Commonwealth of Kentucky
Division for Air Quality

RESPONSE TO COMMENTS

TITLE V (DRAFT PERMIT) NO. V-04-042 (REVISION 1)
LAFARGE NORTH AMERICA
SILVER GROVE, KY

February 2, 2006

CAROLINA ALONSO, REVIEWER
Source I.D. #: 021-037-00090
Source A.I. #: 591
Activity #: APE20050002

SOURCE DESCRIPTION:

A construction/operation permit application was received from Lafarge North America on August 12, 2005 and was complete on December 11, 2005. The applicant proposes the installation of a new wallboard production line at the Silver Grove facility. The new line is similar in design, function, and capacity as the original production line. The applicant also proposes to expand the capacity of the existing Secondary Storage Building.

PUBLIC AND U.S. EPA REVIEW:

On December 8, 2005, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *Florence Boone Co. Recorder* in Florence, Kentucky. The public comment period expired 30 days from the date of publication.

Comment received:

Comments were received from Lafarge North America and from the public. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

ATTACHMENT A

Response to Comments

Comments: on Draft Title V Air Quality Permit submitted by David Abrams, Safety and Environmental Manager for Lafarge North America. Responses by the Kentucky Division for Air Quality are included after each comment.

Title V Permit:

1. Recycle Material Processing System – Clarification of Description

KDAQ incorporated a 2,920 hr/yr operating limit into the draft permit for the Trommel Screen internal combustion engine, which is part of the Recycle Material Processing System (EU37). Although emissions from the engine are limited on a practical basis by how much reclaim material is available for processing, we understand that KDAQ added the operating hour limit to more definitively define the potential emissions from the engine, thereby ensuring that facility-wide potential emissions of NO_X were less than the New Source Review (NSR) major source threshold of 100 tpy.

Condition 1 on page 7 of 42 of the draft permit, as worded, may create confusion since it ties the annual operating limit to the Recycle Material Processing System as a whole, and not specifically to the combustion engine. As noted in the Emission Unit Description section of the permit, the Recycle Material Processing System "*encompasses all equipment and operations associated with the screening of gypsum material in the outdoor storage area*". The engine on the existing Trommel screen equipment only constitutes one aspect of the overall recycle material processing system. Thus, Lafarge requests that the condition be reworded as follows:

> Hours of operation for the **combustion engine associated with the** Recycle Material Processing Operation (EU37) shall not exceed 2,920 hours during any consecutive 12 months.

Division's response: The Division has revised the permit as requested by the source.

2. Recycle Material Processing System – Monthly Fuel Records

Condition 5f on page 10 of 42 adds a requirement for Lafarge to keep records of monthly fuel consumption in the Recycle Material Processing Operation. Lafarge requests that this condition be stricken. This is a recordkeeping requirement for which there is no underlying emission or operating limit. The combustion engine associated with the Recycle Material Processing System is only synthetically limited to a certain number of operating hours. There is no limit on the amount of fuel consumed, which would be redundant regardless since fuel usage is already indirectly capped based on the design rating of the engine (how much diesel can be burned at maximum load) and the limit on operating hours.

Division's response: The recordkeeping requirement will not be deleted. Lafarge is located in an area which is currently designated as nonattainment for ozone. Since both VOC and NO_X are regulated as precursors to ozone, this requirement will ensure the source wide emissions of NOx and

VOC do not exceed any limit or major source threshold.

3. Recycle Material Processing System – Maintenance Records

Lafarge suggests that Condition 5h on page 10 or 42, which requires records of maintenance performed on the burners of the Recycle Material Processing Operation be reworded as follows, on the basis that the actual equipment in question is the internal combustion engine on the screening device.

> h. Maintenance performed on the **combustion engine associated with** ~~burners of~~ the Recycle Material Processing Operation.

Division's response: The Division has revised the permit as requested by the source.

4. Interior Venting Bins and Silos – PM Testing

Condition 3b on page 12 of 42 was reworded in the draft permit to require PM emission tests on both the existing and new gypsum surge bins and silos at the facility. Even attributing a conservative exit grain loading to the integrated bin vent filter systems associated with these storage units, the estimated potential PM released from all the gypsum surge bins and silos at the facility, both existing and new, is **1.6 tpy**. However, even this value, which is negligibly small, is not a true representation of the emissions. Due to the volume of building air pulled into the Air Cooling Systems, the Mill Building in which the bins are located is under negative pressure. Thus, any PM that is released from the bins either settles out inside the building or is sucked into the inlet of the Air Cooling System. PM emissions from the Air Cooling Systems, which are captured in a high efficiency baghouse, are regulated elsewhere in the permit. It is therefore unreasonable for performance testing data to be required for such inconsequential, interior-venting bins. Further, because there are no stacks on the bins, it would not be feasible to perform a Method 5 or 17 test on these units.

Lafarge requests that KDAQ revise the wording of Condition 3b back to the language in the existing Title V permit, which only asserts the right of the agency to request performance testing if necessary. Note also that although the storage bins in question are affected sources under NSPS Subpart OOO, KDAQ has the discretion and authority to waive the PM performance testing requirements of interior venting sources in this situation. For example, the Florida Department of Environmental Protection waived performance testing requirements for small interior venting bins at the sister gypsum plant Lafarge operates in Palatka, Florida.

Division's response: The Division has revised the permit as requested by the source.

5. Existing Starch Silo – Representation in Permit

Lafarge notified KDAQ in a September 6, 2005 supplement to the air permit application for the project that the existing Starch Silo (EU15) would no longer be removed as part of the project, but instead would simply be relocated to a different location at the site. Therefore, Lafarge requests that the listing for this emission unit and its associated description not be removed from page 16 of 42 of the permit.

Division's response: The Division has revised the permit as requested by the source.

6. Gypsum Board Dryer #2 – Stack Configuration

In the same September 6, 2005 supplement letter referenced in Comment #6, Lafarge notified KDAQ that

the original stack configuration planned for Gypsum Board Dryer #2 (EU69) had been modified. Instead of a two-stack configuration, the new Dryer will be equipped with a heat exchanger that will route all exhaust gases through a single dry-end stack. Reflecting this design, the description of the Dryer on page 17 of 42 in the draft permit should be reworded as follows:

> Board Dryer #2 is equipped with several natural-gas fired burners that dry the formed wallboard to the appropriate moisture content. ~~A stack on the wet end of Board Dryer #2 (near inlet) serves for control of humidity.~~ Emissions ~~from combustion and drying~~ exhaust out of a **single** stack on the dry end of Board Dryer #2.

Division's response: The Division has revised the permit as requested by the source.

7. Wallboard Line Emission Units – Visual Monitoring

Condition 4b on page 19 of 42 adds a new requirement that Lafarge perform a qualitative visible observation of the opacity of emissions from designated emission units, and to conduct a Method 9 test if any visible emissions are seen. Lafarge requests that this condition be removed. The Pin Mixer and Additives Systems (EU17 and EU68) (i.e., the Nuisance Baghouses), the End-Trim baghouses (EU20 and EU71), and the Vermiculite Bin (EU28) are small sources of PM emissions and vent to the interior of buildings. Thus, visual monitoring of these emission points is impractical and unwarranted.

With regard to the Gypsum Board Dryers (EU18 and EU69), visual monitoring of the exhaust stacks is impractical and would not provide relevant compliance data. This is primarily because the Board Dryer is not a significant source of particulate matter or opacity. The primary function of the Board Dryer is to drive off excess <u>water</u> used in the board formation process. Wallboards travel on a conveyor through zones directly heated via natural gas fired burners. Only trace amounts of particulate matter emissions occur from natural gas combustion. Some particulate matter may be released from the wallboards due to the high air flow inside the dryers; however, this should be small given that the gypsum is encased within two paper layers and the boards and rest on the moving conveyor. Given that minimal particulate matter emissions are released by design, compliance with the 20% opacity standard applicable under 401 KAR 59:010 is inherently achieved.

In conjunction with the removal of Condition 4b, Condition 5g on page 20 of 42, which requires Lafarge to keep logs of the visual observations, should also be removed from the permit.

Division's response: The monitoring requirement will not be removed. Visual monitoring is a standard requirement to demonstrate compliance with opacity limits. If there is no stack to a unit for visual monitoring, then the facility may state the monitoring requirement is not applicable.

8. Ball Mill Systems – Annual Opacity Testing

Condition 3a on page 22 of 42 was modified in the draft permit to require annual Method 9 testing for the Ball Mill Systems. Lafarge requests that this condition be removed. The Ball Mill Systems (EU16 and EU75) each vent to a dedicated baghouse that vents to the interior of the building. Emissions from each baghouse are estimated to be less than 0.1 tpy. Given the small size of these sources and the fact that they vent to the interior, opacity monitoring should not be necessary.

Division's response: Condition 3a on page 22 is required under 40 CFR 60.675 (b)(2) and will not be removed. This condition has been revised to read as originally in permit V-04-042, requesting Method 9 testing for initial compliance demonstration for the proposed Ball Mill System.

9. Landplaster Bins – Annual Opacity and PM Testing

Condition 3a on page 22 of 42 was modified in the draft permit to require annual Method 9 testing for the Landplaster Bins. Condition 3b on page 22 of 42 requires an initial PM emission test. As noted in the application, the Landplaster Bins now vent to the Cage Mill baghouses, and opacity and PM testing requirements for the Cage Mill baghouses are already specified in other conditions of the permit. To avoid confusion, Lafarge requests that Conditions 3a be removed (as stated in Comment #8) and that Condition 3b be reworded to make it clearer it does not apply to the Landplaster Bin emission units (EU49, EU73, and EU74).

Division's response: Condition 3b on page 22 has been revised as requested by the source. Condition 3a on page 22 has been revised to exclude EU49, EU73, and EU74, but will not be deleted (see Division's response to comment #8).

10. Ball Mills and Landplaster Bins – Visual Monitoring

Condition 4 on page 22 of 42 adds a new requirement that Lafarge perform a qualitative visible observation of the opacity of emissions from designed emission units, and to conduct a Method 9 test if any visible emissions are seen. Lafarge requests that this condition be removed. With regard to the Ball Mill Systems (EU16 and EU75) (i.e., the BMA Receiver Baghouses), visual monitoring is impractical and unwarranted. These baghouses are small sources of PM emissions and vent to the interior of buildings. With regard to the Landplaster Bins, these emission units now duct to the Cage Mill baghouse systems and thus are no longer a direct source of emissions.

In conjunction with the removal of Condition 4, Condition 5c on page 22 of 42, which requires Lafarge to keep logs of the visual observations, should also be removed from the permit.

Division's response: The monitoring requirement will not be changed. See Division's response to comment #7.

