



August 30, 2018

Bondy Shay Gibson, Ed.D.
Superintendent
Jefferson County Schools

Dear Dr. Gibson,

Thank you once again for inviting ROCKWOOL to speak at the Board of Education's meeting on August 27, 2018. We appreciate the opportunity to have shared information with you and your colleagues and to have done our best to answer the Board's questions.

We believe there is an exceptionally robust body of scientific research and analysis that underpins the determination that the ROCKWOOL facility in Ranson will have no negative consequences for the health and wellbeing of the children of Jefferson County. This conclusion is based on two of the most important governing standards and legal limits applicable to our industry, these being the National Ambient Air Quality Standards (NAAQS) and the Maximum Achievable Control Technology (MACT) standard.

The MACT rules set sector-specific legal limits on specific emissions such as formaldehyde, while the NAAQS establish safe exposure limits on other substances. In both cases, the safety standards are based on the specific health needs and requirements of sensitive populations that include children, the elderly and asthmatics. The standards also take into account protection against decreased visibility as well as damage to animals, crops, vegetation and buildings.

Importantly, these standards must be met under "worst-case" conditions that include operating 24/7/365, producing the product that pushes the maximum volume through the production process in the shortest time. The standards model the maximum concentrations where they are highest at any given geographic point, taking into consideration local weather conditions based on five years of weather data. And just to reiterate, these "worst-case" conditions are applied first and foremost in relation to protecting the health of sensitive populations, such as children.

Even in these theoretical worst-case conditions, the ROCKWOOL emissions will be well below the already stringent standards. Actual emissions will be even lower.

It's worth highlighting that the MACT standards are reviewed every eight years, which makes sense as technology and scientific knowledge continues to evolve. The most recent standards were published in 2015. The EPA spent several years collecting emissions data from the entire U.S. mineral wool industry to form the basis for their evaluations. The EPA dictates to industry exactly what data must be collected; who is authorized to independently collect that data; and the methodology used to assess the data.

As we emphasized at the August 27 meeting, the Sierra Club was party to and a very active participant in the entire rule-making process that culminated in additional limits being imposed in 2015. The Sierra Club accepted these limits, which they played a major role in crafting – again, specifically for our industry and specifically geared to protecting the health of sensitive populations such as children, the elderly and asthmatics.

The EPA concluded that these emission limits from mineral wool manufacturing provide an ample margin of safety for human health and the environment. Considering the EPA's massive data collection and the impracticality of replicating the years-long research and analysis that underpins the existing standards, we



recommend a thorough, independent review of this published research as well as a review of the air modeling done specifically for ROCKWOOL Ranson facility.

Our job as parents, professionals and community members is to understand and manage risk to ensure the safety of our children. That applies as much to everyday activities such as being exposed to the sun, playing sports or riding in a car as well as to more significant undertakings such as construction or economic development activities. Managing risk to ensure it remains at acceptable levels is exactly what the environmental regulations referred to above accomplish. Installing the air monitoring stations in the coming months as we have committed to doing will create a solid baseline against which to compare air quality once production at the facility begins.

To recap our suggestion from the meeting, we propose as an immediate next step to organize an informative educational seminar for Board members, conducted by independent experts, to help Board members understand the established scientific foundations, methodologies and modelling on which health risk assessments are already conducted. We believe it is essential to understand the science that already exists before conducting studies that risk repeating it unnecessarily. Our shared goal should be to create a common knowledge foundation on which to build an even deeper understanding to address any uncertainties and questions that the Board and community members have.

With this type of common foundation, it will hopefully be that much easier and more meaningful to define what additional work should be done, by whom, and with whose participation to address any remaining concerns.

As we have said on multiple occasions, we would be pleased to sit down with members of the community to address these issues and search for common ground. I trust, however, that you will appreciate the challenges that necessarily entails. From what we have observed, some vocal members of the community with whom the Board encourages us to meet have already decided categorically that they don't want the ROCKWOOL facility to be built. Many have told us forthrightly that even if they were to accept the science that there is no health risk, they would still oppose the facility because they don't believe any type of industry is appropriate for Jefferson County.

We respect that view, while also acknowledging this is a discussion that the residents of Jefferson County need to have among themselves and with their elected and appointed leaders. ROCKWOOL was invited to locate in Jefferson County, and we're delighted to have made this choice, which we naturally did with the understanding that what we offer in terms of jobs, economic development and best-in-class environmental performance is what the county seeks.

We have reached out to Chris Kinnan and Regina Hendrix several times to invite them to dialogue. Each time they have either rejected or declined to respond. We created a wonderful opportunity for residents to visit with us at four open houses last week to ask questions, gain knowledge and exchange views. We're delighted that many Jefferson County residents took advantage of the opportunity, but also disappointed that Mr. Kinnan urged his supporters to boycott the open houses writing, "We do not want to legitimize Rockwool's Open Houses."

This leads us to ask you for guidance. With whom should we meet? Can you propose representatives among project opponents willing to sit down with us for genuine dialogue?

The Board of Education has urged us to pause construction until the results of an additional independent health assessment is completed. From a technical stand point, it's not possible to pause the project with immediate effect as current activities must be completed to secure soil, drainage and other site preparation requirements while weather permits.

That aside, if we were to pause construction for a time, for example, under what conditions would it be acceptable to restart? What assurances would we have as a responsible business that those with whom we would engage would have a mandate and capacity to uphold whatever understandings were reached? We



wouldn't see a great deal of utility in pausing construction if the most likely outcome is simply a return to the previous status quo.

While we understand the Board's desire for an abundance of caution in asking us to pause construction until additional studies are completed, we are confident that the additional reviews we are proposing will reaffirm the existing conclusions that our emissions will be well under the scientifically-based limits designed primarily to protect the health of sensitive populations such as children, the elderly and asthmatics.

If contrary to expectations, additional reviews were to raise legitimate concerns, we would have time to make any adjustments that might be required, even if that would delay the project.

We also have an obligation to the community to provide the well-paying jobs and economic development opportunities that we have promised.

Attached for your reference is the slide presentation from Monday's meeting.

Finally, for the sake of good order and because a Board member commented that you have written to us without receiving a response, we include the email string documenting our previous exchanges.

Thank you for your time and attention to this matter. I look forward to continuing our constructive dialogue.

Best regards,

A handwritten signature in blue ink, appearing to read 'Trent Ogilvie', written over the typed name.

Trent Ogilvie
President, ROCKWOOL North America

Encl. August 27, 2018 Slide presentation
Email correspondence