

U.S. Environmental Protection Agency  
Office of Resource Conservation and Recovery

**Documentation for Greenhouse Gas Emission and  
Energy Factors Used in the Waste Reduction Model  
(WARM)**

***Durable Goods Materials Chapters***

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For the U.S. Environmental Protection Agency  
Office of Resource Conservation and Recovery

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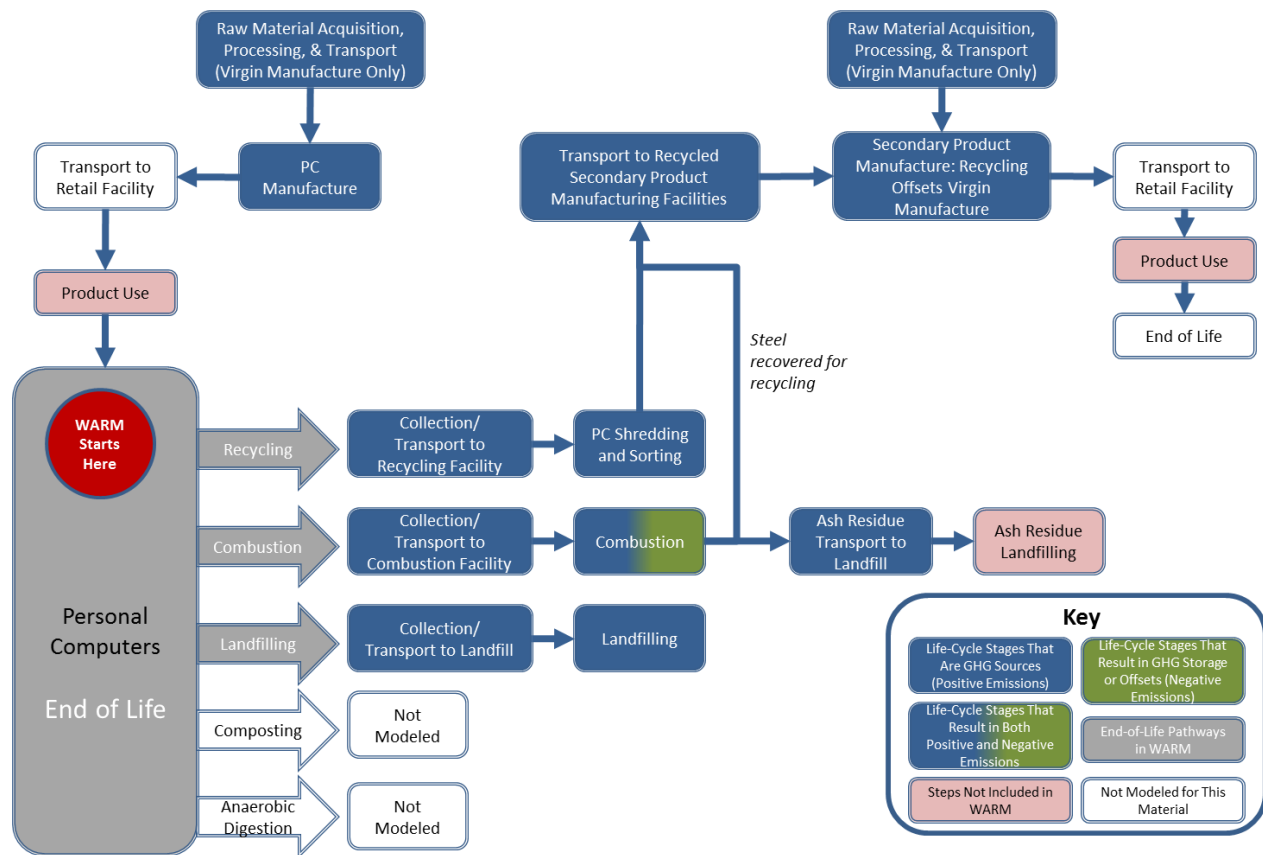
# 1 PERSONAL COMPUTERS

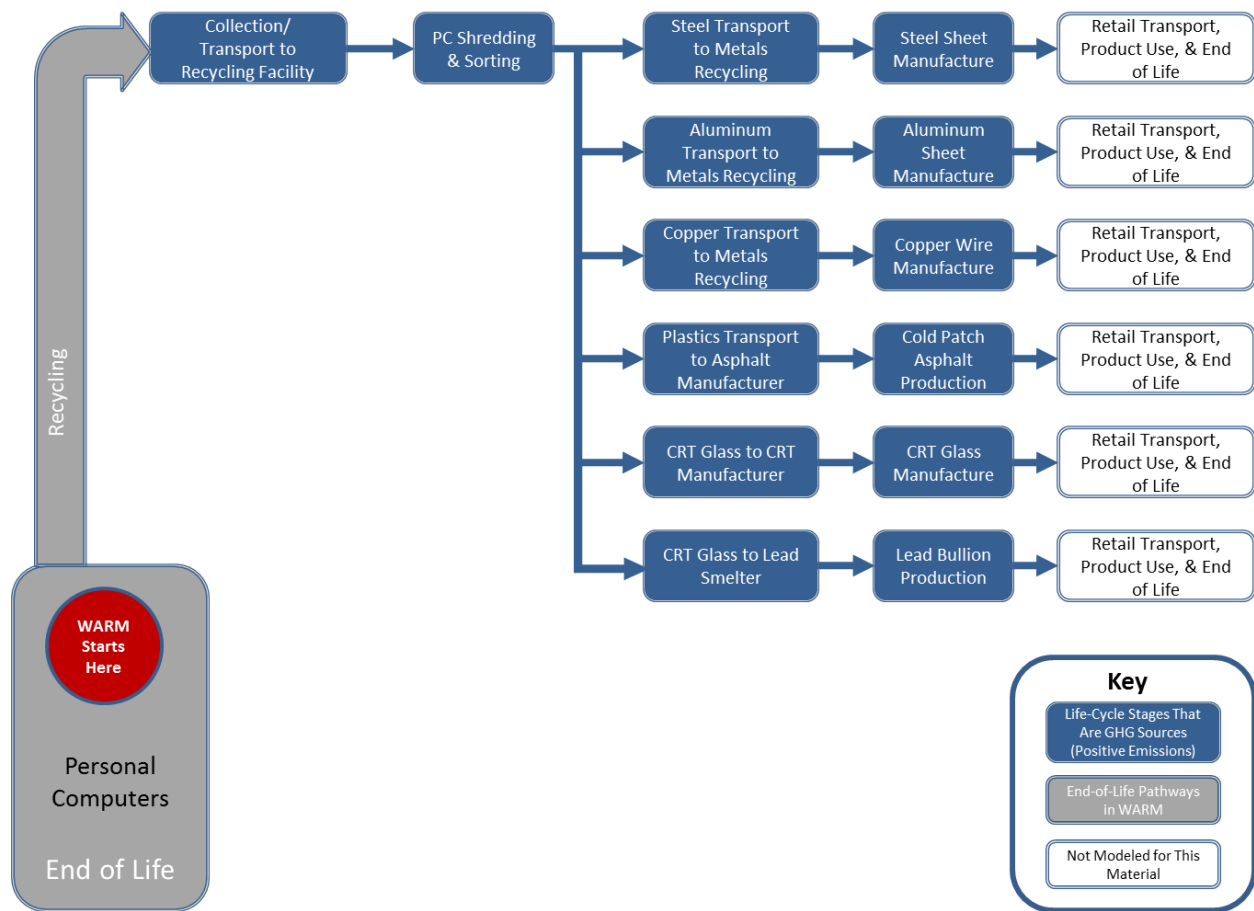
## 1.1 INTRODUCTION TO WARM AND PERSONAL COMPUTERS

This chapter describes the methodology used in EPA's Waste Reduction Model (WARM) to estimate streamlined life-cycle greenhouse gas (GHG) emission factors for personal computers (PCs) beginning at the point of waste generation. The WARM GHG emission factors are used to compare the net emissions associated with PCs in the following four materials management alternatives: source reduction, recycling, landfilling, and combustion. For background information on the general purpose and function of WARM emission factors, see the [Introduction & Overview](#) chapter. For more information on [Source Reduction](#), [Recycling](#), [Landfilling](#), and [Combustion](#), see the chapters devoted to those processes. WARM also allows users to calculate results in terms of energy, rather than GHGs. The energy results are calculated using the same methodology described here but with slight adjustments, as explained in the [Energy Impacts](#) chapter.

The main components of a PC are the central processing units (CPU) and the monitor. The PC modeled in WARM is based on a typical desktop PC with a cathode ray tube (CRT) monitor. The CPU consists of housing (mostly steel) and internal electronic components, while the monitor's primary components are the CRT, plastic case and circuit boards. The wide range of PC models makes it difficult to specify the exact composition of a typical PC, and PC technology continues to evolve rapidly. For WARM analysis, EPA considers the CPU and CRT monitor, while the peripheral equipment (e.g., keyboards, external cables, printers) are left out of the analysis. Flat-panel monitors are now dominant in today's market, having displaced CRT monitors that were common in the 1990's and early 2000's. Although flat-panel monitors are beginning to enter the MSW stream in larger quantities, CRT monitors are still present and will likely remain a sizable component of end-of-life electronics for a number of years.

Upon disposal, PCs can be recovered for recycling, sent to a landfill or combusted. Exhibit 1-1 shows the general outline of materials management pathways in WARM. Recycling PCs is an open-loop process, meaning that components are recycled into secondary materials such as asphalt, steel sheet, lead bullion, CRT glass, copper wire and aluminum sheet. PCs are collected curbside and at special events, or individuals can bring them to designated drop-off sites. Once PCs have been collected for recycling, they are sent to Material Recovery Facilities (MRFs) that specialize in separating and recovering materials from electronic products. Building on Exhibit 1-1, a more detailed flow diagram showing the open-loop recycling pathways of PCs is provided in Exhibit 1-2.

**Exhibit 1-1: Life Cycle of Personal Computers in WARM**

**Exhibit 1-2: Detailed Recycling Flows for Personal Computers in WARM**

## 1.2 LIFE-CYCLE ASSESSMENT AND EMISSION FACTOR RESULTS

The life-cycle boundaries in WARM start at the point of waste generation, or the moment a material is discarded, and only consider upstream emissions when the production of materials is affected by end-of-life materials management decisions. Recycling and source reduction are the two materials management options that impact the upstream production of materials, and consequently are the only management options that include upstream GHG emissions. For more information on evaluating upstream emissions, see the chapters on [Recycling](#) and [Source Reduction](#).

WARM includes source reduction, recycling, landfilling and combustion pathways for materials management of PCs. Anaerobic digestion is not included as a pathway for materials management of PCs. As Exhibit 1-3 illustrates, most of the GHG emissions from end-of-life management of PCs occur from the waste management of these products, while most of the GHG savings occur from offsetting upstream raw materials acquisition and manufacturing of other secondary materials that are recovered from PCs.

