

Montanans Against Toxic Burning

Issues Associated with Burning Waste Tires in Holcim's Trident Cement Kiln

Public health risk

- Cement plants are among the largest producers of dioxin in the United States.
- Studies show that burning tires in cement kilns leads to greatly increased emissions of hazardous air pollutants, including dioxin, lead, mercury, and chromium. These toxic substances enter our bodies through inhalation and through the consumption of locally produced dairy products, meat, and agricultural products.
- These pollutants cause serious health problems, including reproductive impairment, developmental delay, and cancer. Children are especially vulnerable to these pollutants.

Food/agriculture issues

- The area surrounding the Trident plant is used for farming, livestock grazing, and dairy production.
- 35% of the state's milk is produced downwind of the Trident plant.
- Wheat Montana's fields are adjacent to the Holcim facility.
- Local farmers and ranchers could experience decreased productivity, as well as difficulty marketing their goods.
- Local fish and game populations would suffer negative impacts from toxic emissions.

Fallacy of the "recycling" issue

- Burning tires is not recycling.
- State government studied the issue of waste tires in Montana and found that "Montana does not have a problem with waste tire management."
- Holcim plans to burn 1.13 million scrap tires per year, far more than Montana generates in a year. The facility would need to import tires from surrounding states, making the Gallatin Valley the incineration site of other states' wastes.
- If Holcim sources tires from Montana, several other businesses that actually do recycle tires into useful products will be negatively impacted.

Incompatibility with current economic development

- More than 90 small high-tech companies, paying high salaries, are doing business in the Gallatin Valley because of the clean environment and high quality of life.
- In the 2004 State of the Rockies study, Gallatin County was identified as the healthiest county in the Rockies largely because of the lack of toxic air emissions in our valley. Waste incineration at the Trident plant would undermine that status and jeopardize the economic viability of our community.

Problems associated with burning tires in cement kilns

- Cement kilns are not designed to be waste incinerators; they lack the technology necessary for complete destruction of toxic by-products.
- Old, wet-process kilns, like the one at Trident, have a proven track record of noncompliance when burning scrap tires.
- There are huge loopholes in the EPA regulations concerning cement kilns; waste-burning cement kilns receive much less stringent monitoring and oversight than incinerators designed for burning wastes.

Holcim's poor compliance record here and elsewhere

- Holcim's Trident plant is an antiquated facility that experiences frequent equipment failures, breakdowns, and malfunctions. In 2002, the facility exceeded its permitted emissions limits more than 6% of operating time. In 2003, Holcim was fined for violating its permitted operating limits. During January and February of 2005, the Trident kiln experienced serious malfunctions every week and exceeded its permitted emissions limits more than 6.5% of operating time.
- Holcim facilities in other states have received hefty fines for major violations of air quality regulations, and several are currently involved in enforcement actions. Holcim's facility in Ada, Oklahoma, which is the company's only wet-process plant burning whole tires, has been out of compliance for several years running. In September 2005, EPA took a second enforcement action against the Oklahoma facility, issuing a fine of \$321,000 and classifying the facility as a "high-priority violator."

If Holcim is permitted to burn tires, incineration of other industrial wastes will surely follow.

- All other U.S. Holcim facilities that have been permitted to burn tires have subsequently added other industrial wastes as “alternative fuels.” For example, soon after the Holcim plant in Dundee, Michigan, was permitted to burn tires, it submitted a list of more than seventy different industrial wastes to be used as “alternative fuels,” including paints, plastics, and waste products from animal rendering, auto manufacturing, and petroleum refining, all of which were eventually approved by the Michigan DEQ.
- The Montana DEQ has allowed the Holcim Trident facility to burn toxic slag from the Superfund site at the Asarco lead smelter in East Helena, although Holcim failed to apply for a permit to do so. In addition, DEQ has recently made the determination that as long as Holcim pays (virtually any dollar amount) for a waste, the facility does not need a solid waste permit to use that waste. Thus, it appears that the current permitting action (that is, tire incineration) is the de facto threshold for a practically unlimited waste stream for the Trident plant.

Other points to consider

- The DEQ received more than 1,500 comments from the public on this air quality permit action—a record for DEQ. Of those, only two were in favor of the permit: one from Holcim’s engineering consultant and the other from a Manhattan high-school student (part of a submittal from an entire classroom).
- The permit would not create a single new permanent job.
- Some local officials have suggested that we should let Holcim “try” burning tires, and if the facility has problems, DEQ would step in and stop the process. However, in its entire history, the DEQ has never revoked an air quality permit—even when there have been egregious violations at major industrial sources. The agency has said that it prefers to “work with facilities” to help bring them into compliance. No one should expect that the DEQ will “pull” Holcim’s permit if the facility experiences significant problems after being permitted to burn waste tires.