

Investigation of Illegal Tire Dumping Sites along the Southern California-Mexico Border

California Department of Resources Recycling and Recovery

Prepared by

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CalRecycle



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California Department of Resources
Recycling and Recovery

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Certification

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Acronym	Acronym definition
AC	Administrative Complaint
ALJ	Administrative Law Judge
CalRecycle	California Department of Resources Recycling and Recovery
CAO	Clean-up & Abatement Order
CEG	Certified Engineering Geologist
CNLM	Center for Natural Lands Management
GLA	Geo-Logic Associates
ICPHD	Imperial County Public Health Department
LEA	Lead Enforcement Agency
LOV	Letter of Violation
NGO	Non-Government Organization
NOA	Needs and Opportunities Assessment
NOV	Notice of Violation
OAH	Office of Administrative Hearings
PG	Professional Geologist
SB	Senate Bill
SD	San Diego
SPL	Streamlined Penalty Letter
TEA	Tire Enforcement Agency
TDA	Tire-derived Aggregate
TDP	Tire-derived Product
TRP	The Rubberized Pavement Program
TRVEA	Tijuana River Valley Equestrian Association
USEPA	United States Environmental Protection Agency

1. Introduction

Geo-Logic Associates (GLA) is pleased to provide this report summarizing recent efforts to identify and locate occurrences of illegal tire dumping near the southern California-Mexico border. This report was prepared on behalf of the California Department of Resources Recycling and Recovery (CalRecycle), pursuant to Work order DRR19044-C1. Presented in this report are CalRecycle Grant programs and state regulations related to tire transport and disposal, results of agency interviews, results of field inspections of reported illegal tire dumping sites, and a summary of the investigation findings.

The area of investigation was constrained to the border region in southern California from the Pacific Ocean eastward to the Arizona border, and up to 100 kilometers (63 miles) north of the southern California-Mexico border (Figure 1).

Per Work Order DRR19044-C1, GLA was authorized to perform the following tasks:

- Task 1- Develop an Overall Border Tire Assessment Work Plan.
- Task 2- Develop interview questions and perform telephone interviews with approved list of stakeholders.
- Task 3- Perform field reconnaissance of reported tire and waste dumps based on the results of Task 2.
- Task 4- Prepare a summary report of observations at the reported illegal tire dumping sites within the project work area.

GLA also developed a GIS-based website to display reported dump site locations along with field photos and other pertinent documentation collected during agency interview and site reconnaissance.

This project was conducted under the authorization of CalRecycle with cooperation from various agencies within San Diego and Imperial counties. This report was prepared by GLA for CalRecycle by Mr. Greg Shagam, PG, CEG, Project Geologist, and reviewed by Mr. John Hower, PG, CEG, Program Manager.

2. Background

2.1 Purpose

CalRecycle has received requests for assistance with illegal tire dumping and waste accumulation near and around the southern California border despite active investigative efforts by Tire Enforcement Agency (TEA) representatives. GLA was contracted by CalRecycle to assist with these inquiries and either confirm tire stockpile existence and determine a work scope for cleanup or verify that there are few or no piles of illegally dumped tires along the Southern California border area.

The purpose of this investigation is to adopt and submit to the legislature a Five-Year Plan that identifies the locations of illegally dumped waste tires before they can cause environmental problems in the California border region, including in the Tijuana River estuary. The results from this investigation will be included in CalRecycle’s Five-Year Tire Plan to be updated in 2023. The investigation will help CalRecycle continue to support the development of a tire management program in the California border region by providing technical assistance when needed. CalRecycle intends to build on these efforts in the years to come.

2.2 Previous Investigations

Previous studies related to illegal tire dumping were performed by the United States Environmental Protection Agency (USEPA), CalRecycle, and private consultants. Table 1 below lists the references provided by CalRecycle as part of this Work Order.

Table 1: Southern California Illegal Tire Dump Occurrences Investigation List of References

Title	Author	Date Published
Border 2012: U.S.-Mexico Border Scrap Tire Inventory Summary Report	United States Environmental Protection Agency (USEPA)	May 2007
Solid Waste and Waste Tire Strategic Plan	Border Region Solid Waste Working Group – California-Mexico Border Relations Council	January 2017

The Flow of Used Tires from California to Mexico and Waste Tire Disposal Issues in Baja California and the Adjacent Area of Sonora	San Diego State University/CalRecycle	November 2020
Tijuana River Valley Needs and Opportunities Assessment	HDR	March 2020

GLA reviewed these reports, and the following is an overview of the information provided in each report including an interpretation of how this information affected our investigation.

