

Document Log

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Subject	
ACAA Comments on Report to Congress on Increasing Use of Recovered Mineral Components in Cement and Concrete Projects	06/22/2007 12:24 PM

Document Body

Anthony,

This is an impressive document. I commend you for your work. I'd like to make several comments for your consideration:

Page ES-4 - We can give you cenosphere data for 2005. See http://www.acaa-usa.org/PDF/2005_CCP_Production_and_Use_Figures_Released_by_ACAA.pdf

Pages ES-8 and 1-4 - The slow acceptance of performance based specifications limits the use of fly ash, in particular, in some concrete mix designs. Many DOT's do not have the foresight or flexibility to adapt their specifications from prescriptive to performance. That is a year's long effort through groups like ASTM; AASHTO and ACI. Caltrans is aggressively looking to increasing its percentage of replacement, up to fifty percent for large mass pours, based on the GHG reductions that are obtained by increased fly ash mix designs.

Page ES-9 and ES-10 - I think the state review of Pennsylvania is available from John Sager so you could include those results, if you like.

Page 1-5 and 1-6 and 1-7 - Including the additional materials for evaluation as "other" potential mineral components is very good. There is significant potential for some of these materials to have increased usage, less from highway construction than from other applications. We do have utilization data for boiler slag and bottom ash dating back to 1977. FGD byproducts (or "sludge" or "material" were tracked beginning in 1987 but it

was not until 2002 that we separated FGD gypsum FGD dry scrubbers from a more generic listing of FGD material.

Pages 3-5, 3-7 3-9, 3-10, etc. Tables and other charts in this chapter are excellent representations of energy reductions. I think many of them will be used by various industries to promote the value of using these RMCs.

Page 4-2 - I completely agree with the statements in Section 4.1 A significant barrier is that many states have not updated or allowing in their regulations for industrial recycling. This will be a barrier and one that perhaps the EPA regional offices can help change. Industry may be able to identify specific states in which the language of state regulations are specifically hindering progress and then joint efforts by EPA regional staff and industry could be formulated to try get these regulations changed. This may be an opportunity for a strong recommendation that industry and the EPA work together to make it clear these materials are technically alternatives to natural products and are products, by-products or co-products, rather than wastes. They only become wastes when they are not used. This is a public relations activity in many ways.

Page 4-6 - In paragraph 4.4.1, the discussion about RCRA and CERCLA Status states, "...fly ash, bottom ash, boiler slag...are non-hazardous industrial wastes and should be regulated under Subtitle D of RCRA." I think it would be more accurate to state that rather than needing regulation under Subtitle D, they were exempted from regulation under Subtitle C. I don't think it is clearly spelled out that even Subtitle D regulations are required. Please confirm this suggestion with your colleagues.

Page 5-2. I suggest you add reference to the EPA booklet EPA-530-K-05-002 "Using Coal Ash in Highway Construction: A Guide to Benefits and Impacts." This booklet has helped open doors in areas where the lack of understanding of environmental issues was hindering use. Similar publications could be very effective. I suggest the EPA consider developing a booklet addressing the use of RMC and FGD gypsum and other industrial byproducts in architectural and building applications. This would also support the Construction Initiative.

Pages 5-4 and 5-5. We continue to support the recommendations' offered by Headwaters, Holcim and ACAA. We would also encourage the inclusion of other CCPs, such as FGD gypsum, boiler slag, bottom ash and cenospheres, whenever practical.

Page 5-6 - I would suggest acknowledging the Green Building Initiative, as well as LEED as both are beginning to be more widely used. Confining the discussion to LEED may inadvertently infer a preference of one system over another. See the website: <http://www.thegbi.org/gbi/> Since it is developing some ANSI standards in support, it will carry more weight in the future. For example Minnesota and South Carolina just joined the list of states to formally recognize Green Globes alongside LEED making the total 8 states and 2 federal agencies.

It would be good to strengthen the recommendations. Industry and the agency both have perspectives on what can be done to increase the use of RMC. I think many of your recommendations are extremely valid and in some manner, they should be summarized. Perhaps it would be appropriate to add a section, both to the Executive Summary and to the whole document, that lists the many recommendations that are contained within. They are buried in many parts of the text, but should be emphasized.

Overall, the breadth and completeness of detail make this an extremely valuable resource. The listing of environmental impacts (and those calculations) and power plants is especially helpful. I trust the other data included representing slag and silica fume is as complete.

I hope these few comments have been helpful, Anthony. Please do not hesitate to contact me if you have any questions.

Thank you,

Dave Goss
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-----Original Message-----

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Subject: Re: Report to Congress on Increasing Use of Recovered Mineral Components in Cement and Concrete Projects

To All,

Yesterday, I attempted to send out the "Draft of the Report to

Congress."

The document was returned undeliverable to many, because the file was too large. The document had the watermark "Draft" on it, which made the file so huge. I've removed the watermark and I'm attempting to send again. Please remember this is a draft!

Please review the "Draft" of the Report to Congress and submit comments to me by June 22, 2007. Thanks for your continued input in the preparation of this Report. If you have any further questions, you can email me or call me at (703) 308-0458.

Please acknowledge receipt of the document and let me know if you prefer the document in Word.

Thanks.

(See attached file: RTC_June6_2007.pdf)