SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Draft Staff Report
Proposed Amended Rule 1157 – PM10 Emission Reductions from Aggregate and Related Operations

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EXECUTIVE SUMMARY

The federal Clean Air Act requires areas to meet the National Ambient Air Quality Standards to ensure healthy levels of air quality. Although, the South Coast Air Basin (Basin) attains the 24-hour National Ambient Air Quality Standards for PM10, there is higher spatial variation from specific sources that can result in more localized concerns. PM10 (**p**articulate **m**atter less than or equal to **10** microns in aerodynamic diameter) is an air pollutant that is typically directly emitted into the atmosphere. Exposure to PM10 has been known to have detrimental health effects causing respiratory and cardiovascular disease and premature death. Aggregate and related operations are known sources of PM10 emission. Aggregate is granular or grainy material such as gravel, crushed stone, and quarried rocks. Aggregate operations produce sand, gravel, crushed stone, and quarried rocks whereas aggregate related operations use aggregate materials. South Coast AQMD Rule 1157 – PM10 Emission Reductions from Aggregate and Related Operations (Rule 1157) was first adopted in January 2005 and last amended in September 2006. Rule 1157 establishes requirements for aggregate and related operations to reduce PM10 emissions and improve the air quality of the region.

Proposed Amended Rule 1157 (PAR 1157) is being amended to address community concerns regarding PM10 emissions from aggregate and related operations in the Basin. PAR 1157 will expand its applicability to include construction and demolition debris transfer stations as an aggregate related operation. Additional amendments will include strengthening existing rule requirements with preemptive preventative measures such as specified frequencies for dust control, enhanced recordkeeping, and expansion of requirements triggered by recurrent violations. Minor editorial changes and removal of obsolete information are made to improve rule clarity and conform with South Coast AQMD's practice. Typical costs associated with implementing PAR 1157 include costs associated with the signage requirements to standardize font, size, and information across all applicable facilities. All facilities are assumed to install four new signs in order to comply with the signage requirements of PAR 1157. Costs for the newly applicable facilities, construction and demolition debris transfer stations, are associated with the South Coast AQMD registration and required measures, such as the installation of rumble grates, gravel pads, and signage, to comply with the rule. The expected costs estimate $7,700 for the installation of rumble grates, $2,000 for gravel pads, and $1,127 for each sign. Emission reductions from PAR 1157 are not quantified and more robust emission data is necessary to accurately quantify the emission reductions from construction and demolition debris transfer stations.

CHAPTER 1– BACKGROUND

INTRODUCTION

The South Coast Air Quality Management District (South Coast AQMD) is the local government agency responsible for air quality assessment in Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino counties. The South Coast AQMD covers 10,743 square miles, which is the largest of the 35 local air agencies in California and in the United States. Approximately 17 million residents reside within the region. The South Coast AQMD regulates emission from stationary sources, develops and implements plans to meet national air quality standards, permits and inspects about 28,400 affected businesses and communities, and administers over two hundred million dollars of incentive and grant funding annually.

Key activities conducted by the South Coast AQMD include developing plans for achieving compliance with federal and state clean air standards, also known as air quality management plans (AQMPs). Additional key activities include the adoption of air rules and regulations that will reduce emissions from various sources, issuance of permits for equipment that limit the amount of air emissions which will ensure compliance with air quality rules, conduction of periodic inspections to ensure compliance with air quality requirements, responding to public air quality complaints, and conducting ambient air quality monitoring and special studies to protect public health.

A dust cloud or plume, also referred to as total suspended particulate, contains both PM10 (particulate matter less than or equal to 10 microns in aerodynamic diameter) and PM2.5 (particulate matter less than or equal to 2.5 microns in aerodynamic diameter), where the amount of each particulate varies by environment and source. Dust sources are more likely to contain coarse inhalable particles such as PM10. PM10 is an air pollutant that is generated from both natural and anthropogenic sources. Such sources include construction and industrial sites, landfills, dust storms, and wildfires. Based on emissions inventory estimates from the South Coast AQMD 2022 AQMP, total suspended particulate emissions from construction and demolition activities are comprised of approximately 49% PM10 and 5% PM2.5.[1] Numerous studies reviewed by the California Air Resources Board (CARB) have linked high levels of particulate air pollution with detrimental health effects such as respiratory and cardiovascular disease and premature death as smaller particles in the PM10 range can penetrate and deposit deep in lung tissues.[2]

The federal Clean Air Act requires areas to meet the 24-hour National Ambient Air Quality Standards to ensure healthy levels of air quality. Although, the South Coast Air Basin (Basin) attains the National Ambient Air Quality Standards for PM10, some emission sources can elevate PM10 emission levels locally.[3] As PM10 is a heavier particulate, there is higher spatial variation that can result in more localized concerns.

AGGREGATE AND RELATED OPERATIONS

Aggregate materials serve as the base and backbone that helps ensure stability and durability of all kinds of building projects from highways and bridges to homes and gardens. Aggregate materials are granular or grainy material such as gravel, crushed stone, and quarried rocks. Aggregate

[1] 2022 Air Quality Management Plan, South Coast Air Quality Management District. https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16

[2] *Inhalable Particulate Matter and Health (PM2.5 and PM10)*, California Air Resources Board. https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health

[3] 2022 Air Quality Management Plan, South Coast Air Quality Management District. https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16

operations produce sand, gravel, crushed stones, quarried rocks, slag, and rock dust. Crushed stones may comprise of limestone, granite, and other hard rocks. Limestone is a naturally occurring sedimentary rock, whereas chemical lime is the reactive chemical product made by heating limestone to produce calcium oxide or calcium hydroxide. Chemical lime operations are not considered part of aggregate or related operations for the applicability of Rule 1157.

