Public Information Meeting: November 1st, 2007

The following questions were asked by attendees at the Public Information Meeting. Owens Corning committed to responding back with more information in writing.

1. Will the facility need a water runoff permit?

Yes. Owens Corning will apply for a storm water permit for storm water discharges associated with industrial activity. The storm water permit is required before we start operations and we will prepare a Storm Water Pollution Prevention Plan as required by the regulations. Storm water should not come in contact with any raw materials or the finished product at the plant. All raw materials will be stored under roof, in silos and tanks. The finished foam board will be wrapped in shrink wrap before being stored outside

2. Why is there no information here on particulate? Does DEQ regulate particulate? There were 5 tons before and now 12. You broke it out before I do no see that here. How much fine dust particulate will I need to sweep off my porch?

Owens Corning's application does specifically address particulate. If you are referring to the DEQ fact sheet, Owens Corning does not know why information on particulate was not included.

The DEQ does regulate particulate emissions and they are doing so with respect to the Gresham plant. Given the anticipated actual particulate emissions from the plant, the small amount of particulate emitted by the Gresham plant will not be noticeable to the surrounding community and you will not be sweeping it off of your porch.

DEQ has addressed the particulate issue elsewhere in this permitting process. In the Notice DEQ published for the Information Meeting, it discussed particulate emissions from the plant. The Notice pointed out that the dust from the plant will come from the recycling operations (mostly cutting and grinding). It stated that the dust emitted by the recycling operations would be controlled by baghouse filter emission control devices that will be installed in the plant. In that same Notice, DEQ clarified that Owens Corning is required to get an air permit because the amount of particulate and volatile organic compound (VOC) that might be emitted from the plant was above the level that required an air permit under Oregon law.

The DEQ also addressed particulate emissions in the Notice for the December 13th Public Hearing issued on November 9th. The Notice points out that the dust that is not captured and recycled is largely controlled by baghouse filters but that a "small amount" is emitted. It explains that Oregon law requires facilities that could emit 10 or more tons per year of any single criteria pollutant (and particulate is a regulated criteria pollutant) without an

emission control device must obtain a permit even though the facility agrees to install a control device that will reduce actual emissions from the facility to less than 10 tons.

Owens Corning can assure you that particulate emissions and their controls are definitely being addressed within the permitting process. In our permit application, submitted in September, Section 3.1 states that the Gresham operation will generate particulate matter and it identifies the sources of that particulate. Table 3-1 in the permit application shows that the highest amount of particulate anticipated to be emitted from the plant (often referred to as potential emissions) was 12.2 tons per year. Actual emissions of particulate from the plant will be impacted by the amount of foam produced and the amount of material recycled. To give you a comparison, the actual particulate emissions, in 2006, from each of our foam plants in Ohio and Illinois was less than one ton.

You also asked about the change in the potential particulate emissions from the original configuration of the facility to the current version. It is due to several factors.
The amount of board that will be produced is higher now than in the first application which means that more board will be trimmed, cut, and ground for recycle. These are the processes that emit the majority of the particulate emissions. There are also two additional silos, one for pellets and one for ground material in the current version of the plant. These are both additional sources of potential particulate emissions. These sources will have particulate control equipment installed that will control their actual particulate emissions into the air as I described above.

3. The broader value is interesting but my immediate concern is what is coming out of the pipe? My concern is what I am going to be breathing. I live just east of plant.

Subsequent to the public meeting on November 1st, the DEQ has released an Air Contaminant Discharge Permit Review Report for the Gresham plant. It was prepared by the DEQ as part of the Agency's process for preparing the air permit. On page 7 of that report the DEQ lists the estimated potential (highest) emissions. This information shows that the Gresham plant has the potential to emit up to 12.16 tons/year of particulate, 1.77 tons/year of NOx, 2.09 tons/year of CO, 0.01 tons/year of SO2, 17.14 tons/year of VOCs, less than 1 ton/year of all hazardous air pollutants most of which is styrene and 223.1 tons/year of HFC-152a. The HFC-152a is regulated solely because of its flammability and not because of any adverse health effects.

