SESPE
CONSULTING, INC.

374 Poli Street, Suite 200 • Ventura, CA 93001

DUST CONTROL PLAN
For Centralized Waste Treatment Facility

RI-NU Services, LLC
815 Mission Rock Road
Santa Paula, CA 93060

August 2018
Updated November 2020

Prepared for:
RI-NU Services, LLC
15218 Summit Avenue, Suite 300 #601
Fontana, CA 92336

Prepared by:
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(805) 275-1515

County of Ventura
Initial Study
PL15-0106
Attachment 20 - Proposed Dust Control Plan

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DUST CONTROL PLAN

RI-NU Services, LLC
Santa Paula, California

November 2020

1.0 INTRODUCTION AND SUMMARY

Facility Name:	RI-NU Services, LLC
Facility Address:	815 Mission Rock Road Santa Paula, California 93060
Site Contact:	Timothy J. Koziol, (915) 323-7200
Type of Material Processed:	Non-Hazardous Centralized Waste Treatment Facility
Scale of Operation:	Approximately 6.6 acres

The proposed operations at the RI-NU Services, LLC (RI-NU) Facility (Facility) include: accepting, treating, and off-site disposal by truck of various types of non-hazardous wastewater. The primary expected sources of dust generation from this Facility include a solids mixing operation and windblown dust from unpaved surfaces. A water truck and street sweeper will be the main methods used to minimize fugitive dust emissions from the facility:

- For mixing operations, water from the water truck will be sprayed as needed on the stockpiles of solidification material (i.e. saw dust, compost, etc.) that will be located on the northeast end of the two (2) Mixing Areas (see attached Site Plan). Water will also be sprayed as needed to control loosened material that may fall on paved surfaces while being transported from one end of the Mixing Areas to the other. The post-mixed material stored on the southwest end of the Mixing Area will not typically need to be sprayed by the watering truck because this material will be stored underneath a cover.

- The water truck will also be used as needed to control fugitive dust emissions from unpaved surfaces on the north and south-central areas of the facility. The truck may also be used to spray paved surfaces. A non-toxic chemical stabilization dust suppressant may also be applied as needed to unpaved surfaces to minimize fugitive dust emissions. This chemical suppressant will comply with all applicable air and water quality government standards.

- Sweeping will be conducted as needed on paved surfaces where dust or loose, dry material has accumulated.

- Lastly, a Facility-wide speed limit of 15 Miles Per Hour (MPH) or less will be enforced on both unpaved and paved surfaces.

Table 1-1 presents personnel responsible for Plan implementation:

Table 1-1 Plan Implementation Responsibility

Role	Contact and Telephone Number	Responsibility
Environmental Manager	Timothy Koziol (915) 323-7200	- Ensure implementation of this Plan - Maintain and update this Plan
Site Monitor 1	Mike Legan (805) 407-2366	- Monitor the Facility for dust related issues. - Ensure compliance with the provisions of this Plan.
Site Monitor 2	To Be Determined	

2.0 GENERAL REGULATORY REQUIREMENTS APPLICABLE TO THIS FACILITY

Ventura County Air Pollution Control District (VCAPCD) Rule 55 regulates fugitive dust emissions associated with this Facility. General Rule 55 requirements are:

- No visible dust beyond the property line either:
    - Beyond the midpoint (width) of a public street or road adjacent to the property line, or
    - 50 feet from the property line if there is not an adjacent public street or road.
- No emissions of fugitive dust of 20 percent opacity or greater for a cumulative 3 minutes or more in any one (1) hour.
- No track-out from Facility 25 feet or more in length unless at least one of the following three control measures is utilized:
    - *Track-Out Area Improvement:* Pave or apply chemical stabilization to maintain a stabilized surface from the point of intersection with public paved surface and extend for a centerline distance of at least 100 feet.
    - *Track-Out Prevention:* Check and clean the undercarriage and wheels on all vehicles before leaving unpaved surface or install a properly functioning and well-maintained track-out control device(s).
    - Track-Out Removal: Remove track-out from pavement as soon as possible but no later than one hour after it has been deposited on the paved road.

  All track-out shall be removed at the conclusion of each workday or evening shift.
- No person (including facility or site operator) shall load or allow the loading of bulk materials or soil onto outbound trucks unless at least one of the following dust prevention techniques is utilized:
    - Use properly secured tarps or cargo covering that covers the entire surface area of the load or use a container-type enclosure.
    - Maintain a minimum of 6 inches of freeboard below the rim of the truck bed where the load touches the sides of the cargo area and ensure that the peak of the load does not extend above any part of the upper edge of the cargo area.

- Water or otherwise treat the bulk material to minimize loss of material to wind or spillage.
- Other effective dust prevention control measures.

A copy of the Ventura County Air Pollution Control District (VCAPD) Rule 55 is provided for reference in Appendix B.

3.0 DUST GENERATING SOURCES

The Mixing Areas and Facility-wide unpaved surfaces are the primary expected sources of dust generation. Potential sources of dust include:

- **Mixing Areas:** Solids generated by the waste treatment processes are transferred to Mixing Area #2. These solids tend to be very wet and should not generate dust. Solidification materials (sawdust) are mixed with the wet solids to solidify and prepare them for off-site transport and disposal. The mixing occurs in Mixing Area #2. After mixing, the solids are moved to Mixing Area #1 for temporary storage. Mixed solids will normally be transported off site within one hour of being mixed. If mixed solids are left overnight, they will be covered. No unmixed solids will be left overnight.