**Exhibit 1-3: PC GHG Sources and Sinks from Relevant Materials Management Pathways**

Materials Management Strategies for PCs	GHG Sources and Sinks Relevant to PCs		
	Raw Materials Acquisition and Manufacturing	Changes in Forest or Soil Carbon Storage	Materials Management
Source Reduction	<b>Offsets</b> <ul style="list-style-type: none"> <li>Transport of raw materials and intermediate products</li> <li>Virgin process energy</li> <li>Virgin process non-energy</li> <li>Transport of PCs to point of sale</li> </ul>	NA	NA
Recycling	<b>Emissions</b> <ul style="list-style-type: none"> <li>Transport of recycled materials</li> <li>Recycled process energy</li> <li>Recycled process non-energy</li> </ul> <b>Offsets</b> <ul style="list-style-type: none"> <li>Emissions from producing asphalt, steel sheet, lead bullion, CRT glass, copper wire and aluminum sheet from virgin material</li> </ul>	NA	<b>Emissions</b> <ul style="list-style-type: none"> <li>Collection of PCs and transportation to recycling center</li> <li>Demufacturing PCs</li> </ul>
Composting	Not applicable because PCs cannot be composted		
Landfilling	NA	NA	<b>Emissions</b> <ul style="list-style-type: none"> <li>Transport to landfill</li> <li>Landfilling machinery</li> </ul>
Combustion	NA	NA	<b>Emissions</b> <ul style="list-style-type: none"> <li>Transport to WTE facility</li> <li>Combustion-related CO<sub>2</sub> and N<sub>2</sub>O</li> </ul> <b>Offsets</b> <ul style="list-style-type: none"> <li>Avoided utility emissions</li> <li>Steel recovery</li> </ul>
Anaerobic Digestion	Not applicable because PCs cannot be anaerobically digested		

NA = Not applicable.

WARM analyzes all of the GHG sources and sinks outlined in Exhibit 1-3 and calculates net GHG emissions per short ton of PC inputs as shown in Exhibit 1-4. For more detailed methodology on emission factors, please see the sections below on individual materials management strategies.

**Exhibit 1-4: Net Emissions for PCs under Each Materials Management Option (MTCO<sub>2</sub>E/Short Ton)**

Material	Net Source Reduction (Reuse) Emissions for Current Mix of Inputs	Net Recycling Emissions	Net Composting Emissions	Net Combustion Emissions	Net Landfilling Emissions	Net Anaerobic Digestion Emissions
PCs	-50.49	-2.50	NA	-0.19	0.02	NA

<sup>a</sup>The current mix of inputs for PCs is considered to be 100% virgin material.

### 1.3 RAW MATERIALS ACQUISITION AND MANUFACTURING

Exhibit 1-5 provides the assumed material composition of the typical PC used for this analysis.

**Exhibit 1-5: Material Composition of a Desktop PC (CPU and CRT Monitor)**

Material	Application(s)	% of Total Weight	Weight (lbs.) (Assuming a 70-lb. Computer)
Plastics	Monitor case and other molded parts		
ABS <sup>a</sup>		8.0%	5.6
PPO/HIPS <sup>b</sup>		5.3%	3.7

Material	Application(s)	% of Total Weight	Weight (lbs.) (Assuming a 70-lb. Computer)
TBBPA <sup>c</sup> (flame retardant)		5.7%	4.0
Glass	CRT glass/substrate for PWBs <sup>d</sup>	22.0%	15.4
Lead	CRT glass/electronic connections	8.0%	5.6
Steel	CPU case/CRT shield	28.6%	20.0
Copper	PWB conductor/wiring	6.6%	4.6
Zinc	Galvanization of CPU case	3.0%	2.1
Aluminum	Structural components/ PWB conductor	9.5%	6.7
Other	Metals and plastics for disk drives, fasteners and power supplies	3.3%	2.3
<b>Total</b>		<b>100.0%</b>	<b>70.0 lbs</b>

Source: FAL (2002).

<sup>a</sup> Acrylonitrile butadiene styrene.

<sup>b</sup> Polyphenylene oxide/High-impact polystyrene.

<sup>c</sup> Tetrabromobisphenol A.

<sup>d</sup> Printed wiring boards.

The quantity of components and the complexity of their manufacturing processes require that the analysis focus only on the key materials and processes. In particular, the life-cycle assessment (LCA) of PC production includes the following steps:

*Chip manufacture (including wafer production, fabrication and packaging).* A chip (or integrated circuit) is a compact device made of a semi-conducting material such as silicon. Although chip manufacture requires thousands of steps, the primary steps are wafer production, wafer fabrication and chip packaging.

*Printed wiring board production.* Printed wiring boards (PWBs) are part of the circuitry in electronic products.

*CRT production.* Computer monitors and televisions are the two largest applications for CRTs. A CRT is made of many materials and sub-assemblies, including a glass funnel, glass neck, faceplate (screen), electron gun, shadow mask, phosphors and PWBs.

*Monitor housing production.* The monitor case is made of one or more types of plastic resin including acrylonitrile-butadiene-styrene (ABS), polyphenylene ether alloys (referred to as PPE or PPO), and high impact polystyrene (HIPS). Monitor production also involves incorporation of flame retardants into the monitor housing.

*CPU housing production.* CPU cases are made of plastic panels and face plates and steel for structural stability. Much of the steel used in CPU cases is scrap steel; the rest is manufactured from virgin inputs.

*PC assembly.* PCs are assembled manually; the main energy requirement is the operation of conveyor belts for the assembly line.

#### 1.4 MATERIALS MANAGEMENT METHODOLOGIES

This analysis considers source reduction, recycling, landfilling, and combustion pathways for materials management of PCs. It is important to note that PCs are not recycled into new PCs, however; they are recycled in an open loop. The LCA of their disposal must take into account the variety of second-generation products from recycling PCs. Information on PC recycling and the resulting second-generation products is sparse; however, EPA has modeled pathways for which consistent LCA data are available for recycled PC components. The second-generation products considered in this analysis are: non-lead CRT glass into glass cullet, recovered lead into lead bullion, steel into scrap steel, copper into



scrap copper, aluminum into scrap aluminum, and plastic into ground plastic as an input to asphalt manufacturing.

The data source used to develop these emissions factors is a 2002 report published by Franklin Associates, Limited (FAL) on energy and GHG emission factors for the manufacture and end-of-life management of PCs. These data are based on a number of industry and academic data sources dating from the 1990's and 2000's. The data sources for ABS resin production and silicon wafer production rely on older sources; the ABS resin data are taken from confidential industry data sources in the 1970's and the silicon wafer production data are based on photovoltaic-grade silicon production in the 1980's (FAL, 2002).

Source reduction leads to the largest reduction in GHG emissions for PCs, since manufacturing PCs and their components is especially energy intensive. Recycling PCs leads to greater reductions than combustion and landfilling, since it also reduces similarly energy-intensive product manufacturing. Combustion still has a negative net emission factor that is driven by the GHG savings associated with recovered steel, while landfilling has a slightly positive emission factor due to the emissions from landfill operation equipment.

#### 1.4.1 Source Reduction

Source reduction activities reduce the number of PCs that are produced, thereby reducing GHG emissions from PC production. Increasing the lifetime of a PC (e.g., through upgrades in software) or finding alternatives to purchasing new PCs (e.g., using a donated PC) are examples of source reduction. For more information on this practice, see the [Source Reduction](#) chapter.

Exhibit 1-6 outlines the GHG emission factor for source reducing PCs. GHG benefits of source reduction are calculated as the avoided emissions from raw materials acquisition and manufacturing (RMAM) of new PCs.

**Exhibit 1-6. PC Source Reduction Emission Factor for PCs (MTCO<sub>2</sub>E/Short Ton)**

Material	Raw Material Acquisition and Manufacturing for Current Mix of Inputs	Raw Material Acquisition and Manufacturing for 100% Virgin Inputs	Forest Carbon Storage for Current Mix of Inputs	Forest Carbon Storage for 100% Virgin Inputs	Net Emissions for Current Mix of Inputs	Net Emissions for 100% Virgin Inputs
PCs	-50.49	-50.49	NA	NA	-50.49	-50.49

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

NA = Not applicable.

##### 1.4.1.1 Developing the Emission Factor for Source Reduction of PCs

To calculate the avoided GHG emissions for PCs, EPA looks at three components of GHG emissions from RMAM activities: process energy, transportation energy and non-energy GHG emissions. Exhibit 1-7 shows the results for each component and the total GHG emission factor for source reduction. More information on each component making up the final emission factor is provided below.

**Exhibit 1-7: Raw Material Acquisition and Manufacturing Emission Factor for Virgin Production of PCs (MTCO<sub>2</sub>E/Short Ton)**

(a) Material	(b) Process Energy	(c) Transportation Energy	(d) Process Non-Energy	(e) Net Emissions (e = b + c + d)
PCs	50.02	0.37	0.10	50.49

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

First, EPA obtained an estimate of the amount of energy required to produce one short ton of PCs, which is reported as 945 million Btu (FAL, 2002). Next, we determined the fuel mix that comprises this Btu estimate using data from FAL (2002) and then multiplied the fuel consumption (in Btu) by the fuel-specific carbon contents. The sum of the resulting GHG emissions by fuel type comprise the total process energy GHG emissions, including both CO<sub>2</sub> and CH<sub>4</sub>, from all fuel types used in PC production. The process energy used to produce PCs and the resulting emissions are presented in Exhibit 1-8.

**Exhibit 1-8: Process Energy GHG Emissions Calculations for Virgin Production of PCs**

Material	Process Energy per Short Ton Made from Virgin Inputs (Million Btu)	Process Energy GHG Emissions (MTCO <sub>2</sub> E/Short Ton)
PCs	945.13	50.0

Transportation energy emissions come from fossil fuels used to transport PC raw materials and intermediate products. The methodology for estimating these emissions is the same as that used for process energy emissions. Based upon an estimated total PC transportation energy in Btu, EPA calculates the total emissions using fuel-specific carbon coefficients. Exhibit 1-9 shows the calculations for estimating 0.37 MTCO<sub>2</sub>E per short ton of PCs.

**Exhibit 1-9: Transportation Energy Emissions Calculations for Virgin Production of PCs**

Material	Transportation Energy per Short Ton Made from Virgin Inputs (Million Btu)	Transportation Energy GHG Emissions (MTCO <sub>2</sub> E/Short Ton)
PCs	5.03	0.37

Note: The transportation energy and emissions in this exhibit do not include retail transportation.

