



RUBBER
manufacturers
association

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November 28, 2011

Dr. Holly Stallworth
Designated Federal Officer (DFO)
SAD Staff Office
United States Environmental Protection Agency

Re: RMA Comments for the Science Advisory Board on EPA's Accounting Framework for Biogenic CO2 Emissions from Stationary Sources

Dear Dr. Stallworth:

The Rubber Manufacturers Association ("RMA") is the national trade association representing every major domestic tire manufacturer including: Bridgestone Americas, Inc.; Continental Tire the Americas, LLC; Cooper Tire & Rubber Company; The Goodyear Tire & Rubber Company; Michelin North America, Inc.; Pirelli North America; Toyo Tire (U.S.A.) Corporation and Yokohama Tire Corporation. RMA appreciates this opportunity to provide comments on EPA's draft "Accounting Framework for Biogenic Carbon Dioxide (CO2) Emissions from Stationary Sources" (Accounting Framework).

RMA members manufacture tires in the United States that are utilized as fuel after they have completed their service life. RMA member companies are committed to the concept of shared responsibility for tires after they complete their useful lives on vehicles. RMA has worked to develop the market infrastructure to successfully manage and reuse scrap tires, and is extremely proud of the progress in the area of scrap tire management. The success of this commitment is evident in the fact that nearly 90 percent of annually generated scrap tires in the U.S. go to end use markets. Tire Derived Fuel (TDF) is the oldest and most mature market for scrap tires in the country. We strongly support EPA's decision to recognize the natural rubber fraction in tires as carbon neutral, and offer the following comments on EPA's draft accounting framework.

EPA should classify scrap tires used as fuel as "tire derived fuel" and not "tire derived waste"

Throughout the Accounting Framework EPA refers to Tire Derived Fuel as "Tire-Derived Waste." RMA does not support the use of the term "Tire-Derived Waste" in the Accounting Framework.

EPA recently finalized the "Identification of Non-Hazardous Secondary Materials that are Solid Waste" (NHSM rule) rule. 76 Fed. Reg. 54 (March 21, 2011). This rule identifies which non-hazardous secondary materials when used as fuels or ingredients in combustion units

are “solid wastes” under the Resource Conservation and Recovery Act (RCRA). Under this rule, scrap tires combusted for energy recovery that meet the qualifications for a non-waste determination are classified as fuel.

In the final accounting framework, RMA recommends that EPA classify scrap tires used as fuel in combustion units as “Tire Derived Fuel.” As currently drafted, the accounting framework creates three categories of feedstocks for biologically based materials that might be used in stationary sources. These categories include: (1) forest-derived woody biomass, (2) agricultural biomass, and (3) waste materials. Waste materials include tire-derived wastes (TDW). Scrap tires used as fuel in combustion units that are not discarded and meet the legitimacy criteria under the final NHSM rule are classified as “Tire Derived Fuel.” Classification of tires, in the draft Accounting Framework, as Tire-Derived Wastes is inconsistent with the final NHSM rule. RMA recommends that the Accounting Framework utilize the proper terminology for scrap tires used as fuel in combustion units, “Tire Derived Fuel,” as defined by the final NHSM rule.

Calculation of the Natural Rubber Fraction in Tires

The accounting framework indicates that approximately 20% of TDF is composed of natural rubber or biomass. This information is based on the composition of generic passenger and truck tires, and was collected from the Rubber Manufacturers Association’s website. RMA’s website indicates that approximately 14% of a passenger tire is composed of natural rubber and approximately 27% of a truck tire is composed of natural rubber. This information is outdated. Recent data collected from RMA members demonstrates that TDF contains approximately 27.47% natural rubber.

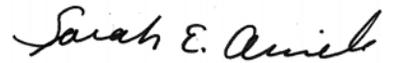
RMA gathered data from our members on the average percentage of natural rubber content by weight for passenger and truck tires sold in the U.S. We then adjusted the averages to account for the difference in weight between passenger tires and truck tires. According to RMA tire data, scraped passenger tires weigh an average of 22.5 pounds and scraped truck or commercial tires weigh an average of 110 pounds. Next we adjusted the weighted averages for natural rubber in both passenger and truck tires to account for market share. We recommend that EPA change the natural rubber percentage in TDF from 20% to 27% to accurately account for the natural rubber percentage in tires sold in the U.S. that are utilized as TDF.

Default Biomass Fraction for Tires

EPA’s “Technical Support Document for Revision of Certain Provisions: Proposed Rule for Mandatory Reporting of Greenhouse Gases” dated July 8, 2010 also indicates that the average biogenic fraction of passenger and truck tires is 20%. We strongly recommend EPA update this technical support document to include RMA’s recent data that reflects the average natural rubber percentage in tires to be 27%.

RMA appreciates the opportunity to comment on the proposed accounting framework.
Please contact me at (202) 682-4836 if you have any questions or require additional information.

Respectfully submitted,

A handwritten signature in cursive script that reads "Sarah E. Amick".

Sarah Amick
Environmental Counsel
Rubber Manufacturers Association