

August 19, 2008

Dear Citizen,

Because you are a Duwamish resident who has shown interest in Lafarge emissions, I want to advise you of results recently made available from tests conducted in May 2008. You may have also received similar letters in November 2007 and March 2008 transmitting findings from previous tests.

Lafarge has conducted three rounds of emissions tests on their cement kiln when adding whole tires to the kiln fuel mix. During the first two tests (during July 2007 and December 2007), measured dioxin levels exceeded the EPA-established limits for cement plants. During the most recent test results (May 2008), measured dioxin emissions were below the allowable concentrations established by the EPA. The fact that Lafarge has produced a compliant testing condition with whole tire fuel substitution leads to a sequence of events which are discussed in more detail below.

EXECUTIVE DIRECTOR
Dennis J. McLerran

BOARD OF DIRECTORS

BREMERTON
Cary Bozeman, Mayor

EVERETT
Ray Stephanson, Mayor

KING COUNTY
Ron Sims, Executive

KITSAP COUNTY
Jan Angel, Commissioner

PIERCE COUNTY
John Ladenburg, Executive

PUBLIC AT LARGE
Marina Cofer-Wildsmith

SEATTLE
Gregory J. Nickels, Mayor

SNOHOMISH COUNTY
Mike Cooper, Councilman

TACOMA
Jake Fey, Councilman

Background:

Lafarge is interested in receiving approval for burning whole tires as part of their kiln fuel mix. Their air permit allows for trial periods to test various levels of tire fuel substitution while measuring pollutant emissions. Test periods are limited to 15 days by EPA regulations – a time period needed to stabilize operational conditions, and complete the necessary emission testing. The Clean Air Agency will not authorize burning whole tires until compliance is demonstrated through required testing. Following successful testing, Lafarge would likely pursue permanent approval of the highest whole-tire fuel substitution rate which demonstrated compliance with all applicable requirements.

History of project events:

March 17, 2006 – Original air permit for whole-tire testing project was approved

June 6-7, 2006 – Lafarge completes the baseline tests (no tires or liquid waste fuels)

July 21, 2006 – Original permit was revised due to project delays for Lafarge

August 7, 2006 – Baseline test report received by the Agency

July 20, 2007 – Initial testing completed using whole tires

September 18, 2007 – First whole-tire test-report received by the Clean Air Agency

December 7, 2007 – Second test completed using whole tires

February 5, 2008 – Second whole-tire test report received by the Agency

May 20, 2008 – Third test completed using whole tires

July 18, 2008 – Third whole-tire test report received by the Agency

Test results:

Tests completed in May, 2008 measured emissions at a tire substitution rate of 11.2 % (percent substitution of energy supplied by coal). The test in December, 2007 was at a tire substitution rate of 14.8%. The test in July, 2007 included two different substitution rates -- one at 14.7% and the other at 16.2%. Throughout this sequence of tests, Lafarge has continued to make adjustments to their operational conditions to support a demonstration of compliance with EPA's dioxin emission limit.

Following a review of the test report, there are several notable results:

- Dioxin emissions during the latest tire substitution tests were the lowest reported concentrations observed during this testing sequence and were below the allowable concentrations in EPA's rule for hazardous air pollutants for cement plants. The dioxin concentrations for this test were only 15% of the maximum allowable dioxin concentration under the EPA's rule and were less than half of the dioxin concentrations observed during the baseline testing from June 2006.
- The third test results mean that Lafarge may proceed with the use of whole tires as a fuel substitute in an ongoing manner under the terms of their current permit approvals providing they operate within the conditions they exhibited during the compliant source test.
- The third test represents a compliance performance test which sets the parameters which Lafarge must meet to demonstrate compliance. The two parameters set by the test are an inlet temperature to the inlet of the electrostatic precipitator which must not exceed 352°F and a tire fuel substitution rate which must not exceed 11.2% tires.
- Operational adjustments by Lafarge during the third test included lowering the kiln exit temperature using an improved water delivery system (for cooling) and installation of a dual range carbon monoxide monitor at the kiln exit to provide additional operational data for the operators to manage kiln conditions.

Next:

Lafarge has updated their Operations & Maintenance (O&M) Plan required by the EPA's rule for hazardous air pollutants for cement plant to reflect the operational practices used during the third test with tires. The Agency required this update to ensure the practices which led to the test results would be included in the regular operational practices of Lafarge. As a result of the third test results and the approval of the updated O&M plan, Lafarge is proceeding with their efforts to use tires as a fuel substitute on a continuous basis, as allowed by their permit approval. They will not use more tires than the level achieved during the third test and will maintain the temperature to the electrostatic precipitator at 352°F or lower for all operations.

Lafarge has scheduled the fourth (and last) test in the sequence required by the current permit for September 24-25, 2008. It is their intent to identify the highest tire substitution rate they can achieve (up to 30% substitution) while maintaining stable kiln operation. This last test in the required sequence would try to find the upper bound of tire substitution that can still exhibit compliant emission performance. If this last test were completed on September 25th, the following sequence of events is anticipated, as identified in the current permit approval conditions:

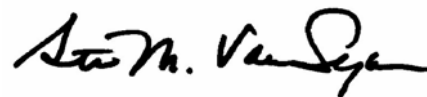
- Lafarge will submit the test results for the fourth test by November 24, 2008
- Lafarge will submit an engineering report compiling and analyzing the data collected and projecting emission changes associated with tire fuel substitution by December 24, 2008

- Lafarge will submit a complete Notice of Construction (NOC) application for final approval of future tire substitution operations by February 7, 2009
- Lafarge will submit a complete amendment application to the Air Operating Permit renewal application currently on file with the Agency to incorporate the elements of the future tire substitution NOC application into the operating permit by February 7, 2009

Following a review of the reports and application materials referenced above, the Agency will consider options regarding possible permanent approval of tire fuel substitution. If an approval is proposed by the Agency, the community will be notified and meetings will be scheduled prior to the formal comment period to allow for questions and discussion regarding the proposal. It would be the Agency's intent, if recommending approval of tire substitution at Lafarge on a permanent basis, to have the comment period open for both the draft NOC conditions regarding tire use and the operating permit renewal at the same time. The air operating permit for Lafarge is scheduled for renewal by May 15, 2009.

The Agency will let you know the results of the next test once we receive the results. We look forward to continued opportunities to meet with the community and discuss the results when we get reports. If you happen to be at the Duwamish River Festival on August 23rd, please feel free to stop by our booth and talk to me about this project. I'd be happy to discuss it with you. We'll let you know about future opportunities in your community to meet with you and discuss the project directly.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Van Slyke". The signature is fluid and cursive, with the first name "Steve" and last name "Van Slyke" clearly distinguishable.

Steve Van Slyke
Supervisory Engineer