



**American
Forest & Paper
Association**

Coal Combustion Residuals

OMB Meeting

December 3, 2014



BETTER PRACTICES 2020
BETTER PLANET
BETTER PEOPLE

Agenda

- Exclusion of non-utility CCRs
- P&P CCR management
- Subtitle D regulation
- Economic Impact



Subtitle D Applicability

- Science does not support hazardous designation
- Sub C designation would eliminate reuse
- EPA enforcement not critical

AF&PA Requests

- Non-utility CCRs must be clearly excluded
- Rule must articulate why non-utility CCRs should not be regulated by states
- EPA must conduct economic impact analysis before any contemplated regulation of non-utility CCRs

