



May 25, 2012

*Via Electronic Transmission: Stallworth.holly@epa.gov, Jenkins.jennifer@epa.gov*

Dr. Holly Stallworth, Designated Federal Official  
Science Advisory Board  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW Washington, DC 20460

**Re:** SAB Review of EPA's Draft *Accounting Framework for Biogenic CO2 Emissions from Stationary Sources*

## **I. Introduction**

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 the SAB's May 9<sup>th</sup> draft review of EPA's proposed "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.

## **II. Natural Rubber**

Tires contain natural rubber that is harvested from the *Hevea Brasilliensis* tree. These trees take roughly seven years to mature at which time the trees can be tapped to extract the natural rubber. Typically, *Hevea Brasilliensis* trees can be tapped for up to thirty years depending on tapping techniques. Tapping the tree involves making a spiral cut in the bark so the natural rubber latex flows from the tree without damaging the tree. The natural rubber latex flows from the tree and is collected. After a short time the natural rubber coagulates and is then cut into small pieces and washed until it is clean. Once clean, the natural rubber is dried, then

pressed into blocks, and later incorporated into tires. Unlike other biogenic sources, the production of natural rubber does not destroy the tree from which the natural rubber is harvested.

### **III. RMA Recommends the Biogenic Accounting Factor for TDF Should be Zero**

The GHG emissions associated with the natural rubber fraction in tires have no net atmospheric impact and actually decrease CO<sub>2</sub> emissions by offsetting the use of synthetic rubber in tires. Synthetic rubber is made by man from petroleum products. The natural rubber content in tires represents non-fossilized and biodegradable organic material that is contained in a tire for years.

Harvesting natural rubber does not destroy the source of the organic material. There are no changes in land use from harvesting natural rubber because the *Hevea Brasilliensis* tree is not destroyed in the process of collecting the rubber latex. As a result RMA believes that TDF should be given an automatic Biogenic Accounting Factor (BAF) of zero.

### **IV. 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.

### **V. EPA should classify scrap tires used as fuel and not waste**

EPA's accounting framework establishes three broad categories of feedstocks: forest-derived woody biomass, agricultural biomass, and waste materials. TDF is included in the category for waste materials. Throughout the Accounting Framework EPA refers to TDF as "Tire-Derived Waste." We oppose the use of the term "Tire-Derived Waste" and the inclusion of TDF in the waste materials feedstock category.

Last year, EPA finalized the “Identification of Non-Hazardous Secondary Materials that are Solid Waste” (NHSM) 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.

RMA appreciates the SAB’s consideration of our comments. Please contact me at (202) 682-4836 if you have any questions or require additional information.

Thank you,

Sarah E. Amick  
Environmental Counsel  
Rubber Manufacturers Association