Comments: on Draft Title V Air Quality Permit by people at the public hearing held on January 12, 2006. As noted, comments were either copied from the public hearing transcript, or enclosed in Attachment B. Responses by the Kentucky Division for Air Quality are included after each comment.

11. Comment by Ms. Martha Delaney (at public hearing):

I worry about fugitive emissions from the factory. I've noticed that quite a few houses there on Route 8 have been boarded up and I'm going to assume condemned. And I can't imagine why that would have happened, except that they are, for some reason, uninhabitable. So to me boarding up a house is not addressing the fugitive emissions; it's just making people not live there anymore.

I worry that gypsum can cause silicosis, this sounds like a very deadly disease; and that the gypsum does have small amount, trace amounts of silicon and that it definitely poses a problem. I also worry that there are particulates coming out of the steam that crosses the boundary, according to section 15.2(e), that it's not supposed to be crossing the boundary, and, yet, if I had to guess, it crosses, I'd say at least four times a

week, maybe more, just depends on which way the wind is blowing.
We live right across from Lafarge, about a half mile. Quite often it comes directly over to our house. And I worry about those particulates hitting our property. We have 33 acres; my children, myself.
So I just wonder also how you measure the fugitive emissions. I know you measure what's coming out of the stacks. But how do you measure what's blowing from the piles, the uncovered piles, when the trucks are loading/unloading, when the barges are unloading? I'm just assuming that there is gypsum in the air from all of that.
So those are my concerns. Thank you.

Division's response: Fugitive emissions are included when calculating potential emissions for both the existing and new facilities. Fugitive emissions depend on several factors, fugitive Particulate Matter (PM) emissions presented in Lafarge's application are based on estimation methods which include methods outlined by EPA, AP-42 emission factors, and peer-reviewed literature.
401 KAR 63:010 applies to any "apparatus, operation, or road which emits or may emit fugitive emissions provided that the fugitive emissions from such facility are not elsewhere subject to an opacity standard within the administrative regulations of the Division for Air Quality". This regulation establishes operating as well as emission limitations; these limits along with their compliance demonstration methods are listed in the permit.
Steam is not a regulated air pollutants under state or federal regulations, so it is not addressed in this permit.

12. Comment by Ms. Martha and Mr. Steve Delaney (see Attachment B):

Division's response: Lafarge is a major source under the Title V permitting program as potential emissions of both particulate matter less than 10 microns (PM_{10}) and carbon monoxide (CO) exceed 100 tpy.
Since the facility is located in an area which is nonattainment for Ozone (VOC and NO_X) and $PM_{2.5}$, applicability of 401 KAR 51:052 Review of New Sources In or Impacting upon Nonattainment Areas (nonattainment NSR) was evaluated. Potential emissions of the existing plant at maximum equipment capacities are less than the 100 tpy for VOC but more than a 100 tpy for NO_X. In order to preclude applicability of 401 KAR 51:052 (nonattainment NSR), Lafarge has accepted limits for NO_X emissions.
Also, potential emissions of total particulate matter (PT), PM_{10}, CO, and sulfur dioxide (SO_2) for the existing plant are less than the 250 tpy major source threshold for 401 KAR 51:017 Prevention of Significant Deterioration of Air Quality (PSD).
It was also found that the proposed project does not trigger any nonattainment NSR or PSD permitting requirements since potential emissions associated with the proposed project are less than the major source thresholds. For fugitive emissions and steam, see Division's response to comment # 11.
Violations to the Northern Kentucky Area Planning Commission are not enforceable by this Division.

13. Comment by Mr. Kurt Gainer (at public hearing):
I live about a mile from the plant, a little less maybe. I want to know if in your review and in your permitting process, do you look at the location of plants like this relative to residential neighborhoods? Are there guidelines? I think this community's realizing now there were errors made in zoning; it wasn't zoned for manufacturing when the first site plans were approved. They had to amend that, change that, later on. And it's turned out to be a very, what I call, colossal mistake for this community.
I want to know, does the Air Quality Board look at local ordinances. There are local ordinances, Campbell County and Silver Grove alike, that read identical for steam, heat, humidity, glare. Now, it doesn't seem like

we've been able to find somebody that'll look at a picture where the steam is visibly going across property lines, hitting houses in some cases, touching on a ballfield, and saying that that steam does not go beyond the property lines. You're saying it stays on Lafarge's property. I've got pictures right here.
I hope you all have been to the plant, you know, more than once, and even in the evening hours. They were cited, I mean, umpteen times back in 2001, for fugitive emissions. And to this day, there's doubt in our minds how well protected we are. Most people felt that there was steam coming out of the top of the buildings; in which case, there probably is H2O for the most part. But with that comes pollutants, particulate matter, carbon monoxide. You call it oxides and nitrogen.
I have noticed visibly, and this could be just an optical illusion, but it should be addressed, it looks -- the color of the emissions coming out of the stacks from the tallest building look to be of a different color than the emissions coming out of the lower ones which are the dryers.
If you have any doubt, I would suggest you look at the hearing in Frankfort because of the violations in 2001. Look at the testimony and the tapes that are on file down there. And there isn't any doubt that those emissions were crossing the property lines. It's in Frankfort; the information's there.
And I want to know to this day, maybe they're in compliance, maybe they aren't -- There's a big storage area down to the west of the plant more or less, and the -- a large part of that remains uncovered. In my mind, I think -- or would want to know if wind passing across that uncovered gypsum pile, does that pick up dust and particulate matter as people are concerned about.
In your permitting process, I want to know, are health statistics and risks evaluated. I don't know if you have any current data. But I wondered if any respiratory, silicosis, I think cancer should be looked at. We probably don't have that data since this plant's been operating But it should be looked at.
It concerns me too, many people say is they just wonder about our drinking water. And these plumes go over not only the residential side, they go over the Ohio River side. And certainly some of that steam, dust emission has to land on the river. Common sense will tell you that, I would think. And I would wonder if there's any drainage from the stockpile yard of the gypsum into the river also.
I think Martha said it very well. I think everybody's puzzled and concerned about homes that have been purchased across the way from the Lafarge plant. They're what, maybe 100, 200 feet. I'm just taking a guess. But very close. And they're not re-sold. They're boarded up or they're torn down. And if there isn't a problem, you know, why is that being done? I think if that's the case, it can't help the property values in that area.
I'd like to know this. I'd like to know if members of the Air Quality Board, including the chairman, would you live close to a plant like this? Would you put your children living in a home close to this plant? Strictly from the air quality standpoint.
I think in most places in the Commonwealth there's a buffer area between plants such as this and the residences. And I hope in your final determination or denial of this that you look at that, how close they are to residents. So I have photographs. I don't know if you'll take any pictures.