  Within the Mixing Areas, dust maybe also be generated from the stockpiles of dry solidification materials (saw dust) located near the northeast end of the two (2) Mixing Areas.

- **Unpaved Surfaces:** Fugitive dust from unpaved surfaces may be generated during windy conditions and blow onto paved areas of the site. Off-road vehicles (e.g. forklifts) may also travel on unpaved surfaces and track dust onto paved surfaces. On-road vehicles will not travel over unpaved areas.

- **Stationary Equipment:** Stationary equipment will be used to treat the influent waste water. Equipment following the six (6) Mixing Tanks, such as the Shaker or the Centrifuge, may produce fugitive dust emissions if wet, loose material were to dry-out and fall out of and / or off of the equipment.

- **Material Transport**: Dust may also be generated during the transportation of mixed waste material from one end of the Mixing Areas to the other end for loading into disposal trucks. Off-site transportation of waste materials may also generate dust if waste materials drop from hauling trucks while being loaded. For bulk loading of waste materials onto outbound trucks, the waste materials are expected to be very wet such that loss of material to wind should be minimal.

None of the above listed potential dust generating sources are expected to generate excessive levels of dust, so track-out is not expected to be an issue at this site.

4.0 FUGITIVE DUST CONTROL MEASURES

During normal wind conditions, typical control and mitigation measures (listed below in Section 4.1) are sufficient to control dust emissions. During high wind conditions, extra steps may be required to control dust generation.

Employees will be trained to identify when the requirements of VCAPD Rule 55 are not being met and to notify the site monitor.

4.1 Standard Dust Control Measures:

The fugitive dust control measures listed below will be used by the Facility to control dust generation:

- As a standard practice, fugitive dust throughout the site will be controlled by the use of a water truck (except during and / or immediately after rainfall). Only as needed, water will be applied to the Mixing Area and Mixing Area stockpiles, to the actively traveled region between northeast and southwest ends of the Mixing Areas, to paved surfaces throughout the facility and to unpaved surfaces.

- Paved surfaces will be swept, as needed.

- Post-mix material gathered at the southwest end of the Mixing Areas will also be covered while awaiting off-site disposal.

- Non-toxic chemical stabilization dust suppressants may be used on unpaved surfaces in lieu of regular watering with a water truck.

- RI-NU will enforce a 15 MPH or less Facility-wide vehicle speed limit. Signs shall be posted on-site limiting traffic to 15 MPH or less.

- Although material loss due to wind is not expected for outbound haul trucks due to the wet nature of the hauled waste materials, outbound haul trucks may utilize at least one of the following dust prevention techniques if dust generation becomes an issue

    - Use of a properly secured tarp or cargo covering that covers the entire surface area of the load.
    - Use of a container-type enclosure.
    - Maintain a minimum of 6 inches of freeboard below the rim of the truck bed where the load touches the sides of the cargo area and ensure that the peak of the loads does not extend above any part of the upper edge of the cargo area.
    - Water or otherwise treat the bulk material to minimize loss of material to wind or spillage.

4.2 High Wind Dust Control Measures:

High wind dust control measures are not expected to be necessary because excavation and other significant dust producing activities will not be carried out within this Facility. Regardless, if wind were to exceed 25 MPH over a one-hour period or during other “high wind events” (wind of such velocity as to

cause fugitive dust to be blown from the Facility to off-site areas) dust producing activities will cease and additional watering will be initiated.

5.0 RECORDKEEPING

A current copy of this Fugitive Dust Control Plan shall be held and maintained onsite. If dust suppressants are used at the facility, the following records will be kept (VCAPD Rule 55.E.6):

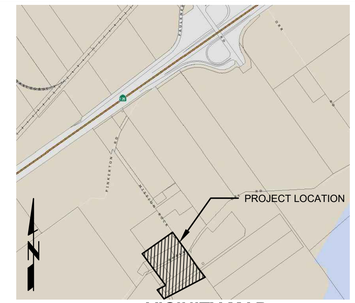
- Dust Suppressant Records: Any person using dust suppressants shall keep the following records:
    - Description of dust control measure;
    - Location and extent of coverage;
    - Date, amount, and frequency of application of dust suppressant; and
    - Manufacturer's dust suppressant product information sheets.

Any documentation related to this Plan shall be retained for a minimum of 2 years (VCAPD Rule 55.E.7).

APPENDIX A

SITE PLAN

NCZ0 ZONE: M3 10,000 SQ. FT.
GENERAL PLAN: EXISTING COMMUNITY



VICINITY MAP
N.T.S.

