



SC DEPARTMENT *of*
**ENVIRONMENTAL
SERVICES**

Q & A on the Fugitive Dust Control Plan (Dust Plan) for Concrete Plants covered under the Bureau of Air Quality (BAQ) General Construction/Operating Permit (General Permits)

Question: Am I required to use the Department provided "Facility Wide Fugitive Dust Control Plan Template"? I have created my own fugitive dust control plan and check sheet that I would prefer to use.

Answer: A facility is not required to use the Department provided fugitive dust control plan template. Facilities may develop and implement their own equivalent document, as long as it includes all the requirements from the general permits.

Question: If we rent a water truck from a third party but it is not something we store/keep on site on a daily basis, would we just make a note of the day(s) it was on site in the "water truck" template?

Answer: Using the Department provided dust plan template, the facility can document under Section 1 (Water Trucks) that they intend to use a third-party water truck, as needed, for fugitive dust control. The facility can document in the Water Truck Log which days the water truck was used on-site to provide fugitive dust control.

Question: We have some materials that have sprinklers on them daily. They are under a timer so would we need to specify that we have a timed sprinkler system to assist with the fugitive dust?

Answer: Using the Department provided dust plan template, the facility can document under Section 2 (Sprinklers) that they are using timers for fugitive dust control. The facility can include the frequency of the times, as well as what the procedures would be should the timers fail. The facility can document in the Sprinkler Log which days the sprinkler were/were not operated on-site.

Question: The "excessive opacity" levels, is that more for documentation if the truck load out is having issues? Does that technically fall more into the Alternative Dust Control methods?

Answer: No. There are two requirements for weekly monitoring. The first requirement is in condition B.5 of the general permits and covers leaks or abnormal visible emissions for the truck/mixer loadouts, and associated truck/mixer loadout control devices. The second requirement is in condition B.14 (dust plan) item 7 of the general permits, which requires a weekly log for operation and maintenance checks of all plant equipment.

Question: As for the weekly log for Operation and Maintenance Checks. We could see it being a viable way to keep tabs on the maintenance being done, but from our understanding at most concrete ready-mix plants, this maintenance log is already required by the air permit itself.

Answer: No. There are two requirements for weekly monitoring. The first requirement is in condition B.5 of the general permits and covers leaks or abnormal visible emissions for the truck/mixer loadouts, and associated truck/mixer loadout control devices. The second requirement is in condition B.14 (dust plan) item 7 of the general permits, which requires a weekly log for operation and maintenance checks of all plant equipment.

Question: How does an alternative dust control method receive approval from the Department?

Answer: A facility utilizing an alternative dust control method is not required to receive approval from the Department. The facility is required to document the alternative method used as well as the operation dates. This information is to be maintained on-site. A facility needs to be mindful that whatever alternative dust control method used does not interfere with the requirements of the stormwater permit.

Question: Would a shroud around the concrete mixing loadout to the trucks fall under Alternative Dust Control Methods or would that be addressed in some other way in the permit itself?

Answer: Yes, the use of a shroud would be documented under Section 3 (Alternative Dust Control Method(s)) of the Department provided dust plan template.

Question: How is a facility supposed to document the use of ready-mix concrete trucks or front loaders for wet suppression?

Answer: Both types of wet suppressions are considered alternative dust control methods and should be documented under that section of the dust plan.