Division's response: Regarding guidelines on plant location: the Division issues permits based on the facility's potential emissions and on the area classification (attainment, non-attainment, unclassified), not based on the property nearby.
Regarding the steam and the uncovered gypsum piles: see Division's response to comment # 11.
Any question not covered under this response does not concern the air quality aspects of the project.

14. Comment by Mr. Kurt Gainer (see attachment B):

Division's response: See Division's responses to comment # 11, comment # 12, comment # 13, and comment # 19.

15. Comment by Ms. Nancy Wills (at public hearing):
I spoke Tuesday evening. and I'm very upset about this. Both Natalie and Clay have been to my home. And when the dust that -- I have the pictures right here. -- that fell on our truck.
Like Kurt said, we have -- we have cistern water back there where we live. And we're -- If it's falling on our vehicles and all around us and coming into our home, it has to be falling on our roof and coming into our cistern water.
And another thing, what I was hearing the other night, the people that live in Silver Grove, they talk about the railroad. The railroad built that town. I don't understand a lot of things. And I don't understand why they put that monster so close to a town. And it's just truly affected our quality of life. I'm sorry.

Division's response: 401 KAR 59:010 New Process Operations, 401 KAR 60:670 (40 CFR 60 Subpart OOO) Standards of Performance for Nonmetallic Mineral Processing Plants, and 401 KAR 60:005 (40 CFR 60 Subpart UUU) Standards of Performance for Calciners and Dryers in Mineral Industries; establish mass emission limits and opacity limits for PM, these limits along with their compliance demonstration methods are listed in the permit. Any emission source not covered by the aforementioned regulations, is covered by 401 KAR 63:010 Fugitive emissions (see Division's response to comment # 11).

16. Comment by Ms. Nancy Wills (see attachment B):

Division's response: See Division's responses to comment # 11 and comment # 15.

17. Comments by Ms. Melissa Mills (at public hearing):
I was a resident of Silver Grove for 13 years. First thing I'd like to say is when I moved there 13 years ago, I didn't expect to live across the street from the biggest drywall plant in the world. I moved a year and a half ago, couldn't stand to live there anymore. The dust that Ms. Wills is talking about, I started filming that back in March of '04. I have countless videos of it. I can describe it to you. They are little white balls. You can touch them and they just crumble. And it's obvious what it is or what it isn't. Lafarge has my videos. Since then I've seen pictures as recent as last month, and same thing, other residents that live around there.
I don't know if you all were aware of any of the videos or the pictures of all the dust. I mean, I always took them off my car because that's the best place that you could see the little balls of dust in the windshield wipers. It would lay in the windshield wipers.
Other than that, I just wanted to know, you know, if it's good to inhale that stuff. Thanks.

Division's response: See Division's responses to comment # 11and comment # 15.

18. Comments by Ms. Melissa Mills (see attachment B):

Division's response: See Division's responses to comment # 11, comment # 12, and comment # 15.

19. Comments by Mr. Steve Delaney (at public hearing):
I live at 3246 Uhl Road, half a mile away from the plant.
I have had the opportunity to go into the plant on its first openings, and tour it. It's a well- built plant and they are very proud of the work that they do there.

The -- A number of the issues that are brought up, however, relate not to the hygiene internal to the plant, but peoples' concerns of external and airborne emissions that go beyond the properties and travel elsewhere. The permit, I hear, being offered tonight is allowing for an increase in emissions fitting in with the present boundaries, an increase of allowed -- above present emissions. It is my wish that Lafarge would show an increase in its production without an increase in its emissions with representation in its permit of proper baghouse and hygiene efforts.
Steam has crossed the road a number of times from the drying systems. I've driven through them a number of times at road level. And it does bear a sulfuric odor to it; there's been no contesting of that throughout different hearings and not many points with that.
Though I don't know if this is an issue for air quality, noise was brought up before. The noise is present and constant from the plant. Though it's not done with a professional grade sound meter, it was a hobbyist sound meter, we have had readings of 50 dpa at our location a half mile away, and 63 decibels when at the plant, which are above -- that particular one being above local ordinance.
The noise is emitted at the stacks. And with the location of the plant within the valley, that noise can be carried away from the plant where it may not be witnessed standing beneath it.
It is our concern that with the increase in the milling processes and the increases in the board making processes, that this noise level would increase. And I expect to see that that would go beyond the marginal that it is right now, into being above allowed local ordinance values. It's a constant noise. It's not a cyclic noise.
So it's just -- if that item's covered under the air quality requirement, I'd like to see that that item's addressed within the permit. Thank you.

