



DEPARTMENT OF PLANNING AND ZONING

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October 8, 2010

Sent via e-mail and U.S. Mail

Mr. Christopher D. Monahan
5601 Courtney Avenue
Alexandria, Virginia 22304

Re: Plant 2 Testing

Dear Mr. Monahan:

This letter responds to your request to extend the two-year testing for Plant 2 as required by Condition #15 of SUP#2010-0014. Previous testing of Plant #2 was conducted November 12-14, 2008, as required.

You have provided the following information. Plant #2 cannot produce asphalt that consistently meets the strict quality and mix specifications required by Virginia Paving Company customers. Operating Plant #2 at the production level necessary to conduct the emissions testing required by Condition #15 would result in producing large quantities of asphalt that would most likely not be able to be used due to questionable asphalt production quality and would have to be recycled. Virginia Paving Company has ceased using Plant #2 for regular manufacture of asphalt. Plant #2 will remain inoperative until maintenance enhancements are performed to the plant. Repairs and enhancements to Plant #2 will be performed in the winter when demand for asphalt is low and Virginia Paving Company employees are available to perform facility maintenance and repairs. Until Plant #2 production quality issues are repaired and the plant is tested for emissions, Virginia Paving Company will rely solely on Plant #1 for production needs. Plant #2 testing is expected to be completed in conjunction with additional Virginia DEQ tests required by the use of natural gas. Testing on Plant #1 was completed in mid-September with results to be delivered in mid-October, in compliance with the SUP condition.

Based on the above information, as well as your letter of September 7, 2010, and our meeting on September 9, 2010, we agree that the testing can be delayed. The City of Alexandria finds it reasonable to permit a one-time extension of the period when Plant #2

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testing must be conducted to a period 90 days after the next plant start-up. We expect that necessary Plant #2 maintenance work and subsequent testing will be diligently pursued and completed. If unforeseen circumstances are encountered that delay diligent completion of the work and emissions testing on the plant, the City expects that Plant #2 will remain inoperative for regular asphalt production until all work and required emissions testing can be completed. To ensure compliance with SUP#2010-0014 requirement for testing, Virginia Paving should notify the Departments of Planning and Zoning and Transportation and Environmental Services when Plant #2 milestones are reached including beginning of and progress of work on Plant #2, initial start up of the plant, and anticipated test dates. This one-time exception is limited to the above circumstances. Condition #15 otherwise remains in full force.

If you have any questions or need additional information, please do not hesitate to contact us.

Very truly yours,



Faroll Hamer, Director
Department of Planning and Zoning

cc: Mark Jinks, Deputy City Manager
Christopher Spera, Deputy City Attorney
Richard Baier, Director, Transportation and Environmental Services
William Skrabak, Director, T&ES Office of Environmental Quality
Barbara Ross, Deputy Director, Planning and Zoning



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Mr. Stephen Milone
Division Chief, Land Use Services
Alexandria Planning and Zoning
City Hall, Room 2100
Alexandria, VA 22314

RE: Virginia Paving Company – Alexandria Asphalt Plant
SUP #2010-0014

Attn: T&ES and P&Z

Virginia Paving seeks guidance on an upcoming issue related to our Alexandria Plant SUP #2005-0042. We have concerns regarding the timing of stack testing for Plant 2, as stated in Conditions 15 of our SUP. This condition requires testing Plant 1 and Plant 2 for Total Suspended Particulates (TSP) emissions by EPA Method 5, once every two years. This requirement was last met during November 2008. We are planning to demonstrate compliance with this requirement on Plant 1, during the upcoming test scheduled for the week of September 13, 2010.

We seek an extension on the associated requirement for Plant 2, which accounts for less than 25% of total facility production. The reason for this request is related to construction quality issues and not consistently meeting mix specifications from plant 2. We will make enhancements this winter to improve this.

As an alternative Virginia Paving offers, for the compliance test of Plant 2, to be performed within 90 days and in no event later than 180 days of Plant 2's next operation. This language is consistent with state operating permits, will limit production from Plant 2 until the compliance test is completed, and provides flexibility to operate the plant as necessary during the maintenance period. We will likely schedule Plant 2's TSP test in conjunction with additional VDEQ tests required by natural gas usage.

Please let us know at your earliest convenience if this is an acceptable approach for the City so we can plan future logistics. If you have any questions or further requests, please contact me at (703) 751 – 7100.

Best regards,

Chris Monahan
Environmental Coordinator

cc: DMH, MCC, MAS, Cheshire-GAW, Mary Catherine Gibbs

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September 7, 2010