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April 15, 2022

VIA EMAIL: [agoldich@co.routt.co.us](mailto:agoldich@co.routt.co.us)

Alan Goldich  
Routt County Planning Department  
136 6<sup>th</sup> Street, Suite 200  
Steamboat Springs, Colorado 80487

Re: Recycling Special Use Permit Application at 40025 Baker Way

Dear Alan:

Please see the responses below to the planning review questions and comments.

**Steamboat Springs Area Fire Protection District (Reviewed By: Doug Shaffer)**

**1. All fire safety requirements for the activities outlined in the application are found in the adopted version of the International Fire Code which is currently the 2018 version. Specifically the recycling and/or storing of used tires is addressed in Chapter 34 of the 2018 International Fire Code and limits pile sizes, separation of piles and separation of piles from the property line, and prohibits open burning, cutting, welding and heating devices in tire storage yards and more. With those code requirements Steamboat Springs Fire Rescue does not see enough information to support the mix of metal recycling and used tire recycling/storage on this property. If tire recycling/storage is part of the plan more information supporting the ability to meet the requirements of Chapter 34 of the 2018 IFC would be required.**

Applicant Response: Applicant does not and will not recycle tires. Applicant does not seek out tires and does not allow tires to be dropped off for disposal. However, complete vehicles are accepted at the facility and tires do occasionally generate at the Property as a byproduct of its primary operations. Tires are not processed on site or stored long term. Tires are shipped offsite to a tire processor.

Applicant is defined by CDPHE as a waste tire generator and has been issued a waste tire generator permit by CDPHE. Waste tire generators can store up to 500 tires outside. Applicant does not and will not store tires inside. Despite the 500-tire maximum, Applicant stores well below 500 tires and only accumulates a maximum of 250 tires at any one time.

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Chapter 34 of the 2018 IFC is applicable to tire rebuilding plants, tire storage facilities and tire byproduct facilities. § 3401.1, 2018 IFC. Applicant is not a tire rebuilding plant or a tire byproduct facility. Tire storage facility is not explicitly defined by the 2018 IFC. However, based on definitions provided by the 2018 IFC and the permit requirements of section 3401.2, Applicant is not likely a tire storage facility.

The 2018 IFC defines “bulk storage of tires” as the storage of tires where the area available for storage exceeds 20,000 cubic feet. Applicant’s storage area is less than 20,000 cubic feet. Additionally, permits are only required under Chapter 34 if the stored tires exceed a volume of 2,500 cubic feet. §§ 105.6.29, 105.6.46, 3401.2, 2018 IFC (“Storage of scrap tires and tire byproducts. An operational permit is required to establish, conduct or maintain storage of scrap tires and tire byproducts that exceeds 2,500 cubic feet (71 m<sup>3</sup>) of total volume of scrap tires, and for indoor storage of tires and tire byproducts.”).

Applicant stores a maximum of approximately 250 tires, which equates to a volume well below the 2,500 cubic feet required for permitting by Chapter 34. Additionally, Applicant does not meet the definition of bulk storage of tires. As such, Applicant is not likely a tire storage facility and is not subject to Chapter 34 of the 2018 IFC.

Despite its lack of applicability, Applicant recognizes the dangers of tire fires and can provide for proper storage of its scrap tires. Applicant can provide 40 feet of clear space around its scrap tire pile. §§ 3405.2, 3405.3, 3405.5, 2018 IFC. As Applicant is restricted to 500 waste tires, but stores less than 250 tires, no issues should arise with pile size, total volume of tires stored, or fencing. §§ 3405.1, 3405.6, 3407, 2018 IFC. The property has no bridges, trestles, elevated roadways or railroads that would impact storage. § 3405.7, 2018 IFC.

Likewise, Applicant can provide precautions against fires, even though its storage of tires is outside the scope of Chapter 34. Applicant will prevent open burning, heat sources, and smoking within the tire storage area. §§ 3404.1, 3404.2, 3404.3, 2018 IFC. Applicant will not store tires beneath electrical power lines having a voltage in excess of 750 volts or that supply power to fire emergency systems. § 3404.4, 2018 IFC.

## **Planning Review (Reviewed By: Alan Goldich)**

### **1. When will the stormwater management elements be installed?**

Applicant response: Stormwater Management will be installed Summer 2022.

**2. Please provide more detail on what ‘general recycling of household waste’ means.**

Applicant response: General recycling of household waste means recycling of household metal, such as appliances or anything metal that can be recycled. It does not include electronics, TVs, glass, wood, plastics, tires or food waste and the appliance and metal products must be free of the same to be accepted at the facility.

**3. Please explain what is involved in pelletizing food waste and plastics.**

Applicant response: Applicant does not currently pelletize food or plastic waste and no longer plans to do so in the future.

**4. Provide list of all types of items that are collected.**

Applicant response: Anything that consists of over 75% metal, including without limitation: aluminum, brass, aluminum cans, cars, car batteries, copper, dishwashers, empty drums and barrels, dryers, electrical cords, furnaces, hot water heaters, iron cast tubs/stoves, kitchen stoves/ranges (household appliances), hoods, metal farm scraps, metal doors, metal frames, metal fireplace inserts, metal roofing, vehicle and home radiators, baseboard heaters, washing machines. Also, do it yourself used waste oil from do it yourselfers pursuant to CDPHE’s regulations for Used Oil Generators.

**5. Is there any lighting on the property?**

Applicant response: Yes, security lighting by Yampa Valley Electric.

**6. Is a sign desired?**

Applicant response: Yes, a sign is desired.

Please let me know if you need additional information or feel free to contact me to discuss the above responses.

Sincerely,

HOSKIN FARINA & KAMPF  
Professional Corporation

*s/ Brent A. Starnes*

Brent A. Starnes

BAS: