

VIRGINIA PAVING COMPANY

Division of The Lane Construction Corporation



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November 6, 2008

City of Alexandria
Julius Holmes
Office of Environmental Quality
Transportation and Environmental Services City of Alexandria
City Hall
301 King Street, Room 3900
Alexandria, Virginia 22314

Re: 5601 Courtney Avenue; Plant Site
Alexandria, Virginia
SUP #2005-0042

Dear Mr. Julius Holmes:

Virginia Paving Company provides the City of Alexandria with October 16, 2008 meeting summary. This was an end of the season meeting between the City of Alexandria and Virginia Paving representatives. During the meeting, the City of Alexandria had communicated items of interest from 2008. An enclosure is included that provides summary and response to the matters discussed.

As always, we appreciate the cooperative effect between the City and Virginia Paving Company. If there are any questions about this issue, feel free to contact us.

Sincerely,

Chris Monahan
Virginia Paving Company
Environmental Coordinator

Enclosure: Meeting Summary
CC: T&ES - Lalit K. Sharma, DAL, CDM, File

Virginia Paving Meeting with City of Alexandria on Oct. 16th 2008

Time: 11am to 1 pm

Location: City Hall, Room 1101

Attendees: City of Alexandria Staff: Richard Josephson, Lalit Sharma, Erica Bannerman, Julius Holmes; VA Paving Staff: Dennis Luzier, David Horton, Chris Monahan

Inquire:	Information:	Response:
Maintaining Van Dorn Street	An Alexandrian citizen inquired on 9/21/08 about possible code violation for uneven pavement at entrance to plant.	VA Paving will make the repairs within ninety (90) days of the date of the notice. (Condition 48 of the SUP). These improvements are scheduled during the first week of November 2008, as cooler temperatures help facilitate this job.
Hotline maintenance	There have been 2 incidents in nearly 2 years that have resulted in delayed response time when citizens have called hotline.	An alternative number has been added to the hotline message as a permanent back up option. The vast majority of complaints are addressed immediately.
Blue Controls operations	How to enhance / optimize Blue smoke control technology. Blue Smoke controls have not always been on during operations.	VA Paving is using flow metering equipment instead of the naked eye to optimize collection of blue smoke. Additionally, a representative of the manufacturer will visit the site to ensure proper operations. VA Paving will record filter pressure drop readings daily and use information to optimize performance. Some operating scenarios may not warrant operation of the blue smoke machines, ie when storing in the silos
FCC responsiveness	FCC has not responded to all of City's inquires without delay.	VA Paving will continue to encourage fast response to City of Alexandria's inquires. FCC Environmental representative and Plant Manager Tim Giles is available 24 hours a day in case of urgent matters call (443) 278-6318.
Incidents of Odors leaving plant during night operation	11 complaints of odors during night operations in 2008. 5 of these complaints can be tied to 3 specific night operations in which multiple complaints were received on the same night. 5 of these night complaints were between Sept-Oct 2008.	Upon receipt of any and all complaints, Virginia Paving notifies the City of Alexandria in a timely manner. Complaints are responded too and investigated immediately in collaboration with City staff. When warranted, corrective action is made. We have been able to alter or eliminate processes in the past to minimize the source of some of these complaints. A special mix not normally processed at this plant may have contributed to a few of the complaints during Sept-Oct. 2008 and the issue has been addressed.
Rejects disposal issue	On September 29, 2008, VA Paving received several complaints of odor in Cameron Station area.	In producing asphalt for a state highway (Route 1) project which straddles City of Alexandria limits, a substantial amount of off spec asphalt was returned to the site from the project. We have learned from this situation and identified alternatives which include cooling prior to dumping or delivery and handling at an alternative location.
Advance notice when producing (SMA) products	The City would like advance notice in order to provide City personnel to ensure monitoring during manufacturing of SMA.	We will attempt to minimize future production of this mix type. When warranted, VA Paving will notify the City and monitor operations closely in conjunction with City Staff during the manufacturing of SMA. SMA is only 2 % of the total hot mix produced so far in 2008.

<p>Issues with previous stack test and rescheduling of stack</p>	<p>City of Alexandria SUP required the company to conduct stack testing in 2007. While the SUP or test protocol did not specify the type of fuel to be used, VDEQ had commented that the test should be conducted under worse case conditions by using recycled fuel oil (RFO). VA Paving believes that both RFO and No. 2 diesel fuel were used during this test.</p>	<p>In cooperation with VDEQ, Virginia Paving Company is in the process of conducting another round of stack testing. The company has worked with VDEQ and City of Alexandria to develop an acceptable revised stack test protocol and test. Fuel sampling will be conducted throughout the test to assure proper fuel usage.</p> <p>Testing of plant 1 took place on Oct 21-24, 2008. Testing of plant 2 is scheduled for Nov. 12-14, 2008.</p>
<p>Fuel Use on Air Quality Action Day</p>	<p>The City requests ability to show inspector fuel type in use during operations.</p>	<p>VA Paving will implement No. 2 fuel Log for the plant that will provide details of fuel usage on air quality action days.</p>
<p>Status of the State Permit</p>		<p>Because the draft permit is based on the 2007 stack test, further processing of that permitting action has been put on hold by VDEQ until a new stack test report is submitted. A report will be submitted promptly after the stack test is complete.</p>