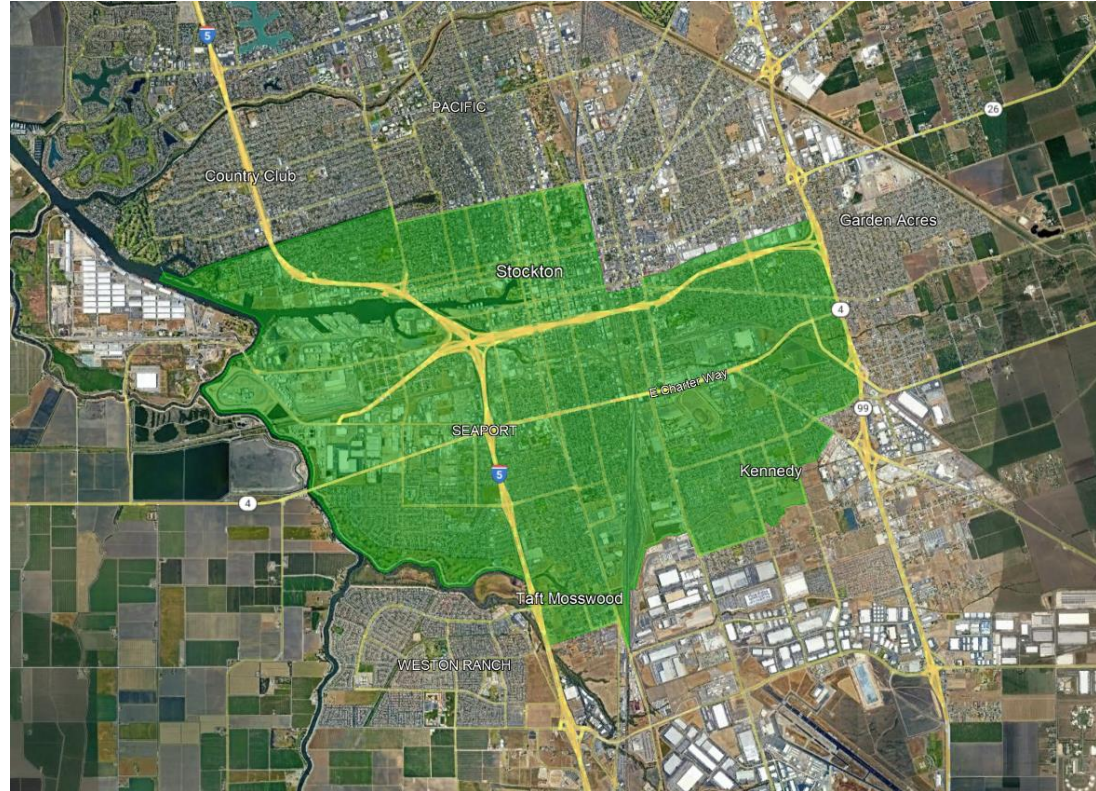


Dust Control Enforcement Update



Stockton CSC

Regulatory and Enforcement Subcommittee Meeting
December 8, 2022

Why Have Dust Control Requirements?

To reduce ambient concentrations of particulate matter (PM₁₀) by requiring actions to prevent, reduce, or mitigate man-made fugitive dust emissions, in an effort to protect public health of valley residents



What Activities Are Subject To Dust Control?

Construction Sites

Excavation and Earthmoving

Bulk Material Handling, Storage Operations and Transport

Vacant Land

Paved and Unpaved Roads

Unpaved Vehicle Traffic Areas



What Are The Basic Requirements?

- Limit "Visible Dust Emissions" (VDE)
- Maintain a Stabilized Surface(s)
 - Unpaved roads
 - Disturbed surface areas
 - Outdoor bulk material storage piles
- Limit Carryout and Trackout



What is a Stabilized Surface?

