

Submitted via www.federalregister.gov

July 25, 2022

Environmental Protection Agency
Office of Resource Conservation and Recovery
1200 Pennsylvania Avenue, NW (5304T)
Washington DC, 20460

Director Hoskinson:

Attached please find the Aluminum Association's comments in response to the Federal Register notice requesting input on EPA's Solid Waste Infrastructure for Recycling (SWIFR) Grant Program.

The Aluminum Association represents the full value chain of aluminum manufacturers and their employees in the United States, ranging from primary production to value-added products to recycling. On behalf of the Association and its member companies, I appreciate the opportunity to provide these comments to the Office of Resource Conservation and Recovery.

Please contact me at cwells@aluminum.org or (804) 385-6351 if you have any questions or need additional information.

Respectfully submitted,



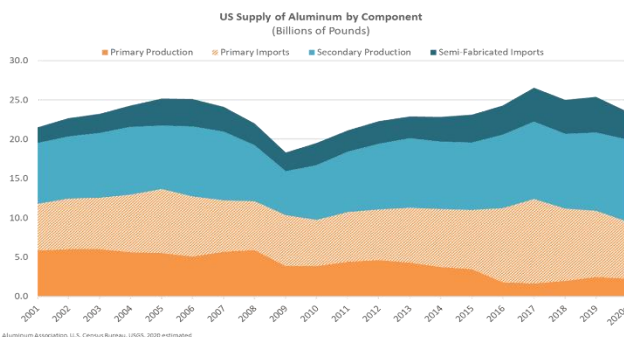
Curt Wells
Senior Director of Regulatory Affairs
The Aluminum Association

Aluminum Association Comments

**87 FR 35200: Request for Information: Solid Waste Infrastructure for Recycling (SWIFR)
Grant Program - Docket ID: EPA-HQ-OLEM-2022-0342
July 25, 2022**

Introduction & Background - The U.S. Aluminum Industry

The Association is the voice of the aluminum industry in the United States, representing aluminum producing companies and their workers that span the entire aluminum value chain from primary production to value-added products to recycling, as well as suppliers to the industry. The Association is charged with developing global standards, business intelligence, sustainability research, and industry expertise for its member companies, policymakers, and the public. Altogether, the Association's member companies produce 70 percent of the aluminum and aluminum products shipped in North America, and the U.S. aluminum industry across the value chain directly employs more than 164,000 union and non-union workers and indirectly supports an additional 470,000 workers. Through its activity, the economic impact of the U.S. aluminum industry adds \$176 billion to the economy annually.¹



Aluminum production in the U.S. is increasingly a story of scrap recovery and recycling. Recycled aluminum uses only 7 percent of the energy involved in the smelting of new aluminum and vastly reduces emissions.² About 75 percent of all aluminum ever produced is still in use today due to its light weight, corrosion resistance, and ability to be circularly recycled.³ The utilization of recycled

aluminum also reduces dependence on imports, making the domestic aluminum supply chain more stable and resilient.

Materials recovery facilities (MRF's) typically process aluminum through foil, aerosol cans, food cans, and beverage cans. While all these products are recyclable, aluminum beverage cans are by far the most widely accepted and processed by materials recovery facilities. The aluminum can continues to be the most valuable beverage package in the recycling bin, with a

¹ The Aluminum Association, *The Economic Impact of the Industry: 2022 Data* (John Dunham & Associates, 2022) <https://aluminum.guerrillaeconomics.net/reports/e6a246b2-625d-49a2-a8c1-138ee4883514> (accessed July 25, 2022).

² Marshall Wang, *The Environmental Footprint of Semi-Fabricated Aluminum Products in North America: A Life Cycle Assessment Report* (The Aluminum Association, 2022) https://www.aluminum.org/sites/default/files/2022-01/2022_Semi-Fab_LCA_Report.pdf (accessed July 25, 2022).

³ Miles Prosser, *Global Aluminium Demand to Reach New Highs After Covid* (International Aluminium Institute, 2022) <https://www.prnewswire.com/news-releases/global-aluminium-demand-to-reach-new-highs-after-covid--iai-301508086.html> (accessed July 25, 2022).

Aluminum Association Comments

87 FR 35200: Request for Information: Solid Waste Infrastructure for Recycling (SWIFR)

Grant Program - Docket ID: EPA-HQ-OLEM-2022-0342

July 25, 2022

value of \$991/ton compared to \$205/ton for PET and a negative value of \$23/ton for glass.⁴ Aluminum beverage cans represent 12.5 percent of typical material recovery facility revenues in states with recycling refund/container deposit programs and 33 percent of typical material recovery facility revenues in states without recycling refund laws.⁵ Without this important revenue stream, most material recovery facilities would either not be able to operate or have to radically alter their business practices and models. However, there continue to be opportunities to improve the existing recycling infrastructure to capture more high value aluminum at MRF's through the Solid Waste Infrastructure for Recycling (SWIFR) grant program as funded by the Infrastructure Investment and Jobs Act (IIJA) of 2021.

