

REPORT

Best Management Practices Plan for the Control of Fugitive Dust

Proposed Hot Mix Asphalt Plant, Town of Greater Napanee, Ontario

Version 1.0

Submitted to:

R.W. Tomlinson Limited

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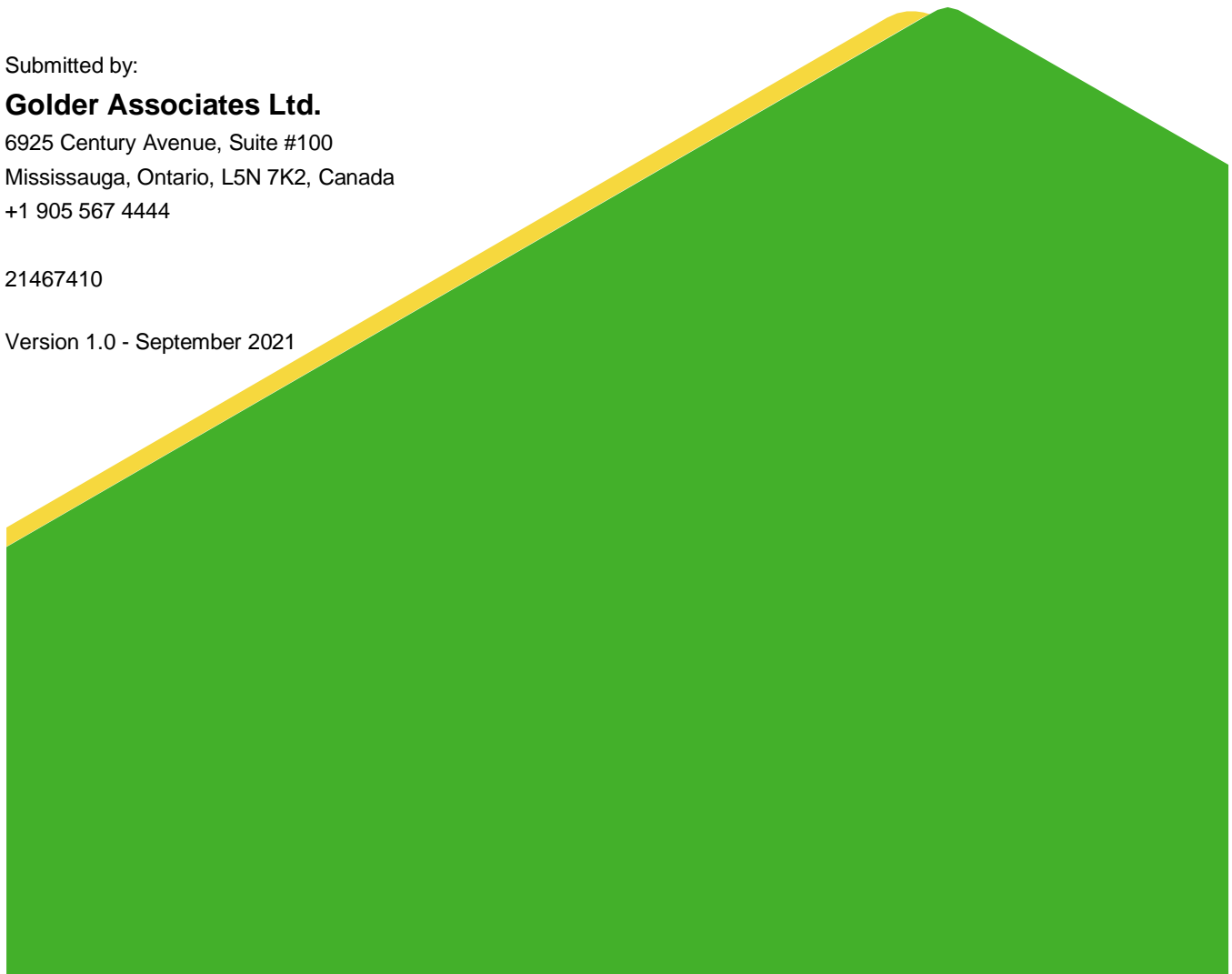
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Distribution List

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Foreword

This Best Management Practices Plan (the Plan) documents the control of fugitive dust that may be generated by the proposed hot mix asphalt plant to be operated by R.W. Tomlinson Ltd. (Tomlinson) at 8205 County Road 2 in Napanee, Ontario (the Plant).