LEGEND

- CUP BOUNDARY 6.3 ACRE ±
- LOT LINE
- PARCEL LINE
- 6 FT HIGH CHAINLINK FENCE
- 6 FT HIGH CORRUGATED METAL FENCE
- EASEMENTS
- EXISTING AC./CONCRETE
- PROPOSED AC./CONCRETE
- LANDSCAPE AREA
- GRAVEL SURFACE
- TP-1 LOCATION OF BACKHOE EXPLORATION TEST PIT
  - N = NEW
  - E = EXISTING
- TRAFFIC ARROW
- FIRE HYDRANT (FH)
- EDISON POWER POLE
- BERM
- "DAY TANK" IN USE CHEMICAL ON CONTAINMENT
- COMPRESSED GAS CYLINDER
- ABANDONED OIL WELL
- ACTIVE OIL WELL
- DRAINAGE DIRECTION
- SS SAFETY SHOWER/EYEWASH
- SEWER LINE TO OXNARD
- TP-2 LOCATION OF BACKHOE PERCOLATION TEST PIT

ID	2010 Approved CUP Equipment	ID	2017 Proposed Equipment	N/E
A	Receiving Bays (4)	A	Receiving Bays (4)	E
B	Trash/Grit Removal Unit	B	Trash/Grit Removal Unit	E
		CL1-5	Clarifier Units (5)	E
		D	Mixing Tanks (6+)	N
D1	Centrifuge Unit	D1	Centrifuge Unit	E
D2	Centrifuge Unit	D2	Centrifuge Unit	E
D3	Centrifuge Unit	D3	Centrifuge Unit	E
D4	Belt Press			
E	Electro-Coagulation Unit	E	Electro-Coagulation Unit or other Metal Removal Unit	N
F1	Ozone Unit #1	F1	Ozone Unit	N
F2	Ozone Unit #2			
G	UV/Oxidation Unit	G	GEM Unit	N
H	Double Wide Office Trailer	H	1056 sq. ft. portable trailer (office)	N
I	Temporary Office Trailer			
J	Laboratory/Receiving Office	J	648 sq. ft. portable trailer (lab)	N
K	Maintenance Shed	K	Maintenance Shed	E
L	Employee Changing Room	L	864 sq. ft. portable trailer (employee changing room)	N
M	Break Room (old receiving office)			
N1	Sea Container (records storage)	N1	Sea Container (records storage)	E
N2	Sea Container (parts storage)	N2	Sea Container (parts storage)	E
N3	Sea Container (parts storage)	N3	Sea Container (parts storage)	E
N4	Sea Container (parts storage)			
N5	Sea Container (parts storage)			
N6	Sea Container (parts storage)			
N7	Sea Container (parts storage)			
O	Sea Container (chemical storage trailer)			
P	Auger			
Q	CKD Silo			
AA	3 – concrete pads	AA	3 – concrete pads	E
BB	2-Plate Presses on concrete Blocks	BB	2-Shaker Units (screens)	N
CC	Old Office (removed)			
DD	Old Air Stripper Unit (removed)			
EE	Old Tool Shed			
FF	Old Carbon Filters			
GG	Old Frac Tank			
HH	Old Skim Tanks (2) w/ concrete secondary containment	HH	Skim Tanks (2)	N
II	4 – Old Frac Tanks			
1	10 – 5000 gallon process tanks	1	10 – 20,000 gallon waste receiving tanks	E
2	7 – 5000 gallon process tanks	2	10 – 20,000 gallon process tanks	E
3	20 – 5000 gallon process tanks	3	5 – 20,000 gallon process tanks	E
4	40 – 5000 gallons process tanks	4	10 – 20,000 gallon waste receiving tanks	N
5	Pond #1 (surface impoundment) (filled in)			
6	20 – 5000 gallon process tanks	5	14 – 20,000 gallon process tanks	E
7	Pond #2 (surface impoundment			
8	10,000 gallons process tank	6	6 - 6,000 gallon poly process tanks	N
9	10,000 gallons process tank			
10	10,000 gallons process tank			
11	Offloading pump			
12	Sand Filters (6)	12	Sand Filters (6 to 8)	N
13	Sand Filters (6)	13	Portable Water Tanks	N
14	Shipping Pit	14	Shipping Pit (Not Used)	E
15	10,000 gallons process tank			
16	Carbon Filters (2)	16	Carbon Filters	N
17	Micron Filtration Pods	17	Filter Units (organo-clay)	N
18	Diesel Fuel Tank (w/secondary containment)	18	Diesel Fuel Tank (w/secondary containment)	E
19	5 – 5000 gallon process tanks	19	pH Adjustment Tanks	N
TBD	Five Receiving Bays: Bay-3, Industrial Bay, Domestic Bay, and (2) Screening Bays			
TBD	Stockpile storage and recycle area;	20	Stockpile storage and recycle area;	E
TBD	Two reverse Osmosis Units;	21	Two reverse osmosis units (or equivalent technology)	N
TBD	One Control Device;	22	One VCAPCD Control Device;	E
TBD	30- Water Processing Tanks			
TBD	All Awnings and concrete pads	23	New 4,852 square foot concrete pad	N
TBD	Three foot deep grass storm water holding basin;			
		25	610 sq. ft. hazardous materials storage building	N
		26	oil/water separator	N
	Total Approved Process Tanks = 143		Total Proposed Process Tanks = 95	

N/E – New or Existing on Site

PROJECT SITE ADDRESS: 815 MISSION ROCK RD, SANTA PAULA, CA

NOTE:
FACILITY IS WITHIN 100-YEAR FLOODPLAIN PER FEMA REVISED PRELIMINARY FIRM 06111C0778F (12/22/15) EXCEPT FOR AREA NOTED.

