

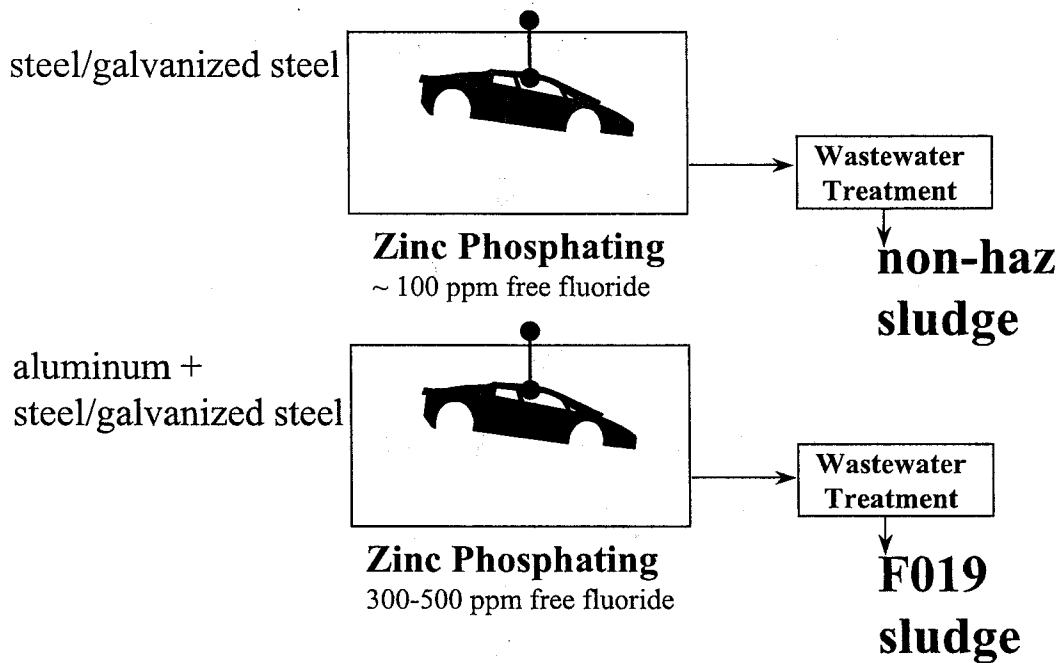
Cars, Aluminum and F019

Presentation to
Office of Management and Budget
by
The Aluminum Association
October 11 ,2006

Agenda

- Problem
 - Benefits of Solution
 - History
 - Solution
 - Summary
-

Problem



- Aluminum has been singled out as the only metal that when conversion coated, generates a listed hazardous waste.
- This is an anomaly of regulatory development and not rooted in environmental protection.
- The increased fluoride used to zinc phosphate aluminum is not of regulatory concern.
- This has created a barrier to using aluminum in cars.
- Aluminum use in cars is key to light weighting.

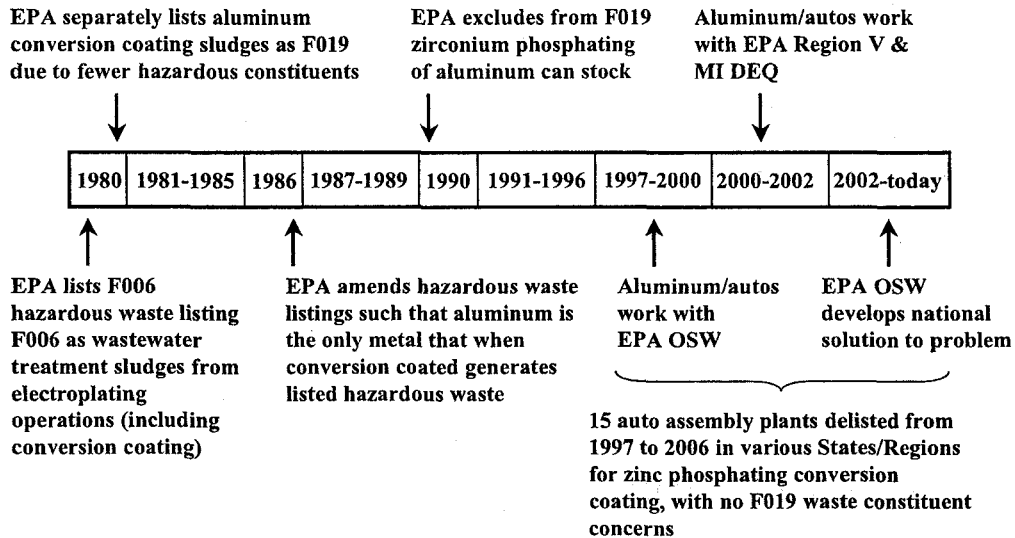
Benefits of Solution

- Every 10% reduction in car weight results in 6-8% decrease in gasoline consumption
- Every pound of aluminum used in a car:
 - Replaces 2 pounds of steel
 - Reduces CO₂ emissions by 20 pounds over 100,000 miles
- Each gallon of gasoline combusted in vehicles produces about 21.5 pounds of CO₂ emissions

- 15 million aluminum intensive vehicles containing 250 pounds of aluminum would:
 - Save 3.5 billion gallons of gasoline
 - Reduce CO₂ emissions by 37.5 million tons

History

F019 Timeline...a long, strange trip



Solution

Amend F019 listing:

“Wastewater treatment sludges from the chemical conversion coating of aluminum except from zirconium phosphating in aluminum can washing when such phosphating is an exclusive conversion coating process **and except from zinc phosphating in automobile and truck assembly plants.**”

Summary

- Aluminum has been singled out as the only metal that when conversion coated generates a listed hazardous waste.
 - This has become a barrier to increasing the amount of aluminum used in auto bodies.
 - Risk assessment and several delistings have shown that F019 generated by car companies is non-hazardous.

 - Potential CO₂ reductions and gasoline savings from car light weighting are staggering.
 - Exclusion by delisting or conditional listing testing criteria merely changes the existing barrier to using aluminum in cars but doesn't solve the problem.
 - Excluding car companies F019 sludges from the F019 listing solves the problem at root cause.
-