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An  Oldcastle Company

Opposing Committee Bill No.351 - An Act Establishing A Preference For The Siting And Licensing Of Completely Enclosed Asphalt Plants.

Tilcon CT **strongly opposes** SB351 as it is simply a way to work around the current siting law and specific criteria which all asphalt producers have been following since the statute was enacted in 1997. The current law was put in place to limit the overall emissions from asphalt plants to the atmosphere. The siting criteria were established to ensure that an asphalt plant be located in a manner so as not to be proximate to a school, hospital, water course, public facilities, etc. Establishing a building around an asphalt plant will have no impact on emissions from the stack.

The proposed law will also impact any pending or future permit modifications, as it will become too costly to retroactively place all asphalt plants inside a building. For example, if my company wanted to invest in a new burner that has lower emission standards than the current one being operated, we would have to get a permit modification approved by the DEEP. A proposal for a simple burner change to reduce emissions and otherwise be more efficient will go from a \$100k investment to more than a million dollar investment, as under SB351 we would need to completely enclose the current plant within a building. The upgrade would not be justified in the end, and more harm than good would result, since no one would invest in technology upgrades that are otherwise good for the environment.

We are aware of no study showing the need or benefit flowing from these new requirements. The proposed bill reflects the desire of someone trying to get around the current siting statute, because they do not meet the current requirements, by adding a building enclosure that does not provide any environmental benefits.

If we were to be subject to the proposed law, costs will increase for the production of asphalt without any improvement in emissions from the stack. These cost increases would have to be passed along to the end user, the traveling public. Up to seventy per cent of our business is working for the DOT and local towns, who will bear the brunt of the increases. In addition, these costs increases will impact our business at a time where we need to do increasingly more work to fix our states failing infrastructure. The proposed law provides no sound impact.

Please oppose SB351.

Regards, Gary Wall
President Tilcon, CT.