

02/12/07

Eric Ervin Statement to House Natural Resources Committee

Thank you Chairman McNutt and members of the Committee. My name is Eric Ervin and I am the Plant Manager at Holcim's Trident Plant. I appear here today to speak in opposition to House Bill 408. There are many excellent reasons to reject this proposed legislation, some of which you have already heard, and I'm confident that you will hear many other good reasons to reject it as the hearing continues.

From my perspective as Plant Manager, the bill deserves to be turned down for several reasons:

First, the bill suggests that using scrap tires as a fuel supplement, and the iron-rich manufacturing byproduct, slag, as a raw material substitute is the same as using hazardous waste. The Trident plant does not use hazardous wastes and is not seeking to use hazardous waste. Neither scrap tires nor slag is toxic or hazardous by any regulatory agency's definition.

In fact, slag has been used for decades to manufacture cement and to preserve natural resources in Montana, with no negative effects on human health or the environment. Tire-derived fuel has been used safely and effectively by cement plants both in the United States and throughout the world as a fuel supplement for decades. This experience has demonstrated that emissions do not differ significantly from the use of coal and, in fact, in some cases emissions are reduced. This has been the official position of the U. S. EPA and was also confirmed by the extensive Environmental Impact Statement conducted by the Montana DEQ.

Second, as part of Holcim's Alternative Fuels and Raw Materials program, our plan to use scrap tires to supplement our use of coal addresses a critical waste management issue for the state of Montana while preserving natural resources. The use of alternate fuels and raw materials throughout the world has been beneficial for the environment and is a cornerstone of Holcim's commitment to Sustainable Development. We've taken a leadership role in reducing the industry's environmental footprint through our involvement with such organizations as EPA Climate Leaders Program, and our affiliation with the World Business Council for Sustainable Development through our parent company, Holcim Ltd. In fact, Holcim Ltd has once again been named "Leader in the Industry" in the Dow Jones Sustainability Index and is acknowledged as the company with the best sustainability performance in the construction materials industry.

The Trident plant is part of this tradition of this environmental stewardship. The plant has operated safely and with respect for human health and the environment for almost 100 years. We use calibrated and certified EPA-approved continuous emissions monitoring systems to examine and document the nature of our emissions and to ensure that we do not negatively impact National Ambient Air Quality Standards. Our air quality operating

permit requires this and our monitoring results are a matter of public record, as we routinely report them to DEQ. Further, our emissions monitoring procedures are overseen by independent observers, with regulatory agency supervision. To ensure that we maintain our excellent record of safety and compliance, we continually improve our equipment and operation practices, currently investing at a rate of \$2 million per year.

Most important, the Trident plant's first priority is the health and safety of our employees and of our neighbors. As an example, we are nearing a 5 year milestone at the Trident plant without a lost time accident. The Holcim Trident plant employs 83 people, supporting families and the local economy, and pays approximately \$20 million in wages and benefits, state and local taxes and through the purchase of goods and services each year. Additionally, we invest approximately \$2 million in capital improvements each year. We take corporate citizenship seriously. We want to continue to be a major employer and economic contributor in the area. However, in doing so, we will not compromise on our first priority. That's why for more than five years the management and employees at the plant have gone through a rigorous, comprehensive, and costly process to secure a permit to engage in a safe, thoroughly tested and environmentally responsible activity. This bill is an attempt to circumvent that process by those who are motivated by something other than science. As such, it is a betrayal of the hard-working people of the Trident plant, who have played by the rules only to find that somebody now wants to change them. In fairness, I hope that the committee will see this maneuver for what is it and reject House Bill 408. Thank you.

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