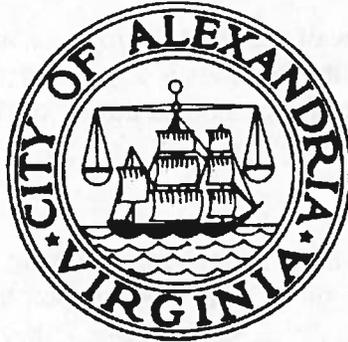


**2011 Virginia Paving Operations in Alexandria
Special Use Permit #2010-0014
Year 2011 Paving Season in Review**



**Department of Transportation & Environmental Services
Office of Environmental Quality (OEQ)
March 1, 2012**

CONTENTS

- 1.0 Executive Summary**
- 2.0 Asphalt Production for 2011 Season**
- 3.0 SUP Required Projects**
- 4.0 Community Issues**
- 5.0 Summary of State Operating Permit
(NRO-046-10)**
- 6.0 Amendment to Special Use Permit (Updated)**
- 7.0 Summary of Natural Gas Performance Test for Plant 1**
- 8.0 Ambient Air Quality Monitoring**

APPENDICES

- 1. Recap of Mid-year Meeting Between City Staff and VAP**
- 2. City of Alexandria Multi-Departmental Inspection**
- 3. Storm Water BMP Inspection and Maintenance Reports**
- 4. Correspondence Between VAP and VDEQ**

1.0 Executive Summary

The City of Alexandria issued a Special Use Permit (SUP) to the Virginia Paving Company (VAP) in November of 2006 and granted an administrative amendment on May 5, 2010. 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 of Alexandria 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 authority to enforce compliance with those conditions.

This document provides an overview of the 2011 paving season. This year was another year full of activities to finalize and improve the previously completed projects and to implement Best Management Practices (BMP) that were considered during the issuance of the permit.

The major activities in 2011 were:

- VAP, after being granted an administrative amendment on May 5, 2010 by the City's Planning and Zoning Office, finalized and began their use of natural gas as a fuel alternative in late November, 2010. VAP operated the vast majority of the Alexandria plant utilizing natural gas as its primary fuel source for the entire 2011 paving season.
- The City conducted a multi-departmental onsite inspection on July 20, 2011. The full report summary is attached.
- To further reduce the impact to the community, VAP produced asphalt during day time operations and performed the load out only at night with a minimum crew present for the first 3 months of the 2011 paving season.
- VAP has introduced a third tier to the response action in the event of a complaint. VAP has included a messaging service and text notification in the event that the hotline is utilized. This insures that the VAP Hotline is always answered by an attendant and the follow up procedures and generates a prompt response.
- A warning letter was issued to VAP on July 26, 2011 by VDEQ. This warning letter was issued as the result of a leased asphalt sifter that was used to reduce crushing times and fugitive emissions. This item was added to reduce the amount of rap crushed by as much as 75%. The process of sorting the rap used in the operation reduces fugitive emissions generated by the existing RAP plant. VAP has applied to VDEQ for permission to add the unit to its State Operating permit. A copy of the warning letter is attached.
- On the evening of September 8, 2011, Backlick Run flooded the VAP site. The City of Alexandria Fire Marshal's Office inspected the cleanup and summarized the lost products. The summary is attached.
- OEQ received a copy of the VAP air emissions compliance report dated August 8, 2011 for initial compliance determination for natural gas usage conducted on Plant #1. VAP has continued operating its fuel efficient locomotive. This has eliminated air and noise complaints for many residents in the Cameron Station and Summer's Grove areas.
- VAP has upgraded the security at the site to further eliminate noise complaints generated onsite.
- The City continues to monitor VAP's operation and evaluates them against SUP production caps and other limits on a routine basis.

- City staff and VAP personnel conducted a mid-year review and the last such meeting was held August 29, 2011. The meeting was very productive and a summary of the topics discussed is attached.
- The City continues to respond to odor complaints in a timely manner and also continues to monitor community conditions as well as monitor VAP's operations on a routine basis.
- The City continues to operate an ambient air monitoring station for particulate matter at the Armistead Boothe Park in Cameron Station.
- VAP operated in a manner that was satisfactory to the guidelines established in the SUP for the 2011 paving season. VAP and the City of Alexandria did receive a limited number of complaints during this period. Ten complaints were received and investigated by VAP and OEQ this season. This marks a 17% decrease from the 2010 season and an approximately 60-75% decline from the 2007-2009 seasons.

2.0 Asphalt Production for 2011

The following table provides a summary of asphalt production for 2011.

Total Annual Production Limit = 980,000 tons	2011 Total Production = 458,348 tons
Night Annual Production Limit = 275,000 tons <small>*work conducted from 8PM-5AM</small>	2011 Night Production = 95,088 tons
Permitted Number of Nights = 110	2011 Number of Night Shifts = 89 <small>*24 of these nights were loadout only</small>

2.1 Summary of Asphalt Production from Jan. 1, 2011 – Dec. 31, 2011

Month	Total Production (tons)	Night Production (tons) **	Number of nights of actual production	Quarterly Production (tons)	Quarterly Number of Nights
January	0	0	0	0	0
February	0	0	0		
March	0	0	0		
April	35,855	127	1	158,080	22
May	48,143	4,404	2		
June	74,082	26,750	19		
July	60,773	16,155	12	161,250	28
August	85,122	23,724	14		
September	15,395	1,479	2		
October	59,243	22,449	15	139,018	15
November	59,237	0	0		
December	20,538	N/A	N/A		
Total Actual*	458,348	95,088	65		
Permitted	980,000	275,000	110		

* The underlying data monitored by the City for SUP compliance was reviewed and found to be correct.

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

3.0 SUP REQUIRED PROJECTS

3.1 Projects Completed to Date

Several SUP conditions include specific completion dates for pertinent projects and improvements. VAP has completed all of the required capital improvement projects. The final phase of the landscape plan and the final one-third of diesel trucks were replaced and/or completed at the end of 2009. VAP has continued its environmental training for their staff and optimizing the operation.

3.2 Information on Key Completed Projects

Blue Smoke Control for Silos, 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, at approximately at 300-350 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 blue smoke control. In the current year, this process has been evaluated and many adjustments have been made to fine tune the collection of the blue smoke. One major adaptation is the daily monitoring of the magnetic gauges that provide the inspection team a snapshot of the system's overall performance. Plant # 1 began operating using natural gas as the primary fuel source in November 2011. As a result of this shift, plant #1 operated the entire 2011 season using only natural gas. Plant personnel have no plans to operate other fuel sources unless there is an issue with the supplier.

Plant 2

VAP completed the second phase of blue smoke control technology at the 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 collecting unit. This improvement has enabled further capture of odors generated when hot mix asphalt falls from Plant 2 silos onto the bed of the delivery trucks. This project was completed on schedule on June 28, 2008 and the city received a confirmation letter shortly afterwards. This blue smoke control is manufactured and serviced by the same company that developed the system for Plant 1. Plant 2 is a much smaller plant and the blue smoke control system is simply a smaller version for the smaller plant. The operation checks and filter maintenance for this system are identical to Plant 1. Plant # 2 has not been utilized in over 2 years. This plant is still listed on the VDEQ state operating permit.

Storm Water Management Facility

VAP installed two storm water management facilities (SWMFs) in December 2006 to provide treatment for storm water runoff leaving the VAP facility. The SWMF is located entirely underground and 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. Storm water BMP inspections for both units occurred on April 25, 2011 and again on November 28, 2011. Inspection consisted of the inspection of existing cartridges and perlite media, and checking sediment build up within the vaults.

A canopy was erected over the equipment fueling station near the facility's office with a bin 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 water maintenance vender provides maintenance and certifies the adequate operation of the storm water 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. Documentation of the most recent storm water maintenance is attached.

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. Phase 2 plantings are situated on the southwest side of the property along the railroad. This serves as a vegetative buffer for adjacent communities. Phase 3 plantings were completed and placed toward the west portion of the property. These landscape plans will help to screen and buffer VAP facility from Van Dorn Street's perspective. Installation of the final phase of the landscape plan has been approved by Planning and Zoning and is a modification the original plan. The final phase near Van Dorn Street would have required the removal of existing vegetation. The modification keeps much of original growth and prevents erosion of the hillside and allows Virginia Paving to improve the area with natural foliage.

FCC Environmental Oil Recycling Plant

In 2011, FCC Environmental (FCC) continued to take initiatives to improve its recycled oil operation on VAP's property. Specifically, FCC implemented a new vibrating screen, additional controls on the bio-filter area, including venting enclosure through two carbon filtration systems. Additionally, FCC continues to clean all used oil tanks using an innovative high pressure, low-

temperature method. FCC Environmental has consistently shared with the City its monthly readings of volatile organic compounds (VOCs) and exiting the carbon filtration system. FCC Environmental, although not onsite 24 hours a day has provided a contact number onsite to respond to complaints with in their operation.

Capital Improvement Projects

Table 3-1 provides a summary of all the projects completed. They have been listed by SUP condition for easy reference to the permit issued on November 2006 and granted administrative amendment on May 5, 2010.

TABLE 3-1 Virginia Paving Company, Alexandria, Virginia Special Use Permit Compliance Schedule - Projects Completed by December 2011			
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	12/31/06	02/28/07
11	Plant 2 – Fugitive Emission Control System	07/30/07	07/24/07
12	Plant 1 – Low NOx Burner	12/31/07	Installed 4/07
12	Plant 2 – Low NOx Burner	10/30/06	03/14/05
13	Asphalt Storage Tank – Vent Condensers	09/30/06	08/17/06
14	Plant 1 Asphalt Conveyors and Loadout – Fugitive Emissions Capture & Control	09/30/07	08/24/07
14	Plant 2 Asphalt Conveyors and Loadout – Fugitive Emissions Capture & Control	06/30/08	06/28/08
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	10/31/06	09/30/2006
16	Second Half of On-Site Trucks & Diesel Engines – 90% Efficient Particle Traps	12/31/06	12/22/2006
16	One-Third of VA Paving Dump Trucks – Replace Trucks	12/31/07	12/31/07

TABLE 3-1
Virginia Paving Company, Alexandria, Virginia
Special Use Permit Compliance Schedule - Projects Completed by December 2011

SUP Condition	Project Description	SUP Compliance Date	Completion Date
16	One-Third of VA Paving Dump Trucks - Replace Trucks	12/31/08	12/31/08
16	One-Third of VA Paving Dump Trucks - Replace Trucks	12/31/09	12/31/09
17	Plant 1 - Increase Stack Height to 20 m	01/31/07	12/20/06
17	Plant 2 - Increase Stack Height to 20 m	01/31/07	12/22/06
18	Hot Oil Heater - Increase Stack Ht to 6 m	10/31/06	01/20/06
19	RAP Crusher - Water Sprays and Drop Enclosures	12/31/06	06/25/05
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	10/31/06	01/09/06
23	All Material Transfer Points - Water Sprays and Enclosures	12/31/06	12/16/06
24	Submit record of fugitive dust control BMPs	04/30/07	4/30/07
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	08/31/07 Within 90 days	8/28/07 10/22/07 10/21/08 9/15/10
25	Plant 2 - Stack Tests (PM2.5, PM10, NOx, SO2, CO) - Test Report	08/31/07 Within 90 days	8/28/07 10/22/07 11/12/08
29	Install Storm water Management Facility	12/31/06	12/22/06
30	Storm water BMPs		
	- Execute maintenance agreement with City	Not specified	01/22/07
	- Secure maintenance contract with SWMF vendor	Not specified	01/25/07
	- Obtain O&M manual from SWMF vendor	Not specified	12/13/06
	- Provide maintenance records to City	Once per year	6/04/09 7/14/10
31	Vegetate buffer between RAP pile and stream	Not Specified	12/22/06
32	On-Site Stream Bank Stabilization	Not Specified	12/04/06

