Environmental Justice Impacts on MixPlant Permitting and Operations



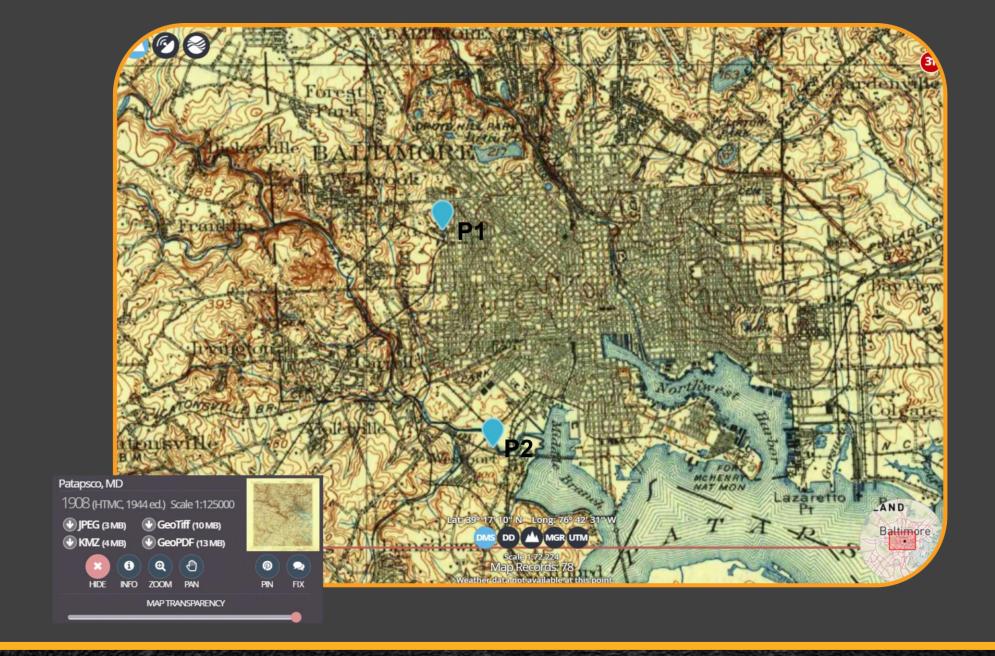




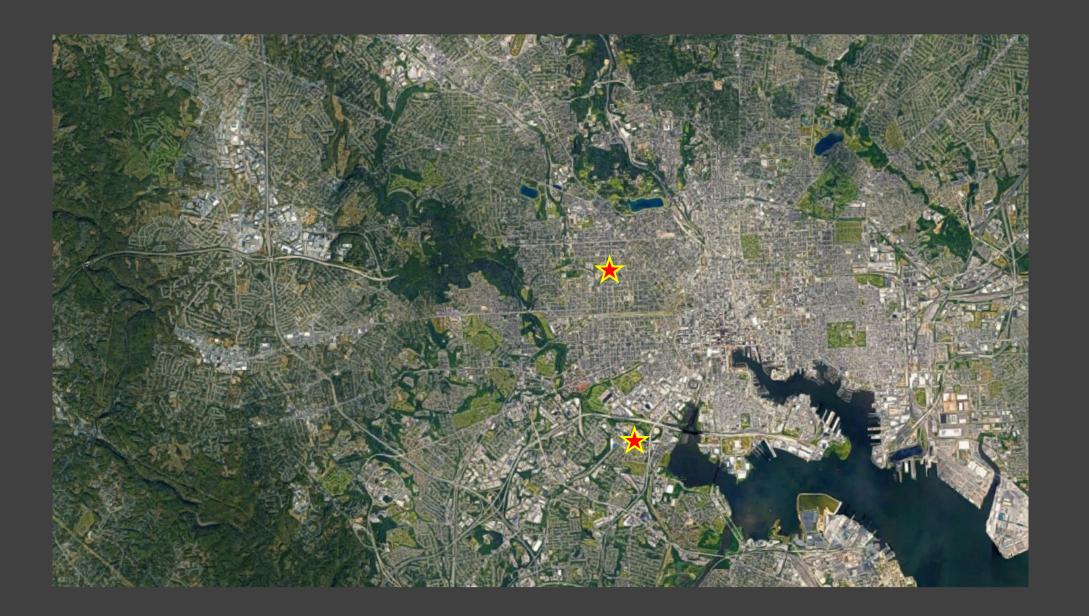
ENVIRONMENTAL OUTLOOK/DRIVERS

- Massive change from a year ago
 - Admin/EPA emboldened by carbon reduction / social equity
 - All is federal 'policy' but some states legislating / regulation
 - Current permitting focus on Env Justice but CO₂ might play
- Carbon reduction: product EPD and fuel consumption
- Environmental Justice
 - Disadvantaged should not bear disproportionate env impact
 - State agencies trying to incorporate into permitting











ENVIRONMENTAL JUSTICE

- ENTREMENTAL DESIGNATION OF LIFE INVOIVEMENTAL DESIGNATION OF LIFE INVOIVEMENT FOR THE PROPERTY OF LIFE INVOIVEMENT OF LIFE INVOICE INV
- Executive Administration's equity 'policy'
 - Env Justice definition: disadvantaged / disproportionate
 - Will be difficult to incorporate as federal (EPA) 'regulation'
 - EPA advocating to state environmental agencies
 - Some states (e.g., Calif) have newly-enacted legis/regulation
- Screening tools: EJScreen (based on TRI) and CEJST (climate/econ)
- Next 3 years will be difficult; EPA charged w/ ensuring EJ fabric



MICH: RESTRICTIVE PERMIT CONDITIONS

- Most restrictive operating conditions of any mix plant
 - Bans use of RFO after allowing in draft permit
 - Requires continuous monitoring of stockpile dust (low wind)
 - Additional (TAC) and annual (PM) stack tests
- Permittee suing agency; so are environmental groups
- NAPA will join other industry efforts to file Amicus Brief
 - Lack of statutory authority (current)
 - Question use of subjective EJ screening tool



CHICAGOLAND EMISSIONS

- Agency/Academic Partnership
 - Required excessive emissions testing
 - First glance: no surprises and emissions well-below EPA 'default' for industry
 - What's next from partnership perspective?
- Capitalizing on compelled testing
 - How are results being communicated
 - How can community concerns be alleviated for good



COMMUNITY INVOLVEMENT

- Sounds cliché but this is one pillar of EJ
 - Communication and opportunity to be heard
 - Address concerns
- Serious consideration for odor control equipment
 - If no odor and no chemical emissions, only truck traffic is left
- Opportunities to meaningful partner with federal EPA
 - Would likely include odor control in exchange for
- Resources are available to help message



SUSTAINABLE & JUST TRANSP. & MATERIALS

- Operate with a small footprint and strive for efficiency
 - Understand / address community and regulatory concerns
 - Go above-and-beyond when needed, even if not required
- Potential partnership opportunities
 - Level playing-field
- EJ and onerous permitting is here to stay