Published in May of 2007, the USEPA issued the report titled Border 2012: U.S.-Mexico Border Scrap Tire Inventory Summary Report. The study area for this report extended along the U.S.-Mexico border from the Pacific Ocean in California east to the Gulf of Mexico in southeast Texas. Aided by San Francisco State University, the authors used results of a project called "Remote Sensing of Waster Tires" where satellite imagery was used to identify potential waste tire piles. This study identified 2 sites in Imperial County, California with an estimated 10,000 tires. GLA interviewed Author Paul Ganster (Professor, San Diego State University) and no additional information was obtained regarding the two waste tire sites in Imperial County. Additional investigation and interviews did not yield information related to the two waste tire sites. It is unknown if the sites were cleaned up, or if the sites were mis-identified during the remote sensing project.

Published in January 2017, The California-Mexico Border Relations Council Border Region Solid Waste Working Group issued a Solid Waste and Waste Tire Strategic Plan. This report explores socioeconomic factors involved with waste tire disposal for alternative uses and references tire dump occurrences listed in the 2012 border report listed above. No new tire dump locations are provided with this report.

Published on November 5, 2017, CalRecycle and San Diego State University issued a report titled, "The Flow of Used Tires from California to Mexico and Waste Tire Disposal Issues in Baja California and the Adjacent Area of Sonora". This report focuses more on socioeconomic factors leading to reused tires and waste tires mostly south of the border. No information on illegal tire dump occurrences north of the California-Mexico border was gained through this report.

In March of 2020, private consultant HDR published a report titled, Tijuana River Valley – Needs and Opportunities Assessment (NOA). This report addresses sewage, trash, and sediment transport across the international border in the Tijuana River Valley. As discussed below, the Tijuana River Valley was not included in this investigation due to current and ongoing CalRecycle involvement with clean up and waste mitigation operations. CalRecycle has also indicated that this study is to focus on illegal dumping occurrences rather than hydrogeologic and fluvial transport of waste and debris by river or stormwater flows. No new locations of illegal tire dumps were gained from this report.

2.3 Tire Management Authorities

Both Imperial and San Diego counties have environmental Local Enforcement Agencies (LEAs) and Tire Enforcement Agencies (TEAs) tasked with the inspection and cleanup of illegally dumped surficial debris. These agencies are tasked with developing and enforcing regulations related to illegal tire dumps, cleanup guidelines, waste tire transport and hauling regulations, and final disposal or reuse of waste tires. These regulations are discussed in Section 2.4 below. It should be noted that tribal regulations may differ from State of California or county regulations. The CalRecycle website provides current information regarding California State statutes and regulations related to tire hauling and disposal.

As described in Section 3, interviews were conducted with representatives of government agencies, environmental organizations, community groups, environmental justice groups, and non-government organizations (NGOs) for the counties, cities, communities, and tribes along the California-Mexico border. Information communicated during these interviews suggests that most cities and communities defer to a LEA or TEA when illegally dumped tires are encountered. In addition, most of the Native American tribal groups contacted indicated that incidents of illegally disposed tires are directed to the tribe's Environmental Manager or Environmental Health Department which would serve as the tribal LEA.

As described in Section 2.5, CalRecycle provides State-funded grants to agencies and other governmental entities with undocumented, illegal waste and tire dumps and the LEAs and TEAs are very knowledgeable about these programs. However, outside of the LEAs and TEAs, the community groups contacted, cities, tribal groups, and other environmental action groups generally are not aware of the grants available to clean up illegal tire dumps.

2.4 Statutes and Regulations

CalRecycle provided the [Statutes and Regulations](#) applicable to waste tire enforcement. In addition, a list of statutory and regulatory citable offenses has been compiled for use by inspectors.

2.4.1 Facility Permitting and Technical Standards

Statutes

Assembly Bill 1843 (Brown, Statutes of 1989) established the waste tire program in 1990, commencing with section 42800 in Chapter 16 of the Public Resources Code. Under Chapter 16, CalRecycle is given the responsibility to administer waste tire management programs to protect public health, safety, and the environment from potential risks and impacts from improper storage and illegal waste tire disposal. CalRecycle established technical standards and a permitting program for waste tire facilities and technical standards for solid waste facilities, which handle tires for storage and disposal.

Regulations

On November 3, 1993, the State of California adopted Waste Tire Facility Permitting and Storage regulations as Title 14, Chapter 3, Article 5.5 of the California Code of Regulations. These regulations were developed by CalRecycle to establish technical standards for proper waste tire storage and legal disposal and defined criteria for allowable operations of waste tire facilities and solid waste facilities that handle tires for storage and disposal. This regulation also established a permitting program for waste tire facilities.