The Plan has been prepared in accordance with the Ontario Ministry of the Environment, Conservation and Parks (Ministry) “*Technical Bulletin - Management Approaches for Industrial Fugitive Dust Sources*” (Ministry 2017) and with the “*Procedure for Preparing an Emission Summary and Dispersion Modelling Report*” (Ministry 2018). The Plan meets the anticipated requirements for a fugitive dust best management practices plan that will likely be a condition on a Environmental Compliance Approval (ECA) that could be issued for the Plant in the future.

As activities or operations change at the Plant, this Plan will be updated as required. To maintain version control, all pages in the Plan have been documented with a version number. The version number will change if the entire report is reissued; if individual pages are provided to update small portions of the Plan then they will be issued with a subversion number and the updated pages will be listed on the following Version Control Page.

Version Control

Version	Date	Description of Changes	Update Pages	Approved By
1.0	September 2021	Original document	N/A	Craig Bellinger

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1.0 INTRODUCTION

The purpose of this Best Management Practices Plan (the Plan) is to document the best management practices (BMPs) for the control of fugitive dust that may be generated by the proposed hot mix asphalt plant to be operated by R.W. Tomlinson Ltd. (Tomlinson) at 8205 County Road 2 in Napanee, Ontario (the Plant).

This Plan was prepared in accordance with the Ontario Ministry of the Environment, Conservation and Parks (Ministry) documents “*Technical Bulletin - Management Approaches for Industrial Fugitive Dust Sources*” (Ministry 2017) and the “*Procedure for Preparing an Emission Summary and Dispersion Modelling Report*” (Ministry 2018) and fulfills the anticipated requirements of an Environmental Compliance Approval (ECA).

This Plan will:

- identify the sources of fugitive dust emissions at the Plant;
- identify potential causes for high dust emissions resulting from these sources;
- outline preventative and control measures that will be in place to minimize the likelihood of high dust emissions from the sources of fugitive dust emissions;
- describe how the best management practices (BMPs) will be implemented, including training of Plant personnel; and
- describe methods of monitoring and record-keeping to verify and document ongoing compliance with the Plan.

This Plan follows the following structure:

- Section 2.0 provides a brief description of the Plant.
- Section 3.0 summarizes the roles and responsibilities of each employment level at the Plant that pertain to the Plan.
- Section 4.0 documents the BMPs that will be in place at the Plant and the decision-making process used to develop these BMPs. This section follows the Plan, Do, Check, and Act (PDCA) cycle according to ISO guidelines. The “Plan” section includes identification and characterization of the emission sources. The “Do” section includes a schedule for implementation of any proposed BMPs, provided a procedure for handling complaints and describes the training requirements. The “Check” section includes a description of inspections and a recordkeeping system. The “Act” section includes a description of guidelines for periodic review of the BMPs to promote its continuous improvement.

Regulator comments pertaining to the development and maintenance of this BMPP will be included in Appendix A. As this is the first version of this BMPP, this section will act as a placeholder for future regulator comments.

2.0 PLANT DESCRIPTION

Table 1 outlines the general information about the Plant that is relevant to this Plan. Figure 1 shows the Plant layout and nearby receptors and Figure 2 shows a wind rose illustrating the predominant wind directions for the area. The wind rose was created using the Ministry regional meteorological dataset for Massena Crops which was used in the Air Quality Impact Assessment Report prepared by Golder Associates Ltd. in 2021.