SCALE OF FEET: 30 0 30 60

APPLICANT:
RI-NU SERVICES LLC.
15218 SUMMIT AVE., SUITE 300
#601 FONTANA, CA 92336
P:(951)-323-7200

PROPERTY OWNER:
SANTA CLARA WASTE WATER CO.
2775 NORTH VENTURA RD.
SUITE 209
OXNARD, CA 93036
P:(909)-641-4418

APN: 099-0-060-565 :	ACRE 6.97
TOTAL:	6.97

ENGINEER:
SESPE CONSULTING INC.
ROB DAL FARRA
374 POLI ST.
SUITE 200
VENTURA, CA 93001
P:805-275-1515

TOTAL PARCEL AREA	= 303,613 SQF
CUP AREA	= 274,655 SQF
NET STRUCTURE COVERAGE	= 27,211 SQF OR 9.0%
PERVIOUS AREA WITHIN CUP	= 138,902 SQF OR 50.6%
IMPERVIOUS AREA WITHIN CUP	= 135,753 SQF OR 49.4%
LANDSCAPE AREA WITHIN CUP	= 26,862 SQF OR 9.8%

SESPE CONSULTING, INC.
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RI-NU WASTE WATER TREATMENT FACILITY
PROPOSED SITE PLAN - SEPTIC

SCALE: HORIZ. AS SHOWN; VERT. AS SHOWN
DRAWN BY: G.CAMUS
DATE: 11/11/2020

ri→nu Services, LLC.

FIGURE NUMBER 1

S:\GR10 – Green Compass\CUP Application 2016 – SCWW\CAD\Site Plan\GR10 –RI–NU–Site–Plan–11–4–20 (septic).dwg Nov 11, 2020, 11:55am GJC

APPENDIX B

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT
RULE 55 – FUGITIVE DUST

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

RULE 55 – FUGITIVE DUST
(Adopted 6/10/08)

A. Applicability

The provisions of this rule shall apply to any operation, disturbed surface area, or man-made condition capable of generating fugitive dust, including bulk material handling, earth-moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations.

B. General Requirements – All Fugitive Dust Sources

1. Visible Dust Beyond the Property Line: No person shall cause or allow the emissions of fugitive dust from any applicable source such that the dust remains visible beyond the midpoint (width) of a public street or road adjacent to the property line of the emission source or beyond 50 feet from the property line if there is not an adjacent public street or road.

2. Opacity: No person shall cause or allow the emissions of fugitive dust from any applicable source such that the dust causes 20 percent opacity or greater during each observation and the total duration of such observations (not necessarily consecutive) is a cumulative 3 minutes or more in any one (1) hour. Only opacity readings from a single source shall be included in the cumulative total used to determine compliance.

3. Track-Out
   a. No person shall allow track-out to extend 25 feet or more in length unless at least one of the following three control measures is utilized:

      i. Track-Out Area Improvement: Pave or apply chemical stabilization at sufficient concentration and frequency to maintain a stabilized surface starting from the point of intersection with public paved surface, and extend for a centerline distance of at least 100 feet with an acceptable width to accommodate traffic ingress and egress from the site.

      ii. Track-Out Prevention: Check and clean the undercarriage and wheels on all vehicles before leaving unpaved surface or install a properly functioning and well-maintained track-out control device(s) that prevents track-out of soil onto paved public roads.

      iii. Track-Out Removal: Remove track-out from pavement as soon as possible but no later than one hour after it has been deposited on the paved road. If a street sweeper is used to remove any track-out, only

PM10-efficient street sweepers certified to meet South Coast AQMD Rule 1186 requirements shall be used. The make and model information and certification documentation of any sweeper used shall be made available upon request.

b. Notwithstanding the preceding, all track-out shall be removed at the conclusion of each workday or evening shift subject to the same condition regarding PM-10 efficient street sweepers as outlined in Subsection B.3.a.iii. The use of blowers for removal of track-out is expressly prohibited under any circumstances.

C. Specific Activity Requirements

1. Earth-Moving: No person shall engage in earth-moving activities in a manner that creates visible dust emissions over 100 feet in length.

2. Bulk Material Handling Facilities Track-Out Prevention: No person shall conduct an active operation with a monthly import or export of 2,150 cubic yards or more of bulk material without utilizing at least one of the following measures at each vehicle egress from the site to a public paved road:

a. Install a pad consisting of washed gravel (minimum size: one inch) maintained in a clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long.

b. Pave the surface at least 100 feet long and at least 20 feet wide.

c. Utilize a wheel shaker/wheel spreading device, also known as a rumble grate, consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and sufficient width to allow all wheels of vehicle traffic to travel over grate to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.

d. Install and utilize a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.

e. Any other control measure or device that prevents track-out onto public paved roads.

3. Truck Hauling: No person (including facility or site operator) shall load or allow the loading of bulk materials or soil onto outbound trucks unless at least one of the following dust prevention techniques is utilized:

a. Use properly secured tarps or cargo covering that covers the entire surface area of the load or use a container-type enclosure.

b. Maintain a minimum of 6 inches of freeboard below the rim of the truck bed where the load touches the sides of the cargo area and insure that the peak of the load does not extend above any part of the upper edge of the cargo area.

c. Water or otherwise treat the bulk material to minimize loss of material to wind or spillage.

d. Other effective dust prevention control measures.

