



Franklin County Construction Industry Council
PO Box 854
Union, MO 63084
www.fccic.org

July 9, 2008

Missouri Air Conversation Commission
C/O Mark A. Fohey, Chairman
PO Box 176
Jefferson City, MO 65102-0176

Dear Mr. Fohey:

An informational meeting occurred on July 2, 2008 in the Franklin County, Missouri commission chambers. Present at the meeting were all county commissioners and representatives from the Franklin County Construction Industry Council (FCCIC), Franklin County Board of Realtors and the Missouri Department of Natural Resources representatives Steven Feeler and Jim Froelker.

The recent rule change concerning the use of Air Curtain Destructors (ACD) for the disposal of vegetation had taken all of us by surprise. A recent cost comparison for disposal of 100 tons of vegetation showed that it cost \$450 using an ACD compared to \$6,282 for tub grinding and disposal at a landfill.

Mr. Feeler was invited to discuss the recent rule change concerning the use of ACD's for vegetation. Mr. Feeler did an excellent job of explaining to us what had happened and why the rule had changed. After further explanation and discussion, it has been realized by all that the rule change will have significant economic impact with negligible environmental benefits.

The FCCIC supports an immediate moratorium on the recent rule change. We also support changing back the general rule to allow the use of ACD's in the future.

If you should have any questions regarding our positions on this matter, feel free to contact myself at 636-583-8400.

Sincerely,

Cameron Lueken
Franklin County Construction Industry Council,
Board of Directors