

Talking Points on Air Quality

Rules 310- 316 are arguably the MOST stringent air quality rule for PM10 in the country. When rules are established in a serious non-attainment area, the State and County were required to apply BACM or Best Available Control Measures and MSM Most Stringent Measures. Agencies look to other non-attainment areas such as San Joaquin Valley in California and Clark County, Nevada to determine what the most stringent measures currently are.

The following are but a few measures rock product facilities are required to employ to reduce emissions.

- Operations must have an approved Dust Control Plan
- Operations and Maintenance plans are required for all air control equipment and monitoring devices.
- Process Controls – which include; permanently mounted water systems must be installed throughout the process.
- Facilities must conduct moisture testing 2x each day to ensure 4% moisture content on our processed materials.
- We must operate baghouses, pressure control systems and overflow warning devices on silos.
- Materials load-out emissions controls are also needed.
- We must adhere to the opacity standards, not allow emissions beyond the property line and operators must make certain to apply these best measures, stabilize or shut down during a high wind event.
- Operations are required to keep records of activity levels, maintenance of equipment, and all tests conducted, including checking silt levels on unpaved areas and maintaining stabilization of the entire facility including storage piles.
- Facilities use water trucks, dust suppressants, palliatives or pave areas of the site.
- We control traffic patterns at the facility to paved or cohesive hard surfaces and clean internal and external roads regularly.
- Facilities install wheel washers, rumble grates and use PM10 certified street sweepers to avoid track-out.
- And by the way, the same requirements apply for any nighttime operations.

- Finally, there must be a Fugitive Dust Control Technician on site and our folks must attend training and be certified through the County.
- The 49 page rule is available on the County's website. If you would like to know more.

That being said, the industry has dramatically reduced emissions since the approval and implementation of revised Rule 316 in March of 2008. According to the County, Rule Effectiveness has improved significantly since the last inventory and implementation of revised Rule 316. Training appears to have paid off.

The industry is exploring with the County the possibility of receiving credit for measures we have taken that are not accounted for in the current inventory, such as additional stabilization on materials that would further reduce emissions.