
City Council Worksession

VIRGINIA PAVING Special Use Permit

November 6, 2006



Virginia Paving Special Use Permit

Since October 14 City Council hearing, staff has:

- Provided responses to Council's questions and concerns (see 11/3/06 memo)
- Met with the Alexandria Health Department and Alexandria City Public Schools
- Met with Brookville-Seminary Civic Association



Enforcement

SUP Enforcement--Generally

- ❑ Changed from complaint-based to proactive in 2005
- ❑ All SUPs now inspected every three years
- ❑ Hierarchy of Enforcement:
 - Notice*
 - Fines*
 - Hearing*
 - Revocation*



SUP Enforcement—Virginia Paving

Comprehensive Enforcement Strategy

- ❑ Review and perform comprehensive inspections every 6 months for the first 2 years and then annually thereafter
- ❑ Targeted inspections to insure compliance with/implementation of date specific conditions
- ❑ Inspections conducted in response to complaints
- ❑ Compliance checklist for all enforcement personnel, and air quality inspection form for air quality staff and consultants



SUP Enforcement—Virginia Paving

Penalties for Noncompliance with Specific Conditions

- ❑ Failure to comply with specific air quality conditions shall result in immediate cessation of all night-time exit and entrance of vehicles from site; and
- ❑ The SUP will be docketed for review and action by City Council within 30 days.



SUP Enforcement—Virginia Paving

Extensive Recordkeeping and Reporting Requirements

Examples:

- ❑ Production and operating information to be provided to City on monthly basis
- ❑ Quarterly report on status of all improvements required by the SUP
- ❑ Reporting and recordkeeping on implementation of operational best management practices



SUP Enforcement—Virginia Paving

Testing and Monitoring Requirements

- On-going testing and monitoring
- Stack tests for PM 2.5, PM 10, NO_x, SO_x, and CO - two tests by 2009 and every 5 years thereafter
- VA Paving to address new proposed PM_{2.5} standard, years ahead of EPA's regulatory framework



SUP Enforcement—Virginia Paving

Enforcement Management

- ❑ One new T&ES inspector needed to address Virginia Paving enforcement (Fiscal impact of \$126,000 in 1st year)
- ❑ Actual SUP related enforcement costs (including staff, consultants, other resources) to be recovered from Virginia Paving on a quarterly or annual basis
- ❑ If Council concurs, should be added as SUP condition



SUP Enforcement—Virginia Paving

Community Outreach

- ❑ Designation of VA Paving employee as compliance officer with name and phone number provided to City and community
- ❑ Regularly scheduled meetings, at least once every 6 months, to discuss operations



Resident Complaints Regarding ODORS

- Asphalt odors
- Natural Gas/Solvent based odors



Staff Actions to Address ODORS

- ❑ **Staff Investigation and follow-up of complaints**
 - **Inspections**
 - **Odor Tracking (Physical)**

- ❑ **Identification/Survey of the potential odor sources**
 - **Virginia Paving operations and US Filter Operations**

- ❑ **Consultants review of best available controls and industry's best practices**

- ❑ **A specific control measure has been identified for each potential source of odor in consultation with City's consultants**

- ❑ **Encouraged US filter to address their Odor sources and received commitments with implementation schedule**



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Odor Source		Odor Control Measure	Proposed SUP Condition No.	Proposed Compliance Date
Asphalt Cement Storage Tanks		Vent Condensers, Steel Wool Filters or equivalent control*	13	Sep 30, 2006
Asphalt Plant No. 1	Asphalt product	Low-odor anti-strip additive or equivalent approach*	6	•Effective Immediately
	Product silo	•Blue Smoke Control	11	Dec 31, 2006
	Product conveyor & loadout	Fugitive Emission Control System (vented to Blue Smoke Control)	14	Sep 30, 2007
Asphalt Plant No. 2	Asphalt product	Low-odor anti-strip additive or equivalent approach*	6	Currently
	Product silo	Fugitive Emission Control System (vented to drum dryer)	11	Jul 30, 2007
	Product conveyor & loadout	Fugitive Emission Control System (vented to drum dryer)	14	Jun 30, 2008
Product Trucks		Low-odor anti-strip additive or equivalent approach*	6	•Effective Immediately
		Covered trucks	None ^{&}	Current ^{&}
Plantwide		Control odor and prevent it from leaving property or becoming a nuisance to neighboring properties	3	Perpetual



US Filter ODORS

Odor Source		Odor Control Measure	Proposed SUP Condition No.	Proposed Compliance Date
U.S.Filter (located on Virginia Paving property)	RFO Loading	Use vapor recovery to prevent discharge to atmosphere	N/A#	Dec 31, 2006
	RFO Storage Tanks	Installed pressure loaded vapor conservation valves	N/A#	Aug 2006
	Vibrating Screen Area	Upgrade to air-tight design and route to vapor recovery system	N/A#	Jan 31, 2007
	Biofilter Area	Enhance current bio-filter by installing effective cover and route exhaust through a carbon bed	N/A#	Feb 28, 2007



IF SUP IS DENIED or Application Withdrawn:

- ❑ **The plant would continue to operate with the existing SUP:**
 - **A stormwater management system would be installed**
 - **Night time vehicular activity would stop**
 - **Night time operation (heating and mixing) would continue**

- ❑ **The additional environmental controls, addressing air quality, noise, odors and other community concerns, would not be required.**

- ❑ **No daily production cap or annual cap, except the 1,500,000 tons stipulated in State Operating Permit.**