Table 1: Plant Description

Item	Description
Subject Lands Property Boundaries	Municipal address – 8205 County Road 2 Survey address – Part of Lot 21, Concession 7 (North Fredericksburgh), Town of Greater Napanee, County of Lennox & Addington
Main Activities/Equipment Used	Material movement (haul trucks, shipping trucks) Material storage (stockpiles/loaders) Material processing (loaders/screens/conveyors, dust/mineral silo) Hot mix asphalt (HMA) handling (load out)
Potential Fugitive Dust Sources	Aggregate material and recycled asphalt pavement (RAP) handling and stockpiles Aggregate and RAP screens, conveyors Unpaved road dust
Production	Up to 180 tonnes per hour
Nearest Sensitive Receptors (Distance/Direction)	Various residences surround the Plant as illustrated on Figure 1.
Predominant Wind Direction	Winds blowing predominantly from the SW direction

3.0 RESPONSIBILITIES

The following sections identify the responsibilities held by each of the operators associated with the Plant as they pertain to this Plan. Note that these individuals may or may not be present while the Plant is in operation.

3.1 Operations Manager

The Operations Manager, or designate, is responsible for:

- reviewing the Plan and ensuring the Plant Operator is following the dust control procedures;
- ensuring that Plant personnel have been trained on the requirements of the Plan; and
- ensuring the Plant has the required tools, equipment and/or parts required to manage fugitive dust.

3.2 Plant Operator

The Plant Operator, or designate, is responsible for:

- reviewing the effectiveness of the current dust control measures and implementing additional controls when necessary;
- Receives complaints and records information to be forwarded to the Environmental Compliance Coordinator;
- scheduling and coordinating the implementation of fugitive dust control measures;
- reviewing non-conformance logs and following up on non-conformances;
- maintaining documentation of training records, inspections and logs; and
- reviewing this Plan as described in Section 4.4.

3.3 Lead Hand

The Lead Hand is responsible for:

- reviewing the effectiveness of the current dust control measures and reporting to the Plant Operator;
- implementing fugitive dust control measures; and
- completing dust control inspections and logs.

3.4 Loader Operator

The Load Operator is responsible for:

- reviewing the effectiveness of the current dust control measures and reporting issues to the Plant Operator or Lead Hand; and
- following the dust control procedures.

3.5 Environmental Compliance Coordinator

The Environmental Compliance Coordinator is responsible for:

- conducting training of plant personnel on the required fugitive dust best management practices; and
- dealing with fugitive dust complaints after receiving details from the Plant Operator.

4.0 FUGITIVE DUST EMISSIONS BEST MANAGEMENT PRACTICES

This section describes the fugitive dust control measures that will be implemented at the Plant and the decision-making process that has been used in the development of the BMPs. This section follows the “PDCA” cycle according to the ISO guideline as follows:

- Section 4.1 **PLAN** - identifies and characterizes the emission sources and BMPs at the Plant.
- Section 4.2 **DO** - documents the schedule for implementation of the Plan, procedure for handling complaints and training requirements.
- Section 4.3 **CHECK** - describes the inspections and a recordkeeping system.
- Section 4.4 **ACT** - describes the BMP review and update procedures to promote its continuous improvement.

4.1 PLAN – Identification and Characterization of Fugitive Dust Sources

4.1.1 Identification of Fugitive Dust Sources

Fugitive dust results from mechanical disturbances of granular materials exposed to the air. Dust generated from these open sources is termed “fugitive” because it is not discharged to the atmosphere in a confined flow stream, such as emissions from an exhaust pipe or a stack (USEPA 1995).

The mechanical disturbance may result from equipment movement, the wind, or both. Therefore, some fugitive dust emissions occur and/or are intensified by equipment use, while others (i.e., wind erosion emissions) are independent of equipment use.

