

**2007 Virginia Paving Operations in Alexandria
Special Use Permit #2005-0042
A Year in Review**



**Department of Transportation & Environmental Services
Division of Environmental Quality
January 23, 2008**

CONTENTS

- 1.0 Executive Summary**
- 2.0 Projects Completed in 2007**
- 3.0 Ambient Air Quality Monitoring**
- 4.0 Virginia Paving Air Emissions**
- 5.0 Community Issues**

APPENDICES

- 1. City of Alexandria Second Annual Multi-Departmental Inspection**
- 2. 2008 Cameron Station PM10 Monitoring Station Schedule**
- 3. Letter from Virginia Paving re: Low-NOx state permit**
- 4. (a) Letter from City of Alexandria to Virginia Paving re: 2007 Stack Test results and VADEQ Permit. (b) Letter from VADEQ to Virginia Paving re: Notice of Violation**
- 5. Updated ECHO Report for the Virginia Paving 2004 Stack Test**

1.0 Executive Summary

The City of Alexandria issued a Special Use Permit (SUP) to the Virginia Paving Company (VAP) in November of 2006. The SUP amended the hours that vehicles could enter and exit the facility and was issued with a total of 78 conditions to address concerns from the City and the community. Each condition was implemented to improve operational conditions at the facility to enhance environmental protection and to provide the City with the power to enforce compliance with those conditions. The SUP is also a testament to the dialogue established among the City, the community and the Virginia Paving Company. This document provides a review of this permit one year after its implementation.

2007 was a year full of activity to complete many of the scheduled projects and to implement Best Operational Practices that were considered during issuance of the permit. The major accomplishments in 2007 were:

- Establishment of the VAP Community Liaison Committee which held meetings on May 3, July 10 and October 17, 2007
- Establishment of the VAP Hotline to receive community complaints related to facility operations
- The City conducted two multi-departmental onsite inspections on May 17 and December 12, 2007
- Daily inspections by City staff of operational conditions and night operations
- Continued monitoring of ambient air particulates at the Armistead Boothe Park monitoring station
- Installation of Blue Smoke system on the storage silos in Plants 1 and 2
- Emissions testing conducted on the two asphalt drum dryer stacks
- Installation of a storm water management facility

These and many other accomplishments and improvements are discussed in greater detail in other sections of this document. The following table provides a summary of asphalt production in 2007.

Total Annual Production Limit = 850,000 tons	2007 Total Production = 582,554 tons
Night Annual Production Limit = 275,000 tons	2007 Night Production = 100,524 tons
Permitted Number of Nights = 110	2007 Number of Night Shifts = 91

2.0 SUP SCHEDULED PROJECTS

2.1 Projects Completed in 2007

Several SUP conditions include specific completion dates for pertinent projects and improvements. Table 2-1 provides a summary of all the projects completed by the end of 2007. They have been listed by SUP condition for easy reference to the permit issued in November 2006. Additional narrative on key specific projects follows Table 2-1.

SUP Condition	Project Description	SUP Compliance Date	Completion Date
6	Maintain records low-odor additive use	Ongoing	In Compliance
8	Maintain records for recycled oil specifications	Ongoing	In Compliance
9	Maintain records for fuel type used on Code Orange and Code Red days	Ongoing	In Compliance
10	Maintain records on No. 2 oil type and sulfur content	Ongoing	In Compliance
11	Plant 1 – Blue Smoke Control	12/31/2006	02/28/2007
11	Plant 2 – Fugitive Emission Control System	07/30/2007	07/24/2007
12	Plant 1 – Low NOx Burner	12/31/2007	Installed 4/2007 VADEQ Permit Pending
12	Plant 2 – Low NOx Burner	10/30/2006	03/14/2005
13	Asphalt Storage Tank – Vent Condensers	09/30/2006	08/17/2006
14	Plant 1 Asphalt Conveyors and Loadout – Fugitive Emissions Capture & Control	09/30/2007	08/24/2007
15	Plant 1 - Baghouse Visible Emissions Test	Once per month	In Compliance
15	Plant 2 - Baghouse Visible Emissions Test	Once per month	In Compliance
16	First half of On-Site Trucks & Diesel Engines – 90% Efficient Particle Traps	10/31/2006	09/30/2006
16	Second Half of On-Site Trucks & Diesel Engines – 90% Efficient Particle Traps	12/31/2006	12/22/2006
16	One-Third of VA Paving Dump Trucks – Replace Trucks	12/31/2007	10/25/2007

TABLE 2-1
Virginia Paving Company, Alexandria, Virginia
Special Use Permit Compliance Schedule - Projects Completed by December 2007

SUP Condition	Project Description	SUP Compliance Date	Completion Date
17	Plant 1 – Increase Stack Height to 20 m	01/31/2007	12/20/2006
17	Plant 2 – Increase Stack Height to 20 m	01/31/2007	12/22/2006
18	Hot Oil Heater – Increase Stack Ht to 6 m	10/31/2006	01/20/2006
19	RAP Crusher – Water Sprays and Drop Enclosures	12/31/2006	06/25/2005
21	Maintain water spraying and wet vacuuming on paved roads records	Daily	In Compliance
22	Plant 2 Product Shipment (Eastern End of Facility) – Pave Truck Access Area	10/31/2006	01/09/2006
23	All Material Transfer Points – Water Sprays and Enclosures	12/31/2006	12/16/2006
24	Submit record of fugitive dust control BMPs	04/30/2007	4/30/2007
24	Submit record of fugitive dust control BMPs	Every 6 months	In Compliance
25	Plant 1 - Stack Tests (PM2.5, PM10, NOx, SO2, CO) - Test Report	08/31/2007 Within 90 days	8/28/2007 10/22/2007
25	Plant 2 - Stack Tests (PM2.5, PM10, NOx, SO2, CO) - Test Report	08/31/2007 Within 90 days	8/28/2007 10/22/2007
29	Install Stormwater Management Facility	12/31/2006	12/22/2006
30	Stormwater BMPs - Execute maintenance agreement with City - Secure maintenance contract with SWMF vendor - Obtain O&M manual from SWMF vendor - Provide maintenance records to City	Not specified Not specified Not specified Once per year	01/22/2007 01/25/2007 12/13/2006
31	Vegetate buffer between RAP pile and stream	Not Specified	12/22/2006
32	On-Site Stream Bank Stabilization	Not Specified	12/04/2006
37	Maintain Delivery times, locomotive use, unloading operations, RAP crusher operation	Daily	In Compliance

TABLE 2-1
Virginia Paving Company, Alexandria, Virginia
Special Use Permit Compliance Schedule - Projects Completed by December 2007

SUP Condition	Project Description	SUP Compliance Date	Completion Date
39	All On-Site Trucks & Equipment – Noise Level Sensing Backup Alarms	05/27/2007	06/25/2006
43	Plant 1 Cylinder Exhaust Port – Noise Reducing Muffler	11/30/2006	07/20/2006
43	Plant 2 Cylinder Exhaust Port – Noise Reducing Muffler	11/30/2006	07/20/2006
48	Remove tack deposits, repair pavement	Within 90 days of City notice	In Compliance
52	Report of non-operational air pollution control equipment	Immediately	In Compliance
53	Maintain Plant temperature readings of asphalt mix	Daily	In Compliance
54	Baghouses - Report of failures and pressure drops - Notify City of repairs	Within 24 hours Upon completion	In Compliance
55	Maintain all records for 5 years	Daily	In Compliance
56	Provide copies of all correspondence with Virginia DEQ	Not specified	In Compliance
58	Submit monthly report of production data	Within 2 weeks of month end	In Compliance
59	All compliance records - Before completion of all SUP projects	Starting 3/31/2007 Once per quarter - within 30 days after quarter end 12/31/2007	Reports submitted: April 30, 2007 July 31, 2007 October 2007
60	Facility Inspection - First two years of SUP approval	Once per 6 months – starting 11/28/06	Inspections performed May 2007 December 2007
63	Hold community meetings, i.e., Community Open House	Twice per year - before 06/30 and 12/31 of each year	March 31, 2007 July 2007
64	Provide and implement a comprehensive landscape plan	Not specified	September 2007
76	Establish a Virginia Paving Liaison Committee	Not specified	Meetings held May 2007 July 2007 October 2007

2.2 Information on Key Completed Projects

Blue Smoke Control for Silo, Load-out Area, and Conveyors

Plant 1

Blue smoke refers to the color of smoke when asphalt is produced. The blue color results from burning silica present in feed materials, such as, sand and rocks. As hot asphalt, approximately at 300 degrees Fahrenheit, is moved on conveyors from the production area to the storage silos, to the delivery trucks, it releases blue fugitive emissions, i.e., blue smoke. VAP completed the installation of the blue smoke control technology for the Plant 1 silo tops in February 2007. In August of 2007, VAP completed the enclosing and venting of the Plant 1 load-out area. This improvement facilitates further reduction of fugitive emissions. As asphalt drops onto the delivery trucks, any blue smoke is potentially vented to the collector unit.

Plant 2

VAP completed the second phase of blue smoke control technology at the Alexandria facility, the enclosure and venting of Plant 2 silo tops, in July 2007. The final phase of the blue smoke control technology consists of enclosing and venting the Plant 2 load-out area to the collector unit. This improvement will enable further capture of odors generated when hot mix asphalt falls from Plant 2 silos onto the bed of the delivery trucks. The project is on schedule for a June 2008 completion date.

Storm Water Management Facility

VAP installed a storm water management facility (SWMF) in December 2006 to provide the highest level of treatment for storm water runoff leaving the VAP facility. The selected passive Best Management Practice is located entirely underground and is configured for convenient inspection and maintenance. Routine inspection of the system and auxiliary equipment are a part of the Virginia Paving's Storm water Pollution Prevention Program.

A canopy was erected over the equipment fueling station near the facility's office with a berm constructed within the canopy to keep residual spillage at the fuel dispensers confined within the area, and precipitation runoff out. Additional measures, such as, a maintenance agreement has been executed with the City of Alexandria.

The storm filter maintenance vendor provides maintenance and certifies adequate operation of the storm filters. VAP maintains a record of operating personnel training on the SWMF; and an O&M Manual is onsite as part of the Storm Water Pollution Prevention Plan (SWPPP). Records of inspections can additionally be found at the facility.

