

**FUGITIVE DUST CONTROL PLAN FOR
VULCAN MATERIALS COMPANY
PLEASANTON FACILITY**

By Haley & Aldrich, Inc.
Costa Mesa, California

For Vulcan Materials Company
Pleasanton, CA

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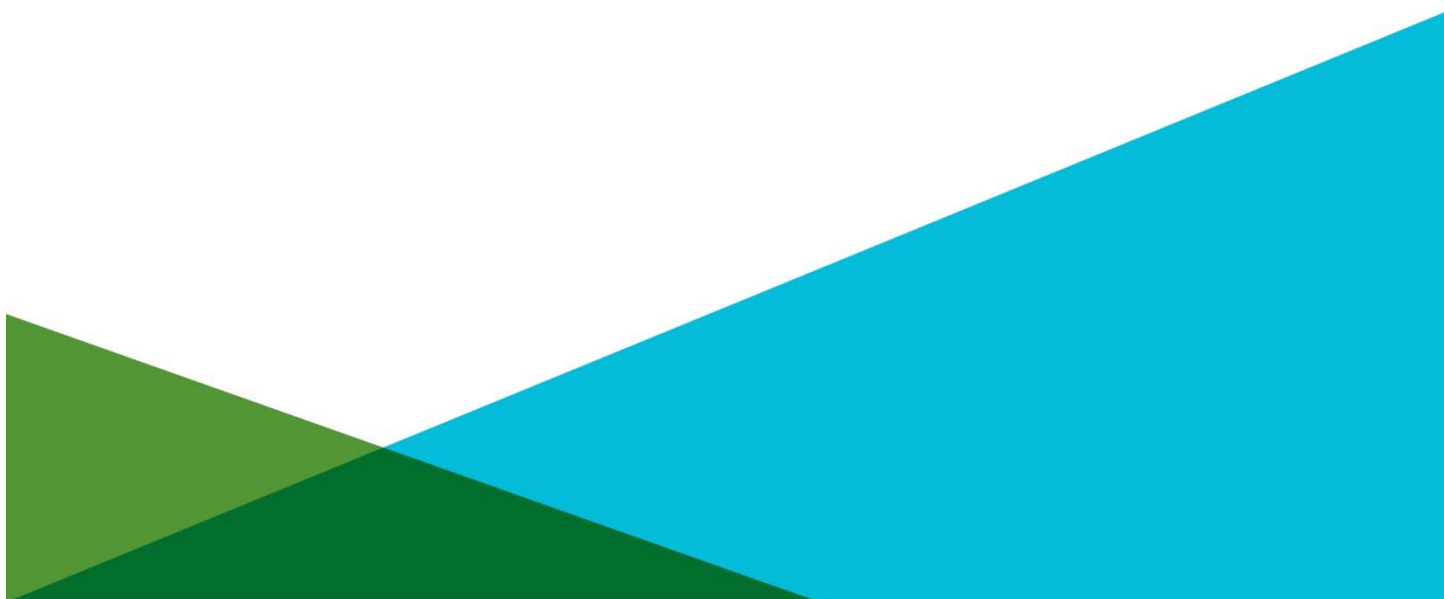


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Appendix A – Fugitive Dust Log

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1. Purpose and Scope

This Fugitive Dust Control Plan (“Plan”) provides facility contact information, applicable rules and regulations, and a description of site operations. In addition, this Plan identifies potential sources of fugitive dust and documents the facility’s control measures for dust control. The Plan also identifies administrative controls, including monitoring and training procedures, as well as procedures for annual review and update. This plan will detail the daily control measures in accordance with South Coast Air Quality Management district Rule 403 (Fugitive Dust) as required by the condition use permit of surface mining permit SMP-16. In addition, the plan identifies a contingency measure which will be implemented during high wind conditions when instantaneous wind speeds exceed 25 miles per hour or when the opacity limitations of Rule 6-1-301 or 6-1-302 cannot be met through the control measures.