The main factors affecting the amount of fugitive dust emitted from a source include characteristics of the granular material being disturbed (i.e., particulate size distribution, density and moisture) and intensity and frequency of the mechanical disturbance (i.e., wind conditions and/or equipment use conditions). Precipitation and evaporation conditions can affect the moisture of the granular material being disturbed and, therefore, have an indirect effect on the amount of fugitive dust emitted.

Once dust is emitted, its travelling distance from the source is affected by climatic conditions, specifically wind speed, wind direction, and precipitation and particle size distribution. Higher wind speeds increase the distance travelled while precipitation can accelerate its deposition. Finer particulates can travel further before settling and, therefore, deserve major concern.

Table 2 summarizes the Plant's fugitive dust sources and lists the causes for high emissions.

Table 2: Sources of Fugitive Dust at the Plant

Source Category	Source Description	Potential Causes for High Emissions (Parameters/Conditions)
Unpaved Roadways	Gravel roads	<ul style="list-style-type: none"> number of vehicles/large weight of vehicles/heavy silt content/high wind speed/high moisture content/dry
Stockpiles and Material Handling	Aggregate and RAP stockpiles	<ul style="list-style-type: none"> moisture content/dry silt content on the stockpile surface/high material size/fine material transfer rate/high material drop height/high wind speed/high
Material Processing	Feed bins, screens, conveyor transfers, HMA load out	<ul style="list-style-type: none"> moisture content/dry material size/fine material transfer rate/high material drop height/high wind speed/high
Silo Unloading	Dust/mineral silo unloading to transport truck	<ul style="list-style-type: none"> moisture content/dry material size/fine material transfer rate/high wind speed/high improper discharge hose connection damaged hose or union

4.1.2 Fugitive Dust Characterization

Particle sizes can be divided into the following categories:

- Fine: < 30 µm in diameter;
- Medium: 30 to 100 µm in diameter; and
- Coarse: > 100 µm in diameter.

As the majority of fugitive dust from the Plant results from mechanical disturbances, the diameter of the dust particles can be categorized as medium (30 to 100 µm in diameter). In addition, the fugitive dust is not expected to contain heavy metals.

4.1.3 Fugitive Dust Best Management Practices

Control measures to reduce fugitive dust should account for the type of emission source, the dispersion conditions and the location of sensitive areas. Control measures are in place to minimize one or more factors leading to the generation and/or dispersion of fugitive dust emissions. These control measures can be classified as follows:

- **Preventative Procedures:** Measures pertaining to the design and installation of structures and the operating procedures which are implemented on a regular basis in order to prevent the generation of dust and/or the dispersion of dust emitted reaching sensitive areas.
- **Reactive Control Measures:** Measures which are implemented in the event of unexpected circumstances which can lead to the generation of dust and/or the dispersion of dust emitted reaching sensitive areas.

Table 3 lists preventative procedures and reactive control measures for fugitive dust that are being implemented at the Plant.

Table 3: Preventative Procedures and Reactive Control Measures for Fugitive Dust Emissions

Source Type	Preventative Procedures/Control Measure	Description	Frequency
Unpaved Roadways	Watering	Water will be applied as a dust suppressant during non-freezing conditions	At least 1 trip per hour during dry periods
	Dust suppressant	Calcium flake to be applied as a dust suppressant	As needed
	Compacting	Ensuring material on unpaved areas is properly compacted	Monitored and compacted as needed
	Road design	Maintain shortest haul distance where possible	Continual
	Speed limit	Speed limit of 20 km/hr is enforced onsite.	Permanent
Stockpiles	Stockpile placement	Aggregate stockpiles are kept as small as possible to reduce the surface area exposed to wind erosion. Where possible, stockpile placement will take advantage of natural wind breaks or be placed below grade. They should also be placed to minimize haul distance.	Continual
	Enclosures	Stockpiles of granular material will be surrounded on three sides by concrete walls.	Permanent
	Watering	Water will be applied as a dust suppressant during non-freezing conditions	As needed when possible
Material Handling	Maintain minimum drop height	Material will be dropped from the shortest distance possible.	Continual

