

March 27, 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 conduct in December, 2007. You may have also received a similar letter in November, 2007 transmitting findings from tests conducted in July, 2007.

Lafarge conducted both rounds of emissions tests on their cement kiln when adding whole tires to the kiln fuel mix. As with the first test, measured dioxin levels during the December, 2007 test exceeded EPA-established limits for cement plants. Measured dioxin concentrations when burning whole tires and coal were also higher than when burning only coal (the permit-established baseline fuel).

Both the July and December emission tests also provided information on additional pollutants, including carbon monoxide (CO), nitrogen oxides (NOx), formaldehyde, and mercury. This data is used to assess whether emission limits are needed for these pollutants as a part of future permit reviews.

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

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Test results:

Tests completed in December, 2007 measured emissions at a tire substitution rate of 14.8% (percent substitution of energy supplied by coal). The test in July, 2007 included two different substitution rates -- one at 14.7% and the other at 16.2%. Operational conditions for the second test were derived from Lafarge's engineering analysis of data from the July test. Lafarge was optimistic that designed changes in operational conditions would demonstrate compliance with EPA's dioxin emission limit.

When we compare the July and December results to the baseline test (without tires) from 2006, there are several notable results:

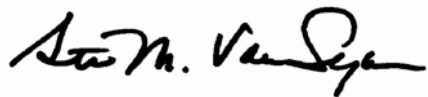
- Dioxin emissions during all tire substitution tests to date increased over the baseline results and were higher than the allowable levels under the EPA's rule for hazardous air pollutants for cement plants. That result means that Lafarge presently has no authorization to use whole tires as a fuel substitute, other than during specified testing periods.
- The data varied, but there was a general reduction in the emissions of NOx. The most recent test showed a decrease in CO emissions with whole tire use. Previous testing had shown an increase.
- The emissions of formaldehyde decreased with the use of whole tires.
- The emissions of mercury have varied slightly up and down with tire substitution and do not appear to show a clear relationship to the whole tire use.

Next:

Lafarge has hired an engineering consultant with experience in combustion chemistry and dioxin emission performance to advise them on which operational variables need to be addressed before completing another test of the whole tire system. The conclusion of that evaluation has not yet been provided to this Agency, but Lafarge has tentatively scheduled another whole tire test for May 28-29, 2008. The results from that test would likely be submitted to the Agency by late July. This test will be the third in a series of four-allowed performance tests with whole tires which were approved with the permit. The general assumption was that Lafarge would test various whole tire substitution levels to establish a maximum level of tires they could use while complying with applicable air quality requirements. Lafarge is still pursuing a lower level of whole tire substitution and operational conditions which will demonstrate compliance. They are unable to use whole tires substitution on a continuous basis until compliance is demonstrated.

The Agency will let you know the results of the next test once we receive the results. We look forward for continued opportunities to meet with the community and discuss the results when we get reports.

Sincerely,



Steve Van Slyke
Supervisory Engineer