2.4.2 Hauler and Manifesting

Statutes

In 1993, Senate Bill (SB) 744 established the Waste Tire Hauler Registration and Manifest Program to oversee the proper transportation, management and tracking of waste and used tires. Senate Bill 876 (Escutia, Statutes of 2000, Chapter 838) expanded CalRecycle’s authority and also charged CalRecycle with implementing a new and improved “California Uniform Waste and Used Tire Manifest System” to more efficiently track the movement and disposal of used and waste tires throughout the state.

Regulations

On May 9, 1996, CalRecycle’s Waste Tire Hauler Regulations became effective as Chapter 19, sections 42950 through 42967 of the Public Resources Code. These regulations include changes

brought about by the passage of SB 744, and mandates that CalRecycle regulate the storage, disposal, and hauling of waste and used tires.

2.4.3 Citable Offenses

To aid TEAs in their inspections of storage, generator, waste tire haulers and end use facilities, three lists of citable offenses have been prepared and posted on the website. Those offenses include violations of:

- Permit Requirements;
- Storage and Disposal Standards; and
- Transportation of Used and Waste Tires.

2.4.4 Enforcement

Enforcement of these regulations is summarized on CalRecycle’s website at the following address: www.calrecycle.ca.gov/Tires/Enforcement.

As outlined on the website, CalRecycle staff or the TEA conduct periodic inspections and/or audits of the Tire Hauler, Generator, and End-use Facility (site) to evaluate and document compliance with waste tire permitting, transportation, and disposal regulations. If the generator, hauler, or end-use facility do not comply with Chapter 19, sections 42950 through 42967 of the Public Resources Code (PRC), violations are issued as summarized below.

2.4.4.1 Hauler Violations

Individuals transporting 10 or more used or waste tires are required to document the transport on a formal manifest. Lesser violations resulting from transporting less than 2000 waste/used tires will typically result in a formal violation using the Streamlined Penalty Letter (SPL). If the hauler accepts the offer set forth in the SPL, then the hauler is compliant. If the hauler does not accept the offer in the SPL, an Administrative Complaint (AC) may be served, and the matter will be heard by an Administrative Law Judge (ALJ) with the Office of Administrative Hearings (OAH). Enforcement for more serious violations will bypass the SPL and an AC will be filed instead. The ALJ will determine whether the violation is administrative, civil, or criminal in nature and may issue fines up to \$5,000 per violation per day for administrative violations or up to \$25,000 per violation per day for civil or criminal violations.

2.4.4.2 Handling and Storage Violations for Generator and End-Use Facilities

If a generator or end-use facility is found to be violating PRC sections 42950-42967, a Waste Tire Survey and Inspection Report would be prepared by the enforcement agency and issued to the violator. The Waste Tire Survey and Inspection Report will include the observed violations, the date of the observation, and a date of re-inspection to document whether the violations have been corrected.

If the site operator corrects the violation, no further enforcement action is taken. However, if the operator fails to correct the violations, a Clean-up & Abatement Order (CAO) may be issued. Civil or criminal penalties may be issued to the operator that fails to correct the violations identified in the CAO.

Typically, if the operator fails to comply with the CAO, an AC will be served, and the matter will be heard by an ALJ at the OAH where the ALJ will make an administrative decision. However, in certain cases, CalRecycle may request that the local District Attorney or State Attorney General file more serious complaints in higher courts for a judge to render a decision.

2.5 CalRecycle Grant Programs

CalRecycle offers the following grant programs for the management and cleanup of illegal tire disposal sites. To read more on grants offered by CalRecycle visit www.calrecycle.ca.gov/Tires/Grants.

Local Government Waste Tire Cleanup Grants

This grant program provides funding to local governments for the cost of collection, removal, transportation, recycling and disposal of California waste tires from illegal tire piles and areas where illegal dumping has occurred along public rights-of-way.

Local Government Waste Tire Amnesty Grants

This grant program provides funding to local governments to hold date specific events for the public to recycle their waste tires at convenient locations.

Rubberized Pavement (TRP) Grant Program

The Rubberized Pavement Grant Program, formerly called the Rubberized Asphalt Concrete Grant Program, provides assistance to local governments to fund rubberized asphalt concrete (RAC) paving projects including hot mix and chip seal.

Tire-Derived Aggregate (TDA) Grants

This grant program provides assistance to local governments utilizing tire-derived aggregate as an alternative to conventional lightweight aggregates in civil engineering projects.

Tire-Derived Product (TDP) Grant Program

This grant program provides funding to certain entities for tire-derived products made from 100 percent California generated waste tires. Projects generally fall into one of three categories: agricultural/landscape, recreational, or transportation.