Source Type	Preventative Procedures/Control Measure	Description	Frequency
	Reduced activity	Material handling activities will be reduced during high wind conditions or when activities are taking place close to sensitive receptors and/or the property boundary.	When wind gusts exceed 40 km/hr ¹ or when activities are within 100 m to sensitive receptors and/or property line
	Good housekeeping	Minimize dust accumulation in material handling areas. Spills will be cleaned up immediately.	Continual
	Watering	Water will be applied as a dust suppressant during non-freezing conditions	As needed when possible
Material Processing	Material moisture content	Water will be applied as a dust suppressant during non-freezing conditions	As needed when possible
	Maintain minimum drop height	Material is to be dropped from the shortest possible distance	Continual
	Good housekeeping	Minimize dust accumulation on equipment and in material processing areas.	Continual
	Enclosures	Cold feed bins are enclosed on three sides	Permanent
Silo Unloading	Visual inspection	When the dust/mineral silo is emptied, a visual inspection of the hose and union is to be completed to ensure there are no holes or leaks	Continual

1 - ChemInfo, 2005

Each fugitive dust source associated with the Plant has been considered using the risk management tool described in the guidance document (CEMI 2010) to assess if the BMPs that will be implemented will adequately manage the risk associated with each source. See Appendix B for the risk factors used in the ranking process. Table 4 identifies the fugitive dust sources and their respective relative risk ranking.

Table 4: Fugitive Dust Sources and Associated Relative Risk Scores

Source Description	Relative Risk Score	Risk Ranking
Unpaved Roads	83	1
Stockpiles	35	2
Material Handling	24	4
Material Processing	21	5
Silo Unloading	34	3

According to the risk ranking, the Unpaved Roads are the fugitive dust source with highest risk for off-site impacts. This indicates that extra care should be taken to ensure that fugitive dust from Unpaved Roads is controlled as much as possible, though improvements to the BMPs.

Note that the Plan process involves the “Check” and “Act” steps which facilitate continuous improvement of fugitive dust management practices. As the BMPs are improved over time, the relative risk score for each source can be revised as required. This process makes the Plan a living document that will be updated, as required, throughout the life of the Plant.

4.2 DO – Implementation Schedule, Complaints and Training

4.2.1 Implementation Schedule

The BMPs listed in Table 3 will be implemented whenever the Plant is operating.

All work that generates fugitive dust at the Plant, whether it is completed by Tomlinson or under contractual agreements, will conform to the requirements of this Plan.

4.2.2 Procedures for Handling Complaints

The Plant will have procedures in place to address complaints related to fugitive dust. All workers should be familiar with how to direct a complaint to the Plant Operator who is responsible for receiving complaints (see section 3.2) should the need arise. The following steps should be taken by the Plant Operator if a complaint is received:

- Complete copy of dust complaint response form (Appendix C) and ask the complainant for the information required on the form (contact information, time of occurrence, etc.).
- Notify the Ministry of complaint (Spills Action Centre, 416-325-3000).
- Conduct a Facility and, if needed, off-site inspection to determine the source of the dust and whether the dust is still causing an issue.
- Carry out fugitive dust mitigation procedures, if needed, and summarize the measures that were taken in the complaint record.

4.2.3 Training

All Plant personnel that will be working at the Plant will be informed about the requirements of this Plan. The Environmental Compliance Coordinator will coordinate training of staff so that operators are familiar with this document and the BMPs that are implemented at the Plant. Training records specific to this Plan will be kept on file by the Plant Operator and Environmental Compliance Coordinator.

4.3 CHECK – Inspection, Maintenance and Documentation

An inspection on the conformity with the BMPs will be documented weekly by the Plant Operator or Lead Hand using the Dust Control Inspection Form (see Appendix D for example). In addition to the weekly inspections, dust control activities will be recorded on the Dust Control Activity Log (see Appendix E for example).

In the event of a non-conformance, the inspector will add the incident to the Non-Conformance Log (see Appendix F for example). Corrective action is to be taken to eliminate the cause(s) of the non-conformance. It is expected that deficiencies identified in inspections be addressed as soon as reasonably possible. Reviews of the Non-Conformance Logs will be done monthly by the Plant Operator.

Copies of the Dust Control Inspection Forms, Non-Conformance Log, Dust Control Activity Log and Complaints Forms will be maintained by the Plant Operator and kept in a binder in the Control Room. This documentation will be kept for a minimum of five years.

4.4 ACT – Plan Review and Continuous Improvement

Inspections assist Tomlinson personnel with the maintenance of an effective Plan. Review of the Plan is intended to evaluate the effectiveness of the dust control practices and focus on the identification of improvement opportunities that can reduce the risk of complaints related to fugitive dust emissions. This Plan will be reviewed and updated, as required, by the Plant Operator when:

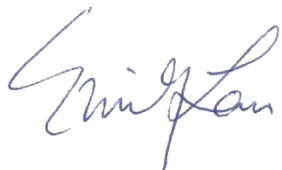
- there are multiple non-conformances documented for the same source or BMP;
- there are verified fugitive dust complaints; and
- when changes to Plant operations are proposed.

5.0 REFERENCES

- Centre for Excellence in Mining Innovation. 2010. Guide to the Preparation of a Best Management Practices Plan for the Control of Fugitive Dust for the Ontario Mining Section. Version 1.0, June 2010.
- ChemInfo. 2005. Best Practices for the Reduction of Air Emissions from Construction and Demolition Activities. March 2005.
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- Ontario Ministry of the Environment, Conservation and Parks. 2017. Technical Bulletin – Management Approaches For Industrial Fugitive Dust Sources. February 2017.
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Signature Page