Landscape Plan

The Virginia Paving's landscape plan was finalized and approved by the City of Alexandria. Installation of landscapes commenced on May 7, 2007. During Phase 1, VAP completed plantings located on the west side of the property and the riparian zone buffer restoration. This area, set between VAP and Backlick Run, was engineered for both soil stability and ecological restoration. It serves as a complement to the storm water runoff treatment system, and it provides a natural bio-filter, protecting Backlick Runs aquatic environment from sedimentation, runoff, and erosion. Phase 1 plantings included a large stand of evergreens which was installed on the adjacent property at Ben Brenman Park to provide enhanced esthetics from that perspective. Phase 2 plantings are situated on the southwest side of the property along the railroad. This serves as a vegetative buffer for adjacent communities. The remaining Phase 3 plantings will be placed toward the west portion of the property. These landscapes will help to screen and buffer VAP facility from Van Dorn Street's perspective. Installation of the final phase of the landscapes will begin during the 2008 planting season.

US Filter Oil Recycling Plant

In 2007, Siemens took several initiatives to improve the US Filter used oil recycling area inside the VAP property. Specifically, Siemens implemented additional controls on the bio-filter area, including venting enclosure through a carbon bed. Additionally, Siemens cleaned all used oil tanks during the 2007 summer season using an innovative high pressure, low-temperature method. Siemens has consistently shared with the City its monthly readings of volatile organic compounds (VOCs) in areas around its operations and in the carbon filtration system.

2.3 Remaining Projects to Complete

The most important remaining capital improvements with scheduled completion after 2007 are the enclosure of the load-out area on Plant 2, and the replacement of the remaining dump trucks to clean diesel.

2.4 Summary of Asphalt Production in 2007

Month	Production (tons)	Night Production (tons) **	Number of nights	Quarterly Production (tons)	Quarterly Number of Nights
January	19,234	0	0	67,541	0
February	5,064	0	0		
March	43,243	0	0		
April	55,957	7,561	9	203,733	42
May	80,273	21,502	17		
June	67,503	16,906	16		
July	60,165	21,607	16	180,196	34
August	66,032	19,048	15		
September	53,999	2,525	3		
October	76,016	11,375	15	131,084	15
November	48,697	0	0		
December	6,371	0	0		
Total Actual*	582,554	100,524	91		
Permitted	850,000	275,000	110		

* - A production summary table included in the November 27, 2007 Memorandum to the Mayor and the City Council erroneously reported the production data and number of nights for that period. However, the underlying data monitored by the City for SUP compliance was reviewed and found to be correct.

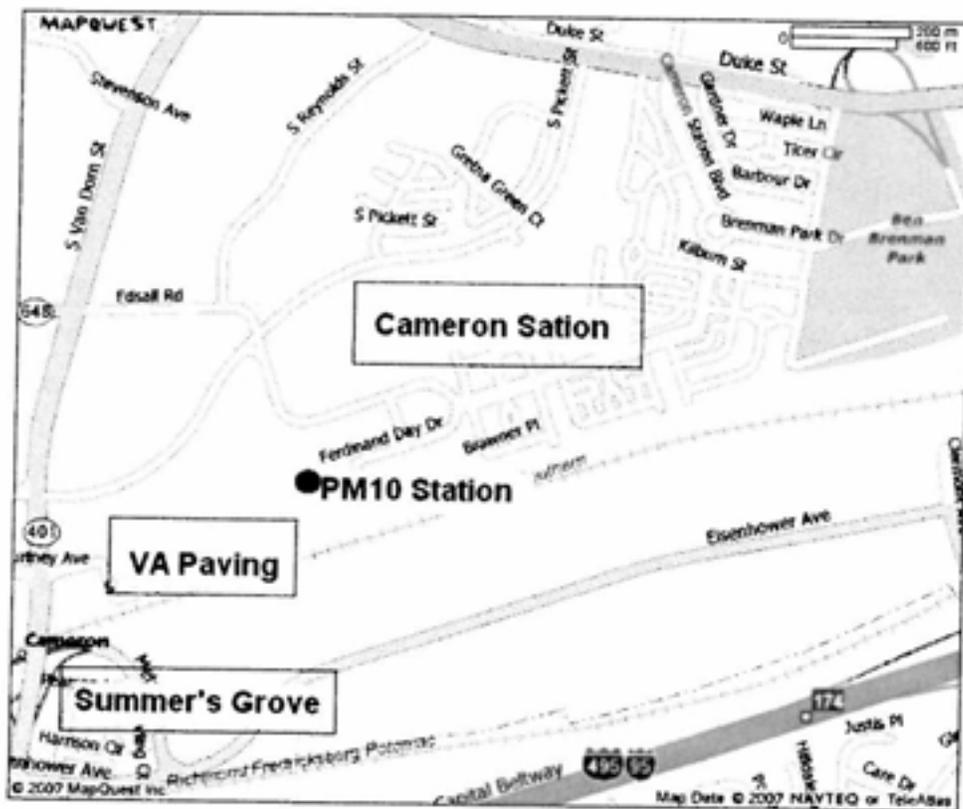
** - Night Production is based on any work conducted from 8 PM to 5 AM.

3.0 AMBIENT AIR QUALITY MONITORING

The City of Alexandria began routinely monitoring ambient air for particulate matter in 2006 at a new monitoring station located at Armistead Boothe Park, near the Samuel Tucker Elementary School in Cameron Station. Monitoring has since then being conducted to measure the ambient air concentrations of particulate matter less than 10 microns in diameter (PM10) in the air surrounding the Cameron Station monitor. This section of the report presents brief background information for this project, the analytical protocols used, and the monitoring results. Lastly, this report discusses the relevant findings.

3.1 Background

Residents near the VAP facility have expressed concerns about the health effects from potential exposure to particulate matter in their community. Specifically, the residents have raised concerns about emissions generated at the Virginia Paving hot mix asphalt facility. This facility is located near residential areas at Cameron Station and Summer's Grove. The following picture depicts the VAP property and surrounding areas.



To address these concerns, the City conducted a short term monitoring study in August of 2004. Two monitors were used for the study, one located at the Armistead Boothe Park and the other at the Ben Brenman Park. The study was designed to monitor PM-10 levels on days when its levels were anticipated to be the highest, based on engineering best practice analysis of weather conditions and predicted wind direction. Monitoring on days when rainfall was predicted was avoided. The results from this short monitoring period in 2004 met the national ambient air quality. However, because they were higher than expected, the City installed a new long term monitoring station to measure PM-10 at Armistead Boothe Park, near the Samuel Tucker Elementary School. This brief report presents the data collected at this newly established monitoring station since its inception, i.e. June 4, 2006.

3.2 Local Sources of Particulate Matter

Particulate matter in general and PM_{2.5} in particular is considered a regional pollutant for the Washington, DC area. There are several sources of particulates likely to affect air quality in the Armistead Boothe Park area monitor. This includes industrial sources such as Covanta Waste-to-Energy facility, Mirant's coal-fired Potomac River Generating Station, Virginia Paving hot mix asphalt plant, and Vulcan Materials aggregate handling facility. Additionally, emissions generated from vehicular traffic (e.g., Route 495 from Springfield to the Woodrow Wilson Bridge) and roadway dust, including passenger cars and light- and heavy-duty trucks, are likely to contribute to the total amount of particulate matter in the neighborhood. Contributions can also be expected to occur from construction activities and off-road fuel-burning equipment such as lawn and garden equipment, as well as natural sources such as wind blown dust.

The City performed an analysis of the magnitude of emissions that are generated from the industrial and on-road mobile sources to develop an understanding of the relative contribution they may have on local air quality. In addition, microscopic analysis of the PM-10 samples collected in August 2004 showed particulate matter properties often associated with fuel combustion sources. However, it is not possible from these results to identify the exact source(s) of the measured particulate matter.

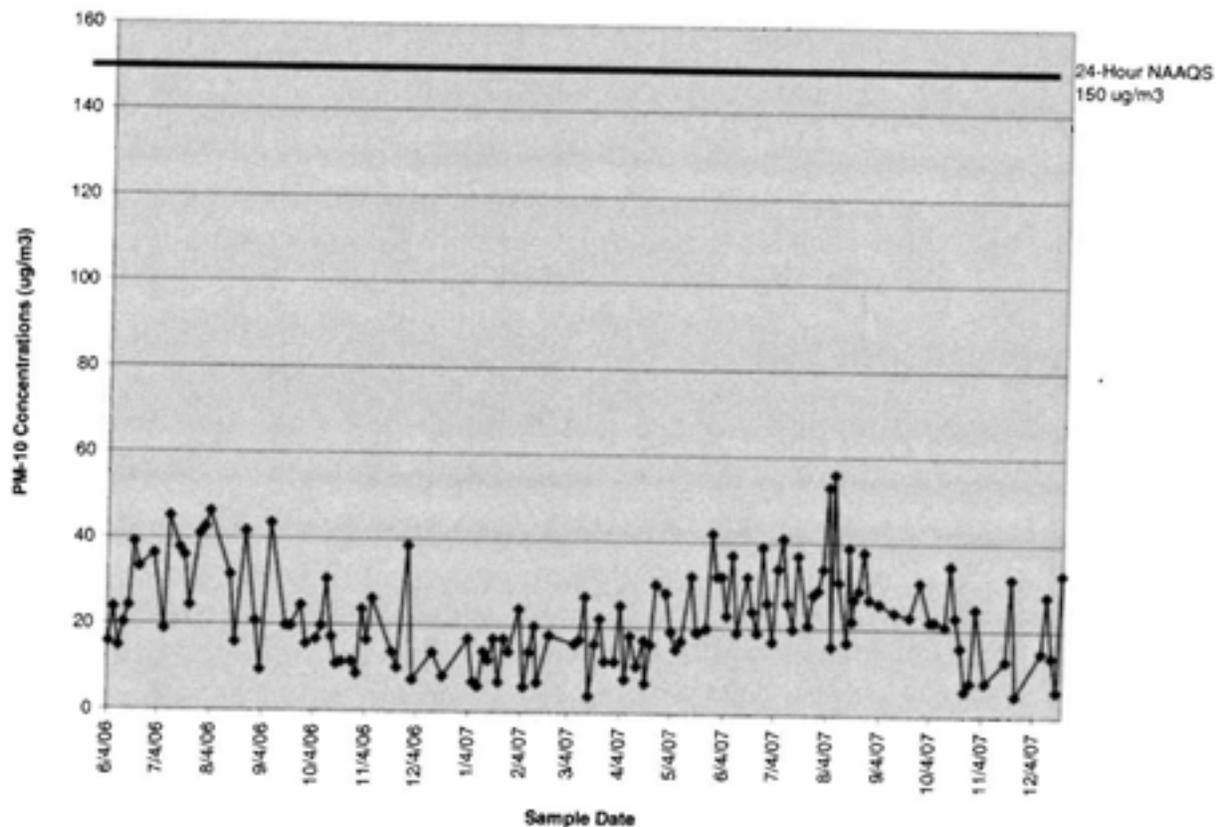
In an effort to address the region's air quality issues, the City of Alexandria participates in the region's air quality planning efforts for Northern Virginia and the Metropolitan Washington area through the Metropolitan Washington Air Quality Committee (MWAQC). Vice-Mayor Redella S. Pepper is City's representative at the MWAQC. The City is also actively involved in discussions with respect to the State Implementation Plan (SIP) for PM_{2.5} in the Northern Virginia area. Other initiatives by the City include outreach programs that were delineated in the report *Environment for a Healthier Alexandria* published in 2007.