D. Exemptions

1. This rule shall not apply to:

a. On-field agricultural operations.

b. Off-field agricultural operations necessary to minimize adverse effects on agricultural or horticultural commodities caused during officially declared disasters or states of emergency.

c. Active operations conducted during emergency life-threatening situations, or in conjunction with any officially declared disaster or state of emergency.

d. Active operations conducted by essential service utilities to provide electricity, natural gas, telecommunication, water or sewer during periods of service outages or emergency disruptions.

e. Weed abatement operations provided that:

i. Mowing, cutting or other similar process is used which maintains weed stubble at least three inches above the soil, or

ii. Any disking or similar operation where effective dust emission prevention control measures are used.

f. Abrasive blasting operations meeting the requirements of Rule 74.1.

g. Unpaved service roads having traffic volume of 20 vehicle trips or fewer per day used by one or more public agencies for inspection of infrastructure and not used for construction or maintenance-related activity.

h. Motion picture, television, or video production activities when dust emissions are required for visual effects. In order to obtain this exemption, the APCO must receive notification in writing at least 72 hours in advance of any such activity and no nuisance results from such activity.

i. Temporary earth coverings of public paved roadways where such coverings are approved by a local government agency for protection of the roadway, and where such roadway is closed to through traffic and visible roadway dust is removed within one day following cessation of activities.

j. Any paved road unless it has track-out or any publicly-owned unpaved road.

k. Demolition operations using blasting explosives, which have been permitted by the California Division of Industrial Safety.

l. The disturbance (i.e., disking, ripping, or scraping) of spreading ground lands in preparation for percolative groundwater recharge. Spreading ground lands are ponds, a system of ponds, or basins into which surface water is introduced for the purpose of allowing or enhancing the infiltration of water into underlying aquifers.

2. Frequently Traveled Private Unpaved Road Conditional Exemption: The requirements in Subsections B.1 (Visible Dust Beyond the Property Line) and B.2 (Opacity) shall not apply to fugitive dust from frequently traveled (more than 20 vehicles per day passing in either direction) unpaved private roads if the operator has covered them with a low silt content material such as recycled road base or gravel to a minimum of four inches; or has implemented all of the following control measures:

a. Control Speed: Control speed to 15 miles per hour or less on unpaved roads through worker notification, signage, and any other necessary means.

b. Restrict Access: Restrict access to private unpaved roads currently used by the public either through signage or physical access restrictions.

c. Road Treatments: Treat unpaved and uncovered frequently traveled roads with water, mulch, or a non-toxic chemical dust suppressant that complies with all applicable air and water quality government standards. If treated, roads shall be treated in a manner that will avoid the sticking of mud to tires that will be carried onto paved public roads.

3. Lightly Traveled Unpaved Private Road Conditional Exemption: The requirements in Subsections B.1 (Visible Dust Beyond the Property Line) and B.2 (Opacity) shall not

apply to fugitive dust from lightly traveled unpaved private roads if the operator has implemented both of the following control measures:

a. Control Speed: Control speed to 15 miles per hour or less on unpaved roads through worker notification, signage, and any other necessary means.

b. Restrict Access: Restrict access to private unpaved roads currently used by the public either through signage or physical access restrictions.

4. Storage Pile Conditional Exemption: The requirements in Subsections B.1 (Visible Dust Beyond the Property Line) and B.2 (Opacity) shall not apply to fugitive dust from storage piles if the operator has implemented at least one of the following control measures:

a. Wind Sheltering: Enclose material in a three or four sided barrier equal to the height of the material.

b. Watering: Apply water at a sufficient quantity and frequency to prevent wind driven dust.

c. Chemical Stabilization: Apply a non-toxic dust suppressant that complies with all applicable air and water quality government standards at a sufficient quantity and frequency to prevent wind driven dust.

d. Covering: Install and anchor tarps, plastic, or other material to prevent wind driven dust.

5. High Wind Exemption: The requirements in Subsections B.1 (Visible Dust Beyond the Property Line). B.2 (Opacity), and C.1 (Earth-Moving) shall not apply to fugitive dust when on-site wind speed exceeds 25 miles per hour (mph) for at least 5 minutes in any one hour period as measured by an anemometer with a minimum resolution of 1.0 mph provided:

a. Applicable control measures outlined in Table 1 have been implemented, and

b. Daily records of specific dust control measures have been maintained.

6. Track-out Exemption: The provisions of Subsection B.3 (Track-Out) shall not apply to on-road vehicles (trucks and passenger vehicles) associated with agricultural operations that have caused track-out due to excessively muddy conditions resulting from rainfall.

E. Recordkeeping Requirements

1. Bulk Material Handling Records: Any operator handling bulk materials and having an APCD Permit to Operate shall keep a monthly log, available upon request, containing or referencing the following information:

    a. Operator name, location of operation, and dates of operation.

    b. Amount (in yards) of bulk material imported or exported per month.

    c. Diagram or map of all egress sites to a public paved road and description of corresponding track-out control measure, if required by this rule.

2. Frequently Traveled Unpaved Road Exemption Records: Any operator or owner of an private unpaved road claiming exemption from the requirements in Subsection B.1 (Visible Dust Beyond the Property Line) and Subsection B.2 (Opacity) shall keep the following records:

    a. Operator name, location of operation, dates when road is open to travel.

    b. List and diagram of unpaved private roads that have more than 20 vehicle trips per day with corresponding method and description of fugitive dust control. If an unpaved private road is being treated, then describe the method used to control speed and restrict access.

3. Storage Pile Exemption Records: Any owner or operator of a storage pile claiming the exemption from the requirements in Subsection B.1 (Visible Dust Beyond the Property Line) and Subsection B.2 (Opacity) shall keep the following records:

    a. Operator name, location of operation, dates of operation

    b. Description of control measure used to minimize fugitive dust including amount of material applied and frequency of application if watering or chemical suppressants are used.

