

- (13) LARGE ROADWAY means any roadway, with an annual daily average number of vehicle trips in excess of 100,000, as listed in [insert reference].

Control Measures:

Material Piles—Apply dust suppressant as necessary, ~~but no less than twice per hour~~ to maintain a stabilized surface and prevent visible emissions; Install coverings; and Install an enclosure with a minimum of three sides (the open side of which will face farthest from potentially impacted areas) and walls with a maximum porosity of 50 percent and a minimum height equal to the highest point of the material pile. ~~Adjacent material piles within 25 feet of each other as measured from the closest edge of each pile shall be considered to be a single pile.~~

Exemptions:

- (f)(2) The provisions of sections (d)(1), (d)(2), (d)(3)(A), (d)(3)(C), and (d)(3)(D) shall not apply to any associated large roadway projects.

While we do not anticipate that many of our projects will occur on large public roadways, we felt it was important to convey the very different type of work that is performed for installation, maintenance and repair activities conducted by essential public services compared to roadway infrastructure projects.

We appreciate the ongoing dialogue and SCAQMD’s willingness to consider the practical implications for associated roadway construction projects. Please let us know if you have any follow-up questions.

Thank you,

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