



**COST SAVINGS  
ATTRIBUTABLE TO  
USWAG REGULATORY SUCCESS**

USWAG Results and Benefits, Highlights of Accomplishments and Activities are compiled and published on an annual basis. While the annual benefits of USWAG membership are impressive, the total bottom line cost savings resulting from USWAG's efforts are truly remarkable.

In 1990, USWAG developed an estimate of the cost savings for its members, in the form of avoided incremental regulatory compliance costs, since its founding in 1978. Based on that analysis, USWAG's regulatory advocacy resulted in costs savings of over \$58.4 billion for the period 1979 through 1990.

USWAG's continued regulatory success, as well as the continuing benefits from past achievements, has not diminished over the most recent decade.

As a result, the estimated total cost savings resulting from USWAG's regulatory success now amounts to \$147.3 billion over the past 21 years.

The cost savings resulting from three issues account for over 99% of the total savings. These issues are:

- 1. the regulation of coal combustion products (CCPs);
- 2. the regulation of treated wood poles and crossarms;
- 3. the use of electrical equipment containing PCBs.

Success in addressing other issues of concern has resulted in additional savings of over \$100 million.

**Coal Combustion Products (CCPs).....**

A core issue of USWAG, obtaining and preserving a non-hazardous waste regulatory determination for CCPs results in annual savings of \$3.7 billion. Projecting those annual savings over 21 years -- back to the beginning of the Beville regulatory process -- yields total cumulative savings of \$77.7 billion.

**Treated Wood.....**

USWAG's success in maintaining the option of secondary use of treated wood and preserving the non-hazardous status of discarded treated wood translates into estimated annual savings of \$3.5 billion. Projecting these savings over 11 years -- back to the beginning of the most significant threats to the nonhazardous status of pentachlorophenol-treated wood -- results in total cumulative savings of \$38.5 billion.

## PCB Regulations.....

USWAG has been successful in preserving its members' ability to continue to use PCB-contaminated mineral oil electrical equipment and avoiding accelerated phase-out of PCB electrical equipment. These avoided costs associated with a complete phase out of all PCB-contaminated and PCB equipment is estimated at \$1.9 billion per year. Projecting these costs back to EPA's 1982 rulemaking results in cumulative savings of \$31 billion.

## Other Issues .....

USWAG efforts in addressing a panoply of other issues have also yielded significant cost savings to its members. These issues and savings include:

**Mixed Waste:** Successfully addressing the dual regulation of mixed radioactive and hazardous wastes allows nuclear power plants to avoid obtaining RCRA hazardous waste storage permits and/or avoiding fines for storage of hazardous waste beyond regulatory time limits has resulted in savings of approximately \$77.5 million.

**Boiler Chemical Cleaning Waste:** USWAG was successful in obtaining a clarification regarding the point of generation for boiler chemical cleaning wastes that would result in these waste streams not being identified as hazardous wastes. Total costs savings amount to approximately \$20 million since 1997.

**Used Oil:** USWAG was successful in convincing EPA that used oil should not be regulated as hazardous waste so long as it is recycled. Total costs savings are estimated at \$1.2 million since 1997.

**Manufactured Gas Plants (MGP):** USWAG has been successful in limiting the application of Land Disposal Rules to MGP wastes, and in obtaining clarification that the TCLP does not apply to MGP wastes, resulting in their regulation as non-hazardous wastes at the federal level. Total cost savings are estimated at \$10 million.

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