



Portland Cement Association

June 17, 2013

The Honorable Fred Upton
Chairman
House Energy and Commerce Committee
2125 Rayburn Building
Washington, DC 20515

The Honorable Henry A. Waxman
Ranking Member
House Energy and Commerce Committee
2322A Rayburn Building
Washington, DC 20515

Dear Chairman Upton and Ranking Member Waxman:

The Portland Cement Association (PCA), which represents 26 U.S. cement manufacturers operating 79 plants in 34 states, and distribution facilities in all 50 states, welcomes introduction of H.R. 2218 the *Coal Residuals Reuse and Management Act of 2013* by Congressman David McKinley of West Virginia. Cement makers are key stakeholders in any legislation intended to preserve the beneficial use and recycling of coal ash, also known as Coal Combustion Residuals (CCRs), a goal that H.R. 2218 would achieve by pre-empting EPA classification of coal ash as hazardous waste under RCRA Subtitle C. Classification of coal ash as a hazardous waste, or even the regulatory uncertainty related to the stalled EPA rulemaking, would impact the recycling of CCRs, including that used by cement makers.

Coal ash recycling has remained flat in recent years at least in part due to the federal regulatory uncertainty, which H.R. 2218 would mitigate. For example, the amount of coal ash used in concrete production in 2011 was 11.7 million tons, up slightly from 11.0 million tons in 2010 but still below 12.6 million tons in 2008, before the EPA proposal. In addition to the 11.7 million of tons of coal ash recycled in the production of concrete, cement makers typically recycle an additional three million tons as a raw material in cement making. CCRs used in the cement manufacturing process serve as a substitute for key ingredients in cement, which would otherwise have to be mined. Coal ash used in concrete production, combined with the amount used by cement manufacturers as a raw material, accounts for more than 10% of the 130.7 million tons produced in the U.S. each year.

The nation's infrastructure relies on durable concrete for dams, runways, highways, bridges, levees, pipelines, and schools. Coal ash makes some concrete structures stronger and longer-lasting largely because it makes the concrete denser and less susceptible to damage from environmental elements. Adding coal ash to the concrete mixture may also minimize cracking in some circumstances. Cement manufacturers believe that a legislative remedy pre-empting classification of CCRs as hazardous waste will not only help preserve high quality manufacturing jobs by curtailing unnecessary regulation, but will also promote environmental stewardship by providing incentives for increased recycling of coal ash, or beneficial use.

PCA welcomes the opportunity to work with members of the committee to encourage passage of a balanced bill during the 113th Congress that will preserve jobs and promote recycling. For more information on cement manufacturers' support for H.R. 2218, please contact Bryan Brendle at (202) 719-1978.

Sincerely,

Gregory M. Scott
President
Portland Cement Association

Cc: Members of the House Committee on Energy and Commerce

500 New Jersey Avenue, N.W., 7th Floor
Washington, DC 20001
202.408.9494 Fax 202.408.0877
www.cement.org