



RANSON

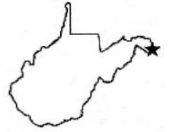
AT THE CENTER OF OPPORTUNITY.

City of Ranson

Office of the City Manager

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Duke Pierson - Mayor



Council Members:

Mike Anderson
Dave Cheshire
Scott Coulter
Donnie Haines
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James Watson

August 16, 2018

ROCKWOOL

Trent Ogilvie, CEO
8024 Esquesing Line,
Milton, Ontario L9T 6W3
(By Email)

Fred Durham
West Virginia Department of Environmental Protection
601 57th Street SE
Charleston, WV
(By email: William F. Durham@wv.gov)

Subject: Ranson Questions Regarding Rockwool Plant Public Health & Environmental Issues

Dear Mr. Ogilvie and Mr. Durham:

As a follow-up to our meeting on August 8, 2018, the City of Ranson seeks to better understand the proposed process for production of mineral wool products and the air pollutants that may be emitted at the planned Rockwool manufacturing plant in Ranson. As all parties know, it has become clear that the Jefferson County public has become very concerned about the Rockwool-Ranson plant and has asked many legitimate and well-reasoned questions. In late 2017/early-2018, the City of Ranson relied upon the West Virginia Department of Environmental Protection (WV DEP), the U.S. Environmental Protection Agency (EPA), and the public permitting process to answer relevant questions regarding the air quality issues related to Rockwool-Ranson as those agencies have the staff with technical and scientific knowledge in the subject-matter.

Ranson understands that WV DEP conducted a full permitting process, which included public participation processes, which ultimately led to a permit issued on April 30, 2018, which applied laws, regulations, and standards established under the federal Clean Air Act and its Prevention of Significant Deterioration (PSD), its National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Mineral Wool Production, and other regulations. For whatever reasons, no citizens, organizations or parties, other than U.S. EPA Region 3, participated in the WV DEP air permitting process for Rockwool. Because of this lack of comment, the City and other relevant agencies did not raise concern or attention to the Air Permit process at that time. But, now citizens have raised concerns and comments about their public health and safety and we believe it is our duty to answer our citizens' and neighbors' questions as best we can in effort to ensure that the public health or safety is not in jeopardy.

While we understand that the Rockwool-Ranson plant is now permitted under federal and state standards, Ranson officials are not able to answer the question of its citizens “is it safe”? And, we want to know. Since early July 2018, Ranson officials and staff have been intently listening to our constituents, but while we have been listening we have also been reviewing the permitting process; raw materials list; draft building plans; the air permit application and final air permit. We have also conducted independent research into the process and have talked with various stakeholders including independent experts throughout the community and the country.

Our review of the relevant documents and conversations have led to several questions. Thus, we ask Rockwool North America and the WV DEP, to provide to the City of Ranson the best information available regarding the following questions and concerns. Ranson suggests that it would be valuable for Rockwool to make your environmental and technical staff and consultants, particularly those involved in the Clean Air Act permitting process, available to support the needed dialogue on the issues and questions raised in this letter.

- 1.) We understand that the Rockwool-RAN melting furnace is permitted to be fueled by as much as 91 tons per day (tpd) of lump coal or petroleum coke. On August 8, 2018, Rockwool North America’s CEO committed to Ranson Mayor Duke Pierson and announced publicly that Rockwool will not use or burn pet coke in the Ranson facility. What assurances or permit changes is Rockwool able to provide that this commitment to not use petroleum coke will be maintained?
- 2.) We understand that mineral wool production plants can use raw materials including indigenous rock, slag and minerals. Your current permit allows at page 18 the use of “slag” as a raw feedstock material. We understand from Rockwool North America’s web site that your materials may use between 19% to 42% “recycled material” as a raw material.
 - a. Will any of the recycled material be industrial slag? What are the projected amounts that will be used, as a percentage of raw materials, and in units per day and/or year?
 - b. What will be the supply sources of industrial slags that may be used? Will there be different and varying sources of such materials?
 - c. What is the nature or makeup of the industrial slag that will be used? Will the makeup of this slag vary by supply source and shipment? What is the process in place for Rockwool to have knowledge of the materials composition of different sources of slag, particularly with respect to potential metals, toxins, or other materials of concern that might potentially be burned, melted, emitted, or otherwise become an output of the plant?
- 3.) We understand that ammonia will be used in the SNCR control technology process in the melting furnace. What are the storage capacities of the ammonia tanks at the planned Rockwool plant? What are the expected storage levels that will actually occur in these tanks? What form will such ammonia be (i.e. aqueous or anhydrous)? What form will be transported to the site? What form will be stored at the site? Will Rockwool be required to establish emergency response or evacuation plans for workers or nearby facilities such as schools?
- 4.) We understand that the permit includes a secondary waste incinerator at the Ranson facility. What role will this play in the production process? What could and will be permissibly burned or used in that equipment?