Non-energy GHG emissions occur during manufacturing but are not related to combusting fuel for energy. For PCs, non-energy GHGs are emitted in the virgin CRT glass manufacturing process by the production of lime and in the evaporation of solvent vapors from photolithography procedures that are used to apply phosphors onto the screen (FAL, 2002, pp. 8, 10). Production of virgin steel and aluminum generate non-energy process GHG emissions from the use of limestone as a fluxing agent, and from the use of coke as a reducing agent (EPA, 2006, p. 11). Perfluorocarbons (PFCs) are also emitted from the smelting stage of virgin aluminum production. FAL provided data on GHG emissions from non-energy-related processes in units of pounds of native gas (2002). We convert pounds of gas per 1,000 lbs. of PCs to metric tons of gas per short ton of PCs and then multiply that by the ratio of carbon to gas to produce the emission factor in MTCO<sub>2</sub>E per short ton of PCs, as detailed in the example below, which shows the calculation of CH<sub>4</sub> process emissions for PCs.

$$1.01 \text{ lbs CH}_4/1,000 \text{ lbs PC} \times 2,000 \text{ lbs PC}/1 \text{ short ton PC} \times 1 \text{ metric ton CH}_4/2,205 \text{ lbs CH}_4 \times 25 \text{ MTCO}_2\text{E}/\text{metric ton CH}_4 = 0.02 \text{ MTCO}_2\text{E}/\text{short ton PC}$$

Exhibit 1-10 shows the components for estimating process non-energy GHG emissions for PCs.

**Exhibit 1-10: Process Non-Energy Emissions Calculations for Virgin Production of PCs**

Material	CO <sub>2</sub> Emissions (MT/Short Ton)	CH <sub>4</sub> Emissions (MT/Short Ton)	CF <sub>4</sub> Emissions (MT/Short Ton)	C <sub>2</sub> F <sub>6</sub> Emissions (MT/Short Ton)	N <sub>2</sub> O Emissions (MT/Short Ton)	Non-Energy Carbon Emissions (MTCO <sub>2</sub> E/Short Ton)
PCs	0.08	0.00	–	–	–	0.10

– = Zero emissions.

### 1.4.2 Recycling

According to EPA (2011), 40 percent of CPUs and 33 percent of computer displays are recycled annually. EPA and other organizations have recently been increasing their focus on improving the recycling of PCs and other electronics because of several factors: (1) rapid sales growth and change are generating a growing stream of obsolete products, (2) manufacturing PCs and other electronics consumes large amounts of energy and materials, (3) electronics contain toxic substances, and (4) convenient and widespread systems for collecting and recycling PCs are not yet fully established. This section describes the development of the emission factor, which is shown in the final column of Exhibit 1-11. For more information on recycling in general, please see the [Recycling](#) chapter.

**Exhibit 1-11: Recycling Emission Factor for PCs (MTCO<sub>2</sub>E/Short Ton)**

Material	Raw Material Acquisition and Manufacturing (Current Mix of Inputs)	Materials Management Emissions	Recycled Input Credit <sup>a</sup> Process Energy	Recycled Input Credit <sup>a</sup> – Transportation Energy	Recycled Input Credit <sup>a</sup> – Process Non-Energy	Forest Carbon Storage	Net Emissions (Post-Consumer)
PCs	–	–	-1.58	-0.04	-0.88	–	-2.50

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

<sup>a</sup> Includes emissions from the virgin production of secondary materials

WARM models PCs as being recycled in an open loop into the following secondary materials: asphalt, steel sheet, lead bullion, CRT glass, copper wire and aluminum sheet (Exhibit 1-12). Specifically, recovered plastic can be used as a filler component in the production of cold-patch asphalt for road construction. Steel and aluminum sheet become scrap metal that can be used to produce a wide range of materials, from auto parts to cookware. Recovered CRT glass can be used for the production of new CRTs or processed to recover lead bullion that can be used to produce items such as batteries and X-ray shielding. Recycled copper wire can be used in various electrical applications, depending on its grade.

The recycled input credits shown in Exhibit 1-11 include all of the GHG emissions associated with collecting, transporting, processing, and recycling or remanufacturing PCs into secondary materials. None of the upstream GHG emissions from manufacturing the PC in the first place are included; instead, WARM calculates a “recycled input credit” by assuming that the recycled material avoids—or offsets—the GHG emissions associated with producing the same amount of secondary materials from virgin inputs. Consequently, GHG emissions associated with management (i.e., collection, transportation and processing) of end-of-life PCs are included in the recycling credit calculation. Because PCs do not contain any wood products, there are no recycling benefits associated with forest carbon sequestration. The GHG benefits from the recycled input credits are discussed in greater detail below.

**Exhibit 1-12: Fate of Recycled PCs**

Primary Material from Recycled PCs	Secondary Product from Recycled PCs	% Composition of Original PC, by Weight
Plastic from CRT monitor and CPU housing	Asphalt	38%
Steel from CPU frame	Steel Sheet	27%
Lead from CRT monitor glass and electronic connections	Lead Bullion	10%
CRT glass from CRT monitor	CRT Glass	2%
Copper from wiring and PWBs	Copper Wire	5%
Aluminum from structural components and PWBs	Aluminum Sheet	18%

Note that the copper industry identifies two types of copper scrap, with No. 1 being cleaner and purer (therefore more desirable) and No. 2 being less pure. USGS (2004) indicates that consumption of purchased copper-base scrap in the United States comprises approximately 93 percent No. 1 scrap and 7 percent No. 2 scrap. WARM uses these percentages to create a weighted average of the two scrap types to represent copper wire manufacture from recycled inputs, as the two types of scrap display different process and transportation energy characteristics.

#### **1.4.2.1 Developing the Emission Factor for Recycling of PCs**

EPA calculates the GHG benefits of recycling PCs by comparing the difference between the emissions associated with manufacturing a short ton of each of the secondary products from recycled PCs and the emissions from manufacturing the same ton from virgin materials, after accounting for losses that occur in the recycling process. These results are then weighted by the distribution shown in Exhibit 1-12 to obtain a composite emission factor for recycling one short ton of PCs. This recycled input credit is composed of GHG emissions from process energy, transportation energy and process non-energy.

To calculate each component of the recycling emission factor, EPA follows six steps, which are described in detail below.

**Step 1.** *Calculate emissions from virgin production of one short ton of secondary product.* We apply fuel-specific carbon coefficients to the data for virgin RMAM of each secondary product (FAL, 2002). This estimate is then summed with the emissions from transportation and process non-energy emissions to calculate the total emissions from virgin production of each secondary product. The calculations for virgin process, transportation and process non-energy emissions for the secondary products are presented in Exhibit 1-13, Exhibit 1-14 and Exhibit 1-15, respectively.

**Exhibit 1-13: Process Energy GHG Emissions Calculations for Virgin Production of PC Secondary Products**

Material	Process Energy per Short Ton Made from Virgin Inputs (Million Btu)	Process Energy GHG Emissions (MTCO <sub>2</sub> E/Short Ton)
Asphalt	0.50	0.03
Steel Sheet	14.60	0.81
Lead Bullion	19.46	1.03
CRT Glass	9.16	0.52
Copper Wire	122.52	7.02
Aluminum Sheet	213.33	11.31

**Exhibit 1-14: Transportation Energy Emissions Calculations for Virgin Production of PC Secondary Products**

Material	Transportation Energy per Short Ton Made from Virgin Inputs (Million Btu)	Transportation Energy GHG Emissions (MTCO <sub>2</sub> E/Short Ton)
Asphalt	0.20	0.02
Steel Sheet	1.41	0.10
Lead Bullion	0.63	0.05
CRT Glass	0.28	0.02

Material	Transportation Energy per Short Ton Made from Virgin Inputs (Million Btu)	Transportation Energy GHG Emissions (MTCO <sub>2</sub> E/Short Ton)
Copper Wire	0.46	0.03
Aluminum Sheet	7.15	0.52

Note: The transportation energy and emissions in this exhibit do not include retail transportation

#### Exhibit 1-15: Process Non-Energy Emissions Calculations for Virgin Production of PC Secondary Products

Material	CO <sub>2</sub> Emissions (MT/Short Ton)	CH <sub>4</sub> Emissions (MT/Short Ton)	CF <sub>4</sub> Emissions (MT/Short Ton)	C <sub>2</sub> F <sub>6</sub> Emissions (MT/Short Ton)	N <sub>2</sub> O Emissions (MT/Short Ton)	Non-Energy Carbon Emissions (MTCO <sub>2</sub> E/Short Ton)
Asphalt (Cold Patch)	0.00	–	–	–	–	0.00
Steel Sheet	1.43	0.00	–	–	–	1.48
Lead Bullion	0.02	0.00	–	–	–	0.03
CRT Glass	0.16	–	–	–	–	0.16
Copper Wire	0.00	–	–	–	–	0.00
Aluminum Sheet	2.14	–	0.00	0.00	–	3.72

– = Zero emissions.

**Step 2.** Calculate GHG emissions for recycled production of one short ton of the secondary product. EPA then applies the same carbon coefficients to the energy data for the production of the secondary products from recycled PCs, and calculates non-energy process GHGs by converting data found in FAL (2002) to metric tons of gas per short ton of secondary product. Exhibit 1-16, Exhibit 1-17 and Exhibit 1-18 present the results for secondary product process energy emissions, transportation energy emissions and process non-energy emissions, respectively.

#### Exhibit 1-16: Process Energy GHG Emissions Calculations for Recycled Production of PC Secondary Products

Material	Process Energy per Short Ton Made from Recycled Inputs (Million Btu)	Energy Emissions (MTCO <sub>2</sub> E/Short Ton)
Asphalt	5.49	0.29
Steel Sheet	12.53	0.67
Lead Bullion	19.50	1.03
CRT Glass	7.29	0.41
Copper Wire	101.05	5.59
Aluminum Sheet	16.59	0.89
Copper No. 1 Scrap	7.89	0.44
Copper No.2 Scrap	22.40	1.40

#### Exhibit 1-17: Transportation Energy GHG Emissions Calculations for Recycled Production of PC Secondary Products

Material	Transportation Energy per Ton Made from Recycled Inputs (Million Btu)	Transportation Emissions (MTCO <sub>2</sub> E/Short Ton)
Asphalt	0.98	0.07
Steel Sheet	0.67	0.05
Lead Bullion	4.01	0.29
CRT Glass	5.28	0.39
Copper Wire	2.17	0.16
Aluminum Sheet	1.01	0.07
Copper No. 1 Scrap	1.85	0.14
Copper No.2 Scrap	2.42	0.18

Note: The transportation energy and emissions in this exhibit do not include retail transportation

**Exhibit 1-18: Process Non-Energy Emissions Calculations for Recycled Production of PC Secondary Products**

Material	CO <sub>2</sub> Emissions (MT/Short Ton)	CH <sub>4</sub> Emissions (MT/Short Ton)	CF <sub>4</sub> Emissions (MT/Short Ton)	C <sub>2</sub> F <sub>6</sub> Emissions (MT/Short Ton)	N <sub>2</sub> O Emissions (MT/Short Ton)	Non-Energy Carbon Emissions (MTCO <sub>2</sub> E/Short Ton)
Asphalt	0.00	–	–	–	–	0.00
Steel Sheet	0.02	–	–	–	–	0.02
Lead Bullion	0.15	–	–	–	–	0.15
CRT Glass	–	–	–	–	–	–
Copper Wire	0.00	–	–	–	–	0.00
Aluminum Sheet	–	–	–	–	–	–

– = Zero emissions.

