

**Letter from Puget Sound Clean Air Agency
to Ash Grove Cement Company**

Dated: August 20, 2026

August 20, 2026

Allen Block, Environmental Manager
Ash Grove Cement Company, Seattle Plant
3801 E Marginal Way S
Seattle, WA 98134

allen.block@ashgrove.com

Dear Mr. Block:

On June 16-18, 2026, Ash Grove Cement Company (Ash Grove) conducted testing of air emissions rates of eight metals at two different rates of tire fuel consumption, pursuant to Condition 5 of Notice of Construction Order of Approval (NOC OOA) No. 12003. One condition represented Ash Grove's previously permitted tire consumption rate (30% of fuel, by weight), and the other condition represented Ash Grove's newly requested tire consumption rate (approximately 37% of fuel, by weight). The Agency received the report summarizing the results of this test on August 17, 2026.

The one-time test requirement of Condition 5 of NOC OOA No. 12003 has now been fulfilled. As such, this testing requirement will not be included as an applicable requirement in the pending Air Operating Permit renewal for Ash Grove.

The Agency has analyzed the reported results of the test using the methodology in Appendix C to Part 60, Title 40, of the Code of Federal Regulations. Appendix C was named in Condition 5 of NOC OOA 12003 as the method by which the Agency would determine whether the proposed change in Ash Grove's tire consumption rate constitutes a physical or operational change to an existing facility that results in an increase in the emission rate of any of the eight metals tested.

Using the t-test statistical methodology prescribed by Appendix C, the Agency has determined that the increased tire consumption rate caused an increase in the emission rate of cadmium. Therefore, an increase in the permitted tire consumption rate would constitute a "modification" related to cadmium emissions, per WAC 173-400-030(51), because it would cause an increase in emissions of cadmium. However, the application materials submitted by Ash Grove for NOC 12003 did not include a proposal for Best Available Control Technology for emissions of cadmium, and the Agency did not make a determination of Best Available Control Technology for cadmium in its review of NOC 12003.



PUGET SOUND
Clean Air Agency

1904 3rd Ave #105
Seattle, WA 98101

206-343-8800

pscleanair.gov

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Pursuant to Condition 5.b. of NOC OOA No. 12003, the previously established tire consumption limit of 30% by weight on a daily average remains in place. Consequently, any possibility of increasing the permitted tire consumption rate under NOC OOA No. 12003 is hereby foreclosed. Ash Grove must update the Fuel Monitoring Plan submitted to the Agency on December 4, 2025, to reflect this 30% limit.

Sincerely,



John P. Dawson
Engineering Manager
Puget Sound Clean Air Agency

cc:

Carl Slimp
Gerard van der Jagt