4. High Wind Exemption Records: Any operator claiming the high wind exemption in Subsection D.5 shall keep daily records of specific dust control actions taken.

5. Track-Out Area Exemption Records: Any operator claiming an exemption from track-out area requirements in Subsection B.3.a shall keep the following records:

    a. Operator name, location of operation, and dates of operations.

    b. Description of control measure used in the improvement of the track-out area or control measure used to prevent track-out.

6. Dust Suppressant Records: Any person using dust suppressants shall keep the following records: Description of dust control measure; Location and extent of coverage; Date, amount, and frequency of application of dust suppressant; and Manufacturer's dust suppressant product information sheets.

7. Any recordkeeping required by this rule shall be made available to APCD compliance personnel upon request. Records shall be retained for a minimum of two years.

F. Test Methods

Compliance with the opacity limit in Subsection B.2 shall be determined using EPA Method 9 with the following modifications:

1. Position: Stand at least 16.5 feet from the plume(s) with the sun oriented in the 140^{o} sector to your back. If feasible, make opacity observations so your line of sight is approximately perpendicular to the direction of plume travel. To the extent possible, position yourself to make opacity observations using a contrasting background.

2. Field Records: Note the following on a record sheet:

   a. Description and location of activity generating emissions, and method of control used, if any.

   b. Observer's name, certification data, and affiliation, and a sketch of the observer's position relative to the dust generating activity and the sun, including estimated distances and direction to the plume.

   c. Time that reading began, approximate wind speed and direction, description of the sky condition (presence and color of clouds), color of the plume, and type of background.

3. Observations: For each reading, make the observation at the highest opacity in the dust plume starting at an elevation line 5 feet above the emission source. Do not look continuously at the source, but make momentary observations once every 15 seconds. Record each observation to the nearest 5 percent. Each reading represents a 15 second period. If multiple plumes exist, do not include more than one plume in the line of sight at one time.

4. Compliance Determination: If the observer records twelve (12) readings of 20 percent or greater during a one-hour period, the source is not in compliance and observations may stop. The 20 percent or greater opacity readings are not required to be consecutive.

5. Only observers certified by the California Air Resources Board, or the U.S. Environmental Protection Agency may determine compliance with opacity limits.

G. Violations

Failure to comply with any provision of this rule is a violation of this rule.

H. Definitions

1. "Active Operation": Any source capable of generating fugitive dust, including, but not limited to, bulk material handling, earth-moving activities, construction or demolition activities, or vehicular movement on unpaved surfaces.

2. "Bulk Material": Sand, gravel, aggregate material less than two inches in length or diameter, and other organic or inorganic particulate matter.

3. "Construction/Demolition Activities": Any on-site mechanical activities conducted in preparation of, or related to, the building, alteration, rehabilitation, demolition, or improvement of property, including, but not limited to, grading, excavating, loading, crushing, cutting, planing, or ground breaking.

4. "Disturbed Surface Area": This means a portion of the earth's surface which has been physically moved, uncovered, destabilized, or otherwise modified from its undisturbed natural soil condition, thereby increasing the potential for emission of fugitive dust. This definition excludes those areas which have:

   a. Been restored to a natural state, such that the vegetative ground cover and soil characteristics are similar to adjacent or nearby natural conditions;

   b. Been paved or otherwise covered by a permanent structure.

5. "Earth-Moving Activities": This means the use of any equipment for any activity where soil is being moved or uncovered, and shall include, but not be limited to the following: grading, earth cutting and filling operations, loading and unloading of dirt, adding to or removing from open storage piles, landfill operations, mining operations, and weed abatement operations.

6. "Frequently-Traveled Unpaved Private Road": For the purpose of defining the conditional exemption in Subsection D.2 , any private unpaved road where the count of vehicles traveling in either direction on the road exceeds 20 in any 24 hour period.

7. "Fugitive Dust": Any solid particulate matter that becomes airborne, other than emitted from an exhaust stack, directly or indirectly as a result of the activities of any person(s).

8. "Lightly-Traveled Unpaved Private Road": For the purpose of defining the conditional exemption in Subsection D.3, any private unpaved road where the count of vehicles traveling in either direction on the road is 20 or less in any 24 hour period.

9. "Off-field Agricultural Operations": Any activities excluding those considered by this rule to be on-field agricultural operations.

10. "On-field Agricultural Operations": Activities, excluding travel on field access roads, conducted solely for the purpose of preparing land for the growing of agricultural or horticultural commodities, tree fruits, or raising of fowl or animals, such as:

    a. Brush or timber clearing, grubbing, scraping, ground excavation, land leveling, grading, turning under stalks, disking or tilling.

    b. Drying, pre-cleaning, handling, or storing of agricultural commodity material on the field where it was harvested.

    c. Handling of fowl, or animal feed materials at sites where animals or fowl are raised.

    d. Disturbing of cultivated land as a result of fallowing, seeding, planting, plowing, disking, fertilizing the soil, cultivating, irrigating, controlling weeds, thinning, heating, pruning, fumigating, spraying, dusting, or harvesting.

11. "Paved Road": A public or private improved street, highway, alley, public way, or easement that is covered by typical roadway materials including, but not limited to, asphalt paving or concrete. For this purpose of this rule, roads covered with recycled road base or gravel are not considered to be paved.