Tire Incentive Program

This grant program provides funding to eligible businesses to use crumb rubber in eligible products or substitute crumb rubber for virgin rubber, plastic, or other raw materials in products. The program’s goal is to increase demand for crumb rubber and promote higher value products. Crumb rubber is recycled rubber produced from automotive and truck scrap tires. During the recycling process, steel and tire cord are removed, leaving tire rubber with a granular consistency.

Local Government Waste Tire Enforcement Grants

This grant program provides funding to local agencies in California for waste tire enforcement activities.

3. Interviews

As summarized in Section 2.0, the waste tire regulations allow for regulatory oversight through inspections and enforcement that can include monetary penalties for violating the regulations. Grant funds provide incentives to commercial operators and residents to properly manage waste tires. Despite these regulations and funding programs, illegal disposal of waste tires continues throughout the state, including a region along the southern California-Mexico border.

To determine those sites where illegal tire disposal has occurred or is currently occurring, GLA collaborated with CalRecycle to develop a list of stakeholders including but not limited to, government agencies, environmental organizations, environmental justice groups, Tribes, and NGOs in the California-Mexico border region to poll for this information. GLA then developed a telephone script and email template that was provided to CalRecycle for review and comment. The final script and template are presented in Appendix A. The list of polled agencies and organizations is provided in Table 2, and interview responses are presented in Appendix B. In

some instances, the organizational representatives who were contacted refused to provide information about known illegal tire disposal activity within their jurisdiction. In those cases, the information was noted in our interview tracker (Appendix B).

Interviews began on May 17, 2022, and were performed throughout the duration of the investigation, which concluded with the issuance of this report. As summarized on Table 2, a total of 104 individuals representing 76 governmental agencies, tribes, communities, and other organizations were contacted. Of those contacted, most had no knowledge of illegal tire dumps within their respective jurisdictions, 37 had knowledge of illegal tire disposal sites but had referred the problems to another organization to resolve, and 8 requested additional assistance during the study to investigate the illegal dumping.

During the interview process, illegal tire disposal sites that might require further in-field verification were assigned a unique identification that referenced the county and street followed by the number of occurrences on that street. For example, the site ID for one reported waste dump site in Imperial County on Gateway Road was identified as Im_Gateway1. If a second site existed on Gateway Road, the site ID would be Im_Gateway2. Active businesses are listed by county then abbreviated company name, for example, the site Ramza Incorporated would be identified as Im_Ramza.

To confirm information provided by the reporting organization about an illegal tire disposal site, GLA scheduled a field inspection with the organization representative to document site conditions. Two organizations agreed to allow field inspections of their illegal tire disposal sites: the Imperial County Public Health Department (ICPHD) and the Campo Band of Mission Indians. ICPHD representatives were willing to meet GLA staff and escort personnel to reported sites. This agency serves as the Imperial County TEA. Access to Campo Band of Mission Indians reservation lands was coordinated through the tribe's Environmental Data Technician/Administrator, Linda M. Hood. On the day of the site visit, two tribal representatives and environmental technicians escorted GLA personnel around the known tire disposal site on reservation land.

4. Field Reconnaissance

The results of the agency and organization interviews provided 21 illegal tire dump sites to investigate (Table 3). These sites were catalogued and plotted on the GIS database constructed for this project. The website address for this database is at <https://calrecycle->

southbordertiresites.gladata.com/map.aspx. After the website has been accessed, information on tire dump sites is shown graphically with colored polygons depicting the reported tire dump locations. Sites shown in red are those that were identified during the interview process but were not able to be located during field visits or are sites that are outside the investigation limits. Yellow polygons represent sites that were visited and inspected to evaluate the approximate size of the site, estimate the number of tires at the site, and provide photographic documentation. By clicking on a yellow polygon, the site name is shown, and an option to select “extended details” where site photos can be viewed. Reported illegal tire dump sites are listed in Table 3.

Site inspections occurred on August 31, 2022, at one property in San Diego County and at 13 properties in Imperial County. As indicated above, two tribal representatives from the Campo Band of Mission Indians escorted GLA’s field geologist on that property. An Imperial County representative escorted GLA’s field geologist to multiple sites including illegal dump sites and active businesses with accumulations of tires on private property.

After performing the field visits, site photos were uploaded to the database website for review by CalRecycle. Based on our inspections, the sites were of three types: those that had been cleaned up previously and currently have no visible waste tires or other solid wastes, those that are private tire dumping/disposal businesses, and those that are common tire dumping locations where the TEA conducts frequent cleanup work. Site descriptions are provided in the sections below.