- Any disturbed surface area or open bulk storage pile resistant to wind-blown fugitive dust emissions
- Surface is stable if it meets a variety of criteria, for example:
 - Visible crust
 - Certain threshold friction velocity (TFV)
 - Flat vegetation cover
 - Standing vegetation cover
 - Combination of standing vegetation & TFV
 - Non-erodible elements
- Unpaved roads/traffic areas with $\leq 6\%$ silt content
- Unpaved parking lots with $\leq 8\%$ silt content

Limit Visible Dust Emission to 20% Opacity & Stabilize the Surface

- Proactive watering and phasing of work
- Application of water or stabilizers to haul and access roads.
- Restrict vehicle access
- Limit vehicle speed
- Cease dust generating activity during wind events



What are Requirements for Carryout and Trackout?

< 50 feet: remove by end of workday

≥ 50 feet - remove immediately, if:

- An urban site
- A rural site ≥ 10 acres



Examples



Measures to Control Dust from Carryout Trackout

Water

Dust
Palliatives

Aggregate

Pavement

Vegetative
Controls

Restricting
Vehicle Access

Reducing
Vehicle Speed

Wind Barriers

Carryout and
Trackout
Prevention



Water Use as a Control Method

- While water is one of the most commonly used dust control methods, any method is acceptable if it successfully limits fugitive dust or stabilizes the surface as required by Regulation VIII
 - Regardless of the method, records must be maintained
- Alternatives to water are commercially available and utilized



Inspection Process if Dust Control Plan is Required

- Review selected control measures in the DCP
- Walk the site
 - Verify the selected control measures are in-use and maintained in good working order
 - Conduct VDE (active sites)
 - Verify stabilized surfaces (inactive sites)
 - Look for trackout on public roads, ensure proper cleanup if present
- Review records
- Summarize findings and take any necessary enforcement action

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Northern Region Central Region Southern Region

Reg VIII Site Inspection Form

Project Name: _____		Project Size (acres): _____	
Project Location/Address: _____		City: _____	
General Contractor: _____		CCL #: _____	
Contact Person: _____	Contact Phone #: _____	Email: _____	
Inspection Date: _____	Inspection Type: New Site <input type="checkbox"/> Periodic <input type="checkbox"/> Complaint <input type="checkbox"/>	Complaint #: _____	
Site Conditions: Active? Yes <input type="checkbox"/> No <input type="checkbox"/>		Workers Present? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Photos Attached? Yes <input type="checkbox"/> No <input type="checkbox"/>			
Weather Conditions: <input type="checkbox"/> Clear <input type="checkbox"/> Partly Cloudy <input type="checkbox"/> Cloudy <input type="checkbox"/> Rain <input type="checkbox"/> Foggy			
Wind Speed: _____		Wind Direction: _____	
Activity Occurring: <input type="checkbox"/> Clearing/Scraping <input type="checkbox"/> Trenching <input type="checkbox"/> Earthmoving <input type="checkbox"/> Stockpiling <input type="checkbox"/> Traffic on Haul Roads			
<input type="checkbox"/> Demolition <input type="checkbox"/> Extraction <input type="checkbox"/> Inactive Areas <input type="checkbox"/> Other: _____			

Rule 8021 – Construction, Demolition, Excavation, and Other Earthmoving Activities

Administrative:

Dust Control Plan (DCP): Required? Yes No Approved? Yes No Plan# _____

Available on Site? Yes No Site Compliant with Plan? Yes No

Construction Notification: Required? Yes No Submitted? Yes No

Demolition:

VDE observed? Yes, VDE Form Attached No Opacity: _____ %

Water applied to building's exterior surfaces? Yes No

Dust suppressants applied to unpaved areas within 100 feet? Yes No

Dust suppressants applied to unpaved areas where equipment is operating? Yes No

NESHAP Requirements for Structures Asbestos Notification Submitted? Yes No

Asbestos inspection conducted by District? Yes No

Construction/Excavation/Extraction/Other Earthmoving Activities:

VDE observed? Yes, VDE Form Attached No Opacity: _____ % Source: _____

Dust Control Measures Implemented: Sprinklers Water trucks #: _____ Wind barriers

Watering records maintained? Yes No Water trucks in use at time of investigation? Yes No

Inactive Areas:

Inactive seven days or more? Yes (use the "Open Areas" section) No

Haul Roads:

Speed Limit Posted? Yes No N/A Meets DOT standards? Yes No Max. speed: _____ mph (15 or less)

Rule 8031 – Bulk Materials

Handling:

VDE observed? Yes, VDE Form Attached No Opacity: _____ % Source: _____

Applying Water? Yes No

Chutes or conveyors > 12 feet? Yes No Fully enclosed Water sprays installed

Storage:

Active Piles? Yes No Inactive piles < than 100 cubic yards? (exempt) Yes No

Piles stabilized? Yes No Applying Water Covered 3-Sided Structure Wind Barriers

Transport:

On-site observed? Yes No Speed limit Applied water Covered trucks Freeboard 6 in.

Off-site observed? Yes No Truck clean or covered, no spillage Water applied and freeboard of 6 in.

Records:

Watering records maintained? Yes No Long-term treatment records? Yes No

Reg VIII Site Inspection (Rev: 11/15/16)

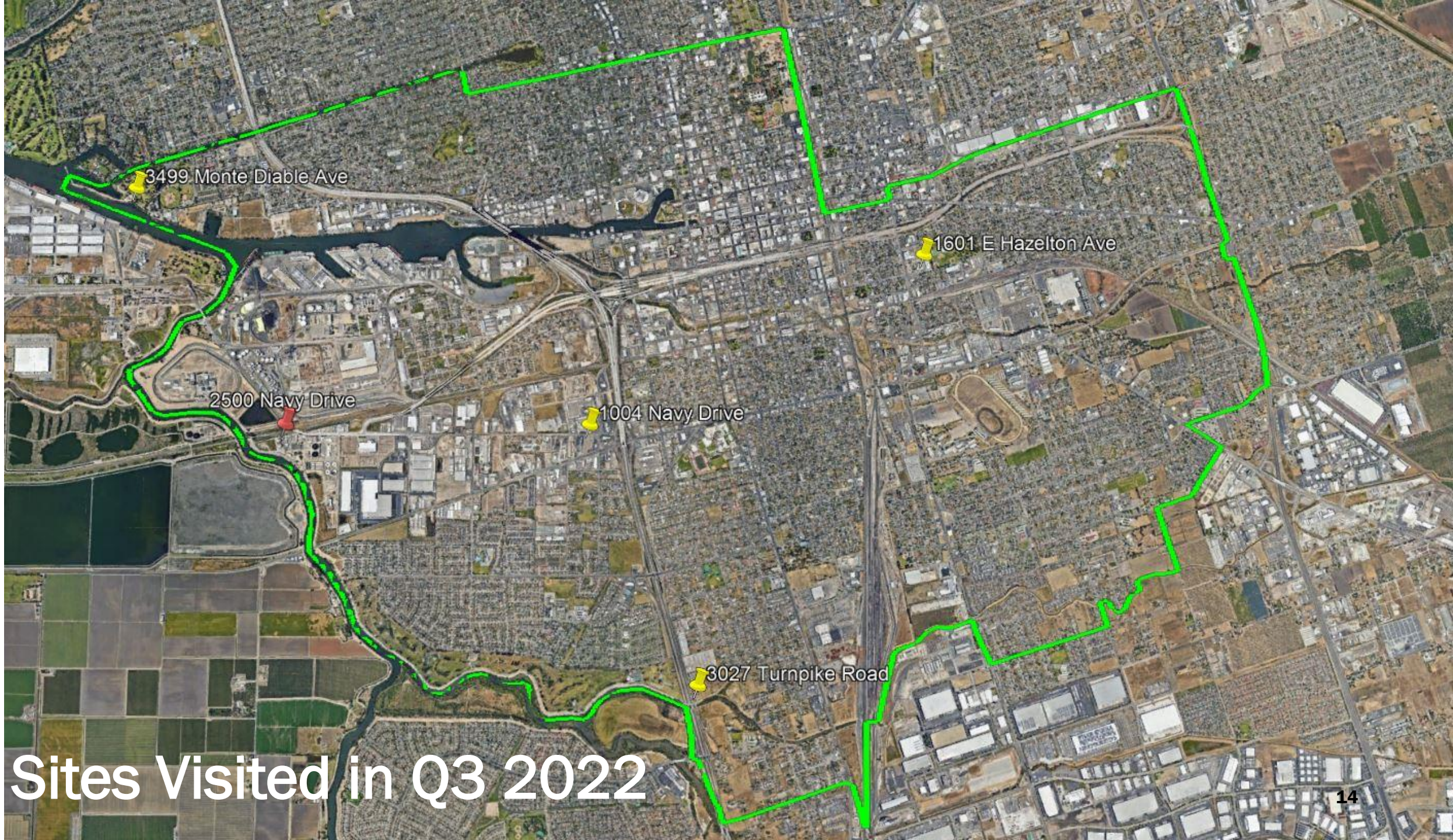
Inspection Process if Dust Control Plan is Not Required