12. "PM-10 Efficient Street Sweeper": Any street sweeper certified by the South Coast AQMD to meet their Particulate Matter (10 microns and less) capture efficiency criteria outlined in SCAQMD Rule 1186 Appendix A.

13. "Source": A source includes all activities and operations that are located on contiguous property under common ownership or control, and includes associated facility-access and haul roads.

14. "Stabilized Surface": Any surface that has been treated, worked, or modified to increase soil stability in order to limit fugitive dust emissions. Methods used to stabilize surface include but are not limited to the following: watering, dust palliatives, vegetation, aggregates, and paving.

15. "Storage Pile": Any accumulation of bulk material or soil, which attains a height of three feet or more and a total surface area of 150 or more square feet.

16. "Track-Out": Any material that adheres to and agglomerates on the exterior surface or tires of motor vehicles, haul trucks, or mobile equipment that have been released onto a named, numbered, or lettered public paved road and can be removed by a PM-10 efficient street sweeper under normal operating conditions.

I. Compliance Schedule:

The requirements of this rule shall become effective on October 8, 2008.

J. Compliance Status

Compliance with this rule shall not guarantee that a person will be in compliance with any other district rule or state regulation, including but not limited to, Rule 50 (Opacity), Rule 51 (Nuisance), Health and Safety Code Section 41700 (Nuisance), or Health and Safety Code Section 41701 (Opacity).

Table 1
Control Measures Needed to Qualify for High Wind Exemption in Subsection D.5

FUGITIVE DUST SOURCE CATEGORGY	CONTROL MEASURES
Earth-Moving	1. Cease all active operations; OR 2. Apply water to soil not more than 15 minutes prior to earth-moving activities.
Disturbed Surface Area	1. On the last day of active operations prior to any Sunday, 1-day holiday, or any other period when active operations will not occur for at least four consecutive days, apply water with a mixture of chemical stabilizer diluted to not less than 5 percent by volume of the chemical stabilizer or to chemical stabilizer manufacturer specifications; OR 2. Apply chemical stabilizers at least 30 minutes prior to the wind event; OR 3. Apply water to all unstabilized disturbed areas at least every 4 hours during the wind event. If there is any evidence of wind-driven dust, water frequency is increased until wind-driven dust is minimized; OR 4. Establish a vegetative ground cover within 21 days after active operations have ceased. Ground cover must be of sufficient density to expose less than 30 percent of unstabilized ground within 90 days of planting, and at all times thereafter.
Unpaved Roads	1. Apply chemical stabilizers prior to allowing traffic; OR 2. Apply water at least twice per hour during active operations;OR 3. Stop all vehicular traffic.
Open Storage Piles	1. Apply water at least twice per hour during the wind event; OR 2. Install temporary coverings.

Ventura County
Air Pollution
Control District

COMPLIANCE ASSISTANCE ADVISORY

Ventura County APCD
Rule 55, Fugitive Dust

On June 8, 2008, the Ventura County Air Pollution Control Board adopted Rule 55, Fugitive Dust. Rule 55 was adopted to comply with a state law that requires local air districts with air quality levels exceeding the state's particulate matter (PM) standards to adopt control measures to reduce PM air pollution. Ventura County exceeds the state's air quality standards for PM. The adverse health impacts from PM air pollution include asthma and other lung diseases, heart disease, and premature death. Ventura County APCD staff estimates that Rule 55 will reduce PM air pollution by 6 tons per day. Rule 55 becomes effective on October 8, 2008.

Rule 55 applies to any disturbed surface area, or man-made condition capable of generating fugitive dust, including bulk material handling, earth-moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations.

In summary, the key provisions of Rule 55 are as follows:

1) Visible dust from an applicable source is prohibited or limited;
2) Measures must be taken to reduce or prevent track-out onto paved public roadways from an applicable source;
3) Track-out must be removed from roadways;
4) Visible dust exceeding 100 feet in length from earth-moving activities is prohibited;
5) Bulk material handling facilities with a monthly import or export of 2,150 cubic yards or more of bulk material must take measures to reduce or prevent track-out onto a paved public road, and;
6) Outbound trucks with bulk materials or soil must either be tarpped, have a 6 inch freeboard below the rim of the truck bed or be wetted or treated to minimize the loss of material to wind or spillage.

A more detailed summary of Rule 55 is attached. Copies of Rule 55 may be obtained at www.vcapcd.org under Rule Development (Current Rules and Regulations).

For additional information on Rule 55, contact air pollution engineer Stan Cowen at 805/645-1408.

Ventura County APCD Rule 55, Fugitive Dust
Summary of Rule Requirements[1]
Effective October 8, 2008

General Requirements – All Fugitive Dust Sources

Visible Dust Beyond the Property Line: No one shall cause or allow fugitive dust from any applicable source beyond the midpoint (width) of a public street or road adjacent to the property line of the emission source or beyond 50 feet from the property line if there is not an adjacent public street or road.

Opacity: No one shall cause or allow fugitive dust from any applicable source that equals or exceeds 20 percent opacity for 3 minutes or more in any one hour.

Track-Out:
No person shall allow track-out to extend 25 feet or more in length unless one of the following control measures is used:

- ✓ Track-Out Area Improvement: Pave or apply chemical stabilization to maintain a stabilized surface starting from the point of intersection with the public paved surface, and extend for a distance of at least 100 feet with a width to accommodate traffic ingress and egress from the site.

- ✓ Track-Out Prevention: Check and clean the undercarriage and wheels on all vehicles before leaving unpaved surface or install a track-out control device(s) that prevents track-out of soil onto paved public roads.

