Fugitive Dust Control Plan for Grain Receiving Haul Roads

ZFS Ithaca, LLC
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July 10, 2018

1.0 INTRODUCTION

This document is intended to fulfill the air quality permit requirement to create and implement a written Fugitive Dust Control Plan to minimize fugitive dust emissions from the haul roads at the ZFS Ithaca soybean plant. The Fugitive Dust Control Plan provides monitoring, control, and recordkeeping methods that will be used at the facility to reduce fugitive dust emissions.

The plan is required pursuant to the Michigan Department of Environmental Quality (MDEQ) Air Quality Division Permit requirements.

2.0 FUGITIVE DUST EMISSION SOURCES

This Fugitive Dust Control Plan addresses the areas of the facility that have the highest potential to generate non-process fugitive emissions, the grain shipping and receiving haul roads.

Fugitive dust is primarily generated from the roads at the facility. Facility road emissions are generated from the contact between the roads and the vehicle tires causing the re-suspension of loose material from the road surface.

The haul roads at the facility support high daily traffic rates, including both plant traffic and customer traffic. The average vehicle weight is highly variable, ranging from small pick-up trucks (0.5 tons) to large customer trucks (~40.0 tons). The primary source of vehicle traffic on the haul roads are from large customer trucks. Only roads that are in service are covered in this plan. Haul roads that are not in use due to construction activities are not addressed.

3.0 FUGITIVE DUST CONTROL METHODS AND RECORDKEEPING

3.1 Sweeping

Paved roads will be monitored and swept as needed. Paved road sweeping will not be conducted on days where rain, snow, or other adverse weather events occur. Additional roads will be paved as construction continues and they will be added to the paved road inventory upon completion. Paved roads will be monitored daily and swept as needed.

3.2 Dust Suppression

Haul roads that have not been paved due to construction activity will use dust suppression as a means of controlling fugitive dust. This will be accomplished through the application of calcium chloride and/or water to the unpaved road surface.

3.3 Visual Observation

A visual observation of haul roads will be conducted and recorded once per day when operating. If, anytime throughout the day an opacity greater than 5.0% is observed on the haul roads,

corrective action will be initiated. Only roads that are in service will be monitored. Haul roads that are not in use due to construction activities will not be observed. Personnel will navigate the road system to determine if excessive fugitive dust is present on the paved haul roads or if fugitive dust is leaving the property boundary.

Implementation of corrective actions shall be taken upon observation of visible fugitive emissions or more frequently in accordance with the Fugitive Dust Control Plan.

Corrective actions will be taken if observers identify any of the following:

- Visible dust greater than 5% opacity
- Buildup or accumulation of excessive dirt/debris on paved roads

Correction actions for the above observations include:

- An increase in the frequency of sweeping on the paved roads
- Water flush/rinse mud, dirt, or similar debris from the paved roads
- Calcium chloride and/or water application to dirt or gravel roads.

Personnel conducting the visual observation will document the inspection and any corrective actions taken on the Fugitive Dust Control Log (Appendix A).If adverse weather creates an unsafe environment to conduct the visual observation, that information will be documented in the Fugitive Dust Control Log. Records will be kept on site with the Fugitive Dust Control Plan for a minimum of five (5) years.

3.4 Speed Limit

Signage will be posted at the entrance to the facility to limit all vehicle traffic speed to 10 miles per hour (mph).

4.0 RESPONSIBLE PERSONNEL

The EHS Manager is responsible for the implementation and updating of the Fugitive Dust Control Plan. The EHS Manager will also be responsible for implementing any revisions made to the plan. All documentation and recordkeeping related to the plan will be reviewed and kept on file with the EHS Manager. A copy of this Fugitive Dust Control Plan will be retained on-site, and it will be made available to an authorized MDEQ representative upon request.

5.0 STAFF TRAINING

All facility staff that are responsible for visual observations and fugitive dust suppression activities shall be made aware of this plan and its contents, including control methods and associated recordkeeping requirements. Staff will immediately be made aware of any revisions to the plan.

ZFS Ithaca, LLC

Visual Emissions of On-Site Vehicle Traffic

Date:	Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Truck Traffic Present Today?	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No
Was dust visually observed on haul road from gate entrance to scale?	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No
Was dust visually observed on haul road from scale to elevator?	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No
Was dust visually observed on haul road from scale to soy plant?	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No	Yes / No
Comments (dust, opacity, rain, snow, ice, spilled grain or meal products, excessive traffic speed, etc..)							
Signature of Observer							

Please add comments if visual dust is observed.