TABLE 3-1
Virginia Paving Company, Alexandria, Virginia
Special Use Permit Compliance Schedule - Projects Completed by December 2011

SUP Condition	Project Description	SUP Compliance Date	Completion Date
37	Maintain Delivery times, locomotive use, unloading operations, RAP crusher operation	Daily	In Compliance
39	All On-Site Trucks & Equipment – Noise Level Sensing Backup Alarms	05/27/07	06/25/06
43	Plant 1 Cylinder Exhaust Port – Noise Reducing Muffler	11/30/06	07/20/06
43	Plant 2 Cylinder Exhaust Port – Noise Reducing Muffler	11/30/06	07/20/06
48	Remove tack deposits, repair pavement	Within 90 days of City notice	In Compliance
51	Replace Locomotive Engine	12/31/09	6/19/09
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 (There after on an annual basis)	Starting 3/31/07 Once per quarter - within 30 days after quarter end 12/31/07 (Annually after project completion)	Reports submitted: 1/28/10
60	Facility Inspection - First two years of SUP approval (There after inspections will be at least on an annual basis)	Once per 6 months – starting 11/28/06 (Performed annually after the first two years)	Inspections performed 3/30/10 12/09/10
63	Hold community meetings, i.e., Community Open House	Twice per year - before 06/30 and 12/31 of each year	4/14/10 10/5/10
64	Provide and implement a comprehensive landscape plan	Not specified	9/07
73	Remove parking area from City ROW, or apply for encroachment or vacation	Not specified	On schedule

TABLE 3-1 Virginia Paving Company, Alexandria, Virginia Special Use Permit Compliance Schedule - Projects Completed by December 2011			
SUP Condition	Project Description	SUP Compliance Date	Completion Date
76	Establish a Virginia Paving Liaison Committee	Not specified	Final Meetings held 4/14/10

4.0 COMMUNITY ISSUES

- The 24-hour VAP Complaint Hotline received ten complaints during this time period. The City received via email and/or telephone notification of these during this time period. All complaints originated in the Cameron Station and Summer's Grove areas. City staff investigations were conducted within hours of notification was received.

Date	Time	Nature of Complaint	Received By	Responder	Notes/Response
1 June 06, 2011	1:45 AM	Noise complaint	VAP Hotline	City Staff/VAP	*Unverified- No asphalt odors were detected in the immediate area. The asphalt plant was not operational at this time.
2 July 01, 2011	1:50 AM	Noise complaint	VAP Hotline	City Staff/VAP	*Verified- VAP discovered the gate was left open and immediately called a meeting to reeducate their personnel on the importance of following procedures.
3 July 14, 2011	11:10 AM	Odor complaint	VAP Hotline	City Staff/VAP	*Verified- VAP immediately called a meeting to reeducate their personnel on the importance of following procedures and using only contract trucks that have ambient sensing alarms installed.
4 August 10, 2011	9:36 PM	Odor complaint	VAP Hotline	City Staff/VAP	*Verified- No asphalt odors were detected in the immediate area but there was a slight odor of burnt plastic present. This complaint was verified but could not be linked to VAP.
5 August 16, 2011	11:25 PM	Odor complaint	VAP Hotline	City Staff/VAP	*Unverified- The odor was described as burning tires. City staff performed a follow up inspection the next morning and no issues were observed at the plant.
6 April 4,	4:02	Odor	VAP	City	*Unverified- This complaint was

	2011	AM	complaint	Hotline	Staff/VAP	not received and was investigated by VAP and city staff until the following day. City staff performed a follow up inspection the next morning and no issues were observed at the plant.
7	August 25, 2011	9:50 PM	Noise complaint	VAP Hotline	City Staff/VAP	*Verified- Outputs were reduced and asphalt temperatures were lower to reduce the nuisance issues observed in the area.
8	October 9, 2011	11:17 PM	Odor complaint	VAP Hotline	City Staff/VAP	*Verified- The plant and FCC were notified but no problems could be found with the operational controls at the plant. Weather conditions were the possible cause of this nuisance.
9	October 10, 2011	7:14 AM	Odor complaint	VAP Hotline	City Staff/VAP	*Unverified- No asphalt odors were detected in the immediate area.
10	November 8, 2011	8:59 AM	Odor complaint	VAP Hotline	City Staff/VAP	*Verified- No asphalt odors were detected in the immediate area but odors were detected that were not representative of a product produced by VAP.

(*Red is a VAP verified compliant, *Blue is an unverified compliant, *Green is an unrelated verified compliant)

The City requests that all complaints be called in immediately to the VAP 24-hour Hotline which can then be followed with calls to the City Nuisance Abatement hotline or Julius Holmes (City staff assigned to VAP). It is extremely difficult to investigate and validate complaints too long after the fact. Please share this information with members of the community so that complaints and concerns can be better investigated and resolved. The VA Paving 24-hour complaint hotline number remains the same (703) 906-9918. The City Nuisance Abatement hotline is (703) 836-0041 and Mr. Holmes' contact information is: (703) 746-4069 office and email address: Julius.holmes@alexandriava.gov

5.0 Key Points of the New State Operating Permit (#NRO-046-10)

VDEQ on February 17, 2010 issued a stationary source permit to modify and operate an asphalt concrete plant located at 5601 Courtney Avenue, Alexandria, Virginia 22304. This amended permit supersedes all other previous permits and conditions. This new permit includes new emissions limits based on the most recent performance test report dated April 30, 2009 and recommendations submitted through public comments and OEQ. With the additional of natural gas as an alternate fuel source, VDEQ required additional performance test using that alternate fuel source. This initial natural gas performance test was conducted on July 06, 2011. The results are included below and compared to the current permit limits:

THE 2010 Permit LIMITS	2011 Performance Test on Plant 1	
	Plant 1 Lb/ton Permit Limits Natural Gas	Plant 1 Lb/ton (Actual) Natural Gas
NO2 (recycled fuel oil)	.052	
NO2 (natural gas)	.024	.023
CO (recycled fuel oil)	.084	
CO (natural gas)	.082	.035
PM2.5	.036	
PM10	.036	
SO2 (recycled fuel oil)	.034	
VOCs (recycled fuel oil)	.020	
VOCs (natural gas)	.030	.005

6.0 SUP AMENDMENT UPDATE

As a result of a minor amendment VAP switched the majority of the RFO (recycled fuel oil) operation over to natural gas for the 2011 paving season. As a result of the satisfactory compliance with the SUP, Condition 59 and Condition 60 have been placed on any annual schedule per the original SUP requirements. Condition 59 refers to compliance records submitted to the City Of Alexandria that will be done annually moving forward and Condition 60 refers to Comprehensive Multi-departmental inspection that will be conducted at a minimum annually moving forward.

7.0 STACK TEST AND OPACITY SUMMARY FOR 2011

As required by the plant's Sup, VAP is tasked with performing performance test at on Plant 1 and Plant 2 at regular intervals. The most recent of these was conducted on July 06, 2011 on Plant 1. The test perimeters were established to determine initial compliance with the Particulate Matter Emission Limits using EPA Method 5. After a review of the stack test results, the test results show that the facility is in compliance with the City of Alexandria SUP emission limits and VDEQ state operating permit.

8.0 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 is being conducted to measure the ambient air concentrations of particulate matter less than 10 microns in diameter (PM10) in the surrounding 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.

8.1 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 VAP hot mix asphalt facility. This facility is located near residential areas at Cameron Station and Summer's Grove.

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 monitoring station since its inception, i.e. June 4, 2006.

8.2 Monitoring Results

For the purpose of demonstrating compliance with NAAQs, SUP Condition 28a states that: The City shall continue operating the PM-10 monitor at Tucker School until three years of valid data have been collected. Once three years of data was collected, the City shall determine the 98th percentile of this data, per the NAAQS, and then multiply that value by 75%, to impute a 98th percentile value for PM-2.5. As a result, the City of Alexandria consulted with Mactec

Engineering and Consulting to tabulate the data collected at the Cameron Station PM10 site, which was established in June 2006. A full 36 months of data have been collected at this time and the representative data collected resulted in the following values:

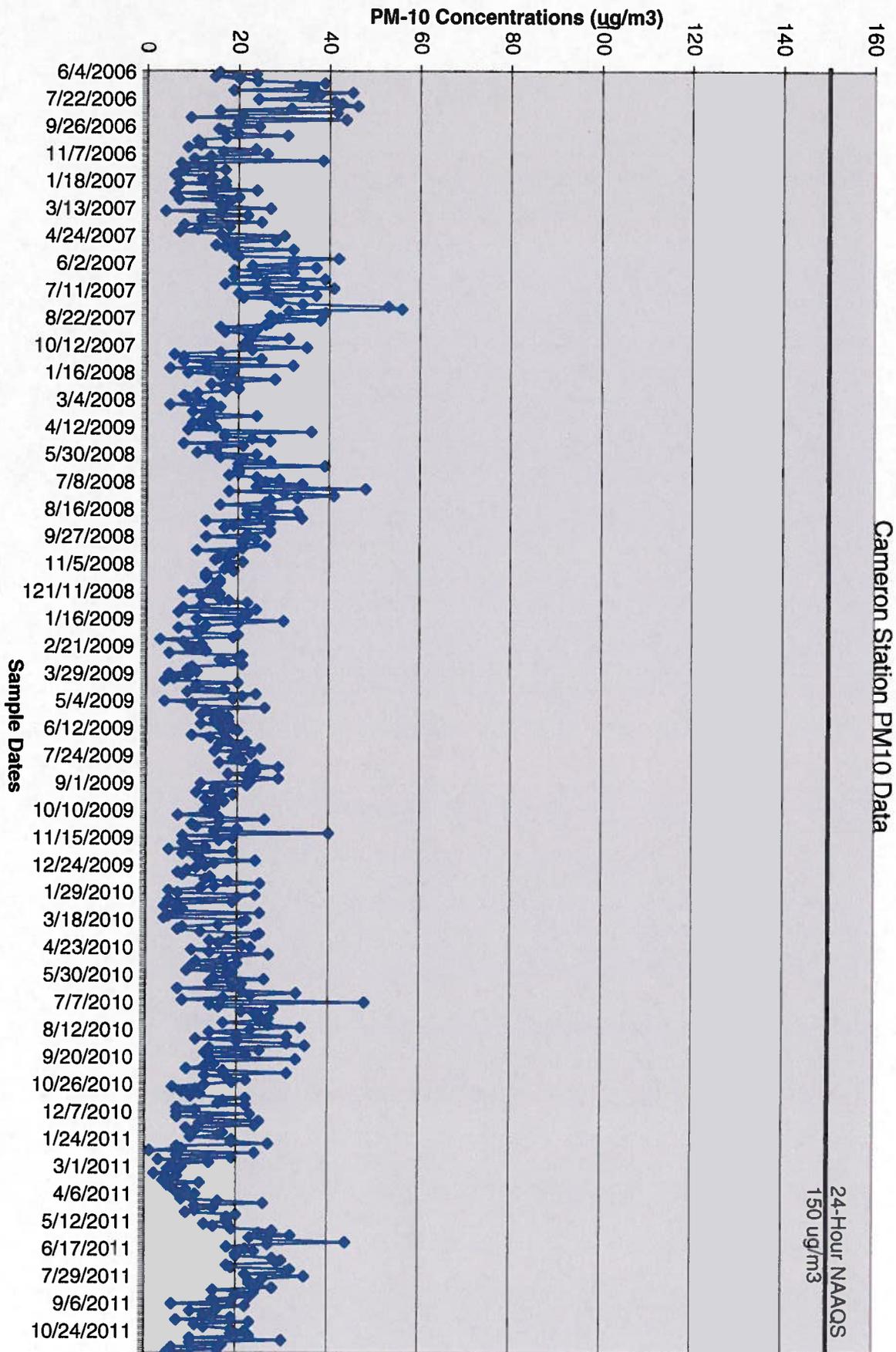
- 24-Hour monitoring design value = 33.9 ug/m3
- 24-Hour NAAQS = 35 ug/m3
- Annual monitoring design value = 14.3 ug/m3
- Annual NAAQS = 15 ug/m3

