

June 18, 2020

Brittany Bolen  
Associate Administrator  
Office of Policy  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Dear Ms. Bolen:

The Portland Cement Association (“PCA”) and the Cement Kiln Recycling Coalition (“CKRC”) appreciate the opportunity to provide the attached list of guidance documents that our industry needs to have recognized as key interpretive documents in the [searchable website](#) EPA has created in conformance with Executive Order 13891 (10/9/19) -- Promoting the Rule of Law Through Improved Agency Guidance Documents.

PCA, founded in 1916, is the premier policy, research, education, and market intelligence organization serving America’s cement manufacturers. PCA members represent 92 percent of US cement production capacity and have facilities in all 50 states. The Association promotes safety, sustainability, and innovation in all aspects of construction, fosters continuous improvement in cement manufacturing and distribution, and generally promotes economic growth and sound infrastructure investment. Cement and concrete product manufacturing, directly and indirectly, employs approximately 610,000 people in our country, and our collective industries contribute over \$125 billion to our economy.

CKRC is a national trade association representing cement manufacturers in the US that recycle energy-bearing hazardous waste by using them as fuel in kilns that produce portland cement. CKRC also represents companies that collect, process, manage, and market alternative fuels and non-hazardous secondary materials for use in cement kilns. CKRC’s membership represents the operation of facilities, plants, and offices in almost every state in our country and employs approximately 7,000 workers whose jobs are directly associated with the process of beneficially recovering energy from alternative fuels in the manufacture of portland cement.

OMB Memorandum M-20-02 (10/31/19) Implementing EO 13891 states that Guidance not on the website by June 27, 2020 is considered “rescinded” and may not be relied upon. As a result, our trade associations did a thorough review of the portal to identify key guidance that is still missing as of today and we believe should be added. Attached you will find a list of the air, water, and waste guidance documents our trade associations urge EPA to consider adding. We also submitted the individual lists of guidance documents to the Office of Air & Radiation, Office of Water, and Office of Land & Emergency Management.

If you have any questions or EPA disagrees with our assessment that any of the attached documents should be lodged on the portal, please let us know. Thank you in advance for considering our submittal. Please feel free to contact me at (202) 719-1977 or [cfranklin@cement.org](mailto:cfranklin@cement.org) or Michelle Lusk, Executive Director of CKRC, at (703) 624-4513 or [mlusk@ckrc.org](mailto:mlusk@ckrc.org).

Regards,

A handwritten signature in black ink, appearing to read "Charles Franklin", followed by a long horizontal stroke.

Charles Franklin  
Vice President and Counsel, Government Affairs