Infrastructure Improvement Opportunities to Capture More Aluminum

The aluminum beverage can industry has long been focused on improving the nation's aluminum can recycling rate, which although it leads all other beverage container types, continues to hover in the 50% range. In terms of recycling infrastructure improvements, significant opportunity exists to capture more used aluminum beverage cans and other aluminum products. Upwards of 25% of post-consumer aluminum cans that make it to a MRF do not end up making it to an aluminum remelting facility for integration into new aluminum beverage can sheet⁶. This is a significant loss of resources that has the opportunity to be addressed in several different ways through the SWIFR grant program.

1) Replacement/Upgrades to existing Eddy Current Separators (ECS)

Eddy Current Separators are often used at MRF's to separate non-ferrous metals such as aluminum from the other materials. SWIFR grants should be prioritized for the replacement and/or upgrade of existing ECS units to improve recovery of high-value aluminum.

2) Adding an ECS to a MRF Residue Line

A significant source of aluminum loss at MRF's is due to its unintentional/accidental inclusion in the residue exiting the MRF destined for disposal/landfilling. This can be avoided with the

⁴ Marshall Wang, *The Aluminum Can Advantage: Sustainability Key Performance Indicators* (The Aluminum Association & Can Manufacturers Institute, 2021) https://www.aluminum.org/sites/default/files/2021-11/KPI_Report_2021.pdf (accessed July 25, 2022).

⁵ Scott Breen, *Aluminum Beverage Can: Driver of the U.S. Recycling System* (Can Manufacturer's Institute, 2020) <https://www.cancentral.com/sites/cancentral.com/files/public-documents/GBB%20Report%20Aluminum%20Can%20Drives%20U.S.%20Recycling%20System%20Final%202020-0623.pdf> (accessed July 25, 2022).

⁶ Scott Breen, *Aluminum Beverage Can: Driver of the U.S. Recycling System* (Can Manufacturer's Institute, 2020) <https://www.cancentral.com/sites/cancentral.com/files/public-documents/GBB%20Report%20Aluminum%20Can%20Drives%20U.S.%20Recycling%20System%20Final%202020-0623.pdf> (accessed July 25, 2022).

Aluminum Association Comments

87 FR 35200: Request for Information: Solid Waste Infrastructure for Recycling (SWIFR)

Grant Program - Docket ID: EPA-HQ-OLEM-2022-0342

July 25, 2022

installation of a well-functioning ECS on the residue line to capture the aluminum previously lost, again, another good use of SWIFR grant funding.

3) Adding a Robotic Sorter to the Fiber Line

Flattened aluminum often becomes co-mingled with paper and other fiber material at MRFs due to its similar shape and this aluminum is subsequently lost for recovery. This results in contamination of the fiber material stream as well and can be avoided through the installation of robotic sorters on the fiber lines at MRFs.

4) Adding a Bag Breaker to the Pre-Sort Station

Recyclables arriving at MRFs in closed bags are often directly discarded by operators given the difficulty in handling them manually through the system. The addition of automated bag breaking equipment at the pre-sort station of a MRF can free the contained material for sorting and capture. This is especially relevant and important for aluminum given the economic value it provides to support MRF operations.

Taken together, the last three options presented above have the potential to increase the aluminum can recovery rate out of a MRF from an average of 75% to 93%, a 24% increase⁷.

The net result of this increased can recovery rate is that MRF infrastructure grants for better aluminum recovery can result in real economic benefits. It is estimated that an average MRF processing 50,000 TPY could capture between \$54,000 and \$297,000 in increased gross revenue in a calendar year from implementation of the opportunities reviewed above,⁸.

Additionally, there is existing precedent for grant programs already improving aluminum can capture rates at MRF's and the SWIFR grant program can complement these existing efforts. For example, the Can Manufacturers Institute in coordination with The Recycling Partnership has identified and funded several grants for these efforts over the last two years⁹. Similarly, Ball Corporation has recently funded grants to MRF's designed to improve can capture rates.

⁷ Scott Breen, *Aluminum Beverage Can: Driver of the U.S. Recycling System* (Can Manufacturer's Institute, 2020) <https://www.cancentral.com/sites/cancentral.com/files/public-documents/GBB%20Report%20Aluminum%20Can%20Drives%20U.S.%20Recycling%20System%20Final%202020-0623.pdf> (accessed July 25, 2022).

⁸ Scott Breen, *Aluminum Beverage Can: Driver of the U.S. Recycling System* (Can Manufacturer's Institute, 2020) <https://www.cancentral.com/sites/cancentral.com/files/public-documents/GBB%20Report%20Aluminum%20Can%20Drives%20U.S.%20Recycling%20System%20Final%202020-0623.pdf> (accessed July 25, 2022).

⁹ <https://www.cancentral.com/media/news/aluminum-beverage-can-manufacturers-ardagh-metal-packaging-and-crown-holdings-provide> (accessed July 25, 2022)

Aluminum Association Comments

87 FR 35200: Request for Information: Solid Waste Infrastructure for Recycling (SWIFR)

Grant Program - Docket ID: EPA-HQ-OLEM-2022-0342

July 25, 2022

The Aluminum Association and its members thank you for the opportunity to submit these comments and welcome any additional opportunities to provide feedback on the work of the Office of Resource Conservation and Recovery in advancing the nation's recycling systems through the grant programs available via IJJA funding.