above;

EXPRESSING our support of and collaboration on the *Tire Initiative*;

COMMITTING to work together to leverage our existing resources to implement activities which support each of the above Actions while maintaining consistency with each country's waste management policies; and

RMA believes that together we can prevent the creation of additional scrap tire piles and clean up our border communities.

Sincerely,



Tracey J. Norberg
Senior Vice President

Cc: Alfonso Flores, Border 2012 Waste Policy Forum Co chair, SEMARNAT
Ellie Kanipe, EPA Headquarters
Emily Pimentel, EPA Region 9
Robert Snowbarger, EPA Region 6