

TO: Virginia Paving Company Liaison Committee

FROM: Dennis Luzier, District Manager
Virginia Paving Company

DATE: September 17, 2008

RE: Fuel in 2007 Stack Test

Please reference the attached letter to the Virginia Department of Environmental Quality regarding the type of fuel used during the stack emissions test conducted in September, 2007. As noted in the letter, it appears that both recycled fuel oil and #2 diesel fuel, were used during this test.

As you know, the City of Alexandria Special Use Permit required the company to conduct stack testing in 2007. While the SUP did not specify the type of fuel to be used, VDEQ had commented that the test should be conducted under worst case conditions by using waste or recycled fuel oil. As noted above, it appears that a mix of the two types of fuel was used.

In cooperation with VDEQ, Virginia Paving Company intends to conduct another round of stack testing in mid-to-late October using only recycled fuel oil. The company plans to work closely with VDEQ to develop an acceptable revised stack test protocol. Although additional stack testing will require additional time and expense, Virginia Paving believes this to be the best course of action under the circumstances.

The City of Alexandria has been informed and I wanted the Liaison Committee to be aware of this as well.

The SUP developed jointly in 2006 by Cameron Station, Summer's Grove, the City of Alexandria and Virginia Paving Company is working well. We are learning together, have made significant improvements, including the use of cutting edge technology, and are committed to compliance with our SUP and Virginia's environmental laws.

(Attachment)



Division of The Lane Construction Corporation

An Equal Opportunity Employer M/F/V/D

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(703) 230 0850
(703) 230 0851 Fax

Mr. Tom Faha
Virginia Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, Virginia 22193

**Re: Virginia Paving Company - Alexandria Facility
Registration No. 70579**

Dear Mr. Faha:

I am writing to follow up on our September 5, 2008 telephone conversation. As we discussed, the Department had requested additional information about the fuel used during the 2007 stack test. That stack test would serve as the basis for the emission limitations developed for the proposed permit modification currently pending for the facility.

Based on a preliminary review, it appears that both recycled oil and virgin No. 2 fuel oil were used alternatively. As we discussed, the proposed permit allows the use of recycled oil, No. 2 fuel, or natural gas as fuel sources. Because two types of fuel were used, there is no stack test data available from operation of the facility using recycled oil as the sole fuel.

Virginia Paving is proposing to conduct another series of stack tests using only recycled fuel oil and we are in the process of contacting air testing companies to set up a new stack test as soon as possible. Once a company has been selected, we will coordinate with DEQ on the testing protocols and dates and would like to arrange a meeting to accomplish this.

We will be in touch with you shortly to make arrangements to meet.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dennis Luzier", is written over a large, light-colored, stylized scribble or flourish.

Dennis Luzier
District Manager

cc: Terry Darton
Ali Khalilzadeh

Alexandria and Occoquan Branch
P.O. Box 22247
Alexandria, VA 22304
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NRO-291-08

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

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L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

Thomas A. Faha
Regional Director

August 16, 2008

Mr. Dennis A. Luzier
District Manager
Virginia Paving Company
14850 Conference Center Drive
Suite 210
Chantilly, Virginia 20151

Registration No.: 70579

Dear Mr. Luzier:

The Department of Environmental Quality's (DEQ) Northern Regional Office (NRO) has reviewed your letter of September 10, 2008. In your letter, you informed the DEQ that it appeared as though both recycled oil and virgin No. 2 fuel oil may have been used during stack testing performed in 2007.

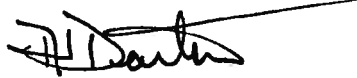
The DEQ discussed the possible outcomes as a result of the possible mixing of fuels during the September 5, 2008, telephone conversation. It was indicated at that time that no final decision had been made as to the course of action that the DEQ would recommend that Virginia Paving follow. As you are aware the minor New Source Review (mNSR) permit that is being drafted by the NRO has emission limits that were based on the 2007 stack testing. Because the draft permit is based on the 2007 stack test, further processing of that permitting action has been put on hold until a new stack test report has been received.

Since Virginia Paving is required to obtain this mNSR permit, it will be necessary for Virginia Paving to perform another round of testing on both plants at Virginia Paving's Alexandria facility. In order to move forward with the stack testing, Virginia Paving must submit two copies of a stack testing protocol to both the Regional Air Compliance and Regional Air Permit Managers at the NRO at least thirty days prior to the anticipated date of testing. The address for the NRO is 13901 Crown Court, Woodbridge, VA 22193. The DEQ's NRO will review the stack test protocols and will contact Virginia Paving to arrange a meeting with appropriate Virginia Paving personnel to go over any issues that have come to light as a result of the NRO's review.

Mr. Dennis A. Luzier
Virginia Paving Company
September 16, 2008
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If you have any questions concerning the above or any other air pollution please feel free to contact me at 703.583.3845.

Sincerely

A handwritten signature in black ink, appearing to read "Terry H. Darton", with a long horizontal line extending to the right from the end of the signature.

Terry H. Darton
Regional Air Permit Manager

cc: R. D. Hartshorn
Chris Monahan, Virginia Paving Company

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