



May, 1, 2013

Scott Nally
Director, Ohio EPA
50 W. Town Street
Columbus, OH 43215

RE: Ohio Steel Council Comment on Beneficial Use Discussion and Slag

Dear Director Nally:

On behalf of the Ohio Steel Council (OSC) and our 14 member companies located throughout the state, we appreciate the opportunity to comment as you develop Ohio EPA's beneficial use rules.

The OSC represents approximately 100,000 jobs that can be linked to the state's steel industry, whose total economic impact on Ohio's economy is an estimated \$7.2 billion. Steel-related jobs in Ohio generate \$4.8 billion in wages. For every job in Ohio's steel industry, two more jobs are generated.

Slag is an important and valuable "Made in Ohio" product that is produced through the iron and steel making processes. Slag has significant benefits in terms of performance and the conservation of environmental resources, and stands among the more than 8 million tons of recycled products made and marketed by Ohio's steel industry each year.

Slag has been used commercially since at least the mid-19th century. The product looks like crushed limestone and possesses many of the same physical and chemical properties as limestone. Many state regulatory systems that have substantial experience in the production and use of slag have already recognized its value as a product. One such state is Ohio, which is one of the largest steel producing states in the U.S. and excludes slag from the definition of "solid waste" in Ohio Rev. Code §3734.01(E).

Slag is primarily used as an aggregate in construction projects, most commonly as a sub-base for roads. The Federal Highway Administration and state departments of transportation encourage its use in infrastructure projects because slag has been found to provide excellent adhesion in asphaltic concrete, and the shape improves skid resistance in road materials. These same properties also make slag a superior material for use as a replacement for Portland cement in concrete and in the construction of concrete buildings. Additional uses include replacement for agricultural lime, septic tank drain field material, and architectural stone.

Slag is an extremely versatile product. It is also the environmentally responsible choice. Because slag is a renewable mineral resource, its use reduces the consumption of natural resources by the construction industry. Recycling slag avoids disposal. Reducing the amount of Portland cement used in concrete decreases energy use, greenhouse gas emissions and use of virgin materials.

In light of the numerous and widespread uses for slag and its long history as a product, **the OSC strongly recommends that slag not be included in OEPA's beneficial use program.**

Furthermore, slag's recognition as a product will bring needed certainty to our industry, and will allow us to increase our competitiveness and the marketability of a valued "Made in Ohio" product.

Thank you for allowing the OSC to serve as a stakeholder and comment on this important matter.

Sincerely,



Brenda Schulz
Nucor Marion
OSC Board Chair



Robert Lapp
The Timken Company
OSC Government Affairs Committee Chair