Notes for January 13/1300 Meeting; CDD/PW/APCD

There were three things the Air District was concerned about with respect to the complaint and Slaton's operation: 1) Use of Serpentine Rock; 2) his crushing operation and the potential for PM emissions like we see from a George Reed or BMM plant; 3) and whether he is compliant with CARB's off-road diesel regulation

1. Slaton applied Serpentine rock from Sierra Rock Products on December 21, 2021.

There may have been other purchases, but that was all I could get from SRP
There are record keeping and operational restrictions that Slaton has to abide by:

> The recordkeeping is administrative only and does not carry much weight as to the APCD enforcing this if he doesn't have his receipts/warning labels. We would be inclined to go after Hatler more than the purchasers
>
> The other issue is the percentage of asbestos in the serpentine he bought. The threshold is 0.25% asbestos to be subject to our surfacing rule and be classified as Restricted Material.
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> We knew he was over that and was subject to the rule.
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> We did two grab samples: average for the 2 samples taken was 1.87%. Pretty much consistent with what Hatler has been selling for the last 20+ years.
>
> We can require that the public not drive on it, but there are also exemptions for him not being required to cover the serpentine at this time.
>
> > Main exemption is his site being a construction site.
> >
> > We are still working with him on his requirements.
>
> Bottom line is that this serpentine rock is everywhere in the county and we would not be surprised to find it on Rugged Trail Road at these same percentages.
>
> ARB with all their wisdom also watered down the rule prior to adoption in 2001. The did not require maintenance of clean rock over so all any purchaser has to do is cover the serpentine with clean rock and they are good.

2. The other issue we looked at was the actual crushing operation. As stated in an earlier email, this is not your run of the mill aggregate plant with screening and other process equipment. The crusher will be attached to an excavator. We do not foresee a lot of PM emissions from this operation

But: it could be very loud.

3. He is compliant with the off-road diesel reg, at least the equipment we observed.

Takeaway

There's not much the air district can do, except to permit him for his crushing operation. We can control the dust, but an operation like this we typically would not permit.

He stated he will only be crushing his own asphalt and concrete from his jobs. Craig Anderson mentioned the important thing is the throughput and he has a sign out front asking for fill material.

Slaton stated this was only to acquire fill for the cul-de-sac, not to process.