The EPA established a particulate matter standard for particles with an aerodynamic diameter of less than 2.5 microns in 1997. These "fine" particles were shown to have increased adverse health effects upon certain segments of the American public, such as children and the elderly. On April 5, 2005, specific counties and cities within the

Metropolitan Washington DC region (including Alexandria) were designated as non-attainment for the PM_{2.5} standard. Monitoring data for the Metropolitan Washington DC region indicate that the area is below the 24-hour PM_{2.5} standard; however, the metropolitan region as a whole is not meeting the annual PM_{2.5} standard.

3.3 Monitoring Results

The following graphic summarizes the PM-10 monitoring results for the long-term monitoring station located at Boothe Park near the Samuel Tucker School. Monitoring at this location started in June of 2006. The 24-hour average PM₁₀ concentrations are compared to the EPA-specified National Ambient Air Quality Standard (NAAQS) of 150 µg/m³. A comparison of the monitoring results with the NAAQS shows that the ambient PM₁₀ concentrations at Cameron Station are below the NAAQS, as depicted in the chart below. As expected, the results show considerable day-to-day variability.



For the purpose of demonstrating compliance with NAAQs, SUP condition 28a states that the City will operate the Cameron Station PM₁₀ monitor until three years of valid data is collected. Appendix 2 includes a schedule for the monitoring days at the Cameron Station PM₁₀ monitor. Once three years of data is collected, the City will determine PM_{2.5} compliance using appropriate methodology to extrapolate from PM₁₀ monitoring results. Table 3-1, summarizes the PM₁₀ monitoring data for 2007, showing the number of samples collected and the maximum values for each of the quarter in the year.

**Table 3-1: Summary of PM10 Monitoring Results
Armistead Boothe Park Station**

2007 Quarter	Maximum Value ug/m3	Number of Samples	Arithmetic Mean ug/m3
1 st Quarterly Totals	27	23	14.2
2 nd Quarterly Totals	42	27	23.2
3 rd Quarterly Totals	56	25	29.8
4 th Quarterly Totals	35	18	18.4
2007 Annual Totals	56	93	21.4

The City of Alexandria continues to monitor ambient air at the Armistead Boothe Park monitoring station. The 2008 schedule for sampling is included in Appendix 2.

4.0 VAP AIR EMISSIONS

The SUP issued by the City of Alexandria, among its 78 conditions, also requires VAP to perform emissions testing on the drum dryer stacks for Carbon Monoxide (CO), Nitrogen Dioxide (NO₂), Sulfur Dioxide (SO₂), and Particulate Matter (<2.5 and 10 micrometers (PM_{2.5} and PM₁₀)). Condition 25 of the SUP delineates a schedule for the stack tests to be performed within a certain timeframe. The stack test, performed in August of 2007 as per schedule in the SUP, is discussed here.

The review conducted by the City focused on the 2007 emissions testing for both plants at the VAP facility, and compares the emissions rates with those listed in the state permit issued by VADEQ. The VA Paving facility in Alexandria conducted stack emissions testing in August of 2007 on the two dryer stacks at the facility. Emissions testing were conducted under conditions most likely to challenge the emissions control measures of the facility. Present during the 2007 testing were two staff members from the City of Alexandria and two staff members from VADEQ.

In order to determine the maximum expected emission rate and to provide some consistency among emission tests, compliance determinations require that stationary sources be operated at or above the 80% production levels. In special cases, depending on the nature of the equipment and its use a source may be operated at other operating rates during compliance testing. However, if the claimed maximum production rate cannot be consistently maintained during the compliance test period, the future allowable operating rate of a process could be limited by a permit condition to the rate actually achieved during the compliance test. During emissions testing Plant 2 could not maintain operation at or above the 80% production levels listed in the permit. That was due to mechanical limitations in the feed of materials to the process. Component limitation restricted the actual maximum production rate of Plant 2 to approximately 250 tons per hour. VAP has indicated that the state permit may change to include an enforceable condition limiting the asphalt production capacity of Plant 2.

VA Paving submitted to the City the document Test Report for Compliance Emissions Testing Conducted on Two Asphalt Plants at the Virginia Paving Facility in Alexandria, Virginia dated October 22, 2007. The report was reviewed and found to be methodological appropriate, as well as, presenting the necessary information for the review. A preliminary review of the report indicates a few inconsistencies between the hourly rates 2007 stack tests and the hourly rates listed in the 2005 VADEQ permit. The City has requested VAP to address these inconsistencies and also to forward any available review conducted by VADEQ on the 2007 testing. A copy of this letter dated January 15, 2008 was also sent to VADEQ and is included in Appendix 4. Also included in Appendix 4, is a copy of a letter received by the City of Alexandria on January 23, 2008 sent by VADEQ to VAP issuing a Notice of Violation regarding same issue on January 16, 2008.

The SUP includes a series of improvement projects to be implemented by VAP to reduce total emissions of air pollutants from the facility. These projects address not only the

emissions from the drum dryer stacks, but also fugitive emissions from material transfer areas, and emissions from diesel powered machinery. Several of these pollution control projects completed in 2007 are summarized below in Table 4-1.

Table 4-1 Virginia Paving Improvements to Reduce Total Emissions	
Improvement	Benefit, Comments and Completion Date
Blue Smoke Control	<p>Blue smoke control technology was specifically designed to minimize emissions and odors from the plant's most exposed areas. The SUP requires installation of Blue Smoke Control technology on both plants. Virginia Paving has completed installation of the blue smoke control system throughout the plant silo's and at load out scales. This type of system is considered the best available control technology for asphalt plants.</p> <p><i>Plant 1 – Completed February 2007</i> <i>Plant 2 – Completed July 2007</i></p>
Low NOx Burner	<p>In efforts to reduce NOx emissions, Condition 12 of Virginia Paving's SUP requires installation of a Low NOx burner on both plants. Virginia Paving submitted an application to modify the VADEQ state operating permit in early 2007 to construct and operate a Low NOx burner on Plant 1. A Hauck Eco Star asphalt burner was installed on Plant 2 prior before March 2005, prior to the SUP approval.</p> <p><i>Plant 1 – Installation Completed April 2007; state permit pending</i> <i>Plant 2 - Completed March 2005</i></p>
Increase Stack Height to 20 meters	<p>To achieve greater dispersion of the exhaust emissions Virginia Paving increased the stack height on Plant 1 and Plant 2 to 20 meters per SUP condition.</p> <p><i>Plant 1 – Completed December 2006</i> <i>Plant 2 – Completed December 2006</i></p>
Asphalt Storage Tank Vent Condensers	<p>Condensers are designed to minimize emissions and odors from tanks used to store asphalt cement. Condensing the vapors turns them into a liquid state wherein they return to the liquid asphalt cement instead of escaping into the atmosphere through the tank vent. Additionally, VAP is planning to use carbon filtration in conjunction with condensers to further reduce odors from the tank area.</p> <p><i>Heatec condensers installation - Completed August 2006</i></p>
Asphalt conveyors and Load Out Areas	<p>This improvement will capture emissions when hot mix asphalt is dispensed from the silos into the bed of trucks. The third phase of blue smoke control technology consists of enclosing and venting Plant 1 load-out area to the collector unit. The fourth and final phase of blue smoke control technology consists of enclosing and venting Plant 2 load-out area to the collector unit.</p> <p><i>Plant 1: Fugitive Emissions Capture & Control – Completed August 2007</i> <i>Plant 2 - Fugitive Emissions Capture & Control - On schedule June 2008</i></p>
Hot Oil Heater - Increase Stack Height to 6 meters	<p>To promote greater dispersion, Virginia Paving increased the stack height on both hot oil heaters to 6 meters.</p> <p><i>Completed January 2006</i></p>
On-Site Trucks and Diesel Engines	<p>A Diesel Particulate Filter (DPF) is a device designed to remove diesel particulate matter from the exhaust gas of a diesel engine. All onsite diesel equipment (e.g., Caterpillar loader, crane) has been outfitted with particle traps that are 90% efficient.</p>
RAP Crusher – Water Sprays and Drop Enclosures	<p>Water sprays were installed to reduce fugitive emissions generated by the Recycled Asphalt Pavement (RAP) crusher. Wet suppression offers a high level of dust emission control. Additionally, drop points on the conveyor were equipped with boot</p>

Table 4-1 Virginia Paving Improvements to Reduce Total Emissions

Improvement	Benefit, Comments and Completion Date
	enclosures to facilitate further reductions in dust potentially generated by the crusher. <i>Completed June 2006</i>
Replace Dump Trucks	In 2004, EPA required off-road diesel engine companies, such as Caterpillar, to manufacture trucks with improved emission profile engines. Virginia Paving is replacing the facility's fleet dump trucks over a period of three years with trucks having engines with reduced emissions. The first third of the dump truck fleet arrived during 3rd quarter 2007 reporting period. The remaining 2 phases are on schedule to meet the SUP completion dates.
Plant 2 Product Shipment Area	Dust potentially generated from the haul road on the eastern end of the facility was reduced and further controlled through the application of asphalt. This improvement expanded wet-vacuum and watering operations to this area. <i>Completed January 2006.</i>
All Material Transfer Points – Water Sprays and Enclosures	The potential for fugitive dust is created when material is exchanged from one conveyer to another. Problematic identified areas at VAP conveyers were enclosed. Additionally, water sprays have been installed to ensure aggregate material remains adequately moist at all transfer points. <i>Completed December 2006</i>

Virginia Paving also submitted a particulate emissions test report to the City of Alexandria for a particulate matter control system on June 21, 2007. The testing was performed on June 14, 2007 to ascertain the control efficiency for PM2.5 and PM10 of the Blue Smoke Control system installed on Plant 1. Review of the report indicates that the removal efficiency is within system's manufacturing claims. The efficiency test addressed the efficiency of the filtering system after capturing particulate emissions at the top of silo area. Capturing relied on a vacuum established at the top of silo area.

As expected, a small percentage of fugitive emissions may escape the vacuum capturing apparatus. VAP is optimizing areas, such as; the load out area at the bottom of the silos was not fitted with fugitive emissions capturing devices at the time of the test. The load out area has since been enclosed and fitted with capturing devices for the Blue Smoke Control system. VAP is working to improve capturing of fugitive emissions in all areas of Plant 1 to minimize escape of fugitive emissions to the atmosphere without being filtered by the Blue Smoke Control system.

5.0 COMMUNITY ISSUES

- The VA Paving Liaison Committee held public meetings on May 3, July 10, and October 17, 2007. Minutes for Liaison Committee meetings are posted at http://alexandriava.gov/planningandzoning/vapaving_sup.php.
- A 24-hour VA Paving Complaint Hotline was established by VA Paving for all complaints related to VA Paving. In addition, the City's 24 hour nuisance abatement hotline takes VA Paving complaints and routes them to the appropriate staff for follow-up. This hotline as well as additional contacts and information resources were disseminated to the community at the Cameron Station Civic Association meeting, and the Community Liaison Committee meeting held on May 3, 2007 and July 10 2007. That information is also posted on the City's Planning and Zoning webpage dedicated to VA Paving, and it is included in the procedures for the City Nuisance Hotline.
- In 2007, complaints about VAP activities were received from members of the community via the 24-hour VA Paving Complaint Hotline, as well as by calling other City telephone numbers and by electronic mail. The City conveyed these complaints to the VA Paving Liaison Committee during the meetings on May 3, July 10, and October 17, 2007. At the July 10 meeting the City reported a total of 18 complaints; and at the October 17 meeting the City reported 7 complaints. There were no complaints received after the October 17, 2007 meeting. There were a total of 25 complaints received in 2007.
- The Liaison Committee requested the City to facilitate a meeting with the Norfolk Southern Corporation to address noise complaints from train operations at night. During the meeting held on July 12, 2007 the Trainmaster indicated that Norfolk Southern is committed to address citizen concerns. Regarding specific issues raised by the Liaison Committee, the Trainmaster indicated that trains idling occur because of schedules, or because when the air temperature is below 32 degrees Fahrenheit, the procedure prevents brake fluids from freezing. To minimize potential noise to residents at Cameron Station and Summer's Grove, the Trainmaster indicated that he was going to communicate to all train conductors operating in Alexandria the necessity to park idle trains adjacent to VA Paving, rather than in the areas near Summer's Grove and Cameron Station residences.
- In early October, the City received a request for information concerning a "failed stack test" conducted in August of 2004 noted on the USEPA's website. Upon contacting VADEQ, its Office of Air Compliance Coordination conducted a review of their Comprehensive Environmental Database System (CEDs). VADEQ concluded that there was an administrative error in the upload from CEDs to EPA's Enforcement and Compliance History Online (ECHO). VADEQ informed the City that VA Paving did not fail the stack test, and that the department is currently pursuing correction of this error. Appendix 5 includes a copy of the updated VAP ECHO report.

- Members of the liaison committee and of the public have raised concerns regarding the street conditions near the plant in particular and in the west end area of the city in general. Virginia Paving has agreed to increase their maintenance efforts at the intersection of Van Dorn Street and Courtney Avenue. VAP has also informed the City that the Vulcan Company is also participating in that effort. Regarding street beautification activities by the City, the Deputy Director of Operations at the City of Alexandria Transportation and Environmental Services indicated that the streets around the Virginia Paving Plant are on a monthly sweeping schedule, except in the winter due to frost conditions.
- The meteorological station located at the Samuel W. Tucker School is now part of the WeatherBug network. Persons with an internet connection can now obtain local weather information for Alexandria, such as temperature, wind direction and humidity. WeatherBug was developed with the purpose of delivering live local weather conditions, forecasts and life saving severe weather alerts from its exclusive network of WeatherBug Tracking Stations. The internet link to the Samuel Tucker station is <http://weather.weatherbug.com/VA/Alexandria-weather.html?zcode=z5602>

APPENDIX 1

City of Alexandria Multi-Departmental Inspection



Comprehensive Inspection Report

Virginia Paving Company

5601 Courtney Avenue, Alexandria, VA

December 12, 2007

Comprehensive December 12, 2007 Inspection Report Summary

The Virginia Paving Company (VPC) operates an asphalt manufacturing plant in Alexandria, Virginia, under a Special Use Permit (SUP #2005-0042). The SUP requires that various City departments conduct a comprehensive bi-annual inspection of the VPC plant. The comprehensive bi-annual inspection consists of (1) Technical Inspection Checklist, (2) On-site Plant Inspection, and (3) Visits to surrounding communities.

The Technical Inspection Checklist was developed by the City Department of Transportation and Environmental Services - Division of Environmental Quality (ALEX-DEQ) to address SUP related documentation and compliance. The checklist reflects technical onsite inspections with full records review and plant operations. The Multi-departmental onsite inspection was conducted on December 12, 2007. In attendance was staff from the City Planning and Zoning, ALEX-DEQ, the Health Department, the Department of Recreation, and the Fire department, Division of Code Enforcement.

Various conditions set forth in the SUP are monitored via review of records required to be kept by VAP. These records include hourly asphalt production and delivery logs, plant operating hours, daily fuel type usage, fuel delivery invoices, and the operating permit issued by the Virginia DEQ. A complete list of records that ALEX-DEQ monitors is included in the Technical Inspection Checklist. VAP has provided full access to their entire SUP related records during requests by ALEX-DEQ.

The multi-departmental onsite inspection was conducted during day operations and consisted of accessing the various areas at the plant to ascertain general site conditions and any health hazards to the workers or the surrounding communities. Those areas included the record keeping office areas; the maintenance buildings; Plants 1 and 2; the pollution control devices such as the Blue Smoke Apparatus installed on Plant 1 and 2; the conveyor systems, the recycling asphalt product pile, the storm water management system, the diesel locomotive, the asphalt heaters and storage tanks, and the US Filters (currently owned by Siemens) oil recycling facility. Night operations were monitored by ALEX-DEQ several times on a weekly basis from April to October.

ALEX-DEQ also conducts daily visits to the surrounding communities during the day and at night when the VAP is producing asphalt. Communities of concern include Summers Grove, Cameron Station and the business area abutting the plant to the north. These communities have expressed environmental concerns related to VAP operations. Of particular concern are asphalt odors emanating from VPC, petroleum odors emanating from the US Filter facility, particulate and fugitive dust emissions, and noise from trucks and trains especially at night. In addition to community visits to address these concerns, ALEX-DEQ monitors and addresses all citizen complaints received at the 24-hour hotline and/or received via other means, such as direct telephone and email contacts.

The VAP facility in Alexandria continues to satisfactorily implement the projects and procedures delineated in the SUP. During the December 12, 2007 inspection, the only issues that needed correction were raised by the City's Code Enforcement Bureau.

Although minor in nature, e.g., electrical panel labeling, an inspection report Notice of Violation with a 30 days correction period was given to the facility. VAP corrected all items listed in that Notice within those 30 days. The Alexandria Health Department noted that areas of standing water could potentially act as mosquito breeding habitat around the facility during the spring and summer months. There was no indication of mosquitoes during the inspection. Staff from the Alexandria Planning and Zoning Department did not find any compliance issues during the inspection.

INSPECTION CHECKLIST – TECHNICAL Virginia Paving Company 5601 Courtney Avenue, Alexandria, Virginia			
Inspection Dates		December 12, 2007	
Inspection Time		3PM-10PM, 9AM-12PM	
Inspection Performed by		Carlos Martins, Erica Branneman	
Inspector Initials			
RECORDS REVIEW			
1	Is a copy of the State Operating Permit issued by VDEQ kept on site and readily available to plant manager and environmental compliance personnel?	Y	
2	Are copies of all reports/records required by VDEQ kept on site and readily available to plant manager and environmental compliance personnel?	Y	
3	Is a copy of the Special Use Permit issued by City of Alexandria kept on site and readily available to plant manager and environmental compliance personnel?	Y	
4	Are copies of all reports/records required by the City kept on site and readily available to plant manager and environmental compliance personnel?	Y	
5	(a) Are copies of all correspondence with Virginia DEQ available on site?	Y	
	(b) Was a copy of every such correspondence submitted to the City?	Y	
6	Operating Hours (a) Is there a complete on-site record of day/night shifts of asphalt production? (b) Is there a running total of night shifts during which asphalt was produced? (Night is defined as 8pm to 5am) (c) Is the running 12-month total number of night shifts less than 110? (d) Did the facility operate on any Code Purple or Code Maroon days?	Y Y Y NA	NA - Not applicable; there has been no Code Purple or Code Maroon days this year yet.
7	Asphalt Production Records (a) Is there a complete on-site record of the tons of asphalt produced during every hour, day, month, and 12-month period of operation? (b) Is the maximum hourly production less than 1,000 tons? (c) Is the maximum nighttime (8pm to 5am) production less than 4,000 tons? (d) Is the maximum daily production less than 8,000 tons? (e) Is the maximum production on a Code Red day less than 4,000 tons? (f) Is the running 12-month night production less than 275,000 tons? (g) Are all environmental projects required by SUP completed?	Y Y Y Y NA Y	There has been no Code Red days this year yet.

	(i) If NO, is the running 12-month total production less than 850,000 tons? (ii) If YES, is the running 12-month total production less than 980,000 tons?	N Y NA	
8	(a) For each asphalt delivery, is there a complete on-site record of the customer name, delivery date and time, and tons of asphalt delivered? (b) Was nighttime production delivered to non-government customers?	Y N	
9	Low-Odor Additive Use (a) Are manufacturer guidelines on low-odor additive use available on site? (b) For each ton of asphalt produced, is there a complete on-site record of the quantity of low-odor additive used and quantity of asphalt cement used?	Y Y	Included in weekly submitted spreadsheet
10	No. 2 oil usage in hot oil heaters and drum dryers (a) Is there a monthly consumption record for the hot oil heaters? (b) Are all running 12-month totals for heater use less than 100,000 gals? (c) For every shipment, is there a record of sulfur content less than 0.05 wt%? (d) For every shipment, is there a record that fuel is on-road diesel quality? (e) On each heater, is there a sign indicating the use of #2 oil only as well as the use of only one heater at any time?	Y Y Y Y Y	
11	Recycled oil usage in drum dryers (a) Is there a daily and monthly consumption record? (b) For every shipment, is there a record of sulfur content less than 0.5 wt%? (c) If sulfur content exceeds 0.4 wt%, is there a record of communication with fuel supplier to achieve 0.4 wt% sulfur. (d) For every shipment, is there a record of meeting other constituent limits? (Other limits include metals, halogens, PCB and flash point.) (e) Was any recycled oil used on Code Orange or Code Red days?	Y Y NA Y NA	Sulfur threshold not exceeded. There has been no Code Red and/or Orange days this year yet.
13	Plant 1 Blue Smoke Control for silo, load outs, conveyors (6-stage filtration) (a) Was capture and control system certified to be 99% efficient? (Performance Test Date: June 14, 2007) (b) Are manufacturer maintenance guidelines available on site? (c) Is there a record of maintenance/repair (filter replacement, etc.)? (Last Maintenance Date: NA)	Y Y NA	No filter replacement has been required yet.
14	Plant 2 Blue Smoke Control for silo, loadouts, conveyor (venting to burner) (a) Was capture & control system certified to be 99% efficient? (Performance Test Date: _____) (b) Are manufacturer maintenance guidelines available on site? (c) Is there a record of maintenance/repair performed on this system? (Last Maintenance Date: _____)	NA Y NA	Was installed in July 2007.
15	Baghouse Controls (a) Was a performance test done on each baghouse in the last 2 years? Plant 1 Test Date: 2004 and 2007 Plant 2 Test Date: 2004 and 2007 Lime Silo Test Date: NA	Y	No Lime Silo use.

	(b) Is there a record of all tests showing TSP less than 0.03 gr/dscf? (c) Is there a record of all monthly opacity tests?	Y Y	
16	Fugitive Emissions Controls (a) Is a copy of the fugitive dust BMP manual readily available on site? (b) Is there a record of opacity monitoring for RAP crusher showing < 10%? (c) Is there a record of twice-daily watering of every paved road? (d) Is there a record of once daily wet vacuuming of every paved road? (e) Is there a record of watering and vacuuming of other paved areas? (f) Is there a record of routine wetting or chemical stabilization of piles? (g) Is there a record of routine inspection of conveyor drop enclosures? (h) Were these records submitted to the City within the last six months? Last Submission Date: DECEMBER 2006	N N Y Y Y Y N Y	Not required in SUP or state permit. Daily records for watering RAP were reviewed. The rap crusher was operating during the site visit. It is now equipped with three water sprayers: one where rap enters the crusher and two at the end of the conveyors. The water truck operated twice during the inspection. No opacity issues from the grounds or RAP crusher observed.
12	Pollution Control Malfunctions (a) Was there any malfunction of any control measure for any pollutant? (b) Is there a record of these malfunctions (date, equipment, reason, etc.)? (c) Was a timely report submitted to the City for every malfunction?	Y Y Y	On the March 29, 2007 10AM the baghouse malfunctioned. It was solved same day by VERSAR.
17	Stack Tests (a) Is there a record of stack tests on Plants 1 and 2 (PM2.5, PM10, NOx, SO2, CO)? Last Plant 1 Test Date: 2004 and 2007 Last Plant 2 Test Date: 2004 and 2007 (b) Were test reports submitted to the City within 90 days of test date? (c) Is there a record of plant mix temperature readings on a daily basis?	Y Y Y	
18	Storm water Management Facility (a) Is a copy of the SWMF BMP contract readily available on site? (b) Is a copy of the SWMF O&M Manual readily available on site? (c) Is there a record of vendor-performed or vendor-certified maintenance? Last Maintenance Date: DECEMBER 27 2006 (d) Were maintenance records submitted to the City within the last one year? Submission Date: DECEMBER 28 2006	Y Y Y Y	Certified by TES-DEQ (Diana Handy)
19	Night Operations (a) During any night shift, was more than one dryer, one loader, one skid steer or one mobile crane operated? (b) Is there a record of all rail deliveries showing delivery date and time? (c) Is there a record of operating hours of locomotive engine, unloading operations and RAP crusher use? Were these operated at night? (d) Was any night delivery of RAP ever dumped on the top of the RAP pile?	N Y Y N	

20	"Hotline" Phone Number (a) Is the "hotline" active? (b) Is the name of the responsible person provided to the City and community? (c) Is there a log of complaints received at this number? (d) Have all complaints been resolved to date?	Y Y Y •	All complaints investigated.
21	Is a copy of the City's BMP manual for automotive industries kept on site and readily available?	Y	
22	Is there a record of maintenance for the locomotive engine to prevent/repair oil, lubricant or fuel leaks?	Y	Maintenance by Estetor Rane.
23	Is a copy of the comprehensive landscape plan readily available on site?	Y	Copy on site since March 2007
PLANT INSPECTION			
1	Asphalt Plant 1 (a) Was Plant 1 operational? (b) If YES, was the baghouse pressure gauge operating properly? (c) Was any visible smoke (other than water) observed from the stack? (d) Did the Blue Smoke control appear to be operating properly? (e) Was strong asphalt odor detected near the Plant 1? (f) Was the stack raised to 20-meter height? (g) What fuel was being burned in the drum dryer? #2 Fuel	Y Y N Y N Y Y	Baghouse magnetic value was 2.1.
2	Asphalt Plant 2 (a) Was Plant 2 operational? (b) If YES, was the baghouse pressure gauge operating properly? (c) Was any visible smoke (other than water) observed from the stack? (d) Did the Blue Smoke control appear to be operating properly? (e) Was strong asphalt odor detected near the Plant 2? (f) Was the stack raised to 20-meter height? (g) What fuel was being burned in the drum dryer?	N	Plant 2 was not in operation during inspection.
3	Asphalt Storage Tanks (a) Were tank vent condensers/steel wool filters appear to be effective? (b) Was strong asphalt odor detected near the storage tanks?	Y N	The vent condensers appeared to be effective. The facility added a charcoal-based vapor recovery system to the loadout area.
4	Hot Oil Heaters (a) Was either of the two hot oil heaters operational? (b) If YES, was the other hot oil heater shut down? (c) Was there a sign clearly indicating that only one heater is allowed to operate at any time? (d) Was the stack raised to 6-meter height? (e) What fuel was being burned in the heater? #2 OIL	Y Y Y Y Y	
5	Lime Silo (a) Was the pressure gauge on lime silo operational? (b) Were any visible emissions observed from the silo baghouse exhaust?	NA NA	The lime silo not in use.

6	<p>Fugitive Dust Emissions</p> <p>(a) Was there evidence of watering/vacuuming of paved roads and surfaces?</p> <p>(b) Was the RAP crusher operational?</p> <p>(c) Were any visible emissions observed from the RAP crusher?</p> <p>(d) Did transfer point enclosures appear to be effective?</p> <p>(e) Did water sprays appear to be effective?</p> <p>(f) Based on general observation, did the facility appear to be following the fugitive dust BMPs?</p>	<p>Y</p> <p>Y</p> <p>N</p> <p>Y</p> <p>Y</p> <p>Y</p>	<p>Crusher did not operate at night. The rap crusher was operating during the day site visit. It is equipped with three water sprayers: one where rap enters the crusher and two at the end of the conveyors. The water truck operated during the inspection. No opacity issues from the grounds or RAP crusher observed.</p>
7	<p>Storm water Management Facility</p> <p>(a) Did the SWMF appear to be operating properly?</p> <p>(b) Was there evidence of sediments or petroleum products in the discharge?</p>	<p>Y</p> <p>N</p>	<p>The storm water system contains ~120 filters: 100 located in the rear of the property and 20 in the front. Outfall monitoring is performed on a quarterly basis. The water samples taken from the rear outfall were free of sediment and petroleum products.</p>
8	<p>RAP / Asphalt Pile / Backlick Run</p> <p>(a) Is the asphalt pile a minimum of 35 feet from the stream?</p> <p>(b) Is access to the RAP pile blocked at night?</p> <p>(c) Was there any evidence of RAP deposited at the top of the pile during night?</p> <p>(d) Is the stream bank properly stabilized?</p> <p>(e) Is the height of the asphalt pile on Parcel B lower than the height of the South Van Dorn Bridge?</p>	<p>Y</p> <p>Y</p> <p>N</p> <p>Y</p> <p>Y</p>	
9	<p>Noise</p> <p>(a) Were any amplified sounds audible at the property line?</p> <p>(b) Was there excessive tailgate banging during truck unloading?</p> <p>(c) Was there excessive use of engine brakes?</p> <p>(d) Are there signs clearly advising truck drivers to minimize tailgate banging and use of engine brakes?</p> <p>(e) Is the truck route properly marked to minimize backup alarms?</p> <p>(f) Do trucks have ambient noise-level sensing backup alarms?</p> <p>(g) Is the RAP crusher shut down at night?</p> <p>(h) During night operation, is only one dryer unit, one loader, one skid steer and one mobile crane operating?</p> <p>(i) Is the locomotive engine taken out of service at night?</p> <p>(j) Was a train delivery received at night? If YES, did the unloading wait until daytime?</p> <p>(k) Are the noise reducing mufflers on plant cylinder exhausts effective?</p> <p>(l) Are there signs on property to limit engine idling to a maximum of five minutes?</p>	<p>N</p> <p>N</p> <p>N</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>N</p> <p>Y</p> <p>Y</p>	
10	<p>(a) Were automotive fluids (oils, lubricants and antifreeze) prevented from being disposed on the ground?</p> <p>(b) Were automotive fluids (oils, lubricants and antifreeze)</p>	<p>N</p> <p>N</p>	<p>Teksolv II is now utilized (in lieu of Safety Kleen) in the parts washer. It is</p>

	prevented from being disposed in the storm or sanitary sewers? (c) Were equipment and automotive repairs found to occur inside building?	Y	less hazardous than Safety Kleen.
11	Lighting (a) Were only the necessary lights turned on during night operations? (b) Are all lights shielded and pointed downward during use?	Y Y	

APPENDIX 2

2008 Cameron Station PM10 Monitoring Station Schedule

2008 PM10 Station Monitoring Schedule

Armistead Boothe Park/Samuel Tucker School/Cameron Station

January

Su	M	Tu	W	Th	F	Sa
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

February

Su	M	Tu	W	Th	F	Sa
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	

March

Su	M	Tu	W	Th	F	Sa
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

April

Su	M	Tu	W	Th	F	Sa
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

May

Su	M	Tu	W	Th	F	Sa
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

June

Su	M	Tu	W	Th	F	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

July

Su	M	Tu	W	Th	F	Sa
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

August

Su	M	Tu	W	Th	F	Sa
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

September

Su	M	Tu	W	Th	F	Sa
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

October

Su	M	Tu	W	Th	F	Sa
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

November

Su	M	Tu	W	Th	F	Sa
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

December

Su	M	Tu	W	Th	F	Sa
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

APPENDIX 3

Letter from VAP re: Low-NO_x State Permit



Division of The Lane Construction Corporation

As Best Available Practice (BAP)

Northern Virginia Area Office
14850 Conference Center Drive
Suite 210
Chantilly, VA 20151
(703) 230 0856
(703) 230 0851 Fax

November 17, 2007

Ms. Faroll Hamer, Director
Department of Planning & Zoning
City Hall, Room 2100
Alexandria, VA 22314

Re: Virginia Paving Co., SUP #2005-0042
5601 Courtney Ave.

Dear Ms. Hamer:

This letter is written pursuant to Condition No. 61 of SUP #2005-0042 approved by the City Council on November 28, 2006, to give the City of Alexandria prior advance notice of a reasonable basis for the delay in complying with the installation date for the low NOx burner on Plant 1 pursuant to Condition No. 12.

As with any major plant improvement, an amendment to our state operating permit with the Virginia Department of Environmental Air Quality (VDEQ) for the installation of a low NOx burner is required. Anticipating that VDEQ would review and issue the amended permit within the normal 90 day timeframe, we applied for this amended permit on January 4, 2007 and, to date, it has not been issued. We are actively working with representatives of the VDEQ to obtain this permit. We do not believe that the amended permit will be issued in time to meet the December 31, 2007 date as specified in condition No. 12.

Since the delay of the installation of this system is beyond the control of Virginia Paving, and Virginia Paving has provided the City with reasonable advance notice, we believe this comports with the requirements of Condition No. 61.

As always, Virginia Paving will continue to work with Staff on the implementation of all the conditions of the Special Use Permit. Please do not hesitate to contact me with any questions.

Very truly yours,

Dennis A. Luzier
Assistant District Manager
Virginia Paving Company

cc: MMC, JSC, MAS, DAH, CDM, File

Alexandria and Occoquan Branch
P.O. Box 22247
Alexandria, VA 22304
(703) 761 7100
(703) 761 4249 Fax

Sterling and Chantilly Branch
P.O. Box 1235
Sterling, VA 20167
(703) 471 8757
(703) 837 3023 Fax

Stafford and Fredericksburg Branch
P.O. Box 810
Stafford, VA 22555
(540) 752 5519
(540) 752 5639 Fax

APPENDIX 4

**Letter from City of Alexandria to Virginia Paving re: 2007 Stack Test
results and VADEQ Permit**

Letter from VADEQ to Virginia Paving re: Notice of Violation



DEPARTMENT OF TRANSPORTATION AND ENVIRONMENTAL SERVICES

Division of Environmental Quality

P.O. Box 178 - City Hall

Alexandria, Virginia 22313

<http://alexandriava.gov/tes/DEQ/>

January 15, 2008

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

Dear Mr. Luzier,

Thank you for submitting the Test Report for Compliance Emissions Testing Conducted on Two Asphalt Plants at the Virginia Paving Facility in Alexandria, Virginia dated October 22, 2007. The City's preliminary review of the report shows inconsistencies between the hourly rates in the tests and the hourly rates listed in the 2005 Virginia Department of Environmental Quality (VADEQ) permit for many of the pollutants that were tested.

The City requests that Virginia Paving provides by February 23, 2008:

- A detailed analysis and explanation of these inconsistencies, and
- The VADEQ review of the report stated above

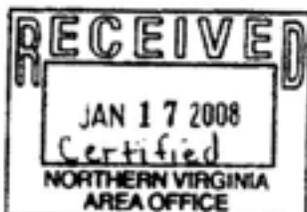
Should you have any questions, please don't hesitate to contact me or Lalit Sharm in my office at 703.838.4334.

Sincerely,

A handwritten signature in black ink, appearing to read "Carlos A. Martins".

Carlos A. Martins
Senior Air Pollution Control Specialist

cc: William Skrabak, Lalit Sharma, Richard Josephson, Chris Monahan



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

13901 Crown Court, Woodbridge, Virginia 22193

(703) 583-3800 Fax (703) 583-3801

www.deq.virginia.gov

L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

Thomas A. Faha
Regional Director

January 16, 2008

CERTIFIED MAIL
Return Receipt Requested

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

Notice of Violation

RE: NOV No. 00-00-NVRO-2007
Virginia Paving Company, Alexandria Plant, Registration No. 70579

Dear Mr. Luzier:

This letter notifies you of information upon which the Department of Environmental Quality ("Department" or "DEQ") may rely in order to institute an administrative or judicial enforcement action. Based on this information, DEQ has reason to believe that the Virginia Paving Company's ("Virginia Paving"), Alexandria Plant may be in violation of the Air Pollution Control Law and Regulations.

This letter addresses conditions at the facility named above, and also cites compliance requirements of the Air Pollution Control Law and Regulations. Pursuant to Va. Code § 10.1-1309 (A) (vi), this letter is not a case decision under the Virginia Administrative Process Act, Va. Code § 2.2-4000 *et seq.* The Department requests that you respond **within 10 business days of the date of this letter.**

OBSERVATIONS AND LEGAL REQUIREMENTS

Citizen comments presented at the May 23, 2007, Virginia State Air Pollution Control Board meeting prompted a comprehensive review of DEQ's source files and DEQ's Comprehensive Environmental Database System for Virginia Paving's Alexandria plant.

Based on this review, personnel from DEQ's Northern Regional Office (NRO) conducted a Full Compliance Evaluation (FCE) of the Alexandria plant and requested emissions testing by the facility. The following paragraphs describe the staff's factual observations and identify the applicable legal requirements.

1. **Observations:** From August 25 through 27, 2004, a Virginia Paving contractor, Ramcon Environmental from Kingston Springs, Tennessee, conducted stack tests on asphalt production Units 1 and 2 at Virginia Paving's Alexandria plant. Virginia Paving conducted the stack tests to collect emission rate data for an air quality permit modification the company wished to submit. Virginia Paving certified that the stack test results were prepared under Virginia Paving's direction and in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted to DEQ-NRO. Virginia Paving used the emission rates from the stack tests to apply for a modification to their March 19, 2004, air permit. Virginia Paving's application for a permit modification sought an increase in the production capacity limits for the Alexandria plant. On February 17, 2005, DEQ-NRO issued a Virginia Stationary Source Permit to Modify and Operate Virginia Paving's Alexandria plant. The permit increased annual production limits and established emission limits based on the stack testing conducted August 25 through 27, 2004. An FCE conducted by DEQ-NRO personnel on June 7, 2007, and a review of the stack test conducted August 25 through 27, 2004, revealed that the stack test results and emission calculations based on the stack tests were in error because of incorrect stack dimensions and transposed field data. Because of errors in the stack test, Virginia Paving submitted a permit application that appeared to contain inaccuracies that understated emissions.

Legal Requirements: *In accordance with 9 VAC 5-80-1150(B),*

"Each application for a permit shall include such information as may be required by the board to determine the effect of the proposed source on the ambient air quality and to determine compliance with the emission standards which are applicable. The information required shall include, but is not limited to, the following:

1. ***Company name and address (or plant name and address if different from the company name), owner's name and agent, and telephone number and names of plant site manager or contact or both.***
2. ***A description of the source's processes and products (by Standard Industrial Classification Code).***
3. ***All emissions of regulated air pollutants.***
 - a. ***A permit application shall describe all emissions of regulated air pollutants emitted from any emissions unit or group of emissions units to be covered by the permit.***

- b. Emissions shall be calculated as required in the permit application form or instructions or in a manner acceptable to the board.*
- c. Fugitive emissions shall be included in the permit application to the extent quantifiable.*
- 4. Emissions rates in tons per year and in such terms as are necessary to establish compliance consistent with the applicable standard reference test method.*
- 5. Information needed to determine or regulate emissions as follows: fuels, fuel use, raw materials, production rates, loading rates, and operating schedules.*
- 6. Identification and description of air pollution control equipment and compliance monitoring devices or activities.*
- 7. Limitations on source operation affecting emissions or any work practice standards, where applicable, for all regulated air pollutants at the source.*
- 8. Calculations on which the information in subdivisions 3 through 7 of this subsection is based. Any calculations shall include sufficient detail to permit assessment of the validity of such calculations.*
- 9. Any additional information or documentation that the board deems necessary to review and analyze the air pollution aspects of the stationary source or emissions unit, including the submission of measured air quality data at the proposed site prior to construction, reconstruction or modification. Such measurements shall be accomplished using procedures acceptable to the board."*

Legal Requirements: In accordance with 9 VAC 5-20-230,

"A. The following documents submitted to the board shall be signed by a responsible official: (i) any emission statement, application, form, report, or compliance certification; (ii) any document required to be so signed by any provision of the regulations of the board; or (iii) any other document containing emissions data or compliance information the owner wishes the board to consider in the administration of its air quality programs. A responsible official is defined as follows:

- 1. For a business entity, such as a corporation, association or cooperative, a responsible official is either:*
 - a. The president, secretary, treasurer, or a vice president of the business entity in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the business entity; or*
 - b. A duly authorized representative of such business entity if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying*

- for or subject to a permit and either (i) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars) or (ii) the authority to sign documents has been assigned or delegated to such representative in accordance with procedures of the business entity.*
- 2. For a partnership or sole proprietorship, a responsible official is a general partner or the proprietor, respectively.*
 - 3. For a municipality, state, federal, or other public agency, a responsible official is either a principal executive officer or ranking elected official. A principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency.*
- B. Any person signing a document under subsection A of this section shall make the following certification:*
- "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering and evaluating the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*
- C. Subsection B of this section shall be interpreted to mean that the signer must have some form of direction or supervision over the persons gathering the data and preparing the document (the preparers), although the signer need not personally nor directly supervise these activities. The signer need not be in the same line of authority as the preparers, nor do the persons gathering the data and preparing the form need to be employees (e.g., outside contractors can be used). It is sufficient that the signer has authority to assure that the necessary actions are taken to prepare a complete and accurate document.*
- D. Any person who fails to submit any relevant facts or who has submitted incorrect information in a document shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information."*
- 2. Observations: Upon request by DEQ-NRO, Virginia Paving conducted compliance emissions testing at the Alexandria plant August 28 through 31, 2007, and September 12 through 14, 2007. According to the results received by DEQ-NRO on October 25, 2007, the facility appears to be operating in exceedance of the emission limits detailed in condition number 17 of the*

facility's current state operating permit for Nitrogen Oxides (Asphalt Dryer for Unit 1 and Unit 2), Carbon Monoxide (Asphalt Dryer for Unit 2), and Volatile Organic Compounds (Asphalt Dryer for Unit 1 and Unit 2). The following table presents the data submitted by the facility from the recent emissions testing.

Pollutant	Unit 1	Unit 2
Nitrogen Oxides	0.034 lb/ton*	0.065 lb/ton*
Carbon Monoxide	0.037 lb/ton	0.071 lb/ton*
Volatile Organic Compounds	0.016 lb/ton*	0.004 lb/ton*
Sulfur Dioxide	0.006 lb/ton	0.013 lb/ton
PM10	0.0035 lb/ton	0.0061 lb/ton

*Exceeds the emission limit specified in the current permit.

Legal Requirements: In accordance with 9 VAC 5-50-260, condition number 17. of the facility's Amended Permit to Modify and Operate dated July 20, 2006, states:

"Emission Limits: Asphalt Dryers – Emissions from the operation of the drum dryers shall not exceed the limits specified below:

	<u>Unit 1</u>	<u>Unit 2</u>
Nitrogen Oxides (NO₂)	0.021 lb/ton	0.023 lb/ton
Carbon Monoxide	0.13 lb/ton	0.012 lb/ton
Volatile Organic Compounds (VOCs)	0.0028 lb/ton	0.0021 lb/ton
Sulfur Dioxide (SO₂)	0.058 lb/ton	0.058 lb/ton
PM10	0.023 lb/ton	0.023 lb/ton

These emission values shall be used as emission factors to calculate and demonstrate compliance with the annual emission limits provided in Condition 18."

3. **Observations:** On January 11, 2007, DEQ received an Air Permit Application and a modification request to replace the existing Aggregate Dryer on Plant 1 with a Hawk Eco Star II, Low NOx Burner. In a letter from DEQ-NRO addressed to Mr. Dennis A. Luzier, dated January 19, 2007, DEQ-NRO stated that it had completed its initial review of the facility's request and had determined that the proposed modifications would be subject to the permitting requirements of Chapter 80, Article 6 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. In this letter, DEQ-NRO also reminded the facility that modification of a source subject to the permitting requirements in Chapter 80 of the Virginia Regulations for the Control and Abatement of Air

Pollution, without the appropriate new source review permit, can result in an enforcement action. On December 6, 2007, the facility notified DEQ-NRO personnel that it had installed a Low NOx Burner on Plant 1 in March of 2007 without first obtaining a Virginia State Permit to modify and operate.

Legal Requirements: In accordance with 9 VAC 5-50-390 and 9 VAC 5-80-1210, condition number 1. of the facility's Amended Permit to Modify and Operate dated July 20, 2006, states,

"Except as specified in this permit, the permitted facility is to be modified and operated as represented in the following applications and correspondence:

- **Permit application dated April 23, 1998, including amendment information dated May 22, 1998.**
- **Letter request dated June 2, 2003, including amendment information dated September 5, 2003; and October 3, 2003.**
- **Permit application dated January 8, 2004.**
- **Permit application dated September 20, 2004, along with supplemental information dated October 14, 2004, October 15, 2004, November 23, 2004, December 14, 2004, January 11, 2005 and February 4, 2004.**
- **Permit application dated April 4, 2006, including supplemental information dated April 24, 2006, and May 2, 2006.**

Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action."

Legal Requirements: In accordance with 9 VAC 5-80-1120(A),

"No owner or other person shall begin actual construction, reconstruction or modification of any stationary source without first obtaining from the board a permit to construct and operate or to modify and operate the source."

ENFORCEMENT AUTHORITY

Va. Code § 10.1-1316 of the Air Pollution Control Law provides for an injunction for any violation of the Air Pollution Control Law, the Air Board regulations, an order, or permit condition, and provides for a civil penalty up to \$32,500 per day of each violation of the

Air Pollution Control Law, regulation, order, or permit condition. In addition, Va. Code §§ 10.1-1307 and 10.1-1309 authorizes the Air Pollution Control Board to issue orders to any person to comply with the Air Pollution Control Law and regulations, including the imposition of a civil penalty for violations of up to \$100,000. Also, Va. Code § 10.1-1186 authorizes the Director of DEQ to issue special orders to any person to comply with the Air Pollution Control Law and regulations, and to impose a civil penalty of not more than \$10,000. Va. Code §§ 10.1-1320 and 10.1-1309.1 provide for other additional penalties.

The Court has the inherent authority to enforce its injunction, and is authorized to award the Commonwealth its attorneys' fees and costs.

FUTURE ACTIONS

DEQ staff wishes to discuss all aspects of their observations with you, including any actions needed to ensure compliance with state law and regulations, any relevant or related measures you plan to take or have taken, and a schedule, as needed, for further activities. In addition, please advise us if you dispute any of the observations recited herein or if there is other information of which DEQ should be aware. In order to avoid adversarial enforcement proceedings, Virginia Paving Company may be asked to enter into a Consent Order with the Department to formalize a plan and schedule of corrective action and to settle any outstanding issues regarding this matter, including the assessment of civil charges.

In the event that discussions with staff do not lead to a satisfactory conclusion concerning the contents of this letter, you may elect to participate in DEQ's Process for Early Dispute Resolution. If you complete the Process for Early Dispute Resolution and are not satisfied with the resolution, you may request in writing that DEQ take all necessary steps to issue a case decision where appropriate. For further information on the Process for Early Dispute Resolution, please visit the Department's website under "Laws & Regulations" and "DEQ regulations" at:
http://www.deq.virginia.gov/regulations/pdf/Process_for_Early_Dispute_Resolution_8260532.pdf
or ask the DEQ contact listed below.

Please contact me at (703) 583-3895 or rdhartshorn@deq.virginia.gov **within 10 business days of the date of this letter** to discuss this matter and arrange a meeting.

Respectfully,


R. David Hartshorn,
Air Compliance Manager

APPENDIX 5

Updated ECHO Report for the VAP 2004 Stack Test



Enforcement & Compliance History Online (ECHO)

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Detailed Facility Report



Report Error

Data Dictionary

For Public Release - Unrestricted Dissemination Report Generated on 01/16/2008
 US Environmental Protection Agency - Office of Enforcement and Compliance Assurance

Facility Permits and Identifiers

Data Dictionary

Statute	System	Source ID	Facility Name	Street Address	City	State	Zip
	FRS	110002030418	NEWTON ASPHALT CO INC	5601 COURTNEY AVENUE	ALEXANDRIA	VA	22301
CAA	AFS	5151000001	VIRGINIA PAVING COMPANY ALEXANDRIA PLANT	5601 COURTNEY AVE	ALEXANDRIA	VA	22304
CAA	AFS	5151000017	NEWTON ASPHALT CO OF VIRGINIA	5601 COURTNEY AVE	ALEXANDRIA	VA	22304
RCRA	RCR	VAD003479045	NEWTON ASPHALT CO	5601 COURTNEY AVE	ALEXANDRIA	VA	22304

Facility Characteristics

Data Dictionary

Statute	Source ID	Universe	Status	Areas	Permit Expiration Date	Latitude/ Longitude	Indian Country?	SIC Codes	NAICS Codes
	110002030418					LRT: 38.802278, -77.132370	No		
CAA	5151000001	Synthetic Minor (Fed. Rep.)	Operating	SIP, NSPS			NA	2951	
CAA	5151000017	Minor (Not Fed Rep.)	Permanently Closed	SIP			NA	2951	
RCRA	VAD003479045	CESQG	Active (H)				No	2951	324121

If the CWA permit is past its expiration date, this normally means that the permitting authority has not yet issued a new permit. In these situations, the expired permit is normally administratively extended and kept in effect until the new permit is issued.

For the RCRA program, activities that contribute to an overall facility status of Active are displayed in parentheses using the acronym HPACS, where H indicates handler activities, P - permitting, A - corrective action, C - converter, and S - state-specific. More information is available in the Data Dictionary.

Inspection and Enforcement Summary Data

Data Dictionary

Statute	Source ID	Insp. Last 05Yrs	Date of Last Inspection	Formal Enf Act Last 05 Yrs	Penalties Last 05 Yrs
CAA	5151000001	4	06/07/2007	0	\$00
CAA	5151000017	0	03/03/2000	0	\$00
RCRA	VAD003479045	0	10/21/1997	0	\$00

Compliance Monitoring History (05 years)

Data Dictionary

Statute	Source ID	Inspection Type	Lead Agency	Date	Finding
CAA	5151000001	STATE PCE/OFF-SITE	State	05/21/2003	

CAA	5151000001	STATE CONDUCTED FCE/ON-SITE	State	07/24/2003	
CAA	5151000001	STATE PCE/OFF-SITE	State	04/06/2004	
CAA	5151000001	STATE PCE/OFF-SITE	State	08/13/2004	
CAA	5151000001	OWNER/OPERATOR-CONDUCTED SOURCE TEST	State	08/26/2004	Result=STACK TEST PASSED
CAA	5151000001	STATE PCE/ON-SITE	State	09/15/2004	
CAA	5151000001	STATE CONDUCTED FCE/ON-SITE	State	10/21/2004	
CAA	5151000001	STATE PCE/ON-SITE	State	11/23/2004	
CAA	5151000001	STATE PCE/OFF-SITE	State	03/21/2005	
CAA	5151000001	STATE CONDUCTED FCE/ON-SITE	State	01/04/2006	
CAA	5151000001	STATE PCE/OFF-SITE	State	03/21/2006	
CAA	5151000001	STATE PCE/OFF-SITE	State	03/19/2007	
CAA	5151000001	STATE CONDUCTED FCE/ON-SITE	State	06/07/2007	
CAA	5151000001	STATE PCE/OFF-SITE	State	08/16/2007	
CAA	5151000001	OWNER/OPERATOR-CONDUCTED SOURCE TEST	State	09/12/2007	Result=STACK TEST PASSED

Entries in *italics* are not considered inspections in official counts.

Compliance Summary Data

[Data Dictionary](#)

Information on the nature of alleged violations is available on the FAQ page.

Statute	Source ID	Current SNC/HPV?	Description	Current As Of	Qtrs in NC (of 12)
CAA	5151000001	NO		12/15/2007	
CAA	5151000017	N/A		12/15/2007	
RCRA	VAD003479045	No		12/10/2007	0

Three Year Compliance Status by Quarter

[Data Dictionary](#)

Violations shown in a given quarter do not necessarily span the entire 3 months. Information on the nature of alleged violations is available on the FAQ page, and information on the duration of non-compliance is available at the end of this report.

AIR Compliance Status													
Statute-Source ID	QTR1 Jan-Mar05	QTR2 Apr-Jun05	QTR3 Jul-Sep05	QTR4 Oct-Dec05	QTR5 Jan-Mar06	QTR6 Apr-Jun06	QTR7 Jul-Sep06	QTR8 Oct-Dec06	QTR9 Jan-Mar07	QTR10 Apr-Jun07	QTR11 Jul-Sep07	QTR12 Oct-Dec07	
CAA: 5151000001													
HPV History													
Program/Pollutant in Current Violation													
SIP	C-PROCED	C-PROCED	C-PROCED	C-PROCED									
NSPS	C-INSP	C-INSP	C-INSP	C-INSP									

High Priority Violator (HPV) History section: "Unaddr" means the facility has not yet been addressed with a formal enforcement action. "Addr" means the facility has been addressed with a formal enforcement action, but its violations have not been resolved. Lead Agency designated can be US EPA, State, Both, or No Lead Determined. If HPV History is blank, then the facility was not a High Priority Violator. C=Compliance; V=Violation; S=Compliance Schedule.

AIR Compliance Status													
Statute-Source ID	QTR1 Jan-Mar05	QTR2 Apr-Jun05	QTR3 Jul-Sep05	QTR4 Oct-Dec05	QTR5 Jan-Mar06	QTR6 Apr-Jun06	QTR7 Jul-Sep06	QTR8 Oct-Dec06	QTR9 Jan-Mar07	QTR10 Apr-Jun07	QTR11 Jul-Sep07	QTR12 Oct-Dec07	
CAA: 5151000017													
HPV History													
Program/Pollutant in Current Violation													
SIP	C-SHUT DN	C-SHUT DN	C-SHUT DN	C-SHUT DN									

High Priority Violator (HPV) History section: "Unaddr" means the facility has not yet been addressed with a formal enforcement action. "Addr" means the facility has been addressed with a formal enforcement action, but its violations have not been resolved. Lead Agency

designated can be US EPA, State, Both, or No Lead Determined. If HPV History is blank, then the facility was not a High Priority Violator. C=Compliance; V=Violation; S=Compliance Schedule.

RCRA Compliance Status													
Statute:Source ID		QTR1 Jan- Mar05	QTR2 Apr- Jun05	QTR3 Jul- Sep05	QTR4 Oct- Dec05	QTR5 Jan- Mar06	QTR6 Apr- Jun06	QTR7 Jul- Sep06	QTR8 Oct- Dec06	QTR9 Jan- Mar07	QTR10 Apr- Jun07	QTR11 Jul- Sep07	QTR12 Oct- Dec07
RCRA: VAD003479045													
Facility Level Status		Compl	Compl	Compl									
Type of Violation	Agency												

The first date displayed for a RCRA Violation corresponds to the violation determination date, and the next to the resolution date (if the violation has been resolved).

Notices of Violation or Informal Enforcement - AFS, PCS, ICIS-NPDES, RCRAInfo (05 year history)

[Data Dictionary](#)

Statute	Source ID	Type of Action	Lead Agency	Date
- No data records returned.				

Formal Enforcement Actions - (05 year history)

AFS, PCS, RCRAInfo, NCDB

[Data Dictionary](#)

Statute	Source ID	Type of Action	Lead Agency	Date	Penalty	Penalty Description
- No data records returned.						

In some cases, formal enforcement actions may be entered both at the initiation and final stages of the action. These may appear more than once above. Entries in *italics* are not "formal" actions under the PCS definitions but are either the initiation of an action or penalties assessed as a result of a previous action. This section includes US EPA and State formal enforcement actions under CAA, CWA and RCRA.

ICIS

[Data Dictionary](#)

Primary Law/Section	Case Number	Case Type	Lead Agency	Case Name	Issued/Filed Date	Settlement Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost
CWA / §301/402	03-2004-0064	Administrative - Formal	EPA	LANE CONSTRUCTION, INC (7 FACILITIES) †	06/15/2004	06/15/2004				\$24,000
CWA / §301/402	03-2004-0065	Administrative - Formal	EPA	LANE CONSTRUCTION, INC †	06/15/2004	10/14/2004	\$51,500			

Federal enforcement actions and penalties shown in this section are from the Integrated Compliance Information System (ICIS-FE&C). These actions may duplicate records in the Formal Enforcement Actions section.

† This enforcement case involves more than one facility. Click on the Case Number for more information.

Demographic Profile of Surrounding Area (3 Miles)

[Data Dictionary](#)

Open more detailed information in a new window (links leave ECHO): 1 Mi, 3 Mi or 5 Mi.

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2000 US Census data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table(LRT) when available.

Radius of Area:	3 Miles	Land Area:	99.65%	Households in area:	67,291
Center Latitude:	38.802278	Water Area:	0.35%	Housing units in area:	69,464
Center Longitude:	-77.132370	Population Density:	5542.35/sq. mi.	Households On Public Assistance:	854
Total Persons:	156,128	Percent Minority:	48.27%	Persons Below Poverty Level:	11,696

Race Breakdown	Persons (%)	Age Breakdown:	Persons (%)
White:	91,474 (58.59%)	Child 5 years and less:	12,604 (8.07%)
African-american:	28,072 (17.98%)	Minors 17 years and younger:	31,136 (19.94%)
Hispanic-Origin:	23,054 (14.77%)	Adults 18 years and older:	124,995 (80.06%)
Asian/Pacific Islander:	16,064 (10.29%)	Seniors 65 years and older:	13,714 (8.78%)
American Indian:	541 (0.35%)		
Other/Multiracial:	10,853 (6.95%)		

Education Level (Persons 25 & older)	Persons (%)	Income Breakdown:	Households (%)
Less than 9th grade:	5,405 (5.15%)	Less than \$15,000:	4,803 (7.14%)
9th-12th grades:	7,252 (6.90%)	\$15,000-\$25,000:	4,685 (6.96%)
High School Diploma:	18,009 (17.15%)	\$25,000-\$50,000:	17,203 (25.57%)
Some College/2-yr:	20,013 (19.05%)	\$50,000-\$75,000:	15,822 (23.51%)
B.S./B.A. or more:	54,359 (51.75%)	Greater than \$75,000:	24,777 (36.82%)

Please note: Entries in gray denote records that are not federally required to be reported to EPA. These data may not be reliable.

Notice About Duration of Violations – The duration of violations shown on this report is an estimate of the actual duration of the violations that might be alleged or later determined in a legal proceeding. For example, the start date of the violation as shown in the ECHO database is normally when the government first became aware of the violation, not the first date that the violation occurred, and the facility may have corrected the violation before the end date shown. In some situations, violations may have been corrected by the facility, but EPA or the State has not verified the correction of these violations. In other situations, EPA does not remove the violation flag until an enforcement action has been resolved.



This report was generated by the Integrated Data for Enforcement Analysis (IDEA) system, which updates its information from program databases monthly. The data were last updated: AFS: 12/15/2007. RCRAInfo: 12/10/2007. FRS: 12/13/2007. ICIS: 12/17/2007.

Some regulated facilities have expressed an interest in explaining data shown in the Detailed Facility Reports in ECHO. Please check company web sites for such explanations.

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