Table 8-1, summarizes the PM-10 monitoring data for 2011, showing the number of samples collected and the maximum values for each of the quarter in the year.

Table 8-1: Summary of PM10 Monitoring Results Armistead Boothe Park Station			
2011 Quarter	Maximum Value ug/m3	Number of Samples	Arithmetic Mean ug/m3
1 st Quarterly Totals	27	30	10.77
2 nd Quarterly Totals	44	29	19.14
3 rd Quarterly Totals	35	27	21.7
4th Quarterly Totals	30	16	15.06
2011 Annual Totals*		102	16.67

**Information contained in this table is the most recently obtained from VDEQ (11/23/11)*

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 PM-10 concentrations are compared to the EPA-specified National Ambient Air Quality Standard (NAAQS) of 150 ug/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.



Meeting Recap with Virginia paving and the City of Alexandria

Meeting date 8/29/11

Persons in attendance:

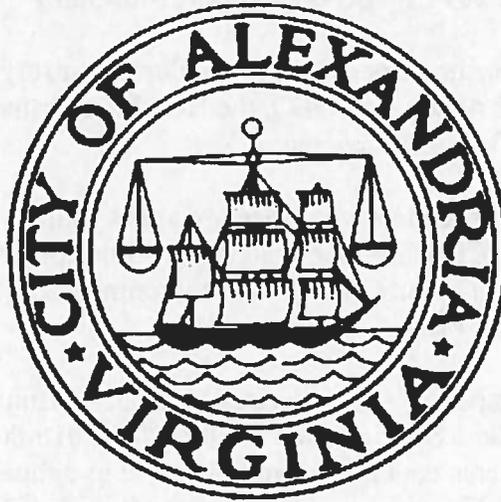
Steve Milone	City of Alexandria
Lalit Sharma	City of Alexandria
Julius Holmes	City of Alexandria
Mike Cuilik	Virginia Paving Company
Chris Monahan	Virginia Paving Company
Russell Furr	City of Alexandria
Christine Vineski	Virginia Paving Company
Brain Gawthrop	Virginia Paving Company

This meeting was held partly in an effort to maintain the present level of service and communication between Virginia Paving and the community. The remainder focused on operational issues related to the SUP.

1. City staff noted that complaint call volume has been greatly reduced this season, but the last couple of complaints lacked the reasonable response time that has become part of the VAP legacy:
 - a. It was proposed in this meeting that a message service would be include as a final attempt to reach VAP in the event of a missed call to the VAP Hotline.
 - b. It was also established that Christine Vineski of VAP was designated the primary responder and Brain Gawthrop would step in as the secondary responder to the Hotline complaints.
 - c. It was also established that City personnel would be notified via text if the messaging service was utilized.
2. City staff observed the height of the front RAP pile and addressed this and the SUP requirement was stated during at this time:
 - a. VAP noted that the pile was high but did not exceed the SUP requirement.
 - b. The City request proof in the form of records.
 - c. VAP stated that records of this nature were not kept but as a preventive measure a RAP height log would be generated and maintained as part of the general record keeping moving forward.

3. City staff inquired about the future of FCC Environmental, a tenant of VAP, also located onsite:
 - a. VAP personnel stated that the operation would remain onsite for the foreseeable future but at the moment the production was been critically reduced. The primary reason for the reduction was the fact that VAP, FCC primary customer, has switched most of their operation to natural gas.
 - b. VAP stated that planned improvement were underway immediately around the FCC site. The reinforcing of the berm was discussed at this time.
4. City staff requested an update on the future of plant #2:
 - a. VAP commented that plant has not been utilized in almost two years and the current plan is to partial dismantling the plant with the option to use it in the future. VAP does not see a need to reassembly the plant presently but retained the right to reassembly if needed under the current SUP and state operating permit.
5. City staff questioned VAP personnel on the logistics of the final removal of the decommissioned locomotive located of the Norfolk Southern spur:
 - a. VAP stated that the train had been taken out of service and the city was notified at that time.
 - b. VAP indicated that the locomotive was sold and the new owner had not claimed the purchase.
 - c. VAP indicated the new owner(s) was having a difficult time remove the locomotive due to FRA regulations.

The meeting was wrapped up with reminders concerning the outreach efforts and a general understanding that an annual meeting of this nature would be helpful for all parties involved.



Comprehensive Inspection Report

Virginia Paving Company

5601 Courtney Avenue, Alexandria, VA

July 20, 2011

Comprehensive July 20, 2011 Inspection Report Summary

The Multi-departmental onsite inspection was conducted on July 20, 2011. In attendance was staff from the City of Alexandria-OEQ, the Health Department, and the Fire department, Division of Code Enforcement.

Attendees at this year's comprehensive inspection are as follow: Julius Holmes (Environmental Specialist), Erica Bannerman (Senior Environmental Specialist), David Weber (Health Department), Tim Giles (FCC Environmental), Robert Oliff (VAP), Joel Thomas (VAP), Christine Vineski (VAP).

The Virginia Paving Company (VAP) operates an asphalt manufacturing plant in Alexandria, Virginia, under a Special Use Permit (SUP #2010-0014). The SUP requires that various City departments conduct a comprehensive bi-annual inspection of the VAP 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 – Office of Environmental Quality (OEQ) to address SUP related documentation and compliance. The checklist reflects technical onsite inspections with full records review and plant operations.

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-OEQ monitors is included in the Technical Inspection Checklist. VAP has provided full access to their entire SUP related records during requests by OEQ.

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 Control System, 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 FCC Environmental (currently owned by Siemens) oil recycling facility. Night operations were monitored by OEQ several times on a weekly basis from April to October.

OEQ also conducts 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 VAP, petroleum odors emanating from the FCC facility, particulate and fugitive dust emissions, and noise from trucks and trains especially at night. In addition to community visits to address these concerns, OEQ

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 July 20, 2011 inspection, Julius Holmes of the City's Office of Environmental Quality observed no items which needed to be addressed during the visit. Felton Gilliam from the Alexandria Planning and Zoning Department did not find any compliance issues during his inspection that was conducted the following week. During the July 20, 2011 inspection David Weber of the Alexandria Health Department noted that areas of standing water could potentially act as mosquito breeding habitats around the facility during the spring and summer months. There was no indication of mosquitoes during the inspection. Russell Furr (Deputy Fire Marshal) conducted an onsite inspection the following week. As a result of his inspection, he submitted a post inspection list to VAP requesting additional follow up. VAP has also corrected items listed by the Fire Marshal and a reinspection was conducted shortly after.

INSPECTION CHECKLIST - TECHNICAL Virginia Paving Company 5601 Courtney Avenue, Alexandria, Virginia			
		Inspection Dates	July 20, 2011
		Inspection Time	9 AM-12PM, 9 AM-12PM
		Inspection Performed by	Julius Holmes / Russell Furr/Felton Gilliam/Erica Bannerman/David Weber
		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	Reviewed 7/20/11
2	Are copies of all reports/records required by VDEQ kept on site and readily available to plant manager and environmental compliance personnel?	Y	Reviewed 7/20/11
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	Reviewed 7/20/11
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	Reviewed 7/20/11
5	(a) Are copies of all correspondence with Virginia DEQ available on site? (b) Was a copy of every such correspondence submitted to the City?	Y Y	Reviewed 7/20/11
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 N	Reviewed 7/20/11

7	<p>Asphalt Production Records</p> <p>(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?</p> <p>(b) Is the maximum hourly production less than 1,000 tons?</p> <p>(c) Is the maximum nighttime (8pm to 5am) production less than 4,000 tons?</p> <p>(d) Is the maximum daily production less than 8,000 tons?</p> <p>(e) Is the maximum production on a Code Red day less than 4,000 tons?</p> <p>(f) Is the running 12-month night production less than 275,000 tons?</p> <p>(g) Are all environmental projects required by SUP completed?</p> <p>(i) If NO, is the running 12-month total production less than 850,000 tons?</p> <p>(ii) If YES, is the running 12-month total production less than 980,000 tons?</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>NA</p>	<p>Reviewed 7/20/11</p>
8	<p>(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?</p> <p>(b) Was nighttime production delivered to non-government customers?</p>	<p>Y</p> <p>N</p>	<p>Reviewed 7/20/11</p>
9	<p>Low-Odor Additive Use</p> <p>(a) Are manufacturer guidelines on low-odor additive use available on site?</p> <p>(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?</p>	<p>Y</p> <p>Y</p>	<p>Provided in weekly spreadsheet for Va Paving and Reviewed 7/20/11</p>
10	<p>No. 2 oil usage in hot oil heaters and drum dryers</p> <p>(a) Is there a monthly consumption record for the hot oil heaters?</p> <p>(b) Are all running 12-month totals for heater use less than 100,000 gals?</p> <p>(c) For every shipment, is there a record of sulfur content less than 0.05 wt%?</p> <p>(d) For every shipment, is there a record that fuel is on-road diesel quality?</p> <p>(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?</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	<p>Reviewed 7/20/11</p> <p>None have exceeded</p>
11	<p>Recycled oil usage in drum dryers</p> <p>(a) Is there a daily and monthly consumption record?</p> <p>(b) For every shipment, is there a record of sulfur content less than 0.5 wt%?</p> <p>(c) If sulfur content exceeds 0.4 wt%, is there a record of communication with fuel supplier to achieve 0.4 wt% sulfur.</p> <p>(d) For every shipment, is there a record of meeting other constituent limits? (Other limits include metals, halogens, PCB and flash point.)</p> <p>(e) Was any recycled oil used on Code Orange or Code Red days?</p>	<p>Y</p> <p>Y</p> <p>NA</p> <p>Y</p> <p>NA</p>	<p>Sulfur threshold not exceeded.</p>
13	<p>Plant 1 Blue Smoke Control for silo, load outs, conveyors (6-stage filtration)</p> <p>(a) Was capture and control system certified to be 99% efficient? (Performance Test Date: June 14, 2007)</p> <p>(b) Are manufacturer maintenance guidelines available on site?</p> <p>(c) Is there a record of maintenance/repair (filter replacement, etc.)? (Last Maintenance Date: 10/13/2009)</p>	<p>Y</p> <p>Y</p> <p>Y</p>	<p>Filter replacement has been preformed.</p> <p>Reviewed 7/20/11</p>
14	<p>Plant 2 Blue Smoke Control for silo, loadouts, conveyor (venting to burner)</p> <p>(a) Was capture & control system certified to be 99% efficient? (Performance Test Date: June 14, 2007)</p> <p>(b) Are manufacturer maintenance guidelines available on site?</p> <p>(c) Is there a record of maintenance/repair performed on this system? (Last Maintenance Date: 10/14/2009)</p>	<p>NA</p> <p>Y</p> <p>Y</p>	<p>Reviewed 7/20/11</p>