**Step 3.** Calculate the difference in emissions between virgin and recycled production. We then subtract the recycled product emissions (Step 2) from the virgin product emissions (Step 1) to get the GHG savings. These results are shown in Exhibit 1-19.

**Exhibit 1-19: Differences in Emissions between Recycled and Virgin PC Secondary Products Manufacture (MTCO<sub>2</sub>E/Short Ton)**

Material	Product Manufacture Using 100% Virgin Inputs (MTCO <sub>2</sub> E/Short Ton)			Product Manufacture Using 100% Recycled Inputs (MTCO <sub>2</sub> E/Short Ton)			Difference Between Recycled and Virgin Manufacture (MTCO <sub>2</sub> E/Short Ton)		
	Process Energy	Transportation Energy	Process Non-Energy	Process Energy	Transportation Energy	Process Non-Energy	Process Energy	Transportation Energy	Process Non-Energy
Asphalt	0.03	0.02	0.00	0.29	0.07	0.00	0.26	0.05	0.00
Steel Sheet	0.81	0.10	1.48	0.67	0.05	0.02	-0.14	-0.05	-1.46
Lead Bullion	1.03	0.05	0.03	1.03	0.29	0.15	0.00	0.24	-0.12
CRT Glass	0.52	0.02	0.16	0.41	0.39	–	-0.11	0.37	-0.16
Copper Wire	7.02	0.03	0.00	5.59	0.16	0.00	-1.43	0.13	–
Aluminum Sheet	11.31	0.52	3.72	0.89	0.07	–	-10.42	-0.45	-3.72

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

Totals may not sum due to independent rounding.

**Step 4.** Adjust the emissions differences to account for recycling losses. In the case of PCs, data indicated an 18 percent recovery-stage loss rate for PCs (i.e., 82 percent of recovered PCs for recycling were actually sent to a recycler; the remainder were landfilled). For the manufacturing stage, data indicated a 35-percent loss rate for asphalt; a 0.5-percent loss rate for lead bullion; and a 1-percent loss rate for copper wire. Zero manufacturing-stage losses were reported for the other secondary products. Because losses occur in both the recovery and manufacturing stages, the net retention rate was calculated as the product of the recovery and manufacturing retention rates, as shown below, using asphalt as an example:

$$\begin{aligned} \text{Net Retention Rate for Asphalt} &= \text{Recovery Stage Retention Rate} \times \text{Manufacturing Stage Retention Rate} \\ &= 82.2\% \times 65.2\% = 53.6\% \end{aligned}$$

Exhibit 1-20 shows how the retention rates are calculated. The differences in emissions from process energy, transportation energy and non-energy processing are then adjusted to account for the loss rates by multiplying the final three columns of Exhibit 1-19 by the retention rates in column (d) of Exhibit 1-20.

**Exhibit 1-20: Calculation of Adjusted GHG Savings for PCs Recycled into Secondary Products**

(a)  Material	(b)  Recovered Materials Retained per Short Ton PCs Collected (%)	(c)  Short Tons Product Produced per Short Ton Recycled Inputs (%)	(d)  Short Tons Product Made per Short Ton PCs Collected (%) (= b × c)
Asphalt	82.2%	65.2%	53.6%
Steel Sheet	82.2%	100.0%	82.2%
Lead Bullion	82.2%	99.5%	81.8%
CRT Glass	82.2%	100.0%	82.2%
Copper Wire	82.2%	99.0%	81.4%
Aluminum Sheet	82.2%	100.0%	82.2%

**Step 5.** *Weight the results by the percentage of recycled PCs that the secondary product makes up.* Using the percentages provided in Exhibit 1-12, EPA weights the individual GHG differences from Step 4 for each of the secondary products. In the case of asphalt, the MTCO<sub>2</sub>E/Short Ton estimates from Step 3, as modified by the loss rates in Step 4, were weighted by the percentage of recycled PCs converted to asphalt (38 percent), as shown below:

Process Energy:	0.14 MTCO <sub>2</sub> E/short ton <sub>unweighted</sub>	x	38 %	=	0.05 MTCO <sub>2</sub> E/short ton
Transportation Energy:	0.03 MTCO <sub>2</sub> E/short ton <sub>unweighted</sub>	x	38 %	=	0.01 MTCO <sub>2</sub> E/short ton
Process Non-energy:	0.00 MTCO <sub>2</sub> E/short ton <sub>unweighted</sub>	x	38 %	=	0.00 MTCO <sub>2</sub> E/short ton

Each product's process energy, transportation energy and process non-energy emissions are weighted by the percentages in Exhibit 1-12 and then they are summed as shown in the final column of Exhibit 1-21.

**Exhibit 1-21: Personal Computer Recycling Emission Factors (MTCO<sub>2</sub>E/Short Ton)**

Material	Recycled Input Credit for Recycling One Short Ton of PCs			
	Weighted Process Energy (MTCO <sub>2</sub> E/Short Ton of Each Material)	Weighted Transport Energy (MTCO <sub>2</sub> E/Short Ton of Each Material)	Weighted Process Non- Energy (MTCO <sub>2</sub> E/Short Ton of Each Material)	Total (MTCO <sub>2</sub> E/Short Ton of PCs Recycled)
Asphalt	0.05	0.01	0.00	0.07
Steel Sheet	-0.03	-0.01	-0.32	-0.36
Lead Bullion	0.00	0.02	-0.00	0.02
CRT Glass	-0.00	0.01	-0.00	0.00
Copper Wire	-0.06	0.01	0.00	-0.05
Aluminum Sheet	-1.57	-0.07	-0.56	-2.20
<b>PC total</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>-2.53</b>

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

NA = Not applicable.

Totals may not sum due to independent rounding.

**Step 6.** *Factor in process emissions from demanufacturing PCs.* EPA assumes that PCs are shredded to extract the materials that are recycled into secondary products. The act of shredding computers consumes electricity, and the GHG emissions associated with this electricity use are allocated to the total emission factor for recycling one short ton of PCs. The final PC recycling emission factor is the sum of the weighted secondary products' emission factors from Exhibit 1-21 and the process emissions from demanufacturing PCs as shown in Exhibit 1-22.

**Exhibit 1-22: Calculation of Recycling Emission Factor for PCs**

<b>Material/Stage</b>	<b>Total (GHG Emissions in MTCO<sub>2</sub>E/Short Ton)</b>
Asphalt	0.07
Steel Sheet	-0.36
Lead Bullion	0.02
CRT Glass	0.00
Copper Wire	-0.05
Aluminum Sheet	-2.20
Demanufacturing Emissions	0.02
<b>PCs (Sum)</b>	<b>-2.50</b>

Totals may not sum due to independent rounding.

#### **1.4.2.2 Limitations**

Given the complex open-loop recycling process, the international flows of end-of-life electronics, and a lack of consistent and up-to-date information on PC recycling, the recycling factor for PCs is subject to important limitations. A primary data gap is the availability of representative life-cycle inventory (LCI) data for PCs and the materials recovered from them in the open-loop recycling process. For this analysis, we utilize an LCI from 2001 for PCs (FAL, 2002) and assume that these data are representative of the current processes used to collect and recover materials from PCs in the United States. This source was selected because it offered consistent and sufficient LCI data to produce an emission factor; however, but improved LCI data in at least three areas could have important effects on our results:

First, the recycling pathway for plastics recovered from PCs is largely unknown and poorly quantified. In this analysis, we assume that plastics are recycled as filler material in asphalt. This is very likely not representative of the dominant recycling pathway for plastics (Masanet, 2009). In reality, plastics are more likely sent overseas to Asia and recycled into low-grade plastic products (Masanet, 2009; McCarron, 2009; Moore, 2009). This might result in greater energy and GHG emissions savings from plastics recycling, but LCI data were not available for calculating a recycling credit for this pathway.

Second, the recycling pathways for CRT glass recovered from CRT monitors dismantled in the United States are not well quantified. It is uncertain what fraction of CRT glass is currently sent to smelters in North America versus recycled into new CRT glass in Asia, although it is likely that glass-to-glass recycling will diminish as the market for CRT monitors declines due to customers switching to flat-panel models (Gregory et al., 2009). Our analysis also assumes that CRT monitors are dismantled and sorted in the United States. A fraction of recovered CRT monitors, however, are likely exported to developing countries. This practice may increase transportation energy and GHG emissions, and result in different dismantling and recovery processes that could influence the energy and GHG emission implications of recycling PCs. The data were insufficient to quantify the flow of CRT monitors from the United States to other countries for recycling.

Finally, only a few integrated shredders are currently operated in the United States (Masanet, 2009). As a result, the emission factor for demanufacturing PCs may be inaccurate and dismantling PCs by hand may be a more common practice. Dismantling PCs by hand is likely to be less energy- and GHG-intensive than shredding them (Liu et al., 2009).

In addition, the life-cycle data for PCs assumes that the monitor is a CRT monitor. However, in the last several years, the sales and use of CRT monitors have been almost entirely supplanted by flat-panel monitors in the United States. This is a significant limitation of the analysis, as CRT and flat-panel monitors differ considerably in composition and weight.



### 1.4.3 Composting

Because PCs are not subject to aerobic bacterial degradation, they cannot be composted. Therefore, WARM does not consider GHG emissions or storage associated with composting.

### 1.4.4 Combustion

GHG emissions from combusting PCs result from the combustion process as well as from indirect emissions from transporting PCs to the combustor. Combustion also produces energy that can be recovered to offset electricity and GHG emissions that would have otherwise been produced from non-baseload power plants feeding into the national electricity grid. Finally, most waste-to-energy (WTE) plants recycle steel that is left after combustion, which offsets the production of steel from other virgin and recycled inputs. All of these components make up the combustion factor calculated for PCs.

It is likely that very few whole PCs are combusted, since components of PCs can interfere with the combustion process and the combustion of CRT monitors in particular can deposit lead that exceeds permitted levels in the combustion ash. Consequently, some level of disassembly and sorting is likely required to separate combustible plastics from other electronic components (EPA, 2008; FAL, 2002), although this is not included in WARM's combustion modeling approach. WARM accounts for the GHG emission implications of combusting PCs, but material managers should ensure that PCs are appropriately processed and sorted before sending the components to combustors.

For further information, see the [Combustion](#) chapter. Because WARM's analysis begins with materials at end of life, emissions from RMAM are zero. Exhibit 1-23 shows the components of the emission factor for combustion of PCs. Further discussion on the development of each piece of the emission factor is provided below.

**Exhibit 1-23: Components of the Combustion Net Emission Factor for PCs (MTCO<sub>2</sub>E/Short Ton)**

Material	Raw Material Acquisition and Manufacturing (Current Mix of Inputs)	Transportation to Combustion	CO <sub>2</sub> from Combustion	N <sub>2</sub> O from Combustion	Avoided Utility Emissions	Steel Recovery	Net Emissions (Post-Consumer)
PCs	–	0.01	0.38	–	-0.12	-0.46	-0.19

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

#### 1.4.4.1 Developing the Emission Factor for Combustion of PCs

EPA estimates that PCs have a carbon content of 12 percent and that 98 percent of that carbon is converted to CO<sub>2</sub> during combustion. This carbon is contained within the plastics in PCs. The resulting direct CO<sub>2</sub> emissions from combustion of carbon in PCs are presented in Exhibit 1-24.