Aggregate related operations can both use and produce aggregate materials which include operations for concrete batch plants, hot mix asphalt production, construction and demolition debris handling, and inert landfills. Aggregate and related operations are sources of direct PM10 emissions. PM10 is generated during the mining, processing, and handling (i.e., transporting, loading/unloading, conveying, crushing, screening, mixing, and storing) of the aggregate materials. Other sources of PM10 emissions are unpaved roads and track-out (where PM10 generated by the facility is transported due to out-going truck traffic to part of the paved public and private roads).

Aggregate Mining

Aggregate mining involves the extraction of aggregate materials from Earth's surface to be processed for various applications. Aggregate mining operations are typically located in isolated areas away from residents and other businesses. The typical process of aggregate mining involves quarrying and extraction, transport to the processing plant, primary crushing, screening, sorting, secondary and tertiary crushing as needed, final screening and washing, and lastly stockpiling and storage. Extraction can be performed through blasting, dredging, or open pit excavation.[4] Blasting involves using controlled explosives to break apart large rock formations. Dredging is carried out with suction or bucket-type dredges that remove aggregates from underwater deposits. Open pit excavation is carried out with heavy machinery like front end loaders, bucket wheel excavators, or draglines to dig out aggregates from softer material.

Concrete and Asphalt Manufacturing

Concrete is mainly composed of water, cement, sand, and coarse aggregate. Approximately seventy-five percent of the United States concrete is produced at concrete batch plants.[5] Many plants are located near aggregate sources; others may be temporarily set up near major job sites. Typical equipment in a concrete batch plant includes conveyors, elevators, elevated storage bins and silos, weight hoppers, and mixers. The primary air quality concern from these operations is particulate matter emissions, mostly from cement dust. Cement is so fine that it contains approximately 150 billion particles per pound, about ten to twenty percent of which are smaller than five microns in diameter. These dust particulates are generated during the transferring and mixing of materials, as well as from sand and aggregate open storage piles. Typical dust controls at concrete batch plants may include water sprays, dust suppressants, hoods, baghouses, etc.

Hot mix asphalt is engineered to provide a long-lasting, high-performance pavement surface that can withstand heavy traffic, and extreme weather.[6] Hot mix asphalt accounts for roughly eighty percent of asphalt used in the United States and is known for its durability with a lifespan of twenty years. Hot mix asphalt is a mixture of size-graded, high-quality aggregate, and, as a binder, liquid

[4] Blair, J. (2024, July 15). *Blair A L Construction Ltd-Quarry Division*. A.L. BLAIR CONSTRUCTION. https://alblairconstruction.com/understanding-the-aggregate-production-process/

[5] Environmental Protection Agency. (2014, July 2). AP-42, Chapter 11.12, Concrete Batching, http://www.epa.gov/ttn/chief/ap42/ch11/index.html.

[6] Voss, G. (2025, December 31). *Hot Mix Asphalt Performance Metrics: Key to Longevity - Asphalt Calculator USA*. Asphalt Calculator USA; Asphalt Calculator. https://asphaltcalculatorusa.com/hot-mix-asphalt-performance-metrics/

asphalt cement, which is heated and mixed in measured quantities. Aggregate and reclaimed asphalt pavement usually constitute over ninety-two percent, by weight, of the total mixture. In general, at the hot mix asphalt plants, dust particulates are generated during conveying, screening, and mixing of materials, as well as from aggregate open storage piles. Typical dust controls may include water sprays, hoods, enclosures, baghouses, etc. In addition, the drying of aggregate may also generate dust emissions. However, the dryers are vented to a baghouse filter for particulate control.

Construction and Demolition Debris Transfer Station

Construction and demolition debris consist of nonhazardous waste materials generated from construction, deconstruction, remodeling, repair, cleanup, or demolition of any part of a structure or building, including the foundations or the utility/commodity pipeline of the structure or building. Construction and demolition debris are transported to construction and demolition transfer stations. These transfer stations temporarily store construction and demolition debris prior to being moved to another facility for further processing to be reused or disposed.

Dust control methods used at these types of facilities include storing the construction and demolition debris in an enclosed building and/or misting/water application. Construction and demolition debris transfer stations were not previously subject to Rule 1157 requirements as this type of operation previously did not meet the definition of related operations. These operations typically do not have equipment that are required to have permits with the South Coast AQMD pursuant to Regulation II – Permits.

REGULATORY HISTORY

Rule 1157 – PM10 Emission Reductions from Aggregate and Related Operations

The 2003 AQMP for the Basin included BCM-08 – Further Emission Reductions from Aggregate and Cement Manufacturing Operations, which identified aggregate and cement operations as sources of PM10 emissions. BCM-08 called for the development of controls to reduce the emissions from aggregate and cement manufacturing operations, therefore Rