

**GENERAL PERMIT NUMBER WMGR038
PROCESSING OF WASTE TIRES FOR THE PRODUCTION OF TIRE
DERIVED MATERIAL AND TIRE DERIVED FUEL**

COMMENT RESPONSE DOCUMENT

LIST OF COMMENTATORS

1. Keystone Rubber Processing Technologies, Inc.

COMMENTS AND RESPONSES

Comment: The description of “approved processing activities” in the General Permit should include the partitioning or sectionalizing of earthmover tires.

Response: The term “approved processing activities” includes partitioning or sectionalizing of earthmover tires. To clarify this distinction, the Department has modified the General permit by including the term “cutting” as an approved processing activity under the General Permit.

Comment: The approved beneficial use activities under the General Permit should include the processing of waste tires into completed, useful consumer and commercial products, and should not be limited to the processing of waste tires as an “ingredient in commercial products”. The items resulting from the partitioning or sectionalizing of earthmover tires are actually sold as products to various consumers and are not merely an “ingredient in commercial products”.

Response: The Department agrees with the comment and has modified the General Permit by including activities associated with the processing of waste tires into completed consumer and commercial products as beneficial use under the General Permit.