**Exhibit 1-24: PC Combustion CO<sub>2</sub> Emission Factor Calculation (MTCO<sub>2</sub>E/Short Ton)**

Components	% of Total Weight	Carbon Content	Total MTCO <sub>2</sub> E/Short Ton of PCs	Carbon Converted to CO <sub>2</sub> during Combustion	Combustion CO <sub>2</sub> Emissions (MTCO <sub>2</sub> E/Short Ton of PCs)
ABS	8%	84%	7%	98%	0.23
PPO/HIPS	6%	85%	5%	98%	0.15
PCs (Sum)	NA	NA	12%	98%	0.38

NA = Not applicable.

Totals may not sum due to independent rounding.

EPA estimates CO<sub>2</sub> emissions from transporting PCs to the WTE plant and transporting ash from the WTE plant to the landfill using data provided by FAL.

Most utility power plants use fossil fuels to produce electricity, and the electricity produced at a WTE plant reduces the demand for fossil-derived electricity. As a result, the combustion emission factor for PCs includes avoided GHG emissions from utilities. We calculate the avoided utility CO<sub>2</sub> emissions based on the energy content of the plastics within PCs; the combustion efficiency of the WTE plant, including transmission and distribution losses; and the national average carbon-intensity of electricity produced by non-baseload power plants. Exhibit 1-25 shows utility offsets from PC combustion.

**Exhibit 1-25: Utility GHG Emissions Offset from Combustion of PCs**

(a)  Material	(b) Energy Content (Million Btu per Short Ton)	(c) Combustion System Efficiency (%)	(d) Emission Factor for Utility- Generated Electricity (MTCO <sub>2</sub> E/ Million Btu of Electricity Delivered)	(e) Avoided Utility GHG per Short Ton Combusted (MTCO <sub>2</sub> E/Short Ton) (e = b × c × d)
PCs	3.07	17.8%	0.22	0.12

The combustion of PCs at WTE facilities also includes steel recovery and recycling processes. Approximately 90 percent of combustion facilities have ferrous recovery systems. FAL reports that one short ton of PCs contains 286 pounds of steel. Since some of this steel is lost during combustion, we included a ferrous recovery factor of 98 percent. The emission impacts of recycling of this recovered steel are shown in Exhibit 1-26.

**Exhibit 1-26: Steel Production GHG Emissions Offset from Steel Recovered from Combustion of PCs**

Material	Short Tons of Steel Recovered per Short Ton of Waste Combusted	Avoided CO <sub>2</sub> Emissions per Ton of Steel Recovered (MTCO <sub>2</sub> E/Short Ton)	Avoided CO <sub>2</sub> Emissions per Ton of Waste Combusted (MTCO <sub>2</sub> E/Short Ton)
PCs	0.25	1.81	0.46

## 1.4.5 Landfilling

### 1.4.5.1 Overview and Developing the Emission Factor for Landfilling of PCs

Roughly 60 percent of PCs entering the municipal solid waste stream are disposed of, and the vast majority of these end up in landfills. In WARM, landfill emissions comprise landfill CH<sub>4</sub> and CO<sub>2</sub> from transportation and landfill equipment. WARM also accounts for landfill carbon storage, and avoided utility emissions from landfill gas-to-energy recovery. However, since PCs are inorganic and do not contain biogenic carbon, there are zero emissions from landfill CH<sub>4</sub>, zero landfill carbon storage, and zero avoided utility emissions associated with landfilling PCs, as shown in Exhibit 1-27. Greenhouse gas emissions associated with RMAM are not included in WARM's landfilling emission factors. As a result, the emission factor for landfilling PCs represents only the emissions associated with collecting the waste and operating the landfill equipment. EPA estimates these emissions to be 0.04 MTCO<sub>2</sub>E/short ton of PCs landfilled. For more information, refer to the [Landfilling](#) chapter.

**Exhibit 1-27: Landfilling Emission Factor for PCs (MTCO<sub>2</sub>E/Short Ton)**

Material	Raw Material Acquisition and Manufacturing (Current Mix of Inputs)	Transportation to Landfill	Landfill CH <sub>4</sub>	Avoided CO <sub>2</sub> Emissions from Energy Recovery	Landfill Carbon Storage	Net Emissions (Post- Consumer)
PCs	—	0.02	—	—	—	0.02

NA = Not applicable.

— = Zero emissions.

#### 1.4.6 Anaerobic Digestion

Because of the nature of personal computer components, personal computers cannot be anaerobically digested, and thus, WARM does not include an emission factor for the anaerobic digestion of personal computers.

### 1.5 LIMITATIONS

As outlined in the recycling section (1.4.2), the open-loop recycling process has several limitations, including limited availability of representative LCI data for PCs and the materials recovered from them.

- The recycling pathway for plastics recovered from PCs is largely unknown and poorly quantified. While we assume that plastics are recycled as filler material in asphalt, in reality they are more likely sent overseas to Asia and recycled into low-grade plastic products.
- The recycling pathways for CRT glass recovered from CRT monitors dismantled in the United States are not well quantified, and it is likely that glass-to-glass recycling will diminish as the market for CRT monitors declines due to customers switching to flat-panel models (Gregory et al., 2009).
- Emission factors are based on PCs comprising a CPU and a CRT monitor, but CRT monitors are no longer common in PCs sold in the United States, having been replaced by flat-panel monitors.
- While we assume that CRT monitors are dismantled and sorted in the United States, a fraction of recovered CRT monitors are likely exported to developing countries.
- Only a few integrated shredders are currently operated in the United States, and as a result, the emission factor for demanufacturing PCs may be inaccurate and dismantling PCs by hand may be a more common practice, reducing the associated energy and GHG intensities.

### 1.6 REFERENCES

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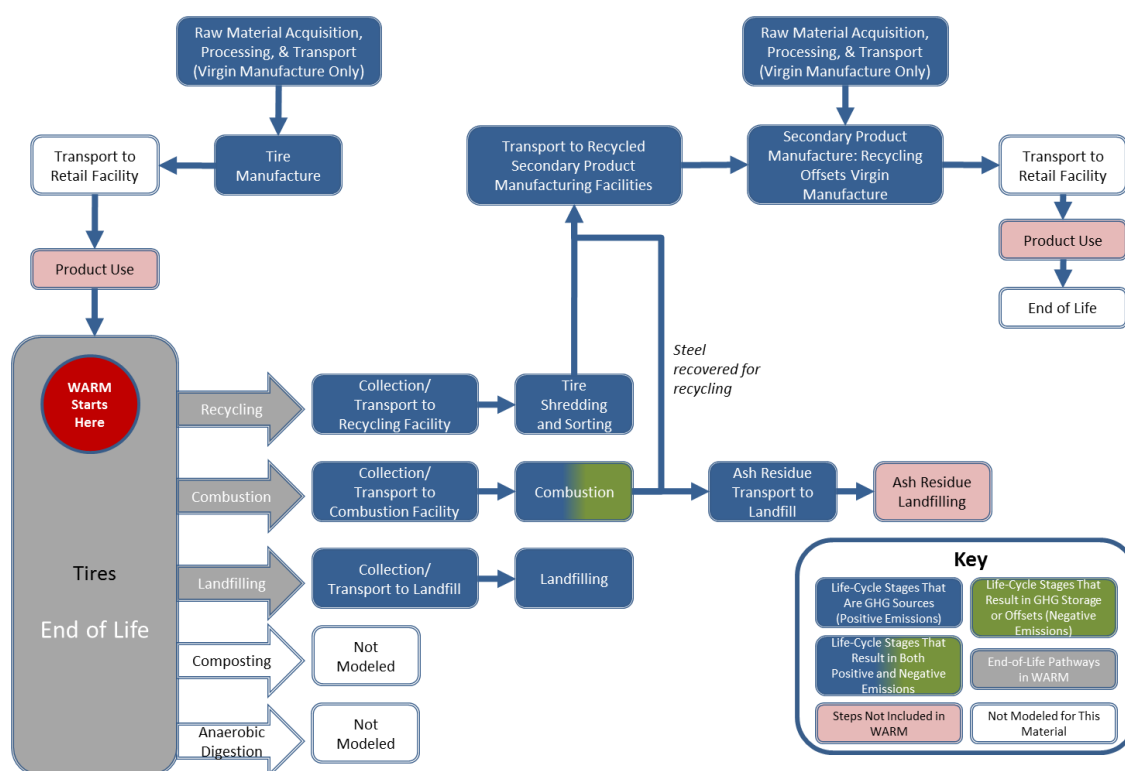
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## 2 TIRES

### 2.1 INTRODUCTION TO WARM AND TIRES

This chapter describes the methodology used in EPA's Waste Reduction Model (WARM) to estimate streamlined life-cycle greenhouse gas (GHG) emission factors for passenger vehicle tires beginning at the waste generation reference point.<sup>1</sup> The WARM GHG emission factors are used to compare the net emissions associated with scrap passenger tires in the following four materials management alternatives: source reduction, recycling, landfilling and combustion (with energy recovery). Exhibit 2-1 shows the general outline of materials management pathways for glass in WARM. For background information on the general purpose and function of WARM emission factors, see the [Introduction & Overview](#) chapter. For more information on [Source Reduction](#), [Recycling](#), [Landfilling](#), and [Combustion](#), see the chapters devoted to those processes. WARM also allows users to calculate results in terms of energy, rather than GHGs. The energy results are calculated using the same methodology described here but with slight adjustments, as explained in the [Energy Impacts](#) chapter.

**Exhibit 2-1: Life Cycle of Tires in WARM**

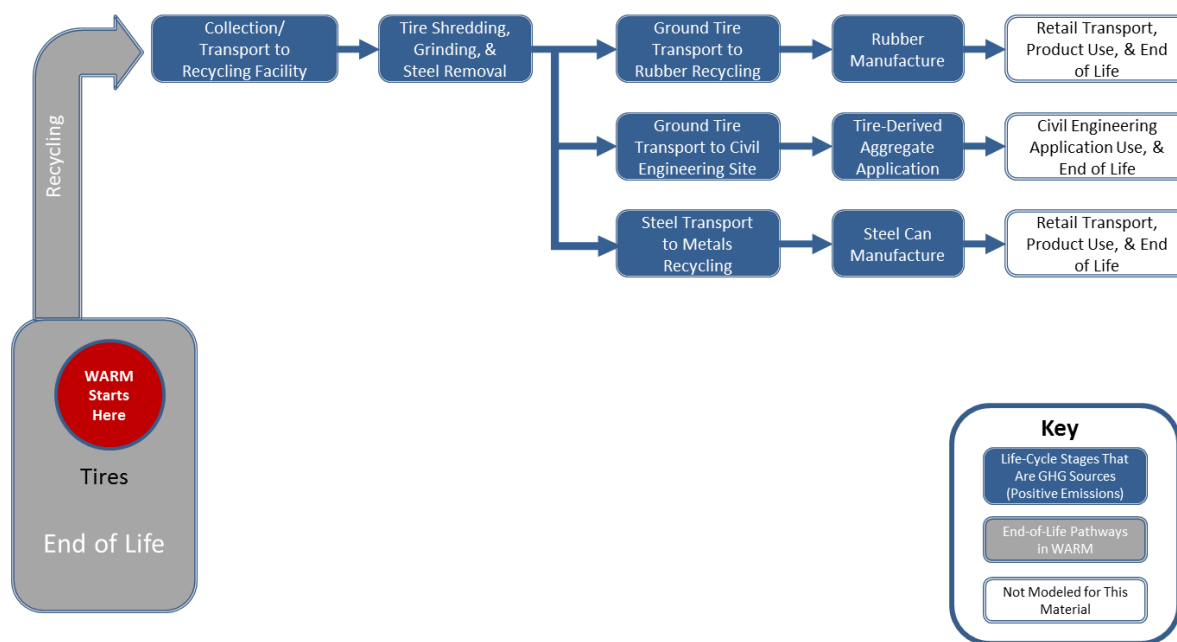


Scrap tires have several end uses in the U.S. market, including as a fuel, in civil engineering, and in various ground rubber applications such as running tracks and molded products. These three end uses of scrap tires are modeled by WARM because they represented more than 90 percent of the scrap tire market in the United States in 2007 (RMA, 2009b). Scrap tires' use as ground rubber and in civil

<sup>1</sup> EPA would like to thank Michael Blumenthal of the Rubber Manufacturers' Association and Albert Johnson of CalRecycle for their efforts in improving these estimates.

engineering practices is an open-loop recycling process, meaning that the tires are not recycled back into tires. Building on Exhibit 2-1, a more detailed flow diagram showing the open-loop recycling pathways of tires is provided in Exhibit 2-2.

**Exhibit 2-2: Detailed Recycling Flows for Tires in WARM**



## 2.2 LIFE-CYCLE ASSESSMENT AND EMISSION FACTOR RESULTS

The streamlined life-cycle GHG analysis in WARM focuses on the waste generation point, or the moment a material is discarded, as the reference point and only considers upstream GHG emissions when the production of new materials is affected by materials management decisions.<sup>2</sup> Recycling and source reduction are the two materials management options that impact the upstream production of materials, and consequently are the only management options that include upstream GHG emissions. For more information on evaluating upstream emissions, see the chapters on [Recycling](#) and [Source Reduction](#).

WARM does not consider composting or anaerobic digestion for the tires category. As Exhibit 2-3 illustrates, most of the GHG sources relevant to tires in this analysis are contained in the end-of-life management section of the life-cycle assessment, with the exception of recycling tires and transporting the recycled products.

<sup>2</sup> The analysis is streamlined in the sense that it examines GHG emissions only and is not a comprehensive environmental analysis of all environmental impacts from municipal solid waste management options.

**Exhibit 2-3: Tires GHG Sources and Sinks from Relevant Waste Management Pathways**

Materials Management Strategies for Tires	GHG Sources and Sinks Relevant to Tires		
	Raw Materials Acquisition and Manufacturing	Changes in Forest or Soil Carbon Storage	End of Life
Source Reduction	<b>Offsets</b> <ul style="list-style-type: none"> <li>Transport of raw materials and intermediate products</li> <li>Virgin process energy</li> <li>Transport of tires to point of sale</li> </ul>	NA	NA
Recycling	<b>Emissions</b> <ul style="list-style-type: none"> <li>Transport of recycled materials</li> <li>Recycled ground rubber and TDA<sup>a</sup> manufacture process energy</li> </ul> <b>Offsets</b> <ul style="list-style-type: none"> <li>Transport of virgin ground rubber and soil/sand</li> <li>Virgin ground rubber and soil/sand manufacture process energy</li> </ul>	NA	<b>Emissions</b> <ul style="list-style-type: none"> <li>Collection of scrap tires and transportation to recycling center</li> <li>Production of ground rubber and rubber for civil engineering applications</li> </ul> <b>Offsets</b> <ul style="list-style-type: none"> <li>Steel recovery from steel-belted radial tires</li> </ul>
Composting	Not applicable since tires cannot be composted		
Combustion	NA	NA	<b>Emissions</b> <ul style="list-style-type: none"> <li>Transport to combustion facilities</li> <li>Combustion-related CO<sub>2</sub> and N<sub>2</sub>O</li> </ul> <b>Offsets</b> <ul style="list-style-type: none"> <li>Avoided utility emissions</li> <li>Steel recovery</li> </ul>
Landfilling	NA	NA	<b>Emissions</b> <ul style="list-style-type: none"> <li>Transport to landfill</li> <li>Landfilling machinery</li> </ul>
Anaerobic Digestion	Not applicable since tires cannot be anaerobically digested		

NA = Not applicable.

<sup>a</sup> Tire-derived aggregate (TDA) is used in civil engineering applications.

WARM analyzes all of the GHG sources and sinks outlined in Exhibit 2-3 and calculates net GHG emissions per short ton of tire inputs. More detailed methodology on emission factors are provided in the sections below on individual waste management strategies.

**Exhibit 2-4: Net Emissions for Tires under Each Materials Management Option (MTCO<sub>2</sub>E/Short Ton)**

Material	Net Source Reduction (Reuse) Emissions for Current Mix of Inputs	Net Recycling Emissions	Net Composting Emissions	Net Combustion Emissions	Net Landfilling Emissions	Net Anaerobic Digestion Emissions
Tires	-4.28	-0.38	NA	0.51	0.02	NA

## 2.3 RAW MATERIALS ACQUISITION AND MANUFACTURING

Exhibit 2-5 provides the characteristics of scrap tires as modeled in WARM. The average scrap tire weight and the amount of steel in an average scrap tire are provided by the Rubber Manufacturers' Association (RMA, 2009a; Blumenthal, 2010). The assumed energy content for scrap tires provided in Exhibit 3 is from the California Integrated Waste Management Board (CIWMB, 1992). While this source is fairly old, it is believed to still be accurate today (Blumenthal, 2010). The percent of scrap tire weight

that is polyester fiber is from NIST (1997), and the remaining material by weight (i.e., total tire weight minus steel and fiber) is assumed to be rubber.

**Exhibit 2-5: Scrap Tire Characteristics**

Scrap Tire Weight	22.5 lb.
Energy Content	13,889Btu/lb.
Material Composition (by Weight):	
Rubber	74%
Steel Wire	11%
Polyester Fiber	15%

Tire manufacturing starts out with the extraction of petroleum, which is processed into synthetic rubber, polyester fiber, oils and carbon black; the mining and manufacture of steel, which is made into steel cords; and the mining and processing of silica. These materials are transported to the tire manufacturer, who selects several types of rubber, along with special oils, carbon black, silica and other additives for production. An electrically powered Banbury mixer combines the various raw materials into a homogenized black gummy material. This material is then sent for further machine processing to make the different components of the tire (i.e., sidewalls, treads, etc.), requiring additional energy inputs. The tire is then assembled by adding the inner liner, which is a special rubber, resistant to air and moisture penetration. The polyester and steel are then added to give the tire strength while also providing flexibility. Next, the tire is placed inside a mold and inflated to press it against the mold, creating the tire's tread. Finally, the tire is heated at more than 300 degrees Fahrenheit for 12 to 15 minutes to be cured (RMA, 2010). The entire tire manufacturing process requires approximately 74 million Btu of energy per short ton of tire produced.

In addition to manufacturing, the RMAM calculation in WARM also incorporates “retail transportation,” which includes the average truck, rail, water and other-modes transportation emissions required to transport plastics from the manufacturing facility to the retail/distribution point, which may be the customer or a variety of other establishments (e.g., warehouse, distribution center, wholesale outlet). The energy and GHG emissions from retail transportation are presented in Exhibit 2-6. Transportation emissions from the retail point to the consumer are not included. The number of miles traveled is obtained from the *2012 Commodity Flow Survey* (BTS, 2013) and mode-specific fuel use is from *Greenhouse Gas Emissions from the Management of Selected Materials* (EPA, 1998).

**Exhibit 2-6: Retail Transportation Energy Use and GHG Emissions**

Material	Average Miles per Shipment	Transportation Energy per Short Ton of Product (Million Btu)	Transportation Emission Factors (MTCO <sub>2</sub> E/ Short Ton)
Tires	497	0.54	0.04

## 2.4 MATERIALS MANAGEMENT METHODOLOGIES

This analysis considers source reduction, recycling, landfilling and combustion pathways for management of scrap tires. It is important to note that tires modeled in WARM are not recycled into new tires; instead, they are recycled in an open loop. Assessing the impacts of their disposal must take into account the secondary products made from recycled tires. Information on tire recycling and the resulting secondary products is sparse; however, EPA modeled the pathways that the majority (approximately 93 percent in 2007) of recycled tires follows, and for which consistent life-cycle assessment data are available (RMA, 2009b). The secondary products considered in this analysis are shredded tires (also known as tire-derived aggregate or TDA) for civil engineering applications and for ground rubber.



The data source used to develop these emission factors is a 2004 report by Corti and Lombardi that compares four end-of-life pathways for tires. These data were based on research from several studies in the 1990s and 2000s in Europe, but EPA believes there are similar energy requirements for processing scrap tires in the United States.

Source reduction leads to the largest reduction in GHG emissions for tires, since manufacturing tires is energy intensive. Recycling tires leads to greater reductions than do combustion and landfilling, since it reduces similarly energy-intensive secondary product manufacturing. Combustion with energy recovery results in positive net emissions, driven primarily by the combustion of carbon compounds found in the rubber portion of the tires. Landfilling results in minor emissions due to the use of fossil fuels in transporting tires to the landfill and in landfilling equipment.

### 2.4.1 Source Reduction

Source reduction activities reduce the number of tires manufactured, thereby reducing GHG emissions from tire production. Extending the life of tires by choosing to purchase long-life tires is an example of source reduction. For more background on source reduction, see the [Source Reduction](#) chapter.

Exhibit 2-7 outlines the components of the GHG emission factor for source reduction of tires. The GHG benefits of source reduction are from avoided raw materials acquisition and manufacturing (RMAM) emissions.

**Exhibit 2-7: Source Reduction Emission Factors for Tires (MTCO<sub>2</sub>E/Short Ton)**

Material	Raw Material Acquisition and Manufacturing for Current Mix of Inputs	Raw Material Acquisition and Manufacturing for 100% Virgin Inputs	Forest Carbon Sequestration for Current Mix of Inputs	Forest Carbon Sequestration for 100% Virgin Inputs	Net Emissions for Current Mix of Inputs	Net Emissions for 100% Virgin Inputs
Tires	-4.28	-4.44	NA	NA	-4.28	-4.44

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

NA = Not applicable.

