

## Document Log

From	To	
"Dave Goss" <dcgoss@acaa-usa.org>	John Sager/DC/USEPA/US@EPA	
CC	BCC	
Subject		
RE: Invitation for Peter to speak at ACAA winter meeting	10/27/2008 08:53 AM	

### Document Body

John,

What I was thinking about risk assessment was not so much driven toward what impact such an assessment might have specifically on CCPs. Instead, I see a likelihood that any risk assessment protocols released by the EPA will be attractive to state agencies. There will be, in my opinion, a trend among state agencies to want to use a risk assessment, such as to be provided by the EPA, on any beneficial use, hence changing the established patterns already in place for a more conservative approach. Until we see the information to be released, I won't know if there is really any chance for a tightening of approvals by state agencies.

State officials tend to be very conservative and if there is some kind of an industrial reuse risk protocol available, they will probably consider using it to avoid the risk of criticism. I think it would be interesting for Peter or the staff to address what they hope the risk assessment will do to all beneficial use of industrial materials and any unintended consequences they think might arise once the protocol is released.

I am not suggesting none should be released, I just think there is a pretty good chance that some state will adopt the risk assessment process in lieu of their current processes to be on the safe side. I may be wrong, but I thought it would be useful for our members to understand the overall philosophy of the EPA in developing the risk assessment information so that our members would not be surprised if they find they are having to respond to questions from state agencies that they had not had asked before.

Any thoughts? I don't feel really strongly about Peter's attendance, but I thought it might be timely for this information.

Secondly, WOCA. If you think it is a possibility, we'd be pleased to consider an EPA keynoter. Maria spoke last time and was well received. We have discussed having a person from the Kentucky State government talk to the attendees, as well. Dave

-----Original Message-----

From: sager.john@epamail.epa.gov [mailto:sager.john@epamail.epa.gov]  
Sent: Saturday, October 25, 2008 1:16 PM  
To: Dave Goss

Cc: Kinch.Richard@epamail.epa.gov; degeare.truett@epamail.epa.gov  
Subject: Re: Invitation for Peter to speak at ACAA winter meeting

As you know, Peter saw your message and responded that we would discuss the speaking invitation. Not having talked with him further, I thought it would be helpful to ask what risk issues would ACAA like OSW to address?

The risk compendium is nearly finished, but I don't think it represents a material change for CCP beneficial use issues. Cathy Davis would be the best person to address this work, if not Peter. Developments in air emission control regulations are certainly germane, but that matter is tied up in the Courts, unless Congress takes action. Certainly if Peter wants to attend, he will, but I am not sure what case to make to him.

The issue of an OSW senior manager to speak at WOCA may also be relevant. I don't know that we can get Peter, Matt or Maria to speak at both.

The three big issues before us seem to be ag, fill and cement applications. Of these, the one area where there may be movement this winter in risk considerations is for fill applications, where we are considering a brochure or booklet. I don't think there would be anything to report at the winter meeting other than a possible statement of intent to move forward in this area.

"Dave Goss"  
<dcgoss@acaa-usa.org>

10/23/2008 08:16 AM

To  
Peter Grevatt/DC/USEPA/US@EPA  
cc  
John Sager/DC/USEPA/US@EPA  
Subject  
Invitation to Speak

Peter,

ACAA will be holding its annual meeting in Phoenix on January 21st. I'd like to invite you or someone from your staff to speak to our membership about the Office of Solid Waste's work on risk assessment, if available. Yesterday, Nicole Villamizar gave an excellent overview of industrial materials recycling at our fall meeting in Denver. In her presentation she mentioned the staff's work on developing guidelines for the regulatory community to support evaluation of potential risks associated with the common materials used in construction. Obviously, as we have discussed in the past, risk questions are common when dealing with CCPs. I think our membership would be very interested in the work you have been doing along this line.

In you new role within OSW, I'd also like to introduce to a

yet-to-be-named person who will replace me when I retire from ACAA, most likely in January. Personally, I can't thank OSW staff members enough for the efforts they have provided our industry in supporting environmentally sound uses for CCPs. Starting back in late 2001, the Agency clearly demonstrated its commitment to increased use and recycling of CCPs through the formation of C2P2. That has been an excellent initiative for our industry and one which I believe will continue to grow. The challenges remain and risks are often the first questions asked about industrial materials recycling. I would like our members to have the opportunity to hear an update directly from you, if you have the time to join us.

We are still firming up the agenda, but Bob Wayland of the EPA OAR group in RTP has also accepted. He will speak on some of the factors affecting future regulatory initiatives related to mercury, CAIR, green house gases and other important topics. As we firm up the meeting details, they will be posted on this page of our website.  
<http://www.aaa-usa.org/cde.cfm?event=184991>

I'll look forward to hearing back from you and hope that you will be able to join us on that date..

Thank you very much,

Dave Goss  
Executive Director  
ACAA  
720-870-7897

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