2. Facility Information

Facility Name: Pleasanton

Facility Address: 50 El Charro Road
Pleasanton, CA 94588

Facility Contact: Plant Manager:
Bart Mayer
Phone Number (925) 249-3060
Cell Phone (559) 217-6268

24-Hour Dust Supervisor:
Bart Mayer
Phone Number (925) 249-3060
Cell Phone (559) 217-6268

Environmental Manager:
Tom Ferrell
Phone Number (559) 434-1201
Cell Phone (559) 978-2215

Applicable Air Permits: Bay Area AQMD Permit to Operate Plant #8507 and Plant #705

3. Description of Operations

Vulcan Materials Company owns and operates the Pleasanton mining operation, a 1,078 acre site consisting of several process ponds, sand and gravel mining, recycled concrete and asphalt, landfill and two Hot Mix Asphalt operations within the unincorporated area of Alameda County, between the cities of Livermore and Pleasanton. The facility is located approximately 1.0 miles south of Interstate 580, off of El Charro Road in Pleasanton, California. The facility consists of the North and South Pit. The North pit is bordered by the Jamieson Horse Ranch to the north, Stanley Blvd to the south, City of Livermore property to the east, and the former Hanson Aggregates property to the west. The South Pit is bordered by Stanley Blvd to the north, Isabel Avenue/Highway 84 to the east, and the CEMEX operation to the south and west.

The facility activities include surface mining of sand and gravel reserves, operation of an aggregate crushing and screening plant, recycled concrete and asphalt, landfill operation and operation of two Hot Mix Asphalt plants. Located on the property are two Ready Mix Plant operations which are not owned by Vulcan Materials Company and are outside of the scope of the plan. Potential sources of fugitive dust include: mining, stockpiles, haul road travel and material processing equipment such as conveyors, screens and crushers.

4. BAAQMD Rules and Regulations

The operations at Pleasanton are subject to Bay Area Air Quality Management District (BAAQMD) prohibitory rules. The applicable rules are restated below:

Regulation 1, General Provision and Definitions, Rule 1-301, Public Nuisance:

1-301 Public Nuisances: *No person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or the public; or which endangers the comfort, repose, health or safety of any persons or the public, or which causes, or has a natural tendency to cause, injury or damage to business or property. For the purpose of this section, three or more violations notices validly issued in a 30 day period to a facility for public nuisance shall give rise to a rebuttable presumption that the violation resulted from negligent conduct.*

Regulation 6, Particulate Matter Rule 1, General Requirements:

6-1-301 Ringlemann No. 1 Limitation: *Except as provided in Sections 6-1-303, 6-1-304 and 6-1-306, a person shall not emit from any source for a period or periods aggregating more than three minutes in any hour, a visible emission which is dark or darker than No. 1 on the Ringlemann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree.*

6-1-302 Opacity Limitation: *Except as provided in Sections 6-1-303, 6-1-304 and 6-1-306, a person shall not emit from any source for a period or periods aggregating more than three minutes in any hour an emission equal to or greater than 20% opacity as perceived by an opacity sensing device, where such device is required by the by the District regulations.*

5. Fugitive Dust Source and Control Measures

In accordance with the conditions use permit of surface mining permit SMP-16, this facility will implement control measures as stipulated in South Coast Air Quality Management District Rule 403 (Fugitive Dust). The following section outlines the sources of fugitive dust and also the control measures which will be implemented. Also included are contingency measures to be implemented during high wind conditions when wind speeds exceed 25 miles per hour or when the opacity limitations of Rule 6-1-301 or 6-1-302 cannot be met through the control measures. Vulcan Materials Company will maintain a daily log which will record the dust control measures implemented to meet the Rule 6-1-301 and 6-1-302. A copy of the dust log is included in Appendix A.

5.1 EARTH MOVING ACTIVITY

- **Control Measure-** Conduct watering as necessary to prevent visible emissions from extending more than 100 feet beyond the active cut or mining area unless the area is inaccessible to watering vehicles due to slope conditions or other safety factors.
- **Contingency Control Measure-**
 - Apply water to soil not more than 15 minutes prior to moving such soil, *or*
 - Cease all active operations.

5.2 DISTURBED SURFACE AREAS

- **Control Measure-** Apply dust suppression in sufficient quantity and frequency to maintain stabilized surface. Any area which cannot be stabilized, as evidence by wind driven fugitive dust must have an application of water at least twice per day to at least 80 percent of unstabilized area.
- **Contingency Control Measure-** Apply water to all unstabilized disturbed areas three times per day. If there is any evidence of wind drive fugitive dust, watering frequency is increased to minimum of four times per day.

5.3 INACTIVE DISTURBED SURFACE AREAS

- **Control Measure-** Apply dust suppressants in sufficient quantity and frequency to maintain a stabilized surface.

5.4 UNPAVED ROADS

- **Control Measure-**
 - Water all roads used for any vehicular at least once per every two hours of active operations normal (3 times per 8 hour work day); *or*
 - Apply a chemical stabilizer to all unpaved road surfaces in sufficient quantity and frequency to maintain a stabilized surface.

- **Contingency Control Measure-**
 - Apply chemical stabilizers prior to wind event;
 - Apply water twice per hour during active operations; **or**
 - Stop all vehicular traffic.

5.5 OPEN STORAGE PILES

- **Control Measure-**
 - Apply chemical stabilizer; **or**
 - Apply water to at least 80 percent of the surface area of all open storage piles on a daily basis when there is evidence of wind driven fugitive dust.
- **Contingency Measure-** Apply water twice per hour.

5.6 PAVED ROAD TRACK-OUT

- **Control Measure-** Track out shall not extend 25 feet or more in cumulative length from the point of origin. All track out shall be removed at the conclusion of each work day or evening shift.
- **Control Measure-** Pave at surface extending at least 100 feet and at least 20 feet wide from vehicle egress from the site to a public road.
- **Contingency Measure-** Comply with vehicle freeboard requirements of Section 23114 of the California Vehicle Code to both public and private roads.

6. Administrative Control Measures

In addition to implementation of site-specific control measures outlined above, Vulcan Materials Company implements procedural and administrative controls to ensure employees, subcontractors and customer observe applicable dust control measures. The follow sections detail additional best management practice (BMPs) which include, inspection and maintenance procedures, employee training, signage, dust control supervisor, periodic review and update of this Plan.

6.1 INSPECTION AND MAINTENANCE PROCEDURES

The following inspection and maintenance procedures are intended to ensure the proper operation and implementation of dust control measures:

- Conduct daily inspection of water spray and dust suppression systems to ensure proper function.
- Timely repair or replace malfunctioning dust control systems.
- Maintain fugitive dust log to ensure control measures are adequately implemented.
- Maintain a current copy of this Fugitive Dust Control Plan and Fugitive Dust Log onsite at all times.

6.2 EMPLOYEE TRAINING

The following employee training procedures are intended to ensure the proper implementation of dust control measures.

- Have at least one person on staff trained in US EPA Method 22 (Visible Determination of Fugitive Emissions)
- At least one month, during tailgate meetings discuss and educate plant personnel on identification and implementation of corrective dust control measures.
- Have at least one person identified as a Dust Control Supervisor that:
 - Is on the site or available on-site within 30 minutes during working hours;
 - Has the authority to expeditiously employ sufficient dust mitigation measures to ensure control measures are adequate; and
 - Has completed South Coast AQMD Fugitive Dust Control Class and has a valid Certificate of Completion for the class.

6.3 MONITORING

The following monitoring procedures are intended to ensure the dust control and contingency measures are implemented:

- A daily fugitive dust log will be utilized to record to ensure proper implementation of control measures to ensure the opacity limitations of Rule 6-1-301 and 6-1-302 are being met. A

current copy of the Fugitive Dust Plan and fugitive dust log will be maintained on-site, and made available for review to County or BAAQMD inspectors upon request.

- Two (2) signs will be posted with the telephone number and person to contact at Vulcan Materials regarding dust complaints. The signs will conform to SCAQMD Rule 403 requirements.

6.4 PLAN REVIEW

In addition to the control measures and contingency measures outlined above, Vulcan Materials Company will implement the following plan review procedures:

- At least annually, conduct a review of this Plan to determine if the existing control measures and contingency measures are adequate and whether additional control measures are warranted.
- Document the findings of the annual plan review, including review date, persons conducting inspection and if any follow-up actions will be documented on the form provided in Appendix B.

APPENDIX A

FUGITIVE DUST LOG

APPENDIX B

PLAN REVIEW

