



July 22, 2015

U.S. House of Representatives
Washington, D.C. 20515

Dear Representative:

On behalf of Associated Builders and Contractors (ABC), a national construction industry trade association with 70 chapters representing nearly 21,000 chapter members, I am writing to express our strong support for the Improving Coal Combustion Residuals Act of 2015 (H.R.1734).

ABC is concerned that the 2014 Environmental Protection Agency (EPA) final rule on the *Disposal of Coal Combustion Residuals from Electric Utilities* could lead to the labeling of coal combustion residuals (CCRs) as hazardous waste, which would virtually eliminate the construction industry's ability to use CCRs in many building materials. Due to the heavy reliance on CCRs in terms of cost and durability, their elimination from the industry's supply chain would cause quality to diminish and prices to skyrocket for end users. Such a move by the EPA strains domestic cement production and other manufacturing processes, while threatening the construction industry with further job loss.

The Improving Coal Combustion Residuals Act would establish a baseline for CCR disposal, while maximizing flexibility for individual states. It allows states with existing programs governing CCR disposal to continue to operate the programs while also maintaining beneficial reuse programs. In addition, the bill incorporates a fail-safe provision that allows the EPA to assist states that are unable or unwilling to meet baseline standards.

The construction industry is the primary end user of CCRs. More than 40 percent of all CCR output is converted into high-quality building materials. Many of these materials—including concrete, asphalt, brick and wallboard—are used daily on jobsites throughout the country, and are especially important for large infrastructure projects. If CCRs are no longer available, manufacturers and builders would be forced to turn to more expensive and, incidentally, lower quality components. This would significantly raise project costs, which largely would be passed on to end users. Ultimately, labeling CCRs as hazardous waste would translate into fewer projects, substantial decreases in revenue and, most importantly, massive job loss.

ABC supports the Coal Combustion Residuals Management Act (H.R. 1734), and urges your support when it comes to the House floor for a vote.

Sincerely,

Geoffrey Burr
Vice President, Government Affairs