- 5.) The Rockwool-Ranson facility is permitted to emit 392 tons per year of hazardous air pollutants. Does Rockwool have an estimate or projection of actual emissions of HAPS that will result at the Ranson facility? Are you able to provide comparisons to other Rockwool plants, such as in Byhalia MS and Milton, Ontario CA, regarding permitted vs. actual emissions of hazardous air pollutants at those facilities? Is Rockwool able to help Ranson understand how these levels of potential / actual emissions may relate to the emissions of hazardous air pollutants by other, “everyday” sources such as freight rail locomotives, vehicles, or other kinds of factories?
- 6.) The Rockwool PSD permit states at p. 34 that the permitted emissions from the gutter exhaust, spinning chamber, curing ovens, curing oven hoods, and cooling section equipment will include 92.89 tons per year of PM, 92.89 TPY of PM-10, and 92.89 TPY of Mineral Fiber. Are these three 92.89 permitted emission amounts referring to the same emissions, or three separate types of emissions which each have the same numeric value? What is the nature of a “Mineral Fiber” emission? Will the nature, makeup or quality of emitted Mineral Fiber or particulate matter change, depending on the type of material used in the melting furnace (that is, the questions in #2)?
- 7.) It appears that the Rockwool-Ranson plant will utilize “Afterburner” technology to control emissions of Volatile Organic Compounds such as phenol, formaldehyde, and methanol. Will the Afterburner control other pollutants such as PM or other pollutants? Are the permitted emissions amounts established in the Pre-Construction permit emissions with Afterburner controls, or measured without taking into account the emissions-reducing effects of the Afterburner?
- 8.) Has Rockwool or DEP conducted a Human Health Risk Assessment or health-based air modeling and screening analysis with respect to the toxic air pollutant emissions from the Ranson plant? Is the WV DEP and/or Rockwool willing to conduct such an analysis and provide such results to the public as requested by the Jefferson County Board of Education?
- 9.) On August 8, Rockwool said that it would consider a program to conduct monitoring of actual emissions from the Ranson plant at off-site locations that could include nearby schools. What is the nature and plans for such a commitment, or next steps for discussing an independent monitoring approach?
- 10.) Citizens and other stakeholders concerned about potential impacts on Jefferson County’s tourism-based economy have expressed concerns regarding the potential visual impact of the planned 213’ smokestacks at the planned Rockwool-Ranson plant. Has Rockwool conducted a visual impact analysis regarding the potential viewshed impacts of the stacks? Are you willing and able to conduct such a viewshed analysis?
- 11.) Given the levels of community concern and opposition, does Rockwool see value in having an independent environmental facilitator or mediator involved in 2018 in an effort to resolve controversies and concerns regarding the planned Ranson plant? Does Rockwool see value in having an independent environmental scientist or technical expert involved in supporting that process? Please consider whether Rockwool would seek any conditions or parameters on such an independent facilitation and/or technical evaluation process.

The City of Ranson hopes that Rockwool and WV DEP can provide effective responses to these questions prior to Rockwool's August 25, 2018, event. Ranson believes it is important to be transparent with the public on both these questions and the responses. Thank you for your continued consideration and cooperation.

Sincerely,

A handwritten signature in blue ink that reads "Andrew P. Blake". The signature is written in a cursive style with a long, sweeping tail on the letter "k".

Andrew P. Blake
City Manager