July 6, 2020

Mr. Peter Wright
Assistant Administrator, Office of Land and Emergency Management
U.S. Environmental Protection Agency
EPA Docket Center, OLEM Docket, Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Docket ID No. EPA-HQ-OLEM-2019-0589

Re: Docket ID No. EPA-HQ-OLEM-2019-0589
Comments on U.S. Environmental Protection Agency (EPA) Designations and Recommendations for Recycled-Content Products in the Comprehensive Procurement Guidelines (CPG) Program

Dear Mr. Wright:

The American Iron and Steel Institute (AISI) on behalf of its U.S. producer members is pleased to submit comments on the EPA Comprehensive Procurement Guidelines (CPG) Program. AISI serves as the voice of the North American steel industry in the public policy arena and advances the case for steel in the marketplace as the preferred material of choice. AISI also plays a lead role in the development and application of new steels and steelmaking technology. AISI’s membership is comprised of integrated and electric furnace steelmakers, and associate members who are suppliers to or customers of the steel industry.

Steel, including stainless steel, is principally produced by one of two processes: the electric arc furnace (EAF) process, and the integrated or basic oxygen furnace (BOF) process. While all steel produced in the U.S. contains a significant level of recycled content, the EAF process typically includes a higher percentage of steel scrap, while the BOF process uses a higher percentage of virgin materials like iron ore. The ratio of EAF to BOF production has been increasing in the U.S. for many years, and at present EAF makes up about two-thirds of total production. BOF and EAF producers are continually developing new and improved grades of steel for various applications, and the level of recycled content is often dependent on the metallurgical requirements of specific grades.

Regardless of production method, all steel products are 100% recyclable at end of life. In 2019, over 60 million tons of steel scrap was recycled into other steel products in the U.S. alone. This
steel scrap comes from many sources such as automobiles, end-of-life buildings, appliances, food cans, etc. One of the most important features of steel as a material is that virtually any steel product can be recycled into any other steel product, such that a steel beam can become another beam, a refrigerator, a food can or a car door.

AISI is pleased to provide input herein on the EPA Comprehensive Procurement Guideline (CPG) Program, as requested in the 04/07/2020 EPA News Release on this topic. Our comments will cover two basic areas: 1) recommendation to add several new products (items) in the CPG Program category of “Construction”; and 2) recommendation for revisions to the steel Postconsumer Content (%) and Total Recovered Materials Content (%) values in the CPG Program.

Recommendations to Add New Products (Items)

AISI has reviewed the Categories and Products currently included in the CPG Program and we suggest that several common products (items) should be added to the Construction category, and further that these products can be specified and purchased with the required levels of postconsumer and total recovered materials content. While our interest is in promoting the specification and purchase of steel products in these recommended new product designations, the product descriptions are generic enough in nature such that other competing products can also be specified. However, steel construction products often contain higher levels of recycled content than products made from other common construction materials. In general, steel products in these recommended new product designations carry no cost premium over the same products with a lower level of recycled content.

The list of recommended new products (items), all in the category of “Construction” are 1) Roof and Floor Deck; 2) Structural Framing; 3) Wall Cladding; 4) Pressure Pipe; and 5) and Storage Tanks, as seen in the table below:
### Recommendation for Revisions to the Steel Recovered Materials Content Values

The CPG Program uses the terms “recycled content” and “recovered materials” at various locations within the program documentation, and at times these terms appear to be used interchangeably. AISI recommends use of a single term to describe a product’s level of recycled material, or alternatively, we recommend providing clear definitions of these and other similar terms in the program documentation.

AISI has reviewed the steel Postconsumer Content (%) and Total Recovered Materials Content (%) values currently listed in the CPG Program, and we are recommending changes to these values based on current technology in steel production in the U.S. The values presently listed in the program are as follows:

<table>
<thead>
<tr>
<th>Category</th>
<th>Proposed New Product (Item)</th>
<th>Examples of steel products included in each category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction</td>
<td>Roof and Floor Deck</td>
<td>Steel composite and non-composite roof and floor deck</td>
</tr>
<tr>
<td>Construction</td>
<td>Structural Framing</td>
<td>Steel structural sections, built-up sections, cold-formed steel (CFS) framing, metal building frames, steel tubes, steel joists, plate</td>
</tr>
<tr>
<td>Construction</td>
<td>Wall Cladding</td>
<td>Steel single-skin and insulated panels</td>
</tr>
<tr>
<td>Construction</td>
<td>Pressure Pipe</td>
<td>Steel pipe for water distribution, oil and gas distribution, irrigation, fire sprinkler, process piping</td>
</tr>
<tr>
<td>Construction</td>
<td>Storage Tanks</td>
<td>Above-ground and below-ground steel tanks, pressure vessels</td>
</tr>
</tbody>
</table>
AISI recommends the separate listing of recovered materials content for EAF and BOF steel production be discontinued, and a single range for steel products be substituted instead, as shown in the following table:

### Recommended New Values for Steel Products

<table>
<thead>
<tr>
<th>Material</th>
<th>Postconsumer Content (%)</th>
<th>Total Recovered Materials Content (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Steel</td>
<td>16-67</td>
<td>25-100</td>
</tr>
</tbody>
</table>

1. Continual advances in steel product grades may affect the level of recycled content in steel from both BOF and EAF processes. These efficiency and technology advances allow the use of lesser quantities of steel to perform the same function in many cases. All steel produced in the U.S. contains a significant level of recycled content, but the specific quantity of recycled content is partly dependent on the type of steel end-product in question. For instance, hot-rolled structural sections (such as beams and columns) might indeed contain total recycled content of up to 100%, whereas products like roofing panels formed from steel sheet would typically contain a lower recycled content. Thus, a range of recycled content for steel products seems more appropriate for application to all steel products in the CPG Program.

2. The proposed approach is consistent with the nature of the recovered materials content listings for other materials in the CPG Program.

3. The footnote for steel listings (Footnote #1, reproduced above) can then be eliminated.

4. Since the recommended range includes the full range of recycled content values in the current program, existing product listings would not be affected.
Thank you for the opportunity to provide input on this EPA Program. We are available to answer any questions about the comments contained herein.

Sincerely yours,

Mark A. Thimons
Vice President, Sustainability
American Iron and Steel Institute