

## RCRA 1976

*The U.S. Congress finds with respect to energy,*

*(1) solid waste represents a potential source of solid fuel, oil, or gas that can be converted into energy;*

*(2) the need exists to develop alternative energy sources for public and private consumption in order to reduce our dependence on such sources as petroleum products, natural gas, nuclear and hydroelectric generation; and*

*(3) technology exists to produce usable energy from solid waste.*

**What Progress have we made?**

**Successful Supply Marketing  
Shingles-to-Fuel  
to the  
Portland Cement Industry**

Max Lee, Ph.D., P.E.  
Koogler and Associates, Inc.

Shingle Recycling Conference  
Dallas, October 28, 2011



- Think like a cement plant operator
- Shingles-to-fuel proven success for Portland cement
- The important questions to developing a business contract
- Navigating the new EPA definition to ensure your supply is not “solid waste”



- **11 million tons of asphalt shingle waste generated in US each year**
  - 9.6 million tons from roofing tear-offs
  - 1.6 million tons from manufacturing scrap



- **Mostly disposed of in landfills**
  - Economically and environmentally cost effective to use as fuel



**AVAILABLE  
SHINGLE SUPPLY**

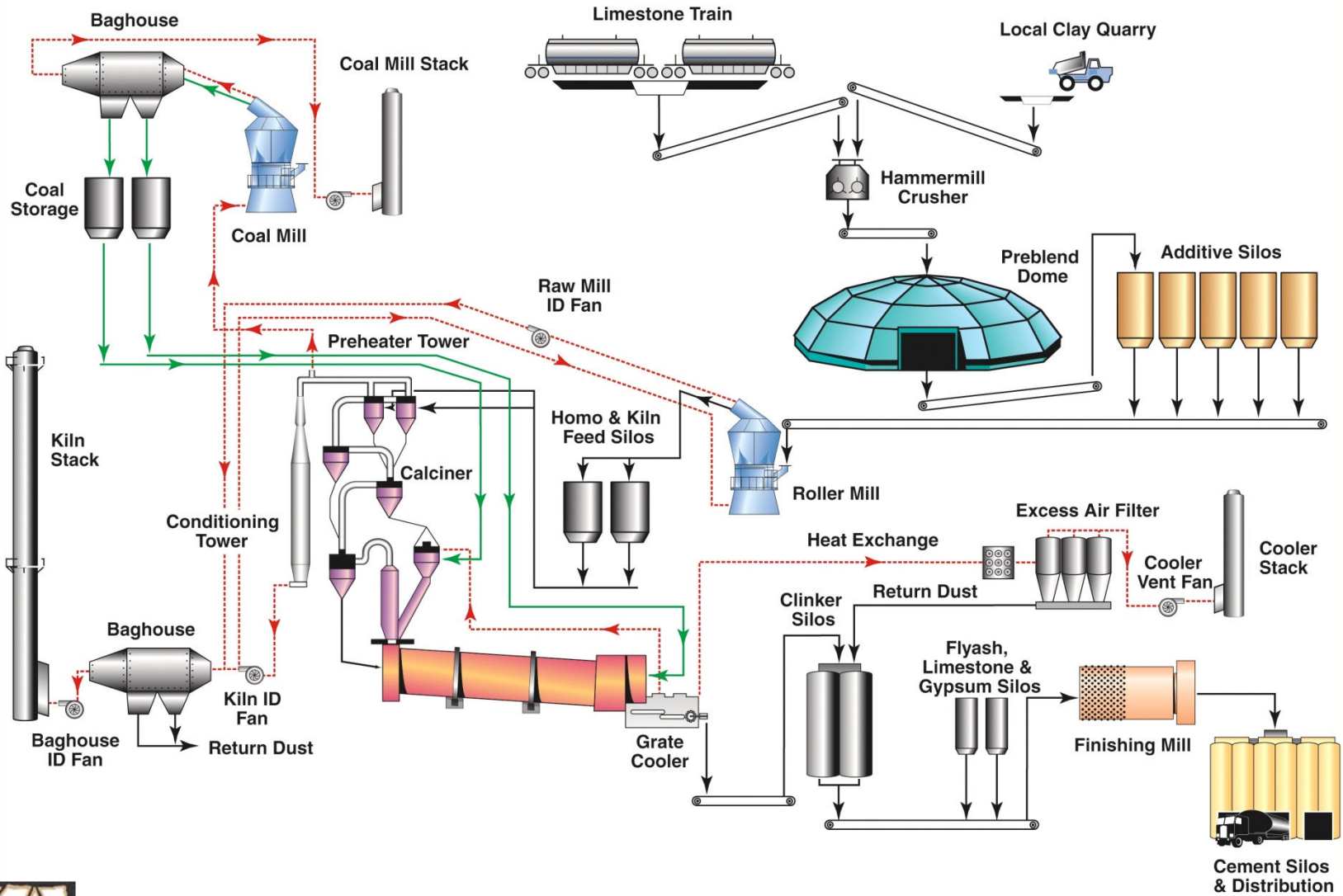


Contact Portland Cement Association for kilns near you



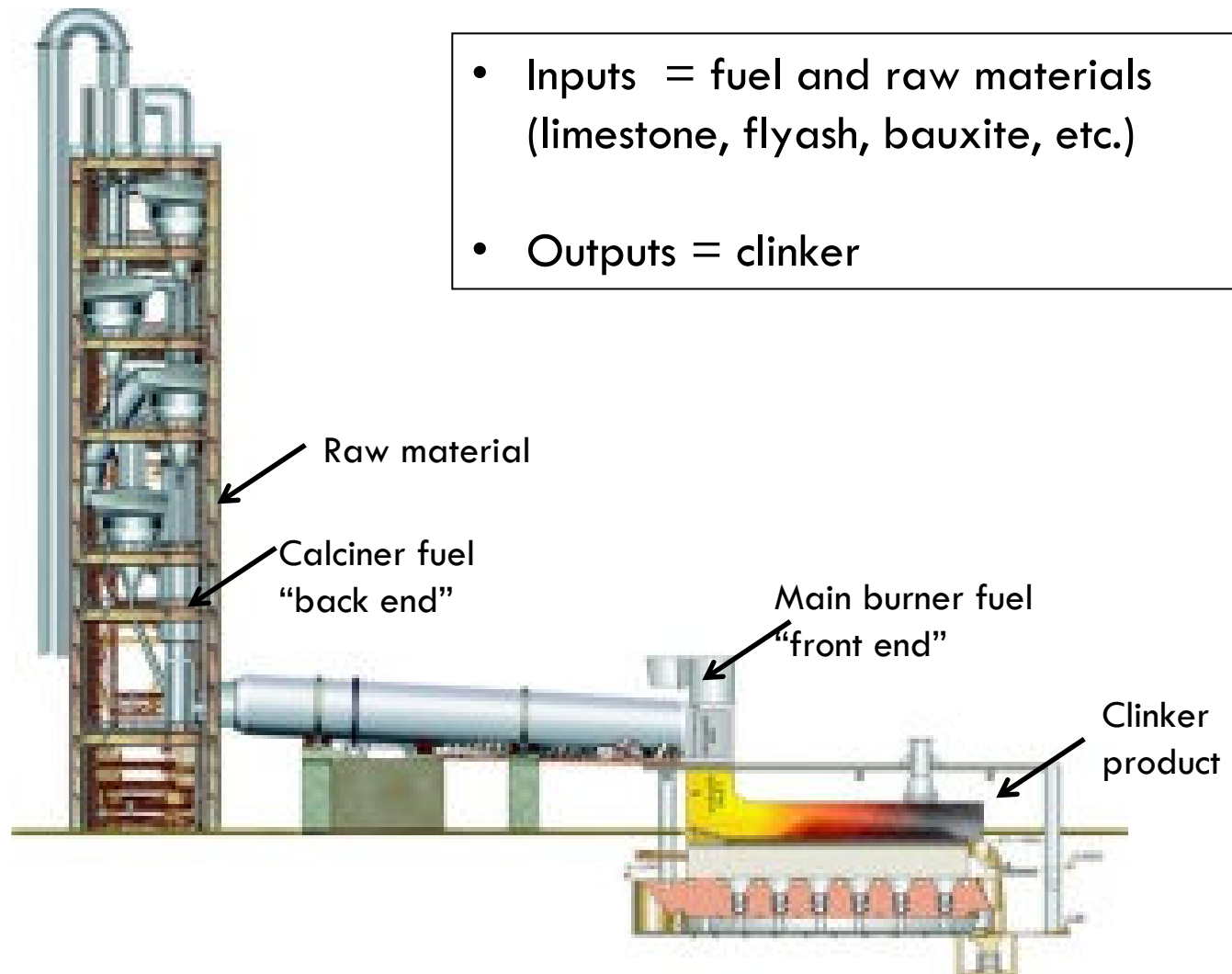
# Think like a Cement Plant Operator





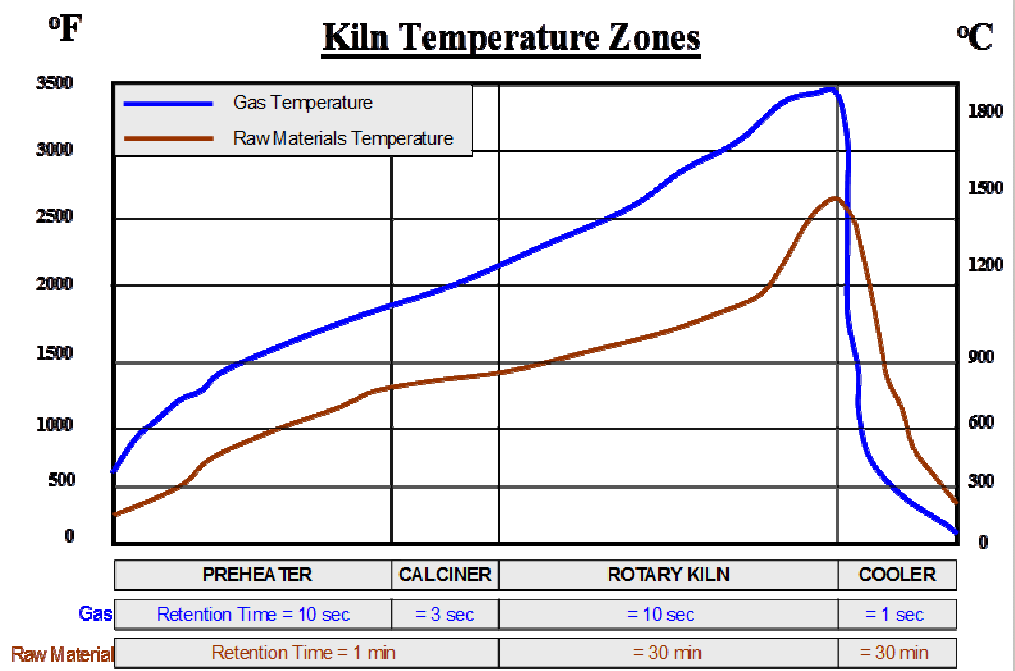
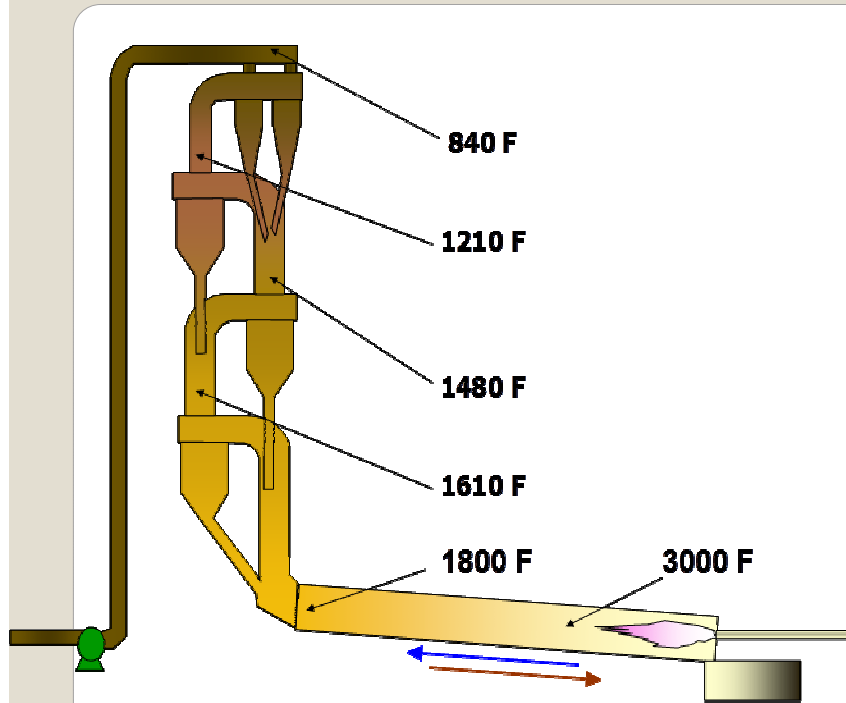
**THE REAL WORLD**

- Inputs = fuel and raw materials (limestone, flyash, bauxite, etc.)
- Outputs = clinker

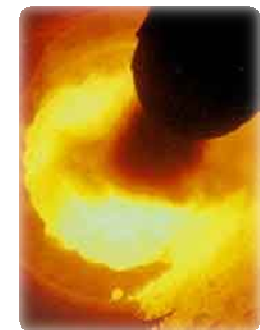


# MODERN KILN





- The general reactions occurring through the temperature regions:
  - $\leq 750^{\circ}\text{F}$ : water evaporation
  - $750$  to  $1350^{\circ}\text{F}$ : mineral dehydration
  - $1100$  to  $1650^{\circ}\text{F}$ : oxidation reactions, carbonate decomposition
  - $1475$  to  $2280^{\circ}\text{F}$ : calcination of aluminates and silicates
  - $2300$  to  $3500^{\circ}\text{F}$ : liquid phase clinker creation



# MODERN KILN

- Annual industry shipments estimated at:

- \$15.0 billion in 2006
- \$8.0 billion in 2010



- Fuel costs can represent 50%+ of operational costs
  - cost of traditional fuels increasing and variable



- Fuel Diversity - Lessons of coal pricing in 2005-2008

- U.S. cement industry lags behind - ranked 13<sup>th</sup> by World Business Council for Sustainable Development among those using alternate fuels

- E.g., many European cement plants at ~80% heat replacement <sup>1</sup>



Source: [www.wbcds.org](http://www.wbcds.org)



# CEMENT ECONOMICS

Fuel Type	Percent Heat Input in US <sup>1</sup>	Usage
Coal	64.0%	10 million tons
Petroleum Coke	21.0%	3 million tons
Natural Gas	3.6%	14 mmft <sup>3</sup>
Tires <sup>3</sup>	3.6%	0.5 million tons
Oils	0.2%	Only for startup

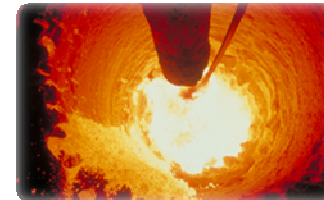


<sup>1</sup>International, I. *Trends in Beneficial Use of Alternative Fuels and Raw Materials*. 2008; Available from: <http://www.epa.gov/sectors/pdf/cement-sector-report.pdf>.

# TYPICAL FUEL

## Four Criteria to Successful Shingle-to-Fuels

- Handling and Storage
- Ensure Kiln Infrastructure Integrity
- Produce a Quality Cement Product
- Maintain or Improve Environmental Emissions and Sustainability



**THE REAL WORLD**



- Shingles must be sized (grinding/chipping).
  - Sieve out the aggregate. Fuel is the bitumen (asphalt). Develop a repeatable sizing analysis procedure to estimate agg in mix.
  - Consistent size critical to combustion
- Roofing Tear-Off Shingles
  - Critical to blend many sources to reduce fuel variability
- On-site vs. off-site grinding/shredding = less handling/transport costs



# PROCESSING SHINGLES FOR FUEL

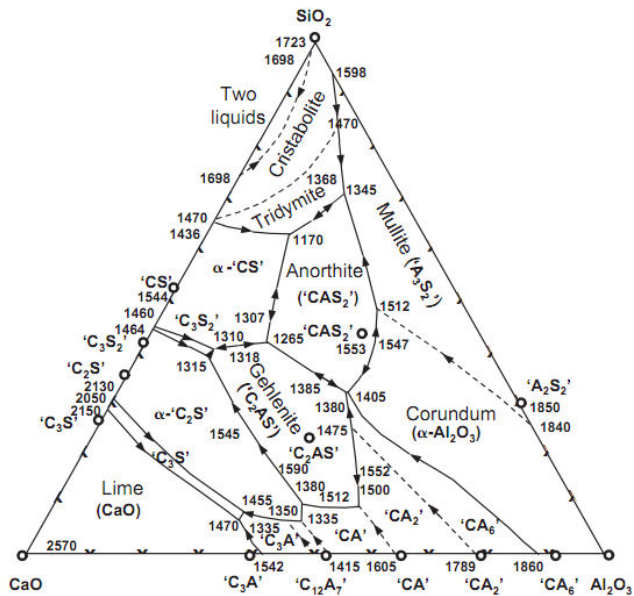
- Combustion must be well-controlled which demands consistent fuel properties
- Primary properties of concern
  - Heat content
  - Phosphorous
  - Alkalis
  - Sulfur
  - Moisture

Shingles – must focus on heat content (blend old and new shingles)

 <p>Refractories</p>	<ul style="list-style-type: none"> <li>• Alkali infiltration</li> <li>• Corrosion</li> <li>• Decreased lifetime</li> </ul>
 <p>Coatings</p>	<ul style="list-style-type: none"> <li>• Condensation of alkali salts</li> <li>• Increased coatings, cloggings</li> </ul>
 <p>Exhausts</p>	<ul style="list-style-type: none"> <li>• Increased gas volumes</li> <li>• Fan capacity</li> </ul>
 <p>Kiln</p>	<ul style="list-style-type: none"> <li>• Possibly less clinker production</li> </ul>

# KILN INFRASTRUCTURE

Ternary Phase Diagram of Cement Manufacture<sup>1</sup>  
(SiO<sub>2</sub> vs. A<sub>2</sub>S<sub>2</sub> vs. CaO)



- Chemistry involved in cement manufacture can be affected by the mineral concentrations in alternative fuel ash
- Metals, e.g., chromium, nickel
- Phosphorous
- Alkalis
- Sulfur
- Can create undesirable effects in cement
  - Reduced strength
  - Increased setting time
  - Color

Processed shingles should not have significant impact on chemistry

<sup>1</sup>Kauffman, G., *Cement: Its Chemistry and Properties*, Department of Chemistry and Institute for Research in Materials, Dalhousie University. Available from: <http://myweb.dal.ca/mawhite/3303/supplementals/cementpaper.pdf>



# CEMENT QUALITY

No debate – shingles-to-fuel are desirable cement kiln fuel

Examples

- St. Mary's Cement: Charlevoix, Michigan
- Lafarge: Brookfield, Nova Scotia

Air emissions – neutral or improvement

Asbestos (what little may be present) will be destroyed in kiln<sup>1</sup>

No ash residue

- EPA and European Union promote use of shingles as fuels for cement kilns
- 6/17/11 -EPA stated in FR notice that pollutant emissions the same or lower when alternative fuels used in cement kiln.

<sup>1</sup> from: <http://www.osti.gov/bridge/servlets/purl/927606-pt5qkC/927606.pdf>