To calculate the avoided GHG emissions for tires, EPA looks at three components of GHG emissions from RMAM activities: process energy, transportation energy and process non-energy GHG emissions. Exhibit 2-8 provides the estimates for each of these three categories for tires made from 100 percent virgin material. In WARM, the user also has the option of selecting source reduction based on the current mix of recycled and virgin material, as shown in Exhibit 2-9. EPA calculates the RMAM emission factors for the current mix of material inputs by weighting the emissions from manufacturing tires from 100 percent virgin material and the emissions from manufacturing tires from 100 percent recycled material by an assumed recycled content. More information on each component making up the final emission factor is provided in Exhibit 2-7. The source reduction emission factor for tires includes only emissions from RMAM, since no forest carbon sequestration is associated with tire manufacture.

**Exhibit 2-8: Raw Material Acquisition and Manufacturing Emission Factor for Virgin Production of Tires (MTCO<sub>2</sub>E/Short Ton)**

(a) Material	(b) Process Energy	(c) Transportation Energy <sup>a</sup>	(d) Process Non-Energy	(e) Net Emissions (e = b + c + d)
Tires	4.40	0.04	–	4.44

– = Zero Emissions.

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

The transportation energy and emissions in this exhibit do not include retail transportation, which is presented separately in Exhibit 2-6.

**Exhibit 2-9: Recycled Content Values in Tire Manufacturing**

Material	Recycled Content Minimum (%)	Recycled Content for “Current Mix” in WARM (%)	Recycled Content Maximum (%)
Tires	0%	5%	5%

Data on energy used to manufacture a new passenger tire from Atech Group (2001), passenger tire weights from RMA (2009a), and data on fuel consumption from the Energy Information Administration’s (EIA) *2006 Manufacturing Energy Consumption Survey* (EIA, 2009) were used to estimate avoided process energy. By using EIA (2009) data, EPA assumes that tire manufacturing uses the same mix of fossil fuels as does the entire synthetic rubber manufacturing industry as a whole. Exhibit 2-10 provides the process energy requirement and associated emissions for tires.

**Exhibit 2-10: Process Energy GHG Emissions Calculations for Virgin Production of Tires**

Material	Process Energy per Ton Made from Virgin Inputs (Million Btu)	Energy Emissions (MTCO <sub>2</sub> E/Short Ton)
Tires	73.79	4.40

## 2.4.2 Recycling

WARM models tires as being recycled in an open loop into the following secondary materials: TDA for civil engineering applications and ground rubber (Exhibit 2-11). Eighty-three percent of the scrap tires recovered in 2007 for recycling were used as TDA in civil engineering applications or as ground rubber. Since these pathways account for the majority of recycling processes, the tire recycling emission factor is a weighted average of the life-cycle emissions from ground rubber and TDA end uses. For more information on recycling in general, please see the [Recycling](#) chapter.

**Exhibit 2-11: Fate of Recycled Tires**

Recycled Tire Material	Virgin Product Equivalent	% Composition of Modeled Market
TDA for Civil Engineering Applications	Sand	42%
Ground Rubber	Synthetic Rubber	58%

Preparing tires for these secondary end uses requires shredding the tires and removing any metal components. Further grinding of scrap tire is accomplished through ambient grinding or cryogenic grinding. Ambient grinding, the simplest grinding process, involves using machinery to size the crumb rubber particles. In cryogenic grinding, shredded rubber chips are frozen using liquid nitrogen and ground in a series of milling devices. Freezing causes the rubber to become brittle, which allows it to break down more easily and aids in the creation of smaller-sized particles (Nevada Automotive Test Center, 2004, p. 11; Praxair, 2009). For this analysis, we assume that tires will be converted into ground rubber by ambient grinding because, according to Corti and Lombardi (2004), the ambient grinding process is used to prepare tires for combustion, the largest waste management option used for tires.

The recycled input credits shown in Exhibit 2-12 include all of the GHG emissions associated with collecting, transporting, processing and manufacturing tires into secondary materials, and recovering steel for reuse. None of the upstream GHG emissions from manufacturing the tire in the first place are included; instead, WARM calculates a “recycled input credit” by assuming that the recycled material avoids—or offsets—the GHG emissions associated with producing the same amount of secondary materials from virgin inputs. Consequently, GHG emissions associated with management (i.e., collection, transportation and processing) of scrap tires are included in the recycling credit calculation. Because tires do not contain any wood products, there are no recycling benefits associated with forest carbon sequestration. The GHG benefits from the recycled input credits are discussed further in the next section.

**Exhibit 2-12: Recycling Emission Factor for Tires (MTCO<sub>2</sub>E/Short Ton)**

Material	Raw Material Acquisition and Manufacturing (Current Mix of Inputs)	Materials Management Emissions	Recycled Input Credit <sup>a</sup> Process Energy	Recycled Input Credit <sup>a</sup> – Transportation Energy	Recycled Input Credit <sup>a</sup> – Process Non-Energy	Forest Carbon Sequestration	Net Emissions (Post-Consumer)
Tires	–	–	-0.46	0.08	–	–	-0.38

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

– = Zero emissions.

NA = Not applicable.

<sup>a</sup> Includes emissions from the virgin production of secondary materials.

#### **2.4.2.1 Developing the Emission Factor for Recycling of Tires**

EPA calculates the GHG benefits of recycling tires by calculating the difference between the emissions associated with manufacturing a short ton of each of the secondary products from recycled tires and the emissions from manufacturing the same ton from virgin materials, after accounting for losses that occur in the recycling process. These results are then weighted by their percent contribution to tire recycling to obtain a composite emission factor for recycling one short ton of tires. This recycled input credit is composed of GHG emissions from process energy and transportation energy. EPA does not model any non-energy process emissions for the virgin or recycled production of tires.

Civil engineering applications for scrap tires offset the use of soil or sand, so a recycling credit for this end use can be applied using the difference between extracting and processing sand and creating TDA. Ground rubber applications for scrap tires offset the use of virgin rubber, so a recycling credit for this end use can be applied using the difference between creating ground rubber from synthetic rubber and creating ground tire rubber. Additionally, a recovered steel credit is estimated based on the process energy recycling credit for steel cans (see the [Metals](#) chapter for details) and the amount of steel recovered through ambient grinding of tires.

To calculate each component of the recycling emission factor, EPA follows six steps:

**Step 1.** *Calculate emissions from virgin production of secondary products.* Data on sand from the Athena Institute (Venta and Nesbit, 2000) report, “Life Cycle Analysis of Residential Roofing Products,” are used to estimate the GHG emissions associated with sand extraction and processing, which is the virgin alternative to TDA. Because sand is generally produced locally, EPA assumes that its haul distance is approximately 20 miles by truck with no back haul. This information on transportation energy is included in the Athena Institute (Venta and Nesbit, 2000) data. There are no process non-energy emissions from extracting and processing sand for civil engineering applications.

EPA uses data from the International Rubber Research and Development Board, as found in Pimentel et al. (2002), along with EIA (2009) fuel consumption percentages for the synthetic rubber

industry, to estimate the GHG emissions associated with synthetic rubber production. Pimentel et al. (2002) include process energy and transportation energy for synthetic rubber manufacture, so no transportation-specific emissions are estimated for synthetic rubber. EPA also assumes that there are no process non-energy emissions from manufacturing synthetic rubber.

The calculations for virgin process and transportation for secondary products are presented in Exhibit 2-13. Note that each product's energy requirements were weighted by their contribution to the recycled tire market modeled in WARM. Also, the transportation energy and emissions are included in the process energy data.

**Exhibit 2-13: Process and Transportation Energy GHG Emissions Calculations for Virgin Production of Tire Secondary Products**

Material	Process and Transportation Energy per Short Ton Made from Virgin Inputs (Million Btu)	Energy Emissions (MTCO <sub>2</sub> E/Short Ton)
Sand	2.13	0.19
Synthetic Rubber	9.91	0.80
<b>Weighted Sum of Virgin Secondary Materials</b>	<b>6.67</b>	<b>0.55</b>

Note: The transportation energy and emissions in this exhibit do not include retail transportation, which is presented separately in Exhibit 2-6.

**Step 2. Calculate GHG emissions for recycled production of one short ton of the secondary product.** The recycled secondary product emission factor is based on life-cycle inventory data for the ambient grinding. TDA pieces are on average 2–12 inches, so EPA uses energy data from Corti and Lombardi (2004) on grinding tires to aggregate greater than 16mm in size for the TDA process energy. For ground rubber produced from scrap tires, we use LCI data on the mechanical grinding of scrap tires to less than 2mm in diameter from Corti and Lombardi (2004).

Personal communication with Michael Blumenthal at the Rubber Manufacturers' Association (Blumenthal, 2010) reveals that scrap tires are transported by truck in batches of 1,000–1,200 tires to facilities no greater than 200 miles away to be shredded and ground. To develop this portion of the emission factor, we assume an average of 1,100 tires constituting a batch that is then transported 200 miles by a diesel truck to be shredded or ground. Exhibit 2-14 and Exhibit 2-15 present the results for process-related energy emissions for recycled products and transportation energy emissions, respectively. Again, EPA assumes there are no process non-energy emissions associated with manufacturing.

**Exhibit 2-14: Process Energy GHG Emissions Calculations for Recycled Production of Tire Secondary Products**

Material	Process Energy per Short Ton Made from Recycled Inputs (Million Btu)	Energy Emissions (MTCO <sub>2</sub> E/Short Ton)
TDA	0.47	0.02
Ground Rubber	3.08	0.16
<b>Weighted Sum of Recycled Secondary Materials</b>	<b>1.99</b>	<b>0.11</b>

**Exhibit 2-15: Transportation Energy GHG Emissions Calculations for Recycled Production of Tired Secondary Products**

Material	Transportation Energy per Short Ton Made from Recycled Inputs (Million Btu)	Transportation Emissions (MTCO <sub>2</sub> E/Short Ton Product)
TDA	0.75	0.06
Ground Rubber	0.75	0.06
<b>Weighted Sum of Recycled Secondary Materials</b>	<b>0.75</b>	<b>0.06</b>

Note: The transportation energy and emissions in this exhibit do not include retail transportation, which is presented separately in Exhibit 2-6.

**Step 3.** Calculate the difference in emissions between virgin and recycled production. EPA then subtracts the recycled product emissions (Step 2) from the virgin product emissions (Step 1) to get the GHG savings. These results are shown in Exhibit 2-16.

**Exhibit 2-16: Differences in Emissions between Recycled and Virgin Tire Manufacture (MTCO<sub>2</sub>E/Short Ton)**

Material	Product Manufacture Using 100% Virgin Inputs (MTCO <sub>2</sub> E/Short Ton)			Product Manufacture Using 100% Recycled Inputs (MTCO <sub>2</sub> E/Short Ton)			Difference Between Recycled and Virgin Manufacture (MTCO <sub>2</sub> E/Short Ton)		
	Process Energy	Transportation Energy	Process Non-Energy	Process Energy	Transportation Energy	Process Non-Energy	Process Energy	Transportation Energy	Process Non-Energy
Tires	4.40	0.04	–	0.10	0.10	–	-4.30	0.06	–

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

– = Zero emissions.