Division's response: Pursuant to 401 KAR 50:012, General Application, the Division requested a Reasonable, Available, and Practical (RAP) control technology analysis for sources emitting $PM_{2.5}$ before issuing the draft permit. The provided RAP analysis evaluated wet scrubbers, electrostatic precipitators, and fabric filter baghouses as commercially available control technologies for PM; reaching to the conclusion that in the gypsum industry, baghouses are considered Best Available Control Technology (BACT) and thus represent RAP. For fugitive emissions and steam see Division's response to comment # 11. Noise is not related to the air quality aspects of the project.

20. Group of comments (at public hearing):
Comment by Mr. Robert Horine, Deputy Judge Executive of Campbell County:
I'm appearing on behalf of Judge Executive Steve Pendery, who's unable to be here this evening. I'm here to express support for Lafarge and encourage approval of an air quality permit for their expansion in Silver Grove.
You should know that Lafarge has been an outstanding corporate citizen in Campbell County. Since coming to Silver Grove, they have made substantial improvements to their facilities and operations that have enhanced their compatibility with the community. Throughout their presence here, they have always kept local government officials informed of their activities and plans for improvement and have been frank and direct in their communications.
Lafarge has a strong track record of doing the right thing and they have gained our trust that they will continue to do so in the future, and we support their plans for expansion. Thank you.

Comment by Mr. John Ollberding:
I have a company, Bluegrass Lawn and Landscape. I take care of grounds at Lafarge and have since they opened.

I just wanted to say that I think that Lafarge has set high goals to keep, you know, things in order there. I have not witnessed any dust blowing or anything like that. I think that if there was dust blowing around, you know, as a lot of people state, that this stuff would be in the trees, you know, on the grass, you know, that, that type of stuff; and I just, I don't see it. You know, the place is on like 170-something acres and we're responsible for taking care of pretty much all that.
So I'm -- I lived in Silver Grove when I was younger, grew up near there. And I think that Lafarge has done good for the community and for most of the people that I know from the community. That's pretty much all I wanted to say.

Comment by Mr. Matthew Holloway:
I've lived in Silver Grove my whole life. I just recently bought a house on Second Street. I've had no problems with the bank trying to buy the house. I have no problem with the dust on my car at my residence.
I also work at Lafarge. I've worked there since they opened, almost six years. I have no health problems from working in the plant, breathing in the plant. I've never seen any dust on my car from parking at the plant.
I've also noticed that Lafarge, since they've opened, has made great strides in trying to support the community, trying to keep up with all the environmental tasks that's brought forth to them every time something happens. They always try to better themselves and the community. I don't think Silver Grove would have a school right now if it wasn't for Lafarge coming to Silver Grove. And I know every time something comes up, they're very open and honest with the community and the way they take strides in trying to better themselves and the community. Thank you.

Comment by Ms. Brenda Partin:
I am a resident of Silver Grove. And I watch -- I'm actually also an employee of Lafarge.
Working first-hand in Lafarge, I know that Lafarge goes out of its way for the environment to make sure that everything should be done the way that it should be done. As -- Like Matt, our vehicle sets in the parking lot. We have no problem with the dust in the parking lot. We live two streets over, directly in front of Lafarge. I've never had a problem with dust on our vehicles or my daughters' vehicles.
As far as the sound and the noise, I've never had a problem with the sound and noise. And I believe that they have been a great, great asset to the community. And I think that you ought to grant them their air quality permit. Thank you.

Comment by Mr. William Holloway:
I live at 5134 Mary Ingles Highway, which is directly across from Lafarge, about three doors down from the entrance. When they first started, the dust was a little rough with the gypsum. They must have took care of that, because I, like I said, I live right on Route 8. Maybe once or twice a year we might have a little dust if we have a bad wind storm.
This gentleman was talking about maybe cancer and this pollution affecting cancer. Well, I had -- I've had lung cancer since 1997. So I go back every six months to get chest x-rays and other x-rays. I've had no change since 2001, since this plant came. And like I said, I live -- I could throw a rock and hit Lafarge standing there.
So I just think they do do everything that they can. It's not perfect. You know, it's never gonna be perfect. But I think they do a lot for the community and I think it ought to pass. Thank you.

Comment by Mr. John Hageman, Thomas More College:
I'm an associate professor in the department of biology. Now, I'm not here to speak for or against any