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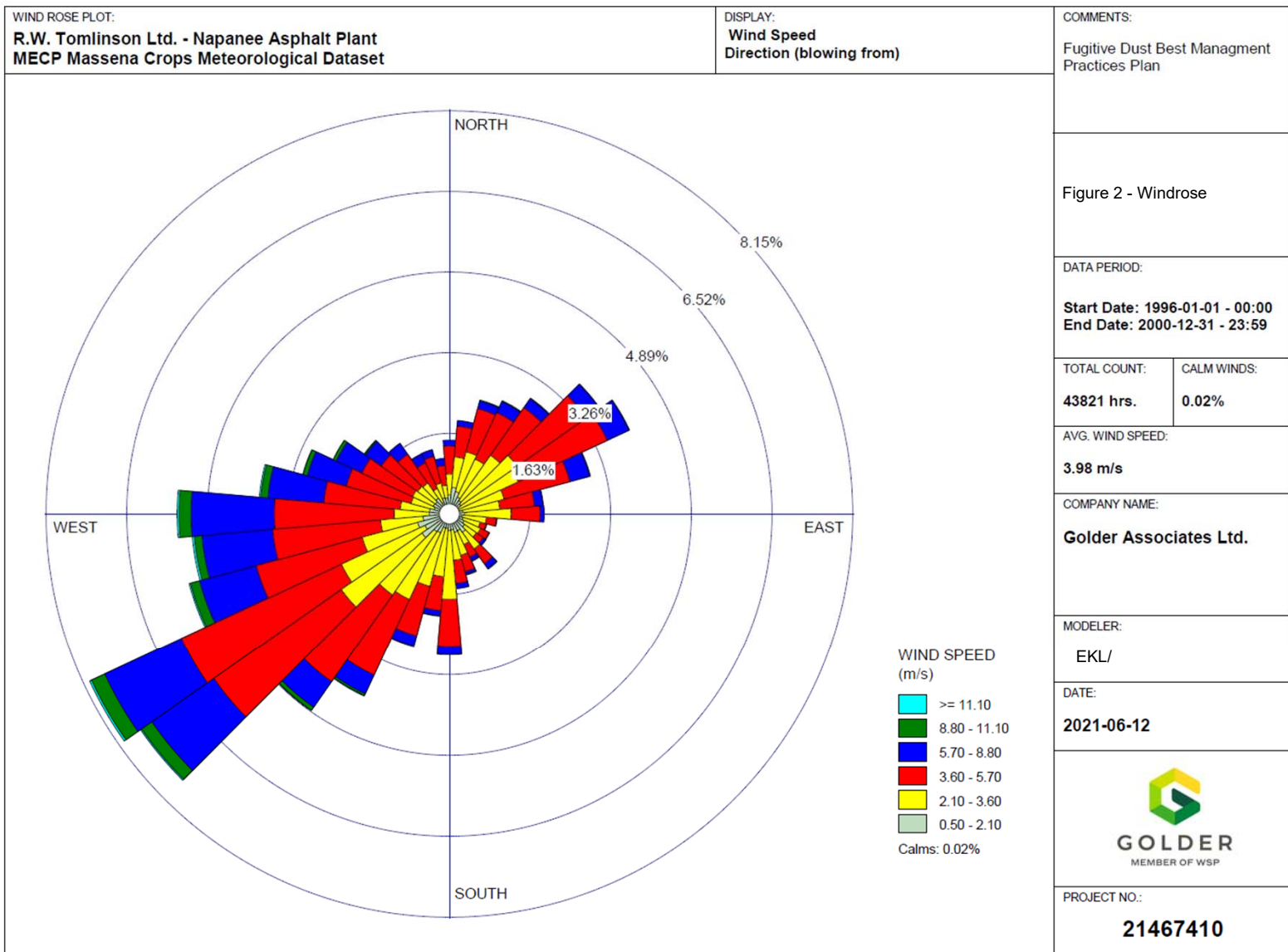
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FIGURES



APPENDIX A

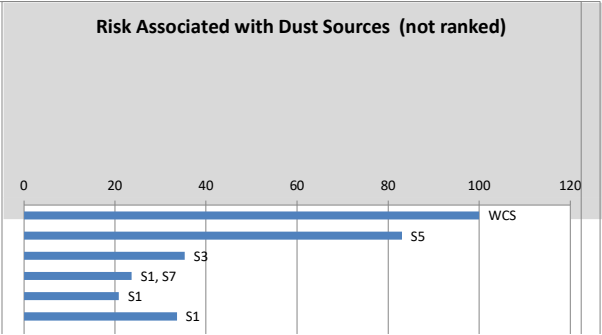
Regulator Comments (Placeholder)

APPENDIX B

Risk Factor Assessment

Fugitive Dust Risk Management Tool

			Risk Factors											Risk Ranking	Relative Risk Score
Source ID Number	Description of the structure / equipment	Category	1	2	3	4	5	6	7	8	9	10	11		
			Frequency of process / activity that generates fugitive dust:	Position of the source related to sensitive areas (e.g.: communities, working areas):	Predominant wind direction is from the source to the closest sensitive area?	Relative amount of visible dust generated in the process / activity:	Dust composition	Dust size range (higher mass percentage)	Is there some wind barrier (e.g.: trees, buildings, landscape) which can prevent the emissions from this source to reach the closest sensitive area?	Is there some measure applied on regular basis to prevent dust emission from this source (preventative)?	Is there some measure applied to this source to reduce dust emission once it occur (reactive)?	Is there some monitoring procedure applied to this source related to fugitive dust control?	Monitoring data / information trigger some control measure?		
WCS	WCS- Worst Case Scenario	Process	Continuous	Close	Yes	High	Metals	Fine	No	No	No	No	No	—	100
S5	Unpaved Roads	Unpaved road / area	Continuous	Medium	Yes	Low	No metals	Medium	Yes	Yes	Yes	Yes	Yes	1	83
S3	Stockpiles	Material stockpile	Continuous	Medium	No	Medium	No metals	Medium	Yes	Yes	Yes	Yes	Yes	2	35
S1, S7	Material Handling	Material transfer (drop operations)	Continuous	Medium	No	Medium	No metals	Medium	Yes	Yes	Yes	Yes	Yes	4	24
S1	Material Processing	Process	Continuous	Medium	No	Medium	No metals	Medium	Yes	Yes	Yes	Yes	Yes	5	21
S1	Silo Unloading	Process	Intermittent	Medium	No	Medium	No metals	Fine	Yes	Yes	Yes	Yes	Yes	3	34



APPENDIX C

Dust Complaint Response Form

TOMLINSON

R.W. Tomlinson Limited

5597 Power Road,
Ottawa, ON K1G 3N4

(613) 822-1867

Official Complaint Form

Date

Complaint

Observation

Cause

Correction

Who is accountable for this action

Date to be completed by

APPENDIX D

Dust Control Inspection From

Weekly Dust Control Inspection Form

Date:

Inspector Name:

Recordkeeping				
Inspection Items	Response	Requirement	Conformance (Y or N)	Notes
Has the Dust Control Log been maintained?		Y		
Has the Non-Conformance Log been maintained?		Y		
Have previous non-conformances been rectified?		Y		

Unpaved/Paved Roadways				
Indicate all road segments that were inspected.				
Indicate which segments were not inspected, if any, and the reason why an inspection was not completed.				
Inspection Items	Response	Requirement	Conformance (Y or N)	Description of Non-Conformance
Is visible dust observed from any section of roadway?		N		
Are appropriate load sizes maintained on haul vehicles?		Y		
Are roadways well maintained? (i.e. good housekeeping)		Y		

Stockpiles and Material Handling				
Indicate all areas that were inspected.				
Indicate which areas were not inspected, if any, and the reason why an inspection was not completed.				
Inspection Items	Response	Requirement	Conformance (Y or N)	Description of Non-Conformance
Is visible dust observed from any location?		N		
Has the equipment been maintenance inspected within the last month?		Y		
Are storage areas well maintained? (i.e. good housekeeping)		Y		

Weekly Dust Control Inspection Form

Date:

Inspector Name:

Recordkeeping				
Inspection Items	Response	Requirement	Conformance (Y or N)	Notes
Has the Dust Control Log been maintained?		Y		
Has the Non-Conformance Log been maintained?		Y		
Have previous non-conformances been rectified?		Y		

Material Processing				
Indicate all areas that were inspected.				
Indicate which areas were not inspected, if any, and the reason why an inspection was not completed.				
Inspection Items	Response	Requirement	Conformance (Y or N)	Description of Non-Conformance
Is visible dust observed from any material handling location?		N		
Are low drop heights maintained?		Y		
Are material handling locations well maintained? (i.e. good housekeeping)		Y		

Silo Unloading				
Indicate all areas that were inspected.				
Indicate which areas were not inspected, if any, and the reason why an inspection was not completed.				
Inspection Items	Response	Requirement	Conformance (Y or N)	Description of Non-Conformance
Is visible dust observed from any the dust silo and related equipment?		N		
Is the area around the dust silo well maintained? (i.e. good housekeeping)		Y		
Are the hose connections in good repair?		Y		

All non-conformances must be documented in the Non-Conformance Log.

Inspector Sign Off: _____

APPENDIX E

Dust Control Log

Napanee Asphalt Plant Dust Control Activity Log

[illegible]

APPENDIX F

Non-Conformance Log

Napanee Asphalt Plant Non - Conformance Log

Date and Time	Inspector Name	Potential or Actual Non-Conformance		Cause	Corrective Action	Corrective Action Sign Off
		Plant Area	Activity / Process / Condition			



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