- Walk the site
 - Conduct visible dust emissions (active sites)
 - Verify stabilized surfaces (inactive sites)
 - Look for trackout on public roads, ensure proper cleanup if present
- Review records
- Summarize findings and take any necessary enforcement action



Inspections at Sites Subject to Regulation VIII Fugitive Dust Requirements

- CERP Measure FD.1 calls for enhanced enforcement of District Regulation VIII fugitive dust requirements within the Stockton AB 617 Community
 - At least one targeted enforcement effort during both the 2nd and 3rd quarters of each year
 - Targeted enforcement is proactive, not driven by complaints
 - 5 site investigations were conducted during Q3 2022
 - 1 violation was discovered during Q3 2022
 - The site did not have sufficient records of water application or trackout mitigation.
- Inspections are also conducted in response to public complaints



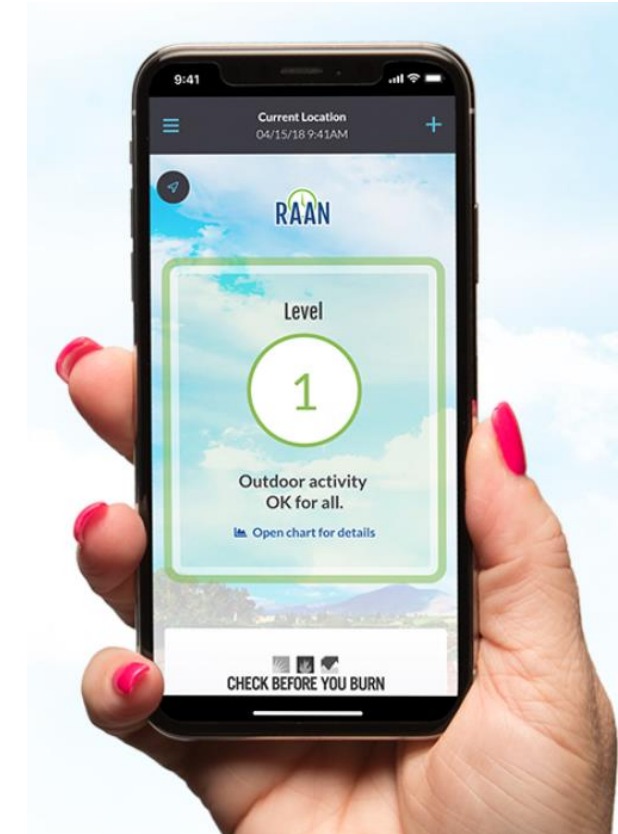
Sites Visited in Q3 2022

How to File a Complaint about Dust (or ANY Air Quality Issue)

- Complaints may be filed online, by phone, or by using the Valley Air app on your smart phone
 - Complaints are responded to 365 days a year
 - Reporting Party information is confidential
 - Filing a complaint will put you in touch with an Air Quality Inspector assigned to the complaint

County of Residence	Toll Free Number
San Joaquin, Stanislaus, Merced	(800) 281-7003

<https://ww2.valleyair.org/file-a-complaint>



Questions?

AB617@valleyair.org