**ENVIRONMENTAL BENEFITS**

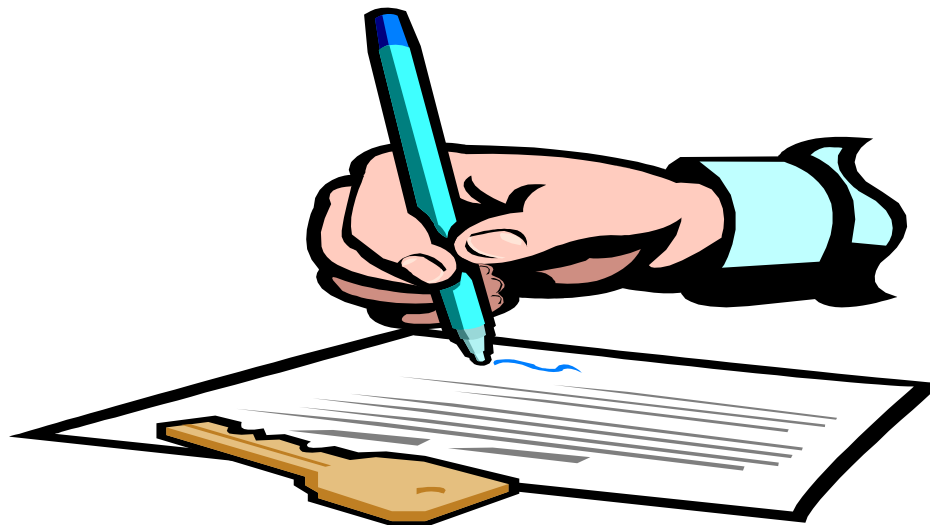


- Traditional fuel concerns; coal, natural gas, nuclear
- Sustainability
  - Local activity = local investment dollars
  - Conservation by diverting waste from disposal
  - Reduce landfilling
  - GHG benefits – air permits
- Studies show there is a limit to fraction of waste that can be recycled
- The U.S. may have a Renewal Portfolio Standard someday...
- State and local initiatives



# SUSTAINABILITY

**The important issues  
to developing a business:  
processing and contracting**



## Pre-negotiation review

- buyer permits (air and solid waste)  
allow for shingles, tear-off and reject
- review waste flow control issues, e.g., Chicago, Miami, NE U.S.

## Negotiating your supply

- Material sampling and analysis
- Specify range parameters: e.g., ranges of heat content, moisture, metals...
- Processing and sizing requirements
- Price limits/floor, timing
- Quantity floor/ceiling
- Who pays for transportation expenses
- Allowed alternative sourcing (negotiate with other suppliers)
- Time terms of payments
- Provisions for Force majeure

## *Promoting the Market*

- Need for shingle industry templated contracts



# CONTRACTING

**Shingles**  
**delivery not included**

**Traditional Fuel (coal)**  
**delivered**

Tipping Fee	\$20
Staging & Testing (var.)	\$5
Chipping	\$13
Sieving	\$8
Blending	\$5
Storage & Loading	\$1.50

Total:	\$52.5/ton	Average Expense:	\$80-160/ton
avg. heat content	11,000 btu/lb	avg. heat content	13,000 btu/lb
Cost/heat content	\$2.40/mmbtu	Cost/heat content	\$3 - 6/mmbtu

- The comparison should be based on heat content not mass!



**COST COMPARISON**

**Ensuring your Shingle-to-Fuel  
is not  
Solid Waste**

## NHSM Rule (40 CFR 241) – Identification of Solid Waste

Are my shingle-to-fuels a “solid waste”?

- Legitimacy Criteria

- Sufficiently Processed – more than just size reduction
- Valuable Commodity – proper handling and storage
- Heating Value – generally  $> 5,000$  btu/lb (as fired)
- **How to Compare Contaminants – The Multi-Billion Dollar Question!**



# NAVIGATING EPA

Kiln owner/operator responsibility but shingle supplier can provide support to promote the contract

- 1) Determine all possible traditional fuels (40 CFR 241.2) units is “designed to burn”
- 2) Determine which contaminants to evaluate- Critical Issue!
- 3) Gather all available sources traditional fuel and shingle contaminant information
- 4) Compare each contaminant either units of ppm or lb/mmbtu.
- 5) Document your comparison!
- 6) Be alert for new EPA guidance, rulemaking, or legislation – keep in touch with your trade associations, consultants

Note that NHSM rule will be re-proposed end of November !



**NAVIGATING EPA**

## Recommendations for Shingle Recycling Organization

### Develop a Shingle-to-Fuel Committee

- Develop standards for materials analysis (sizing, purity, asbestos)
- and procedures
- Develop contracting conditions
- Marketing/Communication
- Promote demonstration grinding systems on-site cement plants



**DEVELOP THE  
MARKET**



*Further reading -*

C&D World magazine - May/June – Part I

C&D World magazine - Sept/Oct – Part II

CementAmericas – Sept/Oct

*Max Lee, Koogler and Associates, Inc.*

*Angela Morrison and Carl Eldred, Hopping Green & Sams*



Koogler and Associates, Inc.

Office: 352-377-5822

Max Lee, PhD. P.E.

[mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)

Contributions from:

Kyle Ulmer

Karl Seltzer

Matt Tribby



**QUESTIONS?**