



Calaveras County Environmental Management Agency

Jason Boetzer ♦ Agency Administrator / Director of Environmental Health / Air Pollution Control Officer

August 24, 2015

Abbott & Kindermann, LLP
Diane Kindermann
2100 Twenty First Street
Sacramento, CA 95818

CB Asphalt
Attn: Shawn Simmons
39 California Street, PMB 118
Valley Springs, CA 95252

Ford Construction
Attn: Jerry Middleton
300 W. Pine Street
Lodi, CA 95240

Re: Health Officer Request for Additional Information

On August 13, 2015 the Planning Commission heard an appeal by Ford Construction and CB Asphalt of the Environmental Management Agency's determination that installation and operation of a hot mix asphalt plant at the Hogan Quarry, 3650 Hogan Dam Road, Valley Springs, APN 050-003-001, will involve the use of hazardous materials that may have a significant effect on the environment and the Planning Director's determination that the finding by the Health Officer requires a Conditional Use Permit pursuant to Calaveras County Code Sec. 17.42.035. During the meeting, the Planning Commission directed the Environmental Management Agency to examine how the applicant will comply with existing rules and regulations on the type, method of use and quantity of substances for the proposed asphalt plant to adequately determine if there may be a significant effect. The Calaveras County Environmental Management Agency received a list of materials from Abbott & Kindermann, LLP on June 25, 2015. In addition to MSDS sheets, the supplemental information listed asphalt cements, #2 diesel fuel and aggregate as the added materials for the proposed asphalt plant. In order to evaluate and consider existing statutes and regulations, the Environmental Management Agency is requesting the following information in order to complete its determination¹.

¹ This request for additional information and the Applicant's responses is neither expected nor intended to constitute any final document or application that may be required at a future date for purposes of certification or approval by any regulatory body or governmental agency.

Government Center, 891 Mountain Ranch Road, San Andreas, CA 95249-9709

It is important to provide any and all information that documents how the applicant will reduce any potentially significant effect on the environment associated with the substances during the routine transport, use, handling, transfer and/or disposal of hazardous materials. All estimates and other projections required below shall be based on the assumption that the asphalt plant will operate at maximum production capacity and that all storage containers for hazardous materials will be filled to their maximum capacity.

- Air Quality:
 - Estimate fugitive asphalt emissions during transport.
 - Estimate long-term mobile source emissions.
 - Emissions estimates should be provided in pounds per day (lbs/day) and tons per year (tons/yr).

- Certified Unified Programs-Hazardous Material/Waste Programs:
 - Hazardous Material Business Plan
 - Complete a list and storage capacity of all containers and tanks of reportable materials, including any other oils, emulsions, lubricants, diesel additives, hydraulic fluids, etc.
 - Training Plan for employees-include spill response.
 - Emergency response plan that addresses the release or threatened release of a hazardous material.

 - Spill Prevention Countermeasure and Control (SPCC) Plan required for aboveground storage of petroleum.
 - Amend the SPCC plan pursuant to 40 CFR Part 122, including the following:
 - Tanks and piping are on gravel, how will spills/leaks be abated?
 - Are the tanks double wall construction?
 - Do containers and piping have secondary containment?
 - Filling and loading procedures of tanks, trucks and containers.
 - Inspection frequency of tanks and associated piping.

 - Hazardous Waste
 - Submit a hazardous waste disposal plan that addresses the following:
 - Will there be any hazardous waste generated?
(ie. Used oil, etc)
 - Amount generated monthly.
 - Storage and location plan
 - Secondary containment

- Additional questions for applicant:

- Will RAP be crushed and stored on site?
- Management of agent(s) used to clean and as release material for asphalt trucks?
- A blue smoke arrester was discussed at the PC meeting, more information on that process and equipment is needed.
- How will the facility respond to potential onsite and offsite spills of any and all chemicals used in the asphaltic concrete production and associated process's including transportation of diesel, asphalt and asphaltic concrete?
- What will be the estimated throughput of diesel fuel for the operations and what is the increase of delivery and transport of diesel fuel?

Please sign and return a copy of this letter with the requested information.



Jason Boetzer
Director of Environmental Health/Air Pollution Control Officer

By their respective signatures below, Applicants certify the responses provided have been prepared in accordance with accepted and sound industry practices and standards and that the responses constitute a good faith effort to provide the Health Officer with all information relevant and responsive to his request. Applicant hereby declares, under penalty of perjury, that all information and responses submitted to the Health Officer are true and correct to the best of his knowledge.

Signature CB Asphalt

Date

Signature Ford Construction

Date