



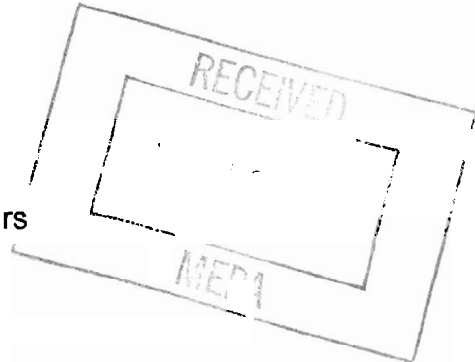
ENGINEERING TECHNOLOGIES GROUP, INC.

ENGINEERED PRODUCTS ♦ DESIGN SOLUTIONS ♦ ENVIRONMENTAL PERMITTING

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November 9, 2007

Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
Department of Environmental Protection
100 Cambridge Street, 9th floor
Boston, MA 02114



Attn.: Mr. Richard Bourre, Assistant Director, MEPA Office

Re: Norfolk Asphalt Company, Norwood, MA (MassDEP Air Permit #
4P07033, Transmittal # W150764)

Dear Mr. Bourre,

Thank you for returning my phone call the other day concerning the above project. As you are aware, ETG filed an air permit application (Non-Major Comprehensive Plan Approval) with the Massachusetts Department of Environmental Protection (MassDEP), Southeast Regional Office, on September 19, 2007 (the check cleared on 9/21/07 and the timeline began the next business day, which was 9/24). We received a draft approval letter on October 11, 2007 and returned our comments to MassDEP on October 22, 2007. We believed that a Final Approval letter would be issued shortly thereafter. (Please note that MassDEP is required to act on this application by December 30, 2007.)

On October 26, we received a phone call from Mr. Tom Cushing, Environmental Engineer, from MassDEP. Rather than hearing that a Final Approval letter would be forthcoming, we were informed that the air permit application was forwarded to the MEPA Unit for their review. It is our understanding that you are being requested to determine if the project warrants the filing of an Environmental Notification Form (ENF). Please consider this correspondence a formal request from our client for a formal response to that question.

It is our opinion that the rehabilitation and upgrading of this existing asphalt plant does not warrant the filing of an ENF. The proposed project is for the replacement of existing asphalt plant equipment with both new components and newer reconditioned plant equipment at the existing facility located at 635 Pleasant Street in Norwood (Norfolk Asphalt Company). The existing plant is an H&B Manufacturing batch mix plant, which is capable of producing 120 tons per hour (TPH) of bituminous concrete. That plant is equipped with a Gencor Model No. AF-40 air atomized burner. The existing plant still remains on site with

approximately 7,700 gallons of liquid asphalt currently being stored in three (3) separate tanks as allowed by state and local permits which have been maintained to the present date, although it has not operated since 1988. The proposed plant will be a Stansteel (or equivalent) batch mix plant capable of producing a maximum of 288 TPH of bituminous concrete. (Note: Even though the hourly production rate of the proposed plant is greater, the actual annual production is expected to be similar to that of the existing plant.) The burner will be a new Gencor "low NOx burner" model UF-100 (or equivalent). The primary fuel of use will be natural gas with ultra low sulfur No. 2 fuel oil used as a back up fuel. The proposed plant will meet Best Available Control Technology (BACT) as determined by the MassDEP for this type of process. Production and fuel limits are being proposed on the facility and therefore, the resultant emissions will remain well below the major source thresholds for all of the criteria pollutants.

In conclusion, we respectfully request that the MEPA Unit respond to the following: 1) Please confirm the proposed project constitutes a replacement project, and 2) Does the proposed project require the filing of an ENF and if so, under which section of the regulations.

Please contact this office if you have any questions or require additional information to make this determination. Thank you in advance for your attention to this matter. We look forward to hearing from you soon.

Sincerely,
For ETG/Engineering Technologies Group, Inc.



Christine M. Gibbons
Manager of Environmental Services

cc: Mr. Tom Cushing, MassDEP
Norfolk Asphalt Company, Inc.