specifics that have been addressed, but I want to keep things in perspective.
I realize this is very personal to all the individuals who are attesting tonight. But I teach an environmental science class and I take my class to the limestone mine nine miles up the road, or probably fifteen miles from Silver Grove. I know what fugitive dust looks like. If you're -- I'm sure anybody here is familiar with the limestone mine problems they've been having.
I also take my students on a field trip across the river to Zimmer Power Plant along with their fugitive dust problems and the ash and everything else they have to deal with. And then the next field trip, I literally take my students to Lafarge. I've done this every summer now for quite some year -- quite a few years. And the students see how the limestone is extracted, turned to lime, used to extract the sulfur from the exhaust, benefiting vast areas of our community by removing that sulfur.
I feel like I'm preaching to the choir here and you guys know all this. But the whole point is, the cleanliness I've seen inside Lafarge and every time I've been there, I can personally attest -- We've been there on some windy days in the summer, dry days. -- I've not seen it. Again, I'm not denying that it exists as these people say. I've got -- I want to believe everybody's being honest.
But the bottom line is, I want you folks to keep in perspective, if Lafarge is not operating, that ash has to go somewhere; it'll be stuck in a hole somewhere, landfill somewhere, and/or go somewhere else or we turn off the electricity and nobody's going to do that.
So the sheer fact that Lafarge takes a waste product, converts it into a usable product instead of just sticking it into the ground, I applaud that company for that. From an environmental standpoint, what they're doing is fantastic, taking an environmental problem and turning it into a product. I trust that your regulatory agents will keep them in line.
I trust they'll keep themselves in line. Is everybody perfect? No. Are they going to have problems? Odds are yes. Will they deal with it? That's to be seen and that's everybody's job to keep everybody in check. I don't want to trade off an ash problem at a power plant to an airborne problem here.
So if everybody does their job, they keep themselves in check, the regulators keep an eye on them, the citizens help the regulators keep an eye on them, I see no reason why this permit shouldn't be extended if everybody does their job. Thank you.

Comment by Mr. Chris Lorentz:
I'm an associate professor of biology at Thomas More College and I'm also the director of the Center for Ohio River Research and Education which is located in Campbell County along Route 8 in California, Kentucky, about ten miles down from Lafarge. And I'm not a resident of Silver Grove, so I can't speak directly to the air quality issues that are being addressed today.
But I felt it important to also mention that I have worked with David Abrams for the past few years in very concerted efforts to improve and enhance the wildlife along the property at Lafarge. My students and I have been involved with improvements to the terrestrial environment and also the creation of ponds to improve the aquatic environments near the area.
In addition to that, they've always welcomed our students for field trips. And, in particular, this past summer, we brought 20 middle school science teachers to Lafarge, and we're trying to develop activities where we can utilize the site at Lafarge into an outdoor environmental education center.
And so in these regards, I feel that Lafarge has made a strong, concerted effort to not only contain in -- within their requirements and compliance, but go beyond the effort in terms of enhancing the environment and improving science education in the area. Thanks.

Comment by Ms. Regina Clos:
I've been a resident of Silver Grove for 14 years. I'm also an employee of Lafarge. And simple and sweet, I

know and see and hear what they -- all the requirements, all that it takes to meet the requirements of what we're here for tonight. Again, I personally, a Silver Grove resident, I haven't seen any change. As far as a Lafarge employee, I know they're doing everything, everything possible to meet it. Thank you.

Comment by Mr. Dave Evans:
I live at 5044 Mary Ingles Highway, directly across from Lafarge. I've lived there 14 months, just a little over. And I think everybody, every factory in the world should be accountable, every business. I owned a business for 25 years in Montana, and, believe me, the EPA was always at my door because it was an auto repair business. They wanted to make sure I was disposing of things properly.
I'm not associated with Lafarge. I don't work for them. So I have nothing to gain here. I worked outside all day today. I'm rehabbing two houses there. And there's no dust. In the almost 15 months that I've been there, I've seen no white drywall dust or any kind of white dust at all. Now, you got dust. You've got dust in this room. But if I thought there was any danger living there, I would take my three children and move. I wouldn't even have bought the place.
I understand they did have some problem four or five years ago; I'm not sure. I wasn't even here. I was in Montana when this happened. Obviously, they fixed it. I would swear in court that there's no dust on my property, no dust around me of that nature, you know, of drywall dust. I mean, it's just not there. I'm outside every day. Like today, as I said, I worked all day outside; I didn't see any dust. I walk my dogs late at night; I don't see no dust. There's no dust on my house, on my cars, anywhere.
My property value, I've heard people say their property value, several, five or six, has went down because of Lafarge. And I can document this if I had to. My property value jumped $26,200 in 12 months. Keep in mind, I live straight across from Lafarge. I like it there so much that I encouraged my in-laws, my mother- and father-in-law to buy the house next door to me so they'd be close to the grandchildren. And I'm in the process of rehabbing that house.
Honest to God, I have yet to see any problem with Lafarge. If it wasn't for Lafarge, like this one gentleman said, we probably wouldn't have a school. I moved to Silver Grove because of the school system. It's a nice, quiet little town. My kids are doing great in school there. And I'll guarantee you, I mean, they -- they contribute heavily to the community. They give scholarships every year. Their tax dollars helps keep the school going. I can see no reason why they shouldn't put an addition on and make a little more drywall; we all need it.
I just don't see any of the problems that these people are concerned about. And I'm not against these people; I mean, I don't even know them. But I just don't see it and I live right there. You know, I mean, I'm right there and I'm outside every day. I live right next door to the Mills. I own a -- one of the houses right next door. I just don't see it. You know, and I would welcome anybody to come down there and use my property to see if they could see it.
When I heard all of this, I contacted David Abrams over at Lafarge and voiced some concerns, you know, what's going on with all this. He said, why don't you just come over to the factory and take a look around. I guarantee you it's the cleanest factory I've ever seen.
As far as the steam, well, I don't think anybody short of God can control which way the wind's gonna blow. If it blows one way, it blows the other. The Ohio River's one of the dirtiest rivers in this country, that and the Mississippi. I mean, I wouldn't eat a fish out of that river.
Cincinnati has got -- I mean, I grew up in Norwood, Ohio when the old Chevrolet plant was there, Allis Chalmers, Grace Chemical still there. And these -- these people, now, that's a dirty, polluted city, Norwood. Silver Grove's not dirty nor polluted. If it is, then I'm just not, you know, I just don't see it. I'm not saying that these people are wrong. I'm just saying, I live right across from them. I like it there.
I do know that I think the reason they're not -- they boarded those houses up -- And I'm not sure about this.