**Step 4.** Adjust the emissions differences to account for recycling losses. Corti and Lombardi (2004) report nearly 90 percent recovery of rubber and steel during ambient grinding, while industry assumes 80 percent recovery in the United States (Blumenthal 2010). To adjust the European data reported by Corti and Lombardi to account for differing practices in the United States, EPA scales down the amount of rubber and steel recovered so that the recovery rate for each is 80 percent. The resulting weighted process energy, transportation energy, process non-energy and total emission factors are presented in Exhibit 2-17.

**Exhibit 2-17: Tires Recycling Emission Factors Adjusted for Recycling Losses (MTCO<sub>2</sub>E/Short Ton)**

Material	Recycled Input Credit for Recycling One Short Ton of Tires			
	Weighted Process Energy	Weighted Transport Energy	Weighted Process Non-Energy	Total
Tires	-0.36	0.08	–	-0.28

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

– = Zero emissions.

**Step 5.** Factor in the GHG emission credit from steel recovery. EPA assumes that 80 percent of the total steel available in scrap tires is recovered at the end of life and is recycled into steel sheet. As a result, an additional recycling input credit from steel recovery is added to the tires recycling process energy emission factor. The recycling input credit for process energy from recycling steel, found in the Metals chapter, is weighted by the relative amount of steel recovered from recycling tires. Exhibit 2-18 shows how the steel recovery credit is calculated and Exhibit 2-19 provides the final calculated recycling emission factor for tires by adding that credit to the tires process energy credit.

**Exhibit 2-18: Steel Recovery Emission Factor Calculation (MTCO<sub>2</sub>E/Short Ton)**

Material	Amount of Steel Recovered (MT/Short Ton Product)	Avoided CO <sub>2</sub> Emissions per Ton of Steel Recovered (MTCO <sub>2</sub> E/Short Ton)	Steel Recovery Emissions (MTCO <sub>2</sub> E/Short Ton Product)
Tires	0.06	1.80	0.10

**Exhibit 2-19: Final Tires Recycling Emission Factors (MTCO<sub>2</sub>E/Short Ton)**

Material	Recycled Input Credit for Recycling One Short Ton of Tires			
	Process Energy	Transport Energy	Process Non-Energy	Total
Tires	-0.46	0.08	–	-0.38

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

– = Zero emissions.

### 2.4.3 Composting

Because tires are not subject to aerobic bacterial degradation, they cannot be composted. As a result, WARM does not consider GHG emissions or storage associated with composting.

### 2.4.4 Combustion

Scrap tires used as fuel made up about 60 percent of the entire scrap tire market in 2007 (RMA, 2009b). About 84 percent of those tires went to pulp and paper mills, cement kilns and utility boilers. WARM models the combustion of tires based on these three facility types. Exhibit 2-20 provides the assumed percent of scrap tires used as fuel that go to each type of facility.

**Exhibit 2-20: Percent of Scrap Tires Used as Fuel at the Three Modeled Facility Types**

Facility	Share Used as Fuel
Pulp and Paper Mills	51%
Cement Kilns	32%
Utility Boilers	17%

GHG emissions from combusting tires result from the combustion process as well as from indirect emissions from transporting tires to the combustor. Combustion also produces energy that can be recovered to offset electricity and GHG emissions that would have otherwise been produced from non-baseload power plants feeding into the national electricity grid. Finally, many of the facilities where tires are used as fuel recycle steel that is left after combustion, which offsets the production of steel from other virgin and recycled inputs. All of these components make up the combustion factor calculated for tires.

For further information on combustion, see the [Combustion](#) chapter. Because WARM's analysis begins with materials at end of life, emissions from RMAM are zero. Exhibit 2-21 shows the components of the emission factor for combustion of tires. Further discussion on the development of each piece of the emission factor is discussed below.

**Exhibit 2-21: Components of the Combustion Net Emission Factor for Tires (MTCO<sub>2</sub>E/Short Ton)**

Material	Raw Material Acquisition and Manufacturing (Current Mix of Inputs)	Transportation to Combustion	CO <sub>2</sub> from Combustion	N <sub>2</sub> O from Combustion	Avoided Utility Emissions	Steel Recovery	Net Emissions (Post-Consumer)
Tires	–	0.01	2.20	–	-1.57	-0.13	0.51

Note: Negative values denote net GHG emission reductions or carbon storage from a materials management practice.

– = Zero emissions.

#### 2.4.4.1 Developing the Emission Factor for Combustion of Tires

EPA calculates CO<sub>2</sub> emissions from combusting tires based on the energy content of tires from CIWMB (1992) and the estimated tire carbon coefficient from Atech Group (2001).

**Exhibit 2-22: Tires CO<sub>2</sub> Combustion Emission Factor Calculation**

Material	Energy Content (Million Btu/Short Ton Product)	MTCO <sub>2</sub> E from Combustion per Million Btu	Combustion CO <sub>2</sub> Emissions (MTCO <sub>2</sub> E/Short Ton Product)
Tires	27.78	0.08	2.20

EPA estimates CO<sub>2</sub> emissions from transporting tires to pulp and paper mills, cement kilns and utility boilers assuming that the distance the tires need to travel is similar to the distance involved in transporting MSW to waste-to-energy facilities. To calculate the emissions, WARM relies on

assumptions from FAL (1994) for the equipment emissions and NREL's US Life Cycle Inventory Database (USLCI) (NREL 2015). The NREL emission factor assumes a diesel, short-haul truck.

Most power plants use fossil fuels to produce electricity, and the electricity produced at the various facilities where tires are used as fuel reduces the demand for conventional, fossil-derived electricity. As a result, the combustion emission factor for tires includes avoided GHG emissions from facilities that would otherwise be using conventional electricity. We calculate the avoided facility CO<sub>2</sub> emissions from electricity production based on (1) the energy content of tires and (2) the carbon-intensity of default (offset) fuel mix at each facility. These avoided GHG emissions are weighted based on the percent of scrap tires used for combustion across three types of facilities (Exhibit 2-20). Exhibit 2-23 shows the electricity offset from combustion of tires.

**Exhibit 2-23: Utility GHG Emissions Offset from Combustion of Tires**

(a)	(b)	(c)	(d)	(e)
Material	Energy Content (Million Btu per Short Ton)	Combustion System Efficiency (%)	Emission Factor for Utility-Generated Electricity (MTCO <sub>2</sub> E/ Million Btu of Electricity Delivered)	Avoided Utility GHG per Short Ton Combusted (MTCO <sub>2</sub> E/Short Ton) (e = b × c × d)
Tires	27.8	NA	NA	1.57

NA = Not applicable.

The combustion of tires at pulp and paper mills and utility boilers also includes steel recovery and recycling processes. Recovered steel from cement kilns is used to replace iron used in the cement-making process, so there is no steel recovery credit for scrap tire use at cement kilns. The recycling credit is therefore weighted for two of the three facilities modeled. Since some steel in tires is lost during combustion, we multiplied the percent of tires that is steel (Exhibit 2-5) by a ferrous recovery factor of 98 percent.

**Exhibit 2-24: Steel Production GHG Emissions Offset from Steel Recovered from Combustion of Tires**

Material	Short Tons of Steel Recovered per Short Ton of Waste Combusted	Avoided CO <sub>2</sub> Emissions per Ton of Steel Recovered (MTCO <sub>2</sub> E/Short Ton)	Avoided CO <sub>2</sub> Emissions per Ton of Waste Combusted (MTCO <sub>2</sub> E/Short Ton)
Tires	0.06	1.80	0.10

## 2.4.5 Landfilling

In WARM, landfill emissions comprise landfill CH<sub>4</sub> and CO<sub>2</sub> from transportation and landfill equipment. WARM also accounts for landfill carbon storage, and avoided utility emissions from landfill gas-to-energy recovery. However, since tires do not contain biogenic carbon and do not decompose in landfills, there are zero emissions from landfill CH<sub>4</sub>, zero landfill carbon storage, and zero avoided utility emissions associated with landfilling tires, as shown in Exhibit 2-25. Greenhouse gas emissions associated with RMAM are not included in WARM's landfilling emission factors. As a result, the emission factor for landfilling tires represents only the emissions associated with collecting the waste and operating the landfill equipment.

**Exhibit 2-25: Landfilling Emission Factor for Tires (MTCO<sub>2</sub>E/Short Ton)**

Material	Raw Material Acquisition and Manufacturing (Current Mix of Inputs)	Transportation to Landfill	Landfill CH <sub>4</sub>	Avoided CO <sub>2</sub> Emissions from Energy Recovery	Landfill Carbon Sequestration	Net Emissions (Post- Consumer)
Tires	–	0.02	–	–	–	0.02

– = Zero emissions.

NA = Not applicable.

For more information, refer to the [Landfilling](#) chapter.

#### 2.4.6 Anaerobic Digestion

Because of the nature of tire components, tires cannot be anaerobically digested, and thus, WARM does not include an emission factor for the anaerobic digestion of tires.

### 2.5 LIMITATIONS

There are several limitations to this analysis, which is based on several assumptions from expert judgment. The limitations associated with the source reduction emission factor include:

- Scrap tire percent composition by material may not be accurate. EPA uses two data sources for estimating the percent fiber and percent steel content of scrap tires. Upon expert review, Blumenthal (2010) notes that today there is less fiber in tires than estimated by NIST (1997). The percent steel content is believed to be accurate, but because of the possibly high fiber content, the percent rubber by weight may be underestimated. Simultaneously, Blumenthal (2010) reports that tires produced recently may contain non-negligible amounts of silica, whereas the data used here assume that any silica content is negligible. If this is the case, the amount of rubber may be overestimated, so it is also possible that the changing trends in fiber and silica content effectively cancel each other out.
- This analysis assumes that the fuel mix used to manufacture tires is the same as the one used to manufacture synthetic rubber. If tire manufacturers use a different fuel mix, the resulting difference in carbon-intensity would influence the carbon emissions produced by manufacturing tires from virgin materials.
- Upon expert review, Blumenthal (2010) reported that the amount of energy required to produce a tire is outdated and that the tire manufacturing process has changed considerably since 2001, the year of the data that WARM relies on for the process energy requirements. The difference in the energy requirements for tire manufacture today would change the associated process energy emissions for source reduction; however, EPA has been unable to find more recent, publicly available data to update the analysis.

There are also some limitations to the recycling emission factor, including:

- By using European process data from Corti and Lombardi (2004), EPA assumes that tire recycling processes in the United States and Europe are similar. This may or may not be the case.
- The assumption that, when scaling down the amount of steel and rubber recovered during the recycling process from Corti and Lombardi (2004) based on an industry estimate of 80 percent recovery of scrap tires (Blumenthal, 2010), the 80 percent recovery is applicable to both steel and rubber. In actuality the *average* recovery between the two materials may be 80 percent. Any difference in the amount of rubber or steel recoverable during recycling would change the recycling input credits for process energy and steel recovery, respectively.

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