		Y	
15	Baghouse Controls (a) Was a performance test done on each baghouse in the last 2 years? Plant 1 Test Date: 2007, 2008 and 2011 Plant 2 Test Date 2007 and 2008 Lime Silo Test Date: NA (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 Y	No Lime Silo in use. Lime silo has been removed from site.
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: 1/29/2010	N N Y Y Y Y Y N Y	Not required in SUP or state permit. Daily records for watering RAP were reviewed. The rap crusher wasn't 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 once 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?	N NA NA	I have no records of recent malfunctions
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, 2007, 10/21/08 and 7/6/2011 Last Plant 2 Test Date: 2004, 2007 and 11/12/08 (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 NA Y	Recent stack tests were recently completed. Time elapsed was not expired.
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: 4/8/11 (d) Were maintenance records submitted to the City within the last one year? Submission Date: 7/21/11	Y Y Y Y	Yearly Inspection performed 7/20/11

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 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? Natural Gas	N	Baghouse magnetic value was 0.0. Plant was down for repairs.
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? None	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.
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? Natural Gas	Y Y Y Y Y	

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 wasn't 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>Fair</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. This system needs scheduled maintenance performed.</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>N</p> <p>N</p> <p>Y</p> <p>Y</p>	<p>There have been nights that the rap pile has been left open in recent months.</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>Y/N</p> <p>Y</p> <p>Y</p>	<p>All equipment owned by Va Paving is in compliance.</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 less</p>

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

STERLING

Stormwater Maintenance Services

Stormwater System Inspection Report

GENERAL INFORMATION

Site Name & Location:	Virginia Paving - Alexandria, VA	Number & Type of Systems Inspected: SYSTEM 1 StormFilter with 97 Perlite Cartridges SYSTEM 2 StormFilter with 18 Perlite Cartridges
Inspection Performed By:	Sterling Stormwater Maintenance Services, LLC	
Number of Pages in Report:	3	

INTRODUCTION

This report has been generated by STERLING Stormwater Maintenance Services, LLC. The information provided in this report is not an evaluation as to the performance of the stormwater systems and STERLING Stormwater Maintenance Services accepts no responsibility relating to the performance of these systems. This information is provided solely as an assessment of the condition of the stormwater systems as it pertains to maintenance. Recommendations and next actions are based on the manufacturer's published literature or the generally accepted practice if applicable.

This report is formatted to provide an overall summary of the inspection results as well as provide detailed findings for each system inspected. An inspection summary is provided below while the detailed findings are included on the following page(s).

INSPECTION SUMMARY

SYSTEM 1: StormFilter System with 97 Perlite Cartridges

Based on the results of the inspection, this system appears to be functioning as designed and no additional maintenance actions are required at this time. However, one of the cartridges in the system is loose and needs to be re-installed.

SYSTEM 2: StormFilter System with 18 Perlite Cartridges

Based on the results of the inspection, no additional maintenance actions are required at this time. However, as noted in the report, it is recommended that the layer of hydrocarbons present in the system should be removed to increase the longevity of the cartridges.

The next inspection for both of the above referenced systems should be performed on or around 4/8/2011.

A detailed description of the condition of the system is provided on the following pages.

INSPECTION AUTHENTICITY

This hereby certifies that the information contained in this report is accurate and was obtained using accepted industry practices.

Inspection Company:	Sterling Stormwater Maintenance Services, Inc
Inspector's Name:	Thomas P. Gorrivan
Certifications:	Certified Professional in Stormwater Quality Preferred Inspector and Maintenance Provider for CONTECH Construction Products, Inc.

Signature:



Date: 4/25/2011

Location and System Parameters:

Site Name:	Virginia Paving	Site Address:	5601 Courtney Ave, Alexandria, VA 22304
BMP Type:	StormFilter	Installation Date:	11/8/2006
# of Cartridges/Media Type:	97 Perlite Cartridges	Last Inspection Date:	April 2010

Inspection Event Parameters:

Date:	4/8/2011	Time:	3:00 PM
Weather:	Scattered Showers	Temperature:	55°F

Findings:

Sediment Depth on Vault Floor:	Less than 1/2"
Water Depth In Structure:	6" but draining
Thickness of Hydrocarbon Layer:	Slight Sheen
Amount of Trash/Debris In Structure:	Minimal

Map of Site Location:



Condition of Components/Repairs Needed:

One of the 97 cartridges is not secure on its manifold and needs to be re-installed. Otherwise, all components appear intact.

Additional Observations:

A defined scum line was present on the vault walls at an elevation approximately equal to the top of the cartridges. Additionally, sediment accumulation on the cartridge tops was negligible.

Site Photos and Detailed Findings:

Photos #1 and #2 show the location of this StormFilter system on the site. This system is designed with 97 Perlite cartridges. Access to the system is provided by a Bilco hatches and a manway opening as shown in photo #2.



Photo #3 shows the inside of the StormFilter system. Almost all of the 97 cartridges installed in the system are shown in the photo. A measurement of the sediment accumulation on the vault floor revealed that up to 1/2" of sediment has accumulated. Sediment accumulation on the cartridge tops was negligible. Trash and debris accumulation in the vault was minimal and only a slight sheen of hydrocarbons was present.

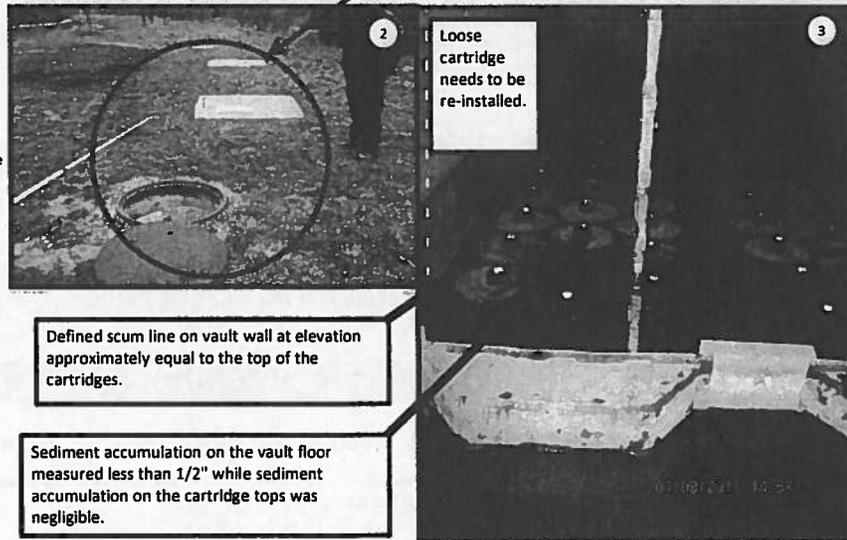


Photo #3 also shows a defined scum line present on the vault walls. The elevation of this scum line was approximately equal to the top of the cartridges. Please note that the higher scum line shown in the photo is likely left over from before the last maintenance event.

Additionally, approximately 6" of standing water was present in the system during the inspection however this is acceptable considering that it rained prior to the inspection.

Defined scum line on vault wall at elevation approximately equal to the top of the cartridges.

Sediment accumulation on the vault floor measured less than 1/2" while sediment accumulation on the cartridge tops was negligible.

Loose cartridge needs to be re-installed.

Manufacturer's Recommendations and Next Actions:

The key manufacturer recommendations for the StormFilter suggest system cleaning and cartridge replacement may be needed if the following are true: A. Sediment accumulation on the vault floor is greater than 4", B. Sediment accumulation on the cartridge tops is greater than 1/4", C. Greater than 4" of water exists in the system for longer than 24 hours after a storm event, and D. the height of the water scum line on the vault walls is greater than 6" higher than the tops of the cartridges.

Based on these guidelines, no additional maintenance activities are required at this time. However, as noted in the findings, one of the cartridges in the system is loose and needs to be re-installed. The next inspection of this system should be performed prior to 4/8/2012.

STERLING

Stormwater Maintenance Services

StormFilter System #2

Location and System Parameters:

Site Name:	Virginia Paving	Site Address:	5601 Courtney Ave, Alexandria, VA 22304
BMP Type:	StormFilter	Installation Date:	11/13/2006
# of Cartridges/Media Type:	18 Perlite Cartridges	Last Inspection Date:	April 2010

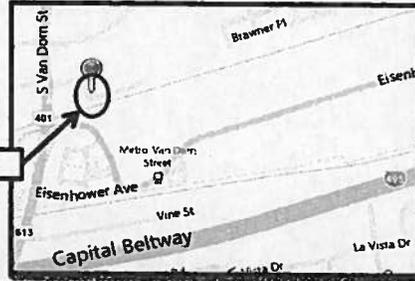
Inspection Event Parameters:

Date:	4/8/2011	Time:	3:00 PM
Weather:	Scattered Showers	Temperature:	55°F

Findings:

Sediment Depth on Vault Floor:	Negligible
Water Depth in Structure:	6" but draining
Thickness of Hydrocarbon Layer:	Moderate Sheen
Amount of Trash/Debris in Structure:	Minimal

Map of Site Location:



Condition of Components/Repairs Needed:

All components appear intact. No apparent repairs are needed.

Additional Observations:

A defined scum line was present on the vault walls at an elevation approximately equal to the top of the cartridges. Additionally, sediment accumulation on the cartridge tops was negligible.

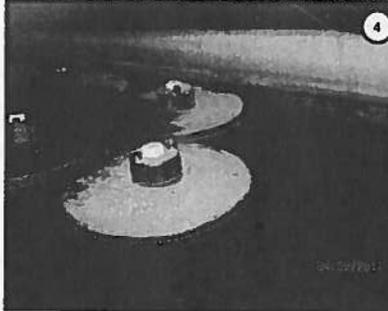
Site Photos and Detailed Findings:

Photos #1 and #2 show the location of this StormFilter system on the site. This system is designed with 18 Perlite cartridges. Access to the system is provided by a Bilco hatch and a manway openings as shown in photo #2.