4.1 Imperial County

On August 31, 2022, GLA met with ICPHD Compliance Technician Raul Martinez at the County’s office, and our staff was escorted to 13 tire dump sites: four were active businesses, and nine were public sites where dumping had previously occurred but had been cleaned up or sites where illegal tire dumping continuously occurs and Imperial County provides regular removal of the waste tires.

4.1.1 Abandoned Tires on Public Lands

The **New River Site** (Im_New River1, Figure 2) is located approximately 1,000 feet southwest of the intersection of Dogwood Road and Highway 98, in an unincorporated portion of the County just west of the City of Calexico. The site is located to the east of the Calexico Solid Waste Site and includes partially buried to completely exposed tires, miscellaneous solid waste (scrap metal, metal pipes, plastics, textiles, and vegetative debris) dumped along an unnamed dirt road south of Dogwood Road, and into erosional rills and slopes adjacent to the New River. Based on our field investigation, the site is approximately 300 feet long and approximately 500 feet wide and comprises roughly 3,000 cubic yards of debris based on the material that was visible. To clean up this site, heavy equipment, such as a backhoe or excavator, will be needed to extract waste and load haul trucks.



The **Williams Avenue Site** (Im_Williams1, Figure 3) is located approximately 150 feet north of Sam Ellis Street and VV Williams Avenue in the City of Calexico. The site is approximately 300 feet long by 50 feet wide. Although just a few scattered waste items were observed during the inspection, according to Mr. Martinez, various types of waste including tires, furniture and mattresses, and other solid wastes typical of illegal residential dumping have been disposed of periodically at this location. ICPHD recently cleaned up this site using a CalRecycle grant to fund operations.



The **Maddox Road Site** (Im_Maddox1, Figure 4) is located along the east and west side of Maddox Road south of West Cole Road in an unincorporated area of Imperial County just west of the City of Calexico. The site measures approximately 1,070 feet from north to south and 100 feet from east to west. Wastes observed during the site inspection include single tires scattered and a few small piles of miscellaneous solid wastes. ICPHD recently cleaned up this site using a CalRecycle grant to fund operations, but dumping occurs periodically, and Mr. Martinez expects dumping to continue.



The **Towncenter Way Site** (Im_Towncenter1, Figure 5) is on the east, west and north sides of Towncenter Way and north of West Cole Boulevard in between the city of Calexico to the south and the community of Heber to the north. Although just a few scattered tires were observed during the site inspection, according to Raul Martinez, wastes have historically been scattered along Towncenter Way over an area measuring approximately 4,500 feet by 300 feet. Illegal dumping of solid waste and tires has repeatedly occurred in the past and this site has been recently cleaned up by ICPHD under a CalRecycle grant-funded program. The site is not secure, and access is not restricted; as a result, Mr. Martinez expects that illegal dumping will continue in the future.



The **Jasper Road 2 Site** (Im_Jasper2, Figure 6) is located along Jasper Road approximately 700 feet southeast of the intersection of Jasper Road and Pitzer Road between the City of Calexico to the south and the community of Heber to the north. The site is a triangular parcel approximately 1,000 feet along Jasper Road and 900 feet north-south from Jasper Road to the canal. Scattered solid waste piles and tires were observed during the site inspection. Approximately 1,000 cubic yards of various solid waste and



tires, and 4,500 cubic yards of green waste and dumped vegetation waste piles were observed at the time of the visit. Mr. Martinez has periodically cleaned up this site in the past. The site is relatively secluded and surrounded by overgrown brush. As a result, illegal dumping is likely to continue at this location.

The **Portico Boulevard Site** (Im_Portico1, Figure 7) is located along the east side of Portico Boulevard north of Weakly Street in northwest Calexico. Although only a few tires were observed during the site inspections the reported area of roadside dumping along Portico Boulevard extends roughly 500 feet north of Weakley Street and is roughly 50 feet wide. Illegal dumping is likely to continue at this location because it is visually shielded by transport truck and motor homes that use the area for extended parking and repairs.



The **Weakley Street Site** (Im_Weakley1, Figure 7) is located on the north and south sides of Weakley Street and primarily east of Portico Boulevard, and west of Scaroni Avenue in the northwestern portion of the City of Calexico. Based on field observations, the site consists of dumping along the north and south side of Weakley Street and extends west of Scaroni Avenue approximately 630 feet. Waste debris consists of miscellaneous solid waste and tires scattered adjacent to the road. Mr. Martinez reported that this site was cleaned up recently using CalRecycle grant funds for operations. The reemergence of illegal waste piles after the recent waste removal operation indicate the likelihood that illegal dumping will continue at this site.



