



Watertown Fire Department

OFFICE of FIRE CHIEF

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June 26, 1997

Dodge County Board of Adjustment
Administrative Building
127 E. Oak Street
Juneau, WI 53039-1329

Myron Ehrhardt, Chairman

First, I apologize for being unable to address the issue of Thomas Springer's requested variance in person. However, I would hope that this correspondence adequately represents the concerns of the Watertown Fire Department.

I do not have a significant problem with the change in operation from that of a storage facility to one that processes the product. While the operation of shredding is one that is exothermic (generates heat) it is probably less dangerous than the random accumulation of a hazardous waste material.

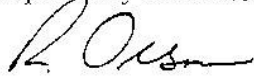
That which concerned me in the past remains a concern now. Guidelines developed for the proper, safe storage of waste tires have not been followed. While it is certainly the prerogative of the DNR to allow Mr. Springer to store tires **without** due consideration to adequate pile separation or clearances from outbuildings, the National Fire Protection Agency does write some rather restrictive recommendations that are considered *minimum standards* by most professional fire persons and industry leaders. These standards have not been followed in the past and I would respectfully request that your consideration of the requested variance, in some manner, address the fact.

I have been furnished a chronological hard copy file of operational plans, guidelines and the permitting process from the inception of Mr. Springer's business. As time has passed, the operational plans submitted by Mr. Springer, and approved by the DNR, have consistently become **less** restrictive. There would seem to be no reasonable explanation for the deviation from the initial, reasonable approach to fire and life safety when the business first began. However, that is exactly what has happened.

As I indicated at the outset, I do not object to Mr. Springer's request for a variance that would allow for the processing of waste tires as long as proper consideration is given to the storage of the raw product initially and ensuring a timely removal of the finished product. Also, fire protection devices shall be placed appropriately for this type of operation.

I would request that all codes, ordinances and standards, including those recommended by the National Fire Protection Agency, dealing with the storage and processing of waste tires, be a part of the text that leads to the granting of the variance requested.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "R. Olson".

Richard L. Olson