Photo #3 shows the inside of the StormFilter system. Several of the 18 cartridges installed in the system are shown in the photo. A measurement of the sediment accumulation on the vault floor revealed that negligible sediment has accumulated. Sediment accumulation on the cartridge tops was also negligible. Trash and debris accumulation in the vault was minimal however a moderate sheen of hydrocarbons was present.

Photo #4 also shows a defined scum line present on the vault walls. The elevation of this scum line was approximately equal to the top of the cartridges.

Lastly, approximately 6" of standing water was present in the system during the inspection. Normally this much standing water would be cause for concern however in this case it is acceptable considering that it rained prior to the inspection.



Sediment accumulation on the vault floor and cartridge tops was negligible.

Defined scum line on vault wall at elevation approximately equal to the top of the cartridges.

Manufacturer's Recommendations and Next Actions:

The key manufacturer recommendations for the StormFilter system cleaning and cartridge replacement may be needed if the following are true: A. Sediment accumulation on the vault floor is greater than 4", B. Sediment accumulation on the cartridge tops is greater than 1/4", C. Greater than 4" of water exists in the system for longer than 24 hours after a storm event, and D. the height of the water scum line on the vault walls is greater than 6" higher than the tops of the cartridges.

Based on these guidelines, no additional maintenance activities are required at this time. However, it is recommended that the layer of hydrocarbons present in the system be removed through the use of absorbents to help prolong the longevity of the cartridges. The next inspection of this system should be performed prior to 4/8/2012.



Stormwater BMP Inspection

Quality Pipe Cleaning Co., Inc.
PO Box 2200
Centreville, VA 20122
Phone 703.641.0111
Fax 703.818.8528

REPORT CONTENTS

This report contains information regarding the results off the BMP(s) inspected at the referenced site.

The following information is provided for each BMP:

Inspection Date
Inspector Information
Inspection Weather Conditions
BMP Location
BMP Designation, Type and Configuration
Sediment, Water, and Hydrocarbon Levels
BMP Maintenance Condition
BMP Physical Condition
Additional Comments and Observations
Inspection Photos (where applicable)
Recommended Action
Certificate of Compliance (if applicable)

INSPECTION SUMMARY

Based on the results of the inspected BMP(s), the following action is recommended:

- All inspected BMPs are operating within manufacturer's established specifications. No further action is required at this time.
- Repairs to one or more off the inspected BMPs is required. See report specifics for details.
- Routine maintenance of one or more of the inspected BMPs is required. See report specifics for details.



PROJECT INFORMATION

Name Virginia Paving Project# 11/28/2011
Address 5601 Courtney Ave
Alexandria, VA 22304

INSPECTION DETAILS

Inspector Sterling Stormwater Mgmt. System ID 0.01
Date 11/28/11 GPS Coordinates N38.802917
W77.1325
Weather Dry

SYSTEM TYPE Media Filtration System MFS MEDIA TYPE Perlite
CONFIGURATION Vault CARTRIDGE# 18
SIZE 8x24

Sediment Depth - Inlet Bay 4'

Pronounced Scum Line?

Sediment Depth - Cartridge Bay 4'

Excessive Hydrocarbons?

Sediment Depth - Top of Cartridges 0

Water Level - Cartridge Bay 0

Physical Condition of Unit: Unit appears to be in good working condition.

Inspector Comments:

Maintenance Required? No

Repairs Required?

INSPECTION AUTHENTICITY

This hereby certifies that the information contained in this report is accurate and was obtained using accepted industry practices.

By: Thomas Buchwald

Company: Quality Pipe Cleaning Co., Inc.

Signature:

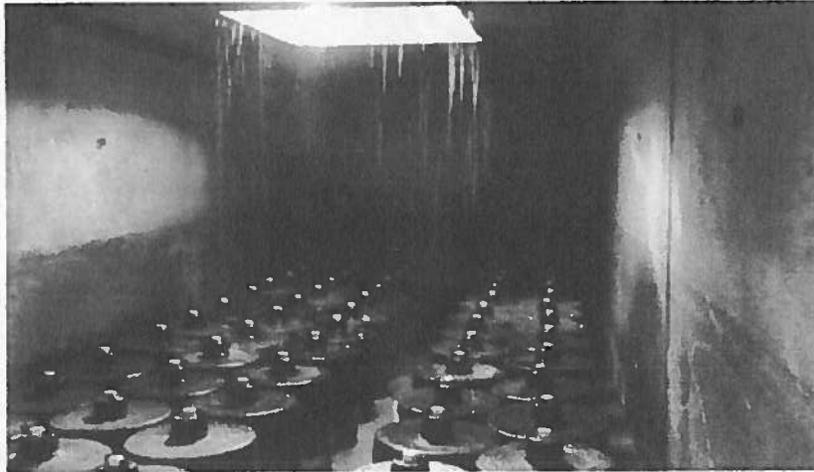
Date: 1/18/12

Title: National Maintenance Manager



Stormwater BMP Inspection Report

INSPECTION PHOTOS



STORMWATER TREATMENT SYSTEM CERTIFICATE OF COMPLIANCE



Virginia Paving
5601 Courtney Ave
Alexandria, VA 22304

Let it be known that the CONTECH stormwater management system was inspected by a qualified professional at a frequency and in a manner consistent with the manufacturer's guidelines for general inspection and maintenance. Results of the inspection were used to determine if additional maintenance activities such as cleaning and/or repair of the system was necessary. The results of the inspection concluded that maintenance was not required on the system.

Therefore, based on these activities and by signed authorization below, this hereby certifies that the CONTECH stormwater management system at the above referenced location has met the requirements for maintenance compliance as specified by the manufacturer for a period of one year, from July 2010 to July 2011.



CERTIFICATE AUTHORIZATION

Thomas Buchwald
National Maintenance Manager
Quality Pipe Cleaning Co., Inc.
1/18/12

Commonwealth of Virginia

Registration No: 70579 AFS Plant ID: 510-00001
Plant Name: Virginia Paving Company Classification: Synthetic Minor
Alexandria Plant Region: NVRO
Address: 5601 Courtney Ave Report No: 277228

AIR INSPECTION REPORT

Inspection Date: 07/06/11 Contact Name: Chris D Monahan
Type: PCE With Site Visit Contact Phone No: (703) 751-7100
Inspector: Katherine M Fisher Air Program Subpart
Inspection Result: In Compliance SIP

Reason:
Observe Stack Test

Inspector Comments:

Arrived: 8:28 a.m. Departed: 11:15 a.m.

Weather Conditions: Light Rain, 79-81 degrees [f], winds Calm to 10 mph from the West South West, humidity 74-82%, Barometric pressure 29.97 inches of Hg and rising.

Name/Title of contact during inspection: Mr. Chris Monahan (Environmental Manager), Ms. Christine Vineski (Plant Environmental Contact), Mr. Kenly Houtz (Air Compliance Group, ACG)

Purpose: To observe stack testing on Plant 1 while burning Natural Gas as required by the current SAPCB permit.

Facility & Process Description: Virginia Paving Alexandria produces asphalt concrete. The facility has two counter-flow drum dryer asphalt plants (Plant 1 and Plant 2), a 150 tph RAP processing plant, multiple liquid asphalt heaters, liquid storage tanks and a parts cleaning machine. Fabric filters control emissions from the drum dryers and a "blue smoke" odor control system is used to collect emissions from the hot mix storage silos and loading trucks.

Permitting & Regulatory Standards: The facility was issued a State Air Pollution Control Board Air Permit on February 17, 2010.

There are currently no open permitting actions.

9 VAC 5 Chapter 50, New or Modified Sources, applies to this facility.

40 CFR 60, Subpart I, applies to this facility.

40 CFR 60, Subpart 000, applies to the RAP processor and screen.

9 VAC 5-40 Article 47, Solvent Cleaning, applies to the parts cleaner.

Compliance History: Please see July 6, 2011, Full Compliance Evaluation (FCE) for a complete compliance history.

Inspection Notes:

Mr. Kenly Houtz of Air Compliance Group (ACG) was the project manager conducting the testing

Commonwealth of Virginia

Registration No:	70579	AFS Plant ID:	510-00001
Plant Name:	Virginia Paving Company Alexandria Plant	Classification:	Synthetic Minor
Address:	5601 Courtney Ave	Region:	NVRO
		Report No:	277228

AIR INSPECTION REPORT**Inspector Comments:**

while DEQ was on site. ACG was using a CAI 600 series (SN W07041) analyzer to read NOx calibrated 0-100 ppm. The span gas was 100.6 ppm and mid-level gas was 49.90 ppm. The analyzer for CO, CO₂, and O₂ was a CAI 600 series (SN W07042-M) with a range of 0-25% O₂, 0-20% CO₂, and 0-500 ppm CO. The CO₂/O₂ unit was calibrated using a span gas of 20.94%/18.63%, respectively, and a mid-level gas of 10.04%/11.74%, respectively. The span and mid-level gas for CO was 242.9 ppm, and 124.6 ppm, respectively. All gases had the appropriate certifications on-site and were not expired.

The facility was using a CAI 600 series model 300 HFID (SN VO2017) analyzer to read in-stack VOC emissions.

The calibration directly to the analyzer, calibration from probe tip to analyzer, stratification check, and leak checks appeared passing. Bias checks and leak check appeared to be passing between each observed run (run 1 and 2).

During run 1 DEQ observed the following readings from the analyzers:

NO₂ - 36.99 ppm
CO₂ - 4.84%
CO - 105.2 ppm
O₂ - 13.31%
VOC - 1.15 ppm

The drum dryer was observed to be operating at the following parameters during run 1:

Production - 483 tph
Natural gas consumption - 77962 scfh
Bag house pressure gauge - 2.1 inches of H₂O
Rap usage - 33%
Temp of drum - 268 degrees [f]
Temp of mix - 311 degrees [f]

At the end of run 1 preliminary data averages were as follows:

NO₂ - 40 ppm, 25.82 lbs/hr
CO₂ - 4.98%

Commonwealth of Virginia

Registration No:	70579	AFS Plant ID:	510-00001
Plant Name:	Virginia Paving Company Alexandria Plant	Classification:	Synthetic Minor
Address:	5601 Courtney Ave	Region:	NVRO
		Report No:	277228

AIR INSPECTION REPORT**Inspector Comments:**

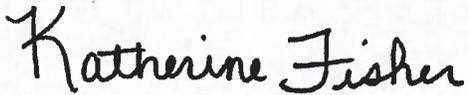
CO - 75 ppm, 33.8 lbs/hr
O2 - 12.5%
VOC - 8.7 ppm

The start of Run 2 was delayed due to weather conditions. DEQ staff did not observe visible emissions as the result of opacity during the inspection; so permission was granted on-site to conduct the VEE although the background was not favorable due to metrological conditions.

Recommendations/Conclusions: Based on the on-site observations of DEQ it appears that the facility and ACG were performing the initial compliance testing as directed by the requirements of the permit and the approved test protocol.

Attachments:

None.