The **Meadowlark Road Site** (Im_Meadowlark1, Figure 8) is located along the east and west side of Meadowlark Road between Gateway Road and an unnamed road to the north, in the eastern part of the City of Calexico north of the Calexico East Port of Entry. During the field investigation, the only area where waste was observed was an area measuring approximately 70 feet by 80 feet on the west side of Meadowlark Road. In addition, although no waste or tires were observed at the time of inspection, Mr. Martinez reported that illegal dumping also occurs on a few vacant lots surrounding the Meadowlark site. Mr. Martinez reported that the now-vacant lots were cleaned up recently by ICPHD using CalRecycle grants to fund the operations. Due to the proximity of local transport and storage facilities that provide visual shielding, Mr. Martinez believes illegal dumping will continue at this site.



The **Gateway Road Site** (Im_Gateway1, Figure 8) is west of the intersection of Gateway Road and Menvielle Road in the vacant land west of the Gateway Road cul-de-sac and northwest of the De Anda Trucking and Storage site, in the eastern part of the City of Calexico and north of the Calexico East Port of Entry. Solid wastes, including numerous waste tires, were observed to the north, west, and southwest of the cul-de-sac and dispersed throughout an area approximately 460 feet long and approximately 60 to 80 feet wide around the north and west side of the road. In addition to the tires, wastes consisted of wooden pallets, furniture, discarded machinery, auto parts, and construction and demolition debris. This site is periodically cleaned up by ICPHD using CalRecycle grants to fund the operation. Mr. Martinez believes that dumping will continue to occur at this site because the Gateway Road site is close to the De Anda Trucking and Storage site, and the site is relatively hidden from the road by shrubbery but easy to access from the road.



4.1.2 Abandoned Tires on Private Property

The **Bonanza Site** (Im_Bonanza, Figure 9) is located at 2093 Old Highway 111 in an unincorporated area of the County just east of El Centro, and approximately 0.3 miles north of the intersection of Old Highway 111 and East Evan Hewes Highway (S80). The lot is roughly 1.1 acres and is currently a new and used retail tire business that was previously abandoned. The ICPHD reported that the previous owner left approximately 4,000 tires on the property. Mr. Martinez stated that the new owner was funding operations to process, or cut tires, and haul to local landfills. During the site investigation, many tires were being cut into fours and the side walls were being removed. No information was provided on how the processed tires would be managed.



The **Rocha Trucking & Parking Site** (Im_RTP1, Figure 10) is located at 25 Anza Road in an unincorporated area of Imperial County just southwest of the City of Calexico and is approximately 700 feet north of the international border. Rocha Trucking and Parking (RTP) is an active business with an 8-acre lot. Discussions with the owners revealed that there are two transport trailers on site full of tires collected that were dumped on site and from offsite collection along Anza Road. The owner would like assistance with disposal of these waste tires, if available.



The **Ramza Incorporated Site** (Im_Ramza, Figure 11) is located at 546 Maddox Road in an unincorporated area of Imperial County just west of the City of Calexico. The roughly 7.25-acre site is an active waste tire storage and hauling facility. At the time of inspection, GLA observed numerous tire piles scattered around the site and many stored trailers. The owner was not available at the time of the inspection, but Ramza Inc. is a registered waste tire hauler in Imperial County.



The **De Anda Trucking Site** (Im_De Anda, Figure 12) is located at 1632 Gateway Rd #1 in eastern Calexico just north of the Calexico East Port of Entry. The roughly 23-acre site consists of a scale house, transport truck and trailer storage, and a repair shop. Discussions with the owner on site revealed numerous transport trailers filled with tires and many waste tires visible on the ground at the site. It is estimated that approximately 3,000-4,000 tires may be stored on this property at the time of the field visit.



4.1.3 Tire Disposal Sites Not Inspected

While reviewing Google Earth images, GLA discovered an unknown tire disposal site near the Chocolate Mountain Gunnery area in northern Imperial County (Im_Unknown1, Figure 13), approximately 5.6 miles northeast of the town of Niland. Numerous tires can be seen in satellite imagery, but GLA was unable to contact any agency with knowledge of this facility.

The **Kloke Road Site** (Im_Kloke1, Figure 4) is along east Kloke Road in an unincorporated area of Imperial County just west of the City of Calexico. The site presumably extends from Maddox Road to the south to West Cole Boulevard to the north and measures approximately 1,250 feet from north to south and 100 feet from east to west. It was reported by ICPHD that the site was recently cleaned up using CalRecycle grants to fund operations. Mr. Martinez notified GLA of this site but did not escort GLA to the site since it is currently clean.

The **Jasper Road 1 Site** (Im_Jasper1, Figure 5) is lightly vegetated open space south of Jasper Road and east of Kloke Boulevard in between the city of Calexico to the south and the community of Heber to the north. The site extends from north to south approximately 4,000 feet, almost to West Cole Boulevard, and is approximately 200 feet wide. It was reported by ICPHD that the site was recently cleaned up using CalRecycle grants to fund operations. Mr. Martinez notified GLA of this site but did not escort GLA to the site since it is currently clean.

The **Robinson Avenue Site** (Im_Robinson1 Ave, Figure 6) is located between the City of Calexico to the south and the community of Heber to the north on Robinson Avenue. and extends between Scaroni Avenue to the east and Portico Boulevard to the west. The site is a rectangular parcel approximately 1,200 feet from east to west and about 200 feet from north to south. It was reported by ICPHD that the site was recently cleaned up using CalRecycle grants to fund

operations. Mr. Martinez notified GLA of this site but did not escort GLA to the site since it is currently cleaned up.

4.2 San Diego County

Interviews with San Diego County agencies did not reveal any previously unknown or undocumented waste tire disposal sites within their respective jurisdictions. “Known” waste tire dump site information was provided to GLA during the interview process; however, additional information and subsequent inspections were not conducted since those sites are already in the process of CalRecycle grant-funded clean ups. On October 12, 2022, GLA (John Hower and Greg Shagam) participated in a MS Teams meeting with CalRecycle representatives, including Jacob Soza (Waste Tire Compliance-South Unit, Supervisor), Alan Zamboanga and Krysty Emery, to discuss “known” sites in San Diego County and provide direction for the completion of this investigation. Based on discussions in the meeting, it was decided that “known” sites already being cleaned up will not be included in this report.

4.2.1 Abandoned Tire Occurrences

Based on our interviews, most smaller agencies that were contacted redirected our questions to the San Diego County TEA, which is CalRecycle. GLA’s investigation and interviews did not discover any additional waste piles that were unreported. Most reported cases involved nuisance dumping near dumpsters behind retail tire shops.

One area of concern reported during interviews is along the Tijuana River where water flows across the border from Mexico into California. As outlined in previous investigations, and confirmed during interviews, some agencies reported sites where solid waste, miscellaneous debris and vegetation have built up along the riverbanks and surrounding areas. Discussions between GLA and CalRecycle resulted in excluding any sites where transport or deposition of waste tires involved geo-fluvial processes, and therefore these sites were not investigated.

4.2.2 Tijuana River Valley

Interviews and calls to the Tijuana River Valley Equestrian Association (TRVEA) connected GLA with TRVEA Officer of Trails, Emma Reece, who was able to assist GLA by forwarding along our interview questions to San Diego County TEA’s, State assembly member staff, and other state park employees managing lands in the County of San Diego. Communications were then directed to CalRecycle representative Jacob Soza. GLA and CalRecycle met via MS Teams and discussed San Diego County sites where GLA was informed that these sites are known to

CalRecycle and are being monitored by the agency. As a result, Mr. Soza suggested that the illegal tire dumping sites along the Tijuana River Valley should not be included in this investigation. GLA understands that CalRecycle has an ongoing working relationship with environmental conservancies and protection groups in the Tijuana River Valley and because of this, no illegal dump sites were catalogued, and no site inspections occurred in this area.

4.3 Tribal Lands

The Campo Band of Mission Indians reported a tire dump site on reservation lands in San Diego County, west of the community of Live Oak springs, approximately 2.4 miles southwest of the Golden Acorn Casino and west of Church Road. Representatives from the Tribal Environmental Health Department and GLA visited the site (SD_Campo1, Figure 14) on August 31, 2022. The site, which was previously a strip mine for aggregate construction materials such as sand and gravel, was barricaded preventing public vehicle access from Church Road. During the site investigation GLA located approximately six piles of tires at the site, ranging from small piles with around ten tires to one larger pile with approximately 300 to 500 tires, totaling approximately 600 to 800 tires. Additional dumping was observed at the site and materials ranged from auto and truck frames and/or parts, cured concrete washout, old mining equipment, oil tanks and construction/demolition wastes. This area is managed by the Tribal Environmental Health Department who have expressed interest in receiving assistance from CalRecycle with tire disposal, if available.



4.4 Sites Outside of the Investigation Limits

The investigation area extends 100 kilometers (63 miles) north of the California-Mexico border and includes a portion of southern Riverside County. Some agencies contacted during our interview process manage lands that extend beyond the limits of this investigation. California State Parks Ranger and Center for Natural Lands Management (CNLM) Manager, Ginny Short, was interviewed and reported three sites in Riverside County, beyond the investigation limits, where illegal dumping has been observed or reported. Since these sites are out of the investigation area, no field site investigations were performed, but they have been catalogued and posted to the website database. Of the three sites reported, two are on San Miguelito Drive,

and one on Thousand Palms Canyon Road. Descriptions are provided below based on interview question responses, review of aerial imagery, and subsequent email correspondence.