The potential emissions of air pollutants are relatively low and should not present a significant risk to even the most sensitive people. That assessment is at the heart of the DEQ's review of our permit application. If the DEQ believes that exposures to regulated air pollutants from the plant will cause any adverse health effect in the community, they should not issue the permit. The plant will be required to maintain its emissions within the levels set by the DEQ to assure the safety of the community.

4. Product is flammable, what about a spill or fire. What is worse case? Does the fire department have enough equipment?

There are two potential fire scenarios that can be identified at the Gresham plant. The first involves the finished product, stored at the plant, catching fire. The second scenario would be a fire involving the raw materials used to produce the foam board. The fire department will have the appropriate equipment to handle either of these scenarios.

At any time, the plant could have up to 16,000,000 board feet of extruded polystyrene foam on the plant site. Although the finished foam board contains a flame retardant additive to inhibit ignition from small fire sources, the finished product will burn if it is exposed to a fire of sufficient heat and intensity. The burning board would then generate carbon monoxide, carbon dioxide, and styrene. Studies have shown that the combustion products of foam are of approximately the same toxicity as combustion products of other building materials such as wood. The blowing agent present in the board may also burn and produce combustion by-products which will vary depending on the blowing agent used and its flammability. Such a fire would be fought using water, carbon dioxide, or dry chemical fire extinguishers. Based on experience at its other foam board manufacturing plants in Ohio, Illinois and Quebec, Owens Corning does not believe that a fire involving the stored product is likely to happen at Gresham but we will be prepared in the unlikely event that one should occur.

The raw materials used at the plant consist of polystyrene resin pellets, blowing agents, flame retardants, and talc. The flame retardant and talc do not present any risk of fire. The Material Safety Data Sheet (MSDS) for the polystyrene resin pellets states that they are nonflammable.

Three of the blowing agents that might be used at Gresham 143a, 152a and 365mfc are flammable. The approved fire fighting materials, per their MSDSs, are water, dry chemicals, alcohol foam and carbon dioxide. Owens Corning has designed the facility to minimize the risk of such a fire. The facility will meet the National Fire Protection Agency (NFPA) codes as required for the flammable classification of the blowing agent.

The blowing agent, in liquid form, will be delivered by tank truck to the plant. It will be pumped from the truck directly into a storage tank that will be located within a containment area to control any possible spill. The maximum amount of blowing agent that can be stored in the tank, at any one time, is 7,820 gallons. When the blowing agent is to be used in the manufacturing process it will be pumped from the storage tank to the plant blowing agent pumping stand inside the plant and incorporated into the foam being produced.

Because one of the flammable blowing agents may be stored at the plant in quantities that exceed the accidental release thresholds (Section 11121 of the 1990 Clean Air Act Amendments) [OAR 340-244-0230, Table 3] the plant is subject to the Accidental Release Prevention requirements in 40 CFR Part 68. As such, process safety elements have been integrated into the design and operation procedures for the blowing agent storage and handling systems. The piping fittings, pumps and other handling equipment that will be present in the plant are designed to meet process safety and risk management

requirements for the storage and handling of these materials. In addition to meeting process safety requirements, the facility will be subject to accidental release prevention requirements and will prepare and submit a Risk Management Plan as required by the regulation.

Prior to putting an Emergency Response Plan together, Owens Corning will meet with the Gresham Fire Department to review its operations at the plant and the materials that will be present at the site. (We have done this in Ohio and Illinois and continue to meet annually with those fire departments to review the plan and the plant's operations.) Those discussions will include both Owens Corning's and the fire department's response to either an accidental release or fire at the facility and the equipment design to meet required risk mitigation and appropriate fire codes. Following those discussions, Owens Corning will prepare a draft of its Emergency Response Plan as required by both federal and state law.

We will schedule a community meeting, at that time, with the Gresham Fire Department and Owens Corning's experts to review and discuss the draft Emergency Response Plan. That process will give the community an opportunity to understand more fully the risks associated with the operation of the plant, the steps being taken to minimize those risks and the planned response to either a release or fire at the facility. We would appreciate any suggestions from the community regarding those emergency responses. Thereafter we will finalize the Emergency Response Plan.