ABBOTT & KINDERMANN, LLP

ATTORNEYS AT LAW

June 24, 2015

**Via Email and Hand Delivery**

Brian S. Moss
Calaveras County Environmental Management Agency
Government Center
891 Mountain Ranch Road
San Andreas, CA 95249

> **Re:** **Response to May 29, 2015 Letter re Proposed Portable Hot Mixed Asphalt Plant – Authority to Construct Application Review**

Dear Mr. Moss:

This firm represents C. B. Asphalt, Inc., in matters pertaining to the proposed portable hot mix asphaltic concrete plant and the requested Authority to Construct. We are hereby responding to your letter dated May 29, 2015, requesting supplemental information. We have added numbers to correspond to the bullet inquiries.

1. _**Identify all materials used in the process:**_

   Aggregate, asphalt cement (typically called asphalt binders).

2. _**Provide MSDS:**_

   No. 2 Diesel; Asphalt Cements (**Attachment 1**)

3. _**Identify chemical nature of air pollution emissions generated from asphalt production:**_

   Attachment 2a (www.epa.gov/ttnchie1/ap42/ch11/related/ea-report.pdf)

   Attachment 2b _2014 Emission Compliance Tests Eagle Peak Rock and Paving, Inc. Alturas, California_, dated October 10, 2014, prepared by The Avogadro Group, LLC. (This study was also provided in the application materials.)

   The Avogadro Group tested for the following components as required by the Siskiyou County Air Pollution Control District (SCAPCD) Permit to Operate: Carbon monoxide (CO), nitrogen oxides (NOx), volatile organic compounds (VOCs), total benzene, toluene, ethyl benzene, and xylenes (BTEX), total

particulate matter (TPM), and visible emissions (VEs). <u>All components were measured at levels that were less than half of the permit limits established by the SCAPCD.</u> More generalized potential emissions for hot mix asphalt plants are provided by the EPA in AP-42 section 11.1, viewable at: http://www.epa.gov/ttnchie1/ap42/ch11/final/c11s01.pdf

4. *Describe fuel and material storage sites:*

Burner Fuel – No. 2 Diesel – CT30P enclosed by concrete containment basin;
Size – 27,162 gal maximum;
Temperature – Ambient;
Pressure – N/A.

Attachment 3 is a site plan of the Hogan Quarry which illustrates storage location. The Industrial SWPPP further reflects that all potential stormwater discharges would be kept on site and directed to the quarry floor.

5. *Identify fuel specifications:*

No. 2 Diesel for Loaders and Generator, as identified above.

6. *Identify the input heating capacity of the burner in mmBtu/hour:*

100 mmBtu/hour

Attachment 4 (www.heatec.com/literature/technical/T-140.pdf)

Attachment 2b *2014 Emission Compliance Tests Eagle Peak Rock and Paving, Inc. Alturas, California*, dated October 10, 2014, prepared by The Avogadro Group, LLC.

7. *Identify bag house details including the air to cloth ratio and air flow rate:*

Attachment 2b *2014 Emission Compliance Tests Eagle Peak Rock and Paving, Inc. Alturas, California*, dated October 10, 2014, prepared by The Avogadro Group, LLC.

8. *Specify annual production:*

Maximum of 250,000 tons depending on market demand.

9. *Identify anticipated amount of onsite asphalt storage:*

None. It all leaves the site that day, as part of the production requirements.

10. *Identify number of additional truck trips:*

Maximum of 625 additional trucks annually, depending on market demand to deliver enough asphaltic cement for each production requirement.

11. *Provide a site map depicting exact location of batch plant and storage of all hazardous materials:*

Attachment 3

Thank you for your review of these materials. As this plant tested so well with the Siskiyou County Air Pollution Control District at levels that were less than half of the permit limits established, we have confidence that it will similarly test at levels beneath the limits established by the Calaveras Air Pollution Control District.

Very truly yours,

Diane G. Kindermann Henderson

DKH/sb
Encls.
cc: Shawn N. Simmons
        Craig Callaway