Inspector's Electronic Signature

Approval Date: Jul 8, 2011



Manager's Electronic Signature

Approval Date: Jul 15, 2011



Commonwealth of Virginia

Registration No:	70579	AFS Plant ID:	510-00001
Plant Name:	Virginia Paving Company Alexandria Plant	Classification:	Synthetic Minor
Address:	5601 Courtney Ave	Region:	NVRO
		Report No:	277228

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		EPA Reference Methods 1, 2, 3A, 3C, 4, 7E, 9, 10, 316, and EPA OTM 12 (Formerly EPA RM 25ap)	Based on the on-site observations of DEQ it appears that the facility and ACG were performing the initial compliance testing as directed by the requirements of the permit and the approved test protocol.	In Compliance



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
NORTHERN REGIONAL OFFICE
13901 Crown Court, Woodbridge, Virginia 22193
(703) 583-3800 Fax (703) 583-3821
www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

Thomas A. Faha
Regional Director

July 26, 2011

Chris Monahan
Virginia Paving – Alexandria
A Division of The Lane Construction Corp.
P.O. Box 22247
Alexandria, Virginia 22304

WARNING LETTER

RE: July 6, 2011, Full Compliance Evaluation (FCE) – Out of Compliance
DEQ Registration Number: 70579

Dear Mr. Monahan:

The Department of Environmental Quality (DEQ) Northern Regional Office (NRO) has reason to believe that Virginia Paving - Alexandria, located at 5601 Courtney Ave, Alexandria, Virginia, may be in violation of the State Air Pollution Control Board (SAPCB) 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 15 business days of the date of this letter.**

OBSERVATIONS AND LEGAL REQUIREMENTS

The following describe DEQ's factual observations and identify the applicable legal requirements:

1. *Observations:* During the July 6, 2011, FCE inspection DEQ observed a McClosky 5x16 screen in line with the RAP crusher. The facility reported the actual processing capacity to be estimated at 275-350 tons per hour (design capacity is 400 tons per hour) and that the equipment was currently being leased from another company. The facility reported the screen was installed at the facility in late spring 2011. This equipment was operating during the inspection. The facility was unable to provide an exemption letter from the DEQ Air Permitting staff or an active Air Permit from the

VA Paving – Alexandria - 70579
Warning Letter
July 26, 2011

Commonwealth of Virginia for the screen. On July 8, 2011, the facility requested an exemption for the screen from DEQ Air Permitting Staff. Based on the information submitted on that date it appears that the screen will require a modification to the Air Permit.

Legal Requirements: 9 VAC 5-80-1120(A) of the State Air Pollution Control Board Regulations states, "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."

2. ***Observations:*** During the July 6, 2011, FCE inspection the facility was unable to provide a monthly and annual log (as a rolling 12-month total) of emissions calculations for the Asphalt Heaters.

Legal Requirements: Permit Condition 13 of the February 12, 2010, State Air Pollution Control Board permit states, "Fuel Throughput - The total throughput of No. 2 distillate fuel oil for the liquid asphalt storage tank heaters, Gencor - Hy Way model HYTGO-340, and the Heatec model HC-120 (Ref. # H:1 and H:2), shall not exceed 120,000 gallons per year, calculated monthly as the sum of each consecutive twelve-month period. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months. Natural gas may be used instead of distillate fuel oil in the asphalt heaters. The throughput of natural gas shall not exceed 16.6 million cubic feet per year, calculated monthly as the sum of each consecutive twelve-month period, which is equivalent in heat value to the fuel oil limit of 120,000 gallons per year. If both natural gas and distillate fuel oil are used in the heaters, the throughputs shall be reduced such that their combined total emissions, calculated using the emission factors in Condition 20, do not exceed the annual emission limits specified in Condition 21."

Legal Requirements: Permit Condition 22(f) of the February 12, 2010, State Air Pollution Control Board permit states, "The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Regional Air Compliance Manager of the DEQ's NRO at the address referenced in the Condition 25...Monthly emission calculations or data necessary to demonstrate compliance with the emission limits contained in Conditions 19 and 21."

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-

VA Paving – Alexandria - 70579

Warning Letter

July 26, 2011

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.

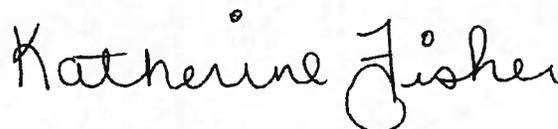
FUTURE ACTIONS

After reviewing this letter, please respond in writing to DEQ **within 15 business days of the date of this letter** detailing actions you have taken or will be taking to ensure compliance with state law and regulations. If corrective action will take longer than 90 days to complete, you may be asked to sign a Letter of Agreement or enter into a Consent Order with the Department to formalize the plan and schedule. *It is DEQ policy that appropriate, timely, corrective action undertaken in response to a Warning Letter will avoid adversarial enforcement proceedings and the assessment of civil charges or penalties.*

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 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 direct written materials to my attention. If you have questions or wish to arrange a meeting, you may reach me at (703) 583-3840 or Katherine.fisher@deq.virginia.gov.

Sincerely,



Katherine Fisher
Air Compliance Inspector, Sr.



Division of The Lane Construction Corporation

An Equal Opportunity Employer M/F/V/D

By Electronic Mail:
Katherine.fisher@deq.virginia.gov

Katherine Fisher
Department of Environmental Quality
13901 Crown Court
Woodbridge, Virginia 22193

Mid-Atlantic Regional Office
14500 Avion Parkway
Suite 200
Chantilly, VA 20151
(703) 230 0850
(703) 230 0851 Fax

VirginiaPaving.com
August 9, 2011

Re: Response to Warning Letter
Virginia Paving, Alexandria Facility Registration No. 70579

Dear Mrs. Fisher:

This letter serves as a response to Virginia DEQ's Warning Letter dated July 26, 2011 which notes two areas of concern.

The first relates to a recent change of our RAP crushing operation to include screening equipment which promotes recycling by sorting material more efficiently. We were under the impression that this was an exempt source because of recent similar equipment permitting determination. We now understand that the screen requires a modification to the air permit. We are currently working with air permitting staff to finalize the necessary revisions. Another revision that we will address during this process is updating tank information in the exempt equipment list of our air permit. We will submit the necessary forms and data to VDEQ by August 15, 2011 as requested in the correspondence from VDEQ on June 25, 2011.

The second concern in the warning letter relates to record keeping requirements for plant auxiliary equipment. We did not have monthly emissions calculations for the hot oil heater equipment that keeps the asphalt cement (AC) warm and viscous in our AC tanks. We have since corrected that deficiency and used historical records to show that we have been in compliance with the emissions limitations established for the liquid storage tank heaters. We have enclosed this log for your review: Department feedback is appreciated.

We appreciate the VDEQ's time and attention given to this matter and look forward to continuing to work with the Department as we advance in the improvements of our operations.

Sincerely,

Chris Monahan
Environmental Manager

cc
DMH, MCC, MAS, CMV, GAW-Cheshire

Alexandria and Occoquan Branch
5601 Courtney Avenue
Alexandria, VA 22304
(703) 751 7100
(703) 230 0851 FAX

Norfolk Branch
P. O. Box 12849
Norfolk, VA 23541
(757) 340 1161
(757) 340 4582 Fax

Stafford and Fredericksburg Branch
P.O. Box 910
Stafford, VA 22555
(540) 720 7550
(540) 720 7044 Fax

Sterling and Chantilly Branch
P.O. Box 1235
Sterling, VA 20167
(703) 471 8787
(703) 834 3023 Fax

Alexandria Asphalt Emissions
Emissions vs Fuel Usage

	Monthly Gallons No.2	12 Month Rolling Total Gallons No.2	Monthly Gas Usage (CCF)	12 Month Rolling Total Gas (CCF)	Emissions									
					NO2			CO			SO2			
					RFO, No. 2	Gas	Total 1.20 tons/year	RFO, No. 2	Gas	Total 0.70 tons/year	RFO, No. 2	Gas	Total 4.25 tons/year	
NOVEMBER 2005	722	722	0	0	0.007	0.000	0.007	0.002	0.000	0.002	0.026	0.000	0.000	0.026
DECEMBER 2005	329	1,051	0	0	0.011	0.000	0.011	0.003	0.000	0.003	0.037	0.000	0.000	0.037
JANUARY 2006	0	1,051	0	0	0.011	0.000	0.011	0.003	0.000	0.003	0.037	0.000	0.000	0.037
FEBRUARY 2006	0	1,051	0	0	0.011	0.000	0.011	0.003	0.000	0.003	0.037	0.000	0.000	0.037
MARCH 2006	0	1,051	0	0	0.011	0.000	0.011	0.003	0.000	0.003	0.037	0.000	0.000	0.037
APRIL 2006	0	1,051	0	0	0.011	0.000	0.011	0.003	0.000	0.003	0.037	0.000	0.000	0.037
MAY 2006	0	1,051	0	0	0.011	0.000	0.011	0.003	0.000	0.003	0.037	0.000	0.000	0.037
JUNE 2006	0	1,051	0	0	0.011	0.000	0.011	0.003	0.000	0.003	0.037	0.000	0.000	0.037
JULY 2006	1,908	2,959	0	0	0.030	0.000	0.030	0.007	0.000	0.007	0.105	0.000	0.000	0.105
AUGUST 2006	3,406	6,365	0	0	0.064	0.000	0.064	0.016	0.000	0.016	0.226	0.000	0.000	0.226
SEPTEMBER 2006	7,500	13,865	0	0	0.139	0.000	0.139	0.035	0.000	0.035	0.492	0.000	0.000	0.492
OCTOBER 2006	8,350	22,215	0	0	0.222	0.000	0.222	0.056	0.000	0.056	0.789	0.000	0.000	0.789
NOVEMBER 2006	8,200	29,693	0	0	0.297	0.000	0.297	0.074	0.000	0.074	1.054	0.000	0.000	1.054
DECEMBER 2006	7,800	37,164	0	0	0.372	0.000	0.372	0.093	0.000	0.093	1.319	0.000	0.000	1.319
JANUARY 2007	8,861	46,025	0	0	0.460	0.000	0.460	0.115	0.000	0.115	1.634	0.000	0.000	1.634
FEBRUARY 2007	8,924	54,949	0	0	0.549	0.000	0.549	0.137	0.000	0.137	1.951	0.000	0.000	1.951
MARCH 2007	8,672	63,621	0	0	0.636	0.000	0.636	0.159	0.000	0.159	2.259	0.000	0.000	2.259
APRIL 2007	6,671	70,292	0	0	0.703	0.000	0.703	0.176	0.000	0.176	2.495	0.000	0.000	2.495
MAY 2007	6,859	77,151	0	0	0.772	0.000	0.772	0.193	0.000	0.193	2.739	0.000	0.000	2.739
JUNE 2007	6,508	83,659	0	0	0.837	0.000	0.837	0.209	0.000	0.209	2.970	0.000	0.000	2.970
JULY 2007	6,884	88,435	0	0	0.884	0.000	0.884	0.221	0.000	0.221	3.139	0.000	0.000	3.139
AUGUST 2007	6,644	91,673	0	0	0.917	0.000	0.917	0.229	0.000	0.229	3.254	0.000	0.000	3.254
SEPTEMBER 2007	6,432	90,605	0	0	0.906	0.000	0.906	0.227	0.000	0.227	3.216	0.000	0.000	3.216
OCTOBER 2007	6,530	88,785	0	0	0.888	0.000	0.888	0.222	0.000	0.222	3.152	0.000	0.000	3.152
NOVEMBER 2007	6,308	86,893	0	0	0.869	0.000	0.869	0.217	0.000	0.217	3.085	0.000	0.000	3.085
DECEMBER 2007	6,538	85,631	0	0	0.856	0.000	0.856	0.214	0.000	0.214	3.040	0.000	0.000	3.040
JANUARY 2008	6,519	83,289	0	0	0.833	0.000	0.833	0.208	0.000	0.208	2.957	0.000	0.000	2.957
FEBRUARY 2008	6,113	80,478	0	0	0.805	0.000	0.805	0.201	0.000	0.201	2.857	0.000	0.000	2.857
MARCH 2008	6,539	78,345	0	0	0.783	0.000	0.783	0.196	0.000	0.196	2.781	0.000	0.000	2.781
APRIL 2008	6,317	77,991	0	0	0.780	0.000	0.780	0.195	0.000	0.195	2.769	0.000	0.000	2.769
MAY 2008	6,503	77,635	0	0	0.776	0.000	0.776	0.194	0.000	0.194	2.756	0.000	0.000	2.756
JUNE 2008	5,725	76,852	0	0	0.769	0.000	0.769	0.192	0.000	0.192	2.728	0.000	0.000	2.728
JULY 2008	5,802	75,970	0	0	0.760	0.000	0.760	0.190	0.000	0.190	2.697	0.000	0.000	2.697
AUGUST 2008	5,707	75,033	0	0	0.750	0.000	0.750	0.188	0.000	0.188	2.664	0.000	0.000	2.664
SEPTEMBER 2008	5,343	73,944	0	0	0.739	0.000	0.739	0.185	0.000	0.185	2.625	0.000	0.000	2.625
OCTOBER 2008	6,088	73,502	0	0	0.735	0.000	0.735	0.184	0.000	0.184	2.609	0.000	0.000	2.609
NOVEMBER 2008	7,220	74,414	0	0	0.744	0.000	0.744	0.186	0.000	0.186	2.642	0.000	0.000	2.642

Alexandria Asphalt Emissions

Emissions vs Fuel Usage

	Monthly Gallons No.2	12 Month Rolling Total Gallons No.2	Monthly Gas Usage (CCF)	12 Month Rolling Total Gas (CCF)	Emissions									
					NO2			CO			SO2			
					RFO ₁ No. 2	Gas	Total 1.20 tons/year	RFO ₁ No. 2	Gas	Total 0.70 tons/year	RFO ₁ No. 2	Gas	Total 4.28 tons/year	
NOVEMBER 2005	722	722	0	0	0.007	0.000	0.007	0.002	0.000	0.002	0.026	0.000	0.000	0.026
DECEMBER 2008	7,962	75,838	0	0	0.758	0.000	0.758	0.190	0.000	0.190	2.692	0.000	0.000	2.692
JANUARY 2009	8,565	77,884	0	0	0.779	0.000	0.779	0.195	0.000	0.195	2.765	0.000	0.000	2.765
FEBRUARY 2009	6,990	78,761	0	0	0.788	0.000	0.788	0.197	0.000	0.197	2.786	0.000	0.000	2.786
MARCH 2009	3,512	75,734	0	0	0.757	0.000	0.757	0.189	0.000	0.189	2.689	0.000	0.000	2.689
APRIL 2009	6,602	76,019	0	0	0.760	0.000	0.760	0.190	0.000	0.190	2.699	0.000	0.000	2.699
MAY 2009	6,366	75,882	0	0	0.759	0.000	0.759	0.190	0.000	0.190	2.694	0.000	0.000	2.694
JUNE 2009	5,853	76,010	0	0	0.760	0.000	0.760	0.190	0.000	0.190	2.698	0.000	0.000	2.698
JULY 2009	5,872	76,080	0	0	0.761	0.000	0.761	0.190	0.000	0.190	2.701	0.000	0.000	2.701
AUGUST 2009	6,127	76,500	0	0	0.765	0.000	0.765	0.191	0.000	0.191	2.716	0.000	0.000	2.716
SEPTEMBER 2009	6,238	77,395	0	0	0.774	0.000	0.774	0.193	0.000	0.193	2.748	0.000	0.000	2.748
OCTOBER 2009	9,500	80,807	0	0	0.808	0.000	0.808	0.202	0.000	0.202	2.869	0.000	0.000	2.869
NOVEMBER 2009	6,294	79,881	0	0	0.799	0.000	0.799	0.200	0.000	0.200	2.836	0.000	0.000	2.836
DECEMBER 2009	6,524	78,443	0	0	0.784	0.000	0.784	0.196	0.000	0.196	2.785	0.000	0.000	2.785
JANUARY 2010	7,749	77,627	0	0	0.776	0.000	0.776	0.194	0.000	0.194	2.756	0.000	0.000	2.756
FEBRUARY 2010	5,419	76,056	0	0	0.761	0.000	0.761	0.190	0.000	0.190	2.700	0.000	0.000	2.700
MARCH 2010	5,956	78,500	0	0	0.785	0.000	0.785	0.196	0.000	0.196	2.787	0.000	0.000	2.787
APRIL 2010	5,694	77,592	0	0	0.776	0.000	0.776	0.194	0.000	0.194	2.755	0.000	0.000	2.755
MAY 2010	6,132	77,358	0	0	0.774	0.000	0.774	0.193	0.000	0.193	2.746	0.000	0.000	2.746
JUNE 2010	6,012	77,517	0	0	0.775	0.000	0.775	0.194	0.000	0.194	2.752	0.000	0.000	2.752
JULY 2010	6,273	77,918	0	0	0.78	0.00	0.78	0.19	0.00	0.19	2.77	0.00	0.00	2.77
AUGUST 2010	6,241	78,032	0	0	0.78	0.00	0.78	0.20	0.00	0.20	2.77	0.00	0.00	2.77
SEPTEMBER 2010	5,966	77,760	0	0	0.78	0.00	0.78	0.19	0.00	0.19	2.76	0.00	0.00	2.76
OCTOBER 2010	6,226	74,486	0	0	0.74	0.00	0.74	0.19	0.00	0.19	2.64	0.00	0.00	2.64
NOVEMBER 2010	4,706	72,898	0	0	0.73	0.00	0.73	0.18	0.00	0.18	2.59	0.00	0.00	2.59
DECEMBER 2010	0	66,374	0	0	0.66	0.00	0.66	0.17	0.00	0.17	2.36	0.00	0.00	2.36
JANUARY 2011	0	58,625	0	0	0.59	0.00	0.59	0.15	0.00	0.15	2.08	0.00	0.00	2.08
FEBRUARY 2011	0	53,206	0	0	0.53	0.00	0.53	0.13	0.00	0.13	1.89	0.00	0.00	1.89
MARCH 2011	0	47,250	0	0	0.47	0.00	0.47	0.12	0.00	0.12	1.68	0.00	0.00	1.68
APRIL 2011	0	41,556	219	219	0.42	0.00	0.42	0.10	0.00	0.10	1.48	0.00	0.00	1.48
MAY 2011	0	35,424	17,285	17,504	0.35	0.09	0.44	0.09	0.07	0.16	1.26	0.00	0.00	1.26
JUNE 2011	0	29,412	18,656	36,160	0.29	0.18	0.47	0.07	0.15	0.23	1.04	0.00	0.00	1.05
JULY 2011	0	23,139	11,159	47,319	0.23	0.24	0.47	0.06	0.20	0.26	0.82	0.00	0.00	0.82



**VIRGINIA
PAVING
COMPANY**

Division of The Lane Construction Corporation

An Equal Opportunity Employer M/F/V/D

Alexandria and Occoquan Branch Office

P.O. Box 22247

Alexandria, VA 22304

(703) 751 7100

(703) 751 4249 Fax

August 15, 2011

Mr. Fred Koozer
AST/UST Compliance Specialist
Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193

RE: Virginia Paving Company – Alexandria Asphalt Plant
ODCP Revisions
FACID #: 3-000593

Dear Fred Koozer:

Virginia Paving Company – Alexandria Plant wishes to submit the revised pages for the Oil Discharge Contingency Plan (ODCP). Recent ODCP revisions are a result of installing 7 new ASTs at this facility. Also included is our spill contractor agreement with Atlas Environmental Services, LLC.

Please let me know if additional information is needed. If you have any questions, contact me at (703) 751 – 7100.

Sincerely,

Christine Vineski
Environmental Specialist

CMV

Enclosures

cc: Cheshire- GAW, DMH, CDM

Virginia Paving Company
Alexandria Asphalt Plant
Oil Discharge Contingency Plan (ODCP)
Division of the Lane Construction Corporation
5601 Courtney Avenue, Alexandria, Virginia 22304



**VIRGINIA
PAVING
COMPANY**

Division of The Lane Construction Corporation

An Equal Opportunity Employer M/F/V/D

Alexandria and Occoquan Branch Office
P.O. Box 22247
Alexandria, VA 22304
(703) 751 7100
(703) 751 4249 Fax

August 15, 2011

By Electronic Mail:
Alireza.Khalilzadeh@deq.virginia.gov

Alireza Khalilzadeh
Department of Environmental Quality
13901 Crown Court
Woodbridge, Virginia 22193

RE: Screen Application
Virginia Paving, Alexandria Facility Registration No. 70579

Dear Mr. Alireza,

This letter serves as a response to your letter dated July 25, 2011 which requests submission of a complete application for the screen at Virginia Paving Company – Alexandria. This letter and the enclosed attachments address items that were requested in the letter. Enclosures include:

- Form 7, including pages 1, 2, 3, 4 (for the diesel engine), page 5 (for the screening unit), page 11 (stack and fuel use for the diesel engine), page 12 (for the pollution/dust control equipment), and page 18 (operating periods).
- A schematic drawing of the RAP recycling operation showing the flow of materials from the initial pile to the screen to the RAP crusher. Water suppression points are detailed in the drawing.
- Available emissions data for the Caterpillar C4.4 ACERT engine.
- Caterpillar C4.4 ACERT engine specification sheet which gives a fuel consumption of 6.6 gallons per hour.
- Product specifications for aggregate material used in hot mix asphalt at Virginia Paving Company – Alexandria.
- Tank information corresponding to equipment exemption request.



**VIRGINIA
PAVING
COMPANY**

Division of The Lane Construction Corporation

An Equal Opportunity Employer M/F/V/O

Alexandria and Occoquan Branch Office

P.O. Box 22247

Alexandria, VA 22304

(703) 751 7100

(703) 751 4249 Fax

As requested, the horsepower rating of the RAP crusher is 150 hp and the typical aggregate material provided to us by Vulcan Quarry in Manassas is traprock.

In addition, we would like to request an equipment exemption for the 7 new above ground storage tanks added to this facility March of this year. Tank information, which includes details of control equipment tied to these tanks, is included on the last page of enclosures.

If during the review of this application, you or the engineering staff have any questions about the application or require additional information, please call me at (703)751-7100.

Sincerely,

Christine Vineski
Environmental Specialist

CMV

Enclosures

cc: GAW, MAS, MCC, DMH, CDM



Division of The Lane Construction Corporation

An Equal Opportunity Employer M/F/V/D

Alexandria and Occoquan Branch Office
P.O. Box 22247
Alexandria, VA 22304
(703) 751 7100
(703) 751 4249 Fax

August 17, 2011

Katherine Fisher
Senior Air Compliance Inspector
Department of Environmental Quality
13901 Crown Court
Woodbridge, VA 22193

RE: Virginia Paving Company – Alexandria Test Report Document Certification
Permit Registration No. 70579

Dear Ms. Fisher,

Attached, please find the document certification for the previously submitted test report for air emission testing that was conducted at the above referenced facility on July 6, 2011.

If you have any questions, please contact me at (703) 751-7100.

Very Truly Yours,

A handwritten signature in blue ink that reads "Christine M. Vineski".

Christine Vineski
Environmental Specialist

CMV
Attachment
cc: DMH, CDM

DOCUMENT CERTIFICATION

Facility Name: Virginia Paving Company – Alexandria

Registration No. 70579

Facility Location: 5601 Courtney Avenue Alexandria 22304

Type of Submittal Attached: Test Report for Air Emissions Testing

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.

Name of Responsible Official (Print): David M Horton

Title: Plant Manager

Signature: _____



Date: August 15, 2011



NRO-249-11

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

13901 Crown Court, Woodbridge, Virginia 22193-1453

(703) 583-3800 Fax (703) 583-3821

www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

Thomas A. Faha
Regional Director

September 9, 2011

Mr. David Horton
Plant Manager
Virginia Paving Company
5601 Courtney Avenue
Alexandria, Virginia 22304

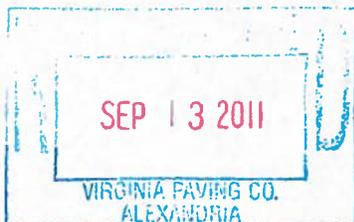
Registration No.: 70579

Dear Mr. Horton:

This letter acknowledges receipt of your permit application dated August 12, 2011. The Department of Environmental Quality (DEQ) Northern Regional Office staff has completed its initial review of your request to modify and operate the Alexandria asphalt plant by adding a diesel engine-driven screening unit for the RAP recycling operation. The proposed project has been determined to be subject to the permitting requirements of Chapter 80, Article 6, to modify and operate, 9 VAC 5-80-1100 et. seq. of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Please note, however, that this determination is subject to change upon further review.

Based upon this initial review, the application contains sufficient information to begin the application review process. If a later analysis of the permit application indicates that additional information is required to support your application, such information will be requested at that time. You are reminded that construction 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 enforcement action.

If you have any questions or require assistance, please call me at (703) 583-3839.



Sincerely,

Alireza Khalilzadeh

Alireza Khalilzadeh
Environmental Specialist II

AK/11249ltr.doc

cc: Ms. Christine Vineski, Environmental Specialist



Commonwealth of Virginia

Registration No: 70579 AFS Plant ID: 510-00001
Plant Name: Virginia Paving Company Classification: Synthetic Minor
Alexandria Plant Region: NVRO
Address: 5601 Courtney Ave Report No: 278252

AIR INSPECTION REPORT

Inspection Date: 08/23/11 Contact Name: Chris D Monahan
Type: PCE Without Site Visit Contact Phone No: (703)751-7100
Inspector: Katherine M Fisher Air Program Subpart
Inspection Result: In Compliance SIP

Reason:
Conduct Enforcement Follow-up (off-site)

****Additional Information is Attached****

Inspector Comments:

On August 11, and 15, 2011, DEQ received a response from Virginia Paving Alexandria to the Warning Letter issued on July 25, 2011, as a result of an out of compliance Full Compliance Evaluation (conducted on July 6, 2011). The following was included in the response:

1. A DEQ Form 7 Air Permit Application for the unpermitted screen.
2. A statement that the facility is now calculating the emissions from the asphalt heaters monthly and annually as a 12-month rolling total.

Based on the information provided in the submittal and response it appears that the facility is no longer out of compliance with its February 17, 2010, SAPCB permit. The Warning Letter will be listed as resolved in CEDS and the facility will be placed back into compliance in the "Air Programs" screen.

Inspector's Electronic Signature
Approval Date: Aug 25, 2011

Manager's Electronic Signature
Approval Date: Sep 2, 2011



Commonwealth of Virginia

Registration No:	70579	AFS Plant ID:	510-00001
Plant Name:	Virginia Paving Company Alexandria Plant	Classification:	Synthetic Minor
Address:	5601 Courtney Ave	Region:	NVRO
		Report No:	278252

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
9VAC5-80- 1120	0000.5	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.	Based on the information submitted the facility is in the process of complying with this regulation.	In Compliance
02-17-10	001	See permit for equipment list.	Based on the information submitted the facility is in the process of complying with this permit Condition.	In Compliance
02-17-10	013	Fuel Throughput - The total throughput of No. 2 distillate fuel oil for the liquid asphalt storage tank heaters, Gencor - Hy Way model HYTGO-340, and the Heatec model HC-120 (Ref. # H:1 and H:2), shall not exceed 120,000 gallons per year, calculated monthly as the sum of each consecutive twelve-month period. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months. Natural gas may be used instead of distillate fuel oil in the asphalt heaters. The throughput of natural gas shall not exceed 16.6 million cubic feet per year, calculated monthly as the sum of each consecutive twelve-month period,	Based on the	In Compliance



Commonwealth of Virginia

Registration No:	70579	AFS Plant ID:	510-00001
Plant Name:	Virginia Paving Company Alexandria Plant	Classification:	Synthetic Minor
Address:	5601 Courtney Ave	Region:	NVRO
		Report No:	278252

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		which is equivalent in heat value to the fuel oil limit of 120,000 gallons per year. If both natural gas and distillate fuel oil are used in the heaters, the throughputs shall be reduced such that their combined total emissions, calculated using the emission factors in Condition 20, do not exceed the annual emission limits specified in Condition 21.		
02-17-10	031.2	e. The daily fabric filter baghouse readings as required by Condition 4.	Based on the differential pressure gauge	In Compliance
		f. Monthly emission calculations or data necessary to demonstrate compliance with the emission limits contained in Conditions 19 and 21.		
		g. Annual throughput of the solvent (TEKUSOLV II) used in the parts cleaning machine (Ref. #100-A), calculated as the sum of each consecutive twelve-month period. Compliance for the consecutive twelve-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding eleven months.		
		h. Results of all stack tests, visible emission evaluations and performance evaluations.		



Commonwealth of Virginia

Registration No: 70579	AFS Plant ID: 510-00001
Plant Name: Virginia Paving Company Alexandria Plant	Classification: Synthetic Minor
Address: 5601 Courtney Ave	Region: NVRO
	Report No: 278252

INSPECTION CHECKLIST

Permit Date or Basis	#	Requirement Narrative	Observation	Comp Status
		<p>i. Records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. The records shall be maintained in a form suitable for inspection and maintained for at least two years (unless a longer period is specified in the applicable emission standard) following the date of the occurrence.</p> <p>These records shall be available for inspection by the DEQ and shall be current for the most recent five years, unless otherwise noted.</p>		



Division of The Lane Construction Corporation

An Equal Opportunity Employer M/F/V/D

Alexandria and Occoquan Branch Office
P.O. Box 22247
Alexandria, VA 22304
(703) 751 7100
(703) 751 4249 Fax

October 7, 2011

By Electronic Mail:
Alireza.Khalilzadeh@deq.virginia.gov

Alireza Khalilzadeh
Department of Environmental Quality
13901 Crown Court
Woodbridge, Virginia 22193

RE: Screen Application Revisions
Virginia Paving, Alexandria Facility Registration No. 70579

Dear Mr. Alireza,

This letter serves as an official response to questions regarding the application for the screen at Virginia Paving Company Alexandria Plant (Registration No. 70579). A revised Form 7, including pages 1, 2, 3, 4, 5, 11, 12, and 18 is attached. Revisions for each page include:

- Page 1: Updated Document Certification Form
- Page 4: Unit Reference No. for the screen engine and type of fuel
- Page 5: Unit Reference No. for the screen and throughput per year for the RAP screen
- Page 11: Unit Reference No. for the engine and type of fuel
- Page 12: Unit Reference No. for the screen
- Page 18: Unit Reference No. for the screen & engine, operating periods for the engine

The existing permit (Registration No. 70579) lists the crusher's Reference No. as "RAP." Moving forward, we request that the crusher's Reference No. be changed to "RAP:C" and that the new screen's Reference No. be "RAP:S". We would also like the engine for the screen to be referred to as "E:S" as indicated in the revised permit application. We believe this nomenclature will minimize confusion in the future.

Virginia Paving Company will install the necessary control equipment to the screen in order to minimize fugitive dust emissions. Separate from the crusher, the screen will have its own wet suppression device which will be fitted with the necessary control equipment as governed by the air permit.



**VIRGINIA
PAVING
COMPANY**

Division of The Lane Construction Corporation

An Equal Opportunity Employer M/F/V/D

Alexandria and Occoquan Branch Office
P.O. Box 22247
Alexandria, VA 22304
(703) 751 7100
(703) 751 4249 Fax

I hope I was able to clarify information needed to proceed with the application process. If during the review of this application revision and this letter, you or the engineering staff have further questions, please call me at (703)751-7100.

Sincerely,

Christine Vineski
Environmental Specialist

CMV
Enclosures
cc: DMH, CDM

Christine M. Vineski

From: John Javelle <John.Javelle@alexandriava.gov>
Sent: Friday, September 09, 2011 12:24 PM
To: William Coates
Cc: Russell Furr; Andrea Buchanan; Christine M. Vineski
Subject: Virginia Paving - Site Survey

I just completed a survey of the Virginia Paving site. There are no major spills or leaks to report. The plant suffered moderate damage but no hazardous material storage was compromised. VA Paving crews are working to clean up the site.

A spill occurred within the containment #1 area. It is unclear at this time whether the product originated from a 55 gallon drum stored within the area or if some piping was compromised. This will be determined once the water is pumped out of the containment unit. The water is being pumped out through a boom from the underside so that floating product is not being pumped out. The tanks in the containment area contain No 2 oil, Asphalt Cement and Recycled fuel oil. The heat transfer fluid on site is all accounted for. One 55 gallon barrel of Eko Sorb was overturned in the containment area. There were 100 gallons of asphalt release agent in a tote that were spilled. Three empty drums of eco sorb are missing.

Two drums of Energy Plus Diesel Fuel Catalyst were carried away but were located and are full.

Two five gallon buckets of chain lube oil are still on the property were accounted for.

One bucket of compressor oil has disappeared.

One bucket of 85140 gear oil has disappeared.

Virginia paving is still conducting an inventory of their hazardous materials and will provide as accurate missing quantities as soon as possible.

John Javelle
Deputy Fire Marshal
Alexandria Fire Department
Fire Prevention & Life Safety
900 Second St.
Alexandria, VA 22314

Tel: (703) 906 4675
Fax: (703) 838 6471