This is speculation. I don't think they want to be in the landlord business and renting those out, having to deal with that. I mean, I could be wrong. But, you know, that's a question that they'd have to ask Lafarge.
The only thing I can tell you is, I have no problems living there. I really didn't care if they made their plant bigger or smaller. But after thinking about it for a couple of days, cause I made a statement here the other night, and I said, it really doesn't matter to me. They're going to employ, I think 100 new people, or 100 new people. That's a lot of jobs, a lot of jobs. There's a lot of people out there that need those jobs. And I guarantee the city of Silver Grove needs Lafarge a whole lot more than Lafarge needs us.
If these people worry about their health issues, my suggestion would be go to this guy right over here, David Abrams and talk to him. He'll show them through the plant. I was in that plant. I'd work in there.
But with God as my witness, I see no reason not to give these people a permit to make -- to add on to their plant. They are not polluting the town. If they are, they're polluting the whole town except the properties that I own, you know. So, I mean, I don't know how they could do that either.
I guess that's about all I got to say. They've been a good neighbor to me, you know. They've been good people. And, of course, so have these people. You know, like I said, I have -- I'm not for or against anybody. But you should, I think -- I encourage you to take this -- help them take this step to better themselves and our community. They're not hurting that community; they're making that community, cause there was nothing there before they came, you know.
I understand they had a problem, but I think they fixed it, if the -- cause I see no dust. I guess that's about all I got to say. You know, like I said, I'll be glad to let anybody come to my place and look for the dust, cause it's just not there. Thank.you.

Comment by Mr. Joe Pelle:
I live right across from the plant in Silver Grove, Kentucky. I agree with Mr. Evans there, that Silver Grove definitely needs Lafarge and they definitely made -- they make the town a lot better.
I also work at the Lafarge plant. And I'm one of the four people that ensure we comply with every condition of Title V, Title V permit. Housekeeping is a big part of my job, which I thank you for your compliment on the outside of the plant and inside.
Some of the things we do there are we sample the piles for moisture content, make sure they are wet and cannot blow around. We tarp the piles to make sure only a small amount is ever exposed. We wash all the roads down and sweep throughout the interior of the plant. I perform -- I perform and document inspections. We have environmental software that makes sure I never forget what I need to do. If there's anything outside that's been dropped, we always pick it up, even -- even if it's truckers are going by or people going by threw it down on the outside, and inside the fence.
I take real good pride in my work. And I really -- I really believe it's a clean plant. And like I said, I live there and I've not had any dust issues with them.
And also, the state has recommended other companies to come in and see how we do things. I have been part of giving those tours and demonstrating our housekeeping record -- methods. That's -- That's all I've got.

Comment by Mr. Neil Bedel:
As a supervisor at Lafarge, I oversee all the aspects of the production throughout the day when I -- when I am over there, including the environment, which, at Lafarge, safety and environment are first. We begin every -- every shift, we have a 15 minute meeting, and every one is -- covers any safety or environmental issues.
We also had two employees -- We have a total of four. Two employees, Joe and another person, and on the days they're off there are two other people over there, to maintain all of the local, state, and federally

mandated environmental regulations that have been passed down to us through the Title V.
Just to give you a quick example, one of the stipulations that we have is if somebody walks out on the street, the blacktop roads on our property and if they just kick their foot down and dust comes up off of that, we can be cited for that. We put down thousands of gallons of water every day just on the roads to make sure that somebody can't walk on our property and kick dust up off the roads. That's just one sample of the jobs that they do. So you know if they take care of the roads that well, they're also taking care of those piles that are around back and every other environmental aspect as well for the plant.
Also, environmentally, they have wildflower beds in front of the plant and back around back. They also have nests for ducks and little docks for ducks on ponds that are located around back of the plant as well, different birdhouses and bird feeders throughout the plants.
And also, I have been a lifelong resident of Silver Grove. I was born and raised there, spent my whole 42 years there in Silver Grove. When the plant opened, I lived right across the street. And when I did sell my house, it was not to get away from Lafarge, it was to get off of Route 8. And when I did sell and move, I stayed in Silver Grove. So I'm only a couple more blocks uptown from where I -- from where I sold my house.
And in my -- In the five and a half years of production of Lafarge, I've never had any problems with any noise, with any air quality issues whatsoever, none. If there were any health risks that I felt were severe or serious, I would not put myself in that situation every day when I go to work. I would not keep my family in that situation, living in Silver Grove, if the risks were that severe. And as a councilman with the city of Silver Grove, it's also my duty to make sure that these regulations and the Title V is followed. And it's also my responsibility for the citizens of Silver Grove that they are not at any risk. I can't imagine, if the risks were that severe and that serious, I can't imagine there being a drywall plant running anywhere in the world, anywhere.
Again, I understand these peoples' concerns and, you know, it's good to see, you know, so many people have -- take a, you know, an active role in what they believe. But I just -- You know, there -- there are no issues. And I just, you know, obviously hope that the permit is granted. And I just thank you for your time.