The **San Miguelito Drive Sites** are separated into two locations, one north of the other near the intersection of San Miguelito Drive and El Centro Way (Rs_San Miguelito1, Figure 15), and the other site approximately 2,500 feet due south near the intersection of Ramon Road and San Miguelito Drive (Rs_San Miguelito2, Figure 16). These two sites are in the community of Thousand Palms, east of the I-10 Freeway and the Bob Hope Drive exit. The area consists of residential tract housing with small parcels that are undeveloped where dumping reportedly occurs.

The **Thousand Palms Canyon Road Site** (Rs_Thousand Palms1, Figure 17) is approximately 3.6 miles east of the community of Thousand Palms in south Riverside County. It was reported that illegal dumping occurs along the side of Thousand Canyon Palms Road at various locations north of the intersection of Ramon Road and Thousand Canyon Palms Road. The area is undeveloped and open desert. Due to the remote location, it is assumed dumping will continue to occur in this location.

5. Summary

Agency and organizational interviews yielded no previously unknown illegal tire disposal sites; however, review of aerial imagery revealed the presence of at least one tire disposal area in the Chocolate Mountain Gunnery area that was not known to those who responded to the interview calls. Interviews indicated the TEA and LEA agencies are frequently utilized for tire cleanup in Imperial County. San Diego County LEAs were already engaged in CalRecycle grant-funded cleanups and coordinating future cleanups directly with CalRecycle's Jacob Soza. The largest tire dump investigated was in San Diego County at the Campo Band Indian Reservation and consisted of roughly between 600 and 800 tires.

Of the known sites reported, they consist of four types: vacant lots with illegal dumping, military installations with stockpiled tires, private businesses with waste tire accumulation on site, or managed waste locations on Native American reservation lands. Some sites are not illegal disposal sites, but the owner has requested agency assistance with tire disposal.

Currently, the source of illegally dumped tires remains unknown. Socioeconomic factors may be causing illegal dumping of tires to continue since residents may not have the financial means for

proper disposal of tires or may not be aware of where tires may be legally disposed. The expenses for registered hauling and processing tires for disposal at landfills may be prohibitive. Our investigation was limited to occurrences of illegal waste dumps, and therefore, more effort would be needed to investigate sources.

GLA is not able to substantiate claims that large piles of waste tires are appearing along or near the southern California-Mexico border. Instead, existing programs in place appear to be effective at removing illegally dumped tires within the area of investigation. Once a site is identified by the TEA, cleanup operations are routinely scheduled to visit the site and coordinate clean-up and disposal of tires. Local landfills typically accept waste tires but are limited to less than 500 tires stockpiled on site. Uncut tires need to be processed in order to be buried in the waste prism by cutting the tires in quarters, or in half (along the middle of the tread).

Imperial County landfills that will accept tires are listed below:

- Calexico Solid Waste Site
- Imperial Landfill
- Niland Solid Waste Site
- Salton City Solid Waste Site

San Diego County Landfills accepting tires are listed below:

- Otay Mesa Landfill
- Sycamore Landfill
- Miramar Landfill
- Borrego Landfill

Some registered tire haulers in Imperial County will pick up tires and process them prior to disposal at local landfills for a fee. One hauler will transport whole tires to a facility in Fontana in San Bernardino County for disposal or recycling.

Illegal waste tire and solid waste dump sites that were identified during interviews will continue to benefit from grants provided by CalRecycle. At sites where illegally dumped waste tires were recently removed; newly dumped tires and other solid wastes were observed. This observation suggests that continued funding of the cleanup grants is needed to ensure that waste tires can continue to be managed by the LEAs and TEAs and that tires do not accumulate to such an extent that they become a threat to public health or the environment.

6. Disclaimer

This report is based on the limited data described above and referenced herein and was prepared in accordance with generally accepted civil engineering and geotechnical practices. All site observations and descriptions apply only at the time of the site visit. Since the site investigations, field conditions and regulations may have changed due to factors beyond or control. It makes no other warranties, either expressed or implied, as to the professional data presented in it. Geo-Logic Associates should be notified of any conditions that differ from those described herein, this may require a re-evaluation of the data and conclusions presented. This report was not prepared for use by other parties and projects other than those named or described above. It may not contain sufficient information for other parties or other purposes.

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