

**To:** Dravis, Samantha[dravis.samantha@epa.gov]  
**Cc:** Monroe, Loren[Loren\_Monroe@BGRdc.com]  
**From:** Strobel, Kristin  
**Sent:** Mon 4/17/2017 6:57:56 PM  
**Subject:** RE: Request for Meeting-ISRI  
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Thanks. Samantha.

*The primary purpose of the meeting is to introduce the leadership of **The Institute of Scrap Recycling Industries, Inc. (ISRI)** which represents approximately 1,300 companies in 21 chapters in the U.S. and 34 countries worldwide that process, broker and consume scrap commodities, including metals, paper, plastics, glass, rubber, electronics, and textiles. Generating more than \$105 billion annually in U.S. economic activity, the scrap recycling industry provides nearly half a million Americans with good jobs.*

The U.S. scrap recycling industry's significant contributions to environmental protection, resource conservation, and sustainability are dependent upon government policies that understand and recognize these benefits and that promote their growth. With the industry recycling more than 130 million metric tons of commodity grade materials each year, transforming outdated or obsolete products and materials into useful raw materials needed to produce new products, recyclers offer real solutions for balancing economic growth and environmental stewardship.

Time permitting, potential topics for discussion include:

**Recognize Scrap is Not Waste/Recyclables are Not Waste.** Persistent misidentification of recyclable materials as solid waste, and even hazardous waste, impedes recycling at the federal, state, and local levels. Preserving the gains made by the industry that scrap is not waste under Subtitle C of Resource Conservation and Recovery Act (RCRA) is critical for the industry.

**Reform Citizen Suits Provisions in the Clean Water Act to Prevent Abuse.** ISRI seeks modifications to the citizen suit provisions of the Clean Water Act to prevent frivolous and unfounded lawsuits. Over the years, we have witnessed increased abuse of Clean Water Act citizen lawsuits filed for enrichment rather than as the Act original intended. Many organizations

have used publicly available databases to obtain information about regulated facilities and threaten to sue them under the Clean Water Act simply to extract sizable financial “donations” and “voluntary” actions from facilities not otherwise required by law to do so. These facilities settle simply to avoid the costs of litigation, while the organizations then use settlement donations to repeat the process on other facilities in a vicious cycle that was not intended by Congress.

**Clarify the Regulatory Uncertainty Surrounding Recycled Rubber:** The lack of regulatory clarity in the U.S. is causing significant loss of U.S. jobs, while untested imports replace recycled rubber and add to U.S. landfills. EPA acknowledged in 2008 that the Agency did not see any health concerns based on studies already conducted. There is a vast body of science since then that should allow EPA to re-affirm their 2008 conclusion while supporting the long-term studies undertaken by California OEHHA.

Based on anecdotal claims suggesting a possible link between cancer and playing on athletic fields with recycled rubber infill, President Obama ordered a multi-agency Federal study. The federal study was to last one year and industry has cooperated with EPA. However, after 11 months of data collection, EPA has now determined that it needs another two years to complete its work and has asked to extend its study into 2019 to collect more data. As a result of the extended uncertainty, the industry is seeing significant economic and job loss in the industry and, ironically, the use of materials that have other adverse health and environmental impacts.

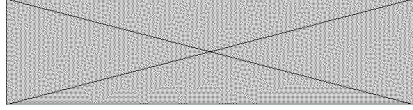
**Support Continuation of a National Mercury Switch Program with Incentives.** With the National Vehicle Mercury Switch Recovery Program (NVMSRP) slated to end this year, ISRI encourages consideration of reinstating switch payments and the exploration of available avenues to keep the program operational into 2018 and beyond. The program’s viability is dependent on a number of factors, including EPA’s continued participation and whether continuation of the program would carry the same indemnifications that vehicle dismantlers, scrap processors, and others receive for participating in the current program.

If you need additional information or background, please feel free to call or email me.

Thank you,

Kristin

Kristin Strobel  
*Director of State Affairs*  
BGR Government Affairs, LLC



The Homer Building  
Eleventh Floor South  
601 Thirteenth Street, NW  
Washington, DC 20005  
Direct: (202) 661.6324  
Fax: (202) 833-9392  
[kstrobel@bgrdc.com](mailto:kstrobel@bgrdc.com)  
[www.bgrdc.com](http://www.bgrdc.com)

**From:** Dravis, Samantha [mailto:dravis.samantha@epa.gov]  
**Sent:** Monday, April 17, 2017 8:51 AM  
**To:** Strobel, Kristin <KStrobel@bgrdc.com>  
**Cc:** Monroe, Loren <Loren\_Monroe@BGRdc.com>  
**Subject:** RE: Request for Meeting-ISRI

Thanks Kristin. What would be the subject of the meeting?

**From:** Strobel, Kristin [mailto:KStrobel@bgrdc.com]  
**Sent:** Monday, April 17, 2017 7:47 AM  
**To:** Dravis, Samantha <dravis.samantha@epa.gov>  
**Cc:** Monroe, Loren <Loren\_Monroe@BGRdc.com>  
**Subject:** Request for Meeting-ISRI  
**Importance:** High

Samantha,

I hope you had a wonderful Easter weekend with your family.

Per our conversation last week, I would like to formally request a meeting with Administrator Pruitt and our client, the **Institute of Scrap Recycling Industries (ISRI)**.

The meeting will include:

- Robin Weiner (ISRI)
- Mark Reiter (ISRI)
- Billy Johnson (ISRI)
- Loren Monroe (BGR Group)
- Kristin Strobel (BGR Group)

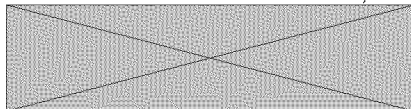
If possible, we would request the meeting dates of **May 10<sup>th</sup>, 11<sup>th</sup> or 12<sup>th</sup>** (specific times are whatever works best for the Administrator).

Please let me know if you need additional background information or details for the meeting.

Thank you for your assistance,

Kristin

Kristin Strobel  
*Director of State Affairs*  
BGR Government Affairs, LLC



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Eleventh Floor South  
601 Thirteenth Street, NW  
Washington, DC 20005  
Direct: (202) 661.6324  
Fax: (202) 833-9392

[kstrobel@bgrdc.com](mailto:kstrobel@bgrdc.com)  
[www.bgrdc.com](http://www.bgrdc.com)