Comment by Mr.Dan Montgomery:
I'm a new resident to Campbell County. I've been here since July the 1st, serving as superintendent of Silver Grove Schools. Former testimony notwithstanding, I probably would not have realized that Lafarge was a corporate citizen of Silver Grove if I hadn't driven past the school and looked at it. I personally have not seen any of the dust there at the school. We don't have a noise problem. I contacted the principal, other administrators and teachers that have worked there considerably longer than me, some of them before Lafarge located in Silver Grove, and I cannot find any instances in which air quality has been a problem there at the school. The school is located on Third Street, just a couple hundred yards, probably, from the plant itself.
Lafarge has been a good partner with the school as far as educational opportunity. Our science department, in the past, has worked closely with Lafarge's environmental control officer as far as testing standing water, one of my science teachers tell me, from various locations at the plant. They've looked for dissolved oxygen, nitrates, carbon dioxide, phosphates, Ph, and silicates, and found everything to be well within the boundaries that they had anticipated.
They've also conducted soil samples and testing of soils as part of science projects there at school. The science department also surveyed amphibians, reptiles, and bird populations, and found no discernable change in the number of birds, reptiles. I guess there's as many snakes and frogs on Lafarge's property as there are somewhere else in Campbell County.
And we also participated in the purple martin study. And martins come and migrate and nest at Lafarge just

like they do anywhere else in Kentucky. We, as far as our studies with our science department in Lafarge, found no negatives as far as any kind of a wildlife. They have no negative issues as far as their location and the quality or health-related problems for our students or any members of our faculty.
Lafarge has been a good corporate citizen for the community, a good partner for the school, provided our school teachers and students a valuable opportunity to study environmental sciences only a two minute drive away. We certainly appreciate Lafarge working, their environmental office working closely with us. We have some ongoing projects with Lafarge and Newport Aquarium. So all of these things tie together, and, in my opinion as superintendent of Silver Grove Schools, to make Lafarge a good neighbor and one that the Silver Grove Board of Education and School District would certainly support in their request for an increase.
Again, thank you on behalf of Silver Grove and the Board of Education.

Comment by Ms. Kay Wright:
I have been a resident in Silver Grove for 40 years. I also happen to be the city clerk. I could tell you for four hours the benefits to Silver Grove, but I understand this is about air quality. I have many, many allergies. I have taken my own allergy injections for years. I have no problems, no increased problems whatsoever. I'm still taking the same medication I took ten years ago. I have nothing wrong. My office is three blocks right down from the plant. I have a maroon car. It gets dirty with highway dust once in a while. It needs washing right now. But I see no change whatsoever in the dust on my car. My car sits there five days a week.
And as I said, I could go on for hours and hours about the benefits, but I know that's not what you're here for. But I highly support Lafarge and their plant. They highly support the town. Thank you for your time.

Comment by Mr. Gary Molchan:
I'm the director of environment safety and loss control for Lafarge Corporation. Thank you for the opportunity to talk here tonight.
Lafarge works very hard to comply with all the environmental standards that we have at all of our facilities; work especially hard here in Silver Grove because of the close proximity of the plant to the town. We've worked many hours to try and make the place clean, and I feel the place is clean. We're in compliance with our permit, our existing permit. I reviewed the proposed permit, which has many of the same conditions, and I feel we can be in compliance with those conditions of the permit.
I think that the plant is a very clear example of how a company should operate in a community. I feel that the operation of our plant is shared openly with the community. I have never told someone that they cannot come in the plant to see the plant, to tour the plant. We certainly have hours of availability to do that. But I don't know if any of the people that have spoken here this evening have ever been inside the plant, have ever toured the plant, have ever taken an interest in what actually goes on inside this operation, rather than the perception of what goes on.
And I truly am proud of all the people that work at the plant and their efforts in their job and their compliance with the conditions that we have in the permit. And I look forward to continuing the operation and would hope that you grant the permit with the stringent conditions that it does have in it, because we welcome the opportunity to continue to work in this town and to continue to comply with the permits in the State of Kentucky. Thank you.

Comment by Mr. Randy Steinhauer:
I'm the deputy chief of Campbell County Fire District One, Station 51, which is located in Silver Grove. We serve fire and EMS for the community.

I briefly want to say that I've been born and raised in Silver Grove. I have family that still live there and parents, my wife's parents, and I have relatives sitting here tonight and good friends. So I hope they respect my decision not to debate either side on the issue of for or against the permit.
But I am here to tell you about the economic impact on fire and EMS that Lafarge brought to us. During the first year, the EMS side, and as everybody is aware of, the volunteerism in this world, in the nation, has gone down tremendously. We were on the verge of losing EMS in the city. So the first year I was able to hire EMS personnel to supplement the loss of EMS during the day shift, and keep that operation going.
And throughout the years ever since they have been here, they have also provided extrication tools for us, outside the perimeter of the taxation that they have to pay toward the fire district. They have bought monitors for us, which we have never used on the premise, but we have used in residential area and residential property tremendously a lot of times over the last few years. And they've also provided a hazmat person from their plant to the Northern Kentucky and Greater Cincinnati Regional Response, in case there is a disaster in that area.
If there's any other questions, you can -- if anybody wants to ask me, I'm open for anything. But I just want to let you know there is an economic impact to us while they are sitting there. We hope that they continue to be there. Thank you.

Division's response: These comments are either not concerning the air quality aspects of the project or they do not require a response from the Division.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.

ATTACHMENT B

Comments from Martha and Steve Delaney,
Kurt Gainer, Nancy Wills, and Melissa Mills