- ✓ Track-Out Removal: Remove track-out from pavement as soon as possible but no later than one hour after it has been deposited on the road. If a street sweeper is used to remove any track-out, only "PM10-efficient" street sweepers certified to meet South Coast AQMD Rule 1186 requirements shall be used. The make, model information and certification documentation of any sweeper used shall be made available to APCD personnel upon request.

All track-out shall be removed at the conclusion of each workday or evening shift. The use of blowers for removal of track-out is prohibited.

Specific Activity Requirements

Earth-Moving: No person shall engage in earth-moving activities in a manner that creates visible dust emissions over 100 feet in length.

Bulk Material Handling Facilities Track-Out Prevention: No person shall conduct an operation with a monthly import or export of 2,150 cubic yards or more of bulk material without

[1] This is a summary of the Rule requirements. Refer to Rule 55, Fugitive Dust, for specific requirements.

utilizing at least one of the following measures at each vehicle egress from the site to a public paved road:

- ✓ Install a pad consisting of washed gravel (one inch minimum size) maintained in a clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long.

- ✓ Pave the surface at least 100 feet long and at least 20 feet wide.

- ✓ Utilize a wheel shaker/wheel spreading device, also known as a rumble grate, consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and sufficient width to allow all wheels of vehicle traffic to travel over grate to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.

- ✓ Install and utilize a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.

- ✓ Any other control measure or device that prevents track-out onto public paved roads.

Truck Hauling: No person, including the facility or site operator, shall load or allow the loading of bulk materials or soil onto outbound trucks unless at least one of the following dust prevention measures is used:

- ✓ Use properly secured tarps or covering that covers the entire surface area of the load or use a container-type enclosure.

- ✓ Maintain a minimum of 6 inches of freeboard below the rim of the truck bed where the load touches the sides of the cargo area and insure that the peak of the load does not extend above any part of the upper edge of the cargo area.

- ✓ Water or treat the bulk material to minimize the loss of material to wind or spillage.

- ✓ Any other effective dust prevention control measures.

Exemptions

Rule 55 does not apply to the following (this is a partial list - refer to Rule 55, Section D):

- ✓ On-field agricultural operations.

- ✓ Weed abatement operations provided that: (1) Mowing, cutting or other process is used which maintains weed stubble at least three inches above the soil, or (2) Any disking or similar operation where effective dust control measures are used.

- ✓ Unpaved service roads, with a daily traffic volume of 20 vehicle trips or fewer, used by public agencies for inspection of infrastructure.

- ✓ Motion picture, television, or video production activities when dust emissions are required for visual effects. The APCD must receive notification in writing at least 72 hours in advance of any such activity and no nuisance results from such activity.

- ✓ Any paved road unless it has track-out or any publicly-owned unpaved road.

- ✓ The disturbance (i.e., disking, ripping, or scraping) of spreading ground lands in preparation for percolative groundwater recharge.

Frequently Traveled Private Unpaved Roads: The Visible Dust and Opacity requirements do not apply to dust from frequently traveled (more than 20 vehicles per day passing in either direction) unpaved roads if the road is covered with a low silt content material such as recycled road base or gravel to a minimum of four inches or implements all of the following control measures:

- ✓ Control Speed: Control speed to 15 miles per hour (mph) or less on unpaved roads through worker notification, signage, and any other necessary means.

- ✓ Restrict Access: Restrict access to private unpaved roads used by the public either through signage or physical access restrictions.

- ✓ Road Treatments: Treat unpaved and uncovered frequently traveled roads with water, mulch, or a non-toxic chemical dust suppressant that complies with all applicable air and water quality government standards. If treated, roads shall be treated in a manner that will avoid the sticking of mud to tires that will be carried onto paved public roads.

Lightly Traveled Unpaved Private Road Conditional Exemption: The Visible Dust and Opacity requirements do not apply to dust from lightly traveled unpaved roads if the operator implements both of the following control measures:

- ✓ Control Speed: Control speed to 15 mph or less on unpaved roads through worker notification, signage, and any other necessary means.

- ✓ Restrict Access: Restrict access to private unpaved roads currently used by the public either through signage or physical access restrictions.

Storage Pile Conditional Exemption: The Visible Dust and Opacity requirements do not apply to dust from storage piles if the operator has implemented at least one of the following control measures:

- ✓ Wind Sheltering: Enclose material in a three or four sided barrier equal to the height of the material.

- ✓ Watering: Apply water at a sufficient quantity and frequency to prevent dust.

- ✓ Chemical Stabilization: Apply a non-toxic dust suppressant at a sufficiently to prevent wind driven dust.

- ✓ Covering: Install and anchor tarps, plastic, or other material to prevent wind driven dust.

High Wind Exemption: The Visible Dust, Opacity and Earth-Moving requirements do not apply to dust when on-site wind speed exceeds 25 mph for at least 5 minutes in any one hour provided:

- ✓ Applicable control measures outlined in Table 1 (of the Rule) have been implemented, and

- ✓ Daily records of specific dust control measures have been maintained.

Track-out Exemption: The Track-Out requirements do not apply to on-road vehicles (trucks and passenger vehicles) associated with agricultural operations that have caused track-out due to excessively muddy conditions resulting from rainfall.

Recordkeeping Requirements

Consult Rule 55 for specific recordkeeping requirements