
Fugitive PM10 Management Plan

Overview

The San Joaquin Valley APCD's Regulation VIII that addresses fugitive dust specifies two general control methods for controlling fugitive dust: (1) limiting visible dust emissions and (2) maintaining a stabilized surface. Visible dust emissions (VDE) may not exceed 20 percent opacity during periods when soil or other dust-producing materials are being disturbed by vehicles, equipment, or the forces of wind. "Opacity" is a visual evaluation of the amount of one's view that is obscured by a dust plume. The VDE limit applies to construction sites, the handling and storage of bulk materials, and to unpaved roads and traffic areas. A stabilized surface is a treated surface that is resistant to wind effects. This requirement applies to vacant open areas that have previously been disturbed, unpaved roads and traffic areas, and outdoor bulk storage piles. Methods for creating and maintaining a stabilized surface may include applying chemical or organic stabilizers, road-mix or paving materials, vegetative materials, or water for soaking the soil or forming a visible crust.

For unpaved roads and unpaved traffic areas, a Fugitive PM10 Management Plan (FPMP) may be implemented as a compliance alternative to the Visible Dust Emission standard and the requirement to maintain a stabilized unpaved road surface. The FPMP identifies the control measures to be implemented whenever vehicular traffic reaches and exceeds the applicable thresholds i.e., ≥ 75 vehicles per day or ≥ 26 vehicles per day with 3 or more axles). Acceptable control measures are those that have demonstrated to achieve at least 50 percent PM10 control efficiency when properly applied to an unpaved surface.

A FPMP may not be prepared for unpaved haul roads and access roads as well as traffic areas at construction projects nor as an alternative to a Conservation Management Practice (CMP) Plan for agricultural sources. Non-agricultural sources choosing to implement a FPMP are required to submit a plan to the District for approval. Once approved, the owner or operator is required to implement the District-approved FPMP on all days where traffic exceeds the applicable minimum thresholds. An approved plan remains active until the District notifies the owner or operator that it is no longer valid, or until the owner or operator notifies the District that plan implementation has been permanently discontinued.

Required Information

The FPMP must include the following information:

1. The names, addresses, and phone numbers of persons responsible for the preparation, submittal, and implementation of the FPMP, and of the persons responsible for the unpaved road or traffic area.

2. A plot plan or map showing the location of each unpaved road or traffic area to be covered by the FPMP, the total length in miles of unpaved roads, and the total area in acres of unpaved traffic areas that will be subject to the plan.

3. The months (and weeks, if known) of the year when vehicle traffic is expected to exceed the minimum thresholds described in the applicable rules, and the types of vehicles (i.e. passenger vehicles, trucks, mobile equipment, etc.).

4. The control methodologies to be applied, including:
- a. Product specifications;
 - b. Manufacturer’s usage instructions (method, frequency, and intensity of application);
 - c. Application equipment (type, number, and capacity); and
 - d. Environmental impact information and approvals or certificates related to appropriate and safe use for ground application.

5. The condition of the treated surfaces to be achieved as a result of the use of suppressants or other dust control material.

Record Keeping Requirements

Owners and operators are required to maintain records and any other supporting documents to demonstrate compliance for those days when control measures were implemented. Records are to include the type of control measure implemented, the location and extent of coverage, and the date, amount and frequency of applying dust suppressants.

Record keeping forms developed by the District or a facsimile that provides the necessary information may be used for record keeping purposes. Records are to be kept for a minimum of one year following termination of dust generating activities. Title V stationary sources are required to keep the records for a minimum of five years. Records must be made available to the District inspector upon request. The matrix below lists the forms to be used for Regulation VII record keeping.

Industry	Activity at site and corresponding record keeping forms					
	Bulk Materials	Unpaved Roads	Equip & Vehicle Storage	Open Areas	Earth Moving	Trackout and Carryout
Construction	A C	A C D	A C D	A C	A	B
Oilfields	A C	A C D	A C D	A C	A	B
Off-field Ag Ops	A C	A C D	A C D			
Ag Product Processing	A C	A C D	A C D			B
Bulk Materials	A C	A C D	A C D			B
Equipment & Vehicle Storage	A C	A C D	A C D	A C		B
Truck Stops	A C	A C D	A C D	A C		B

Form A = Daily watering schedule

Form B = Sweeping/cleanup schedule for trackout and carryout

Form C = Permanent control measure (e.g., paving, gravel, a grizzly, chemical dust suppressants)

Form D = Daily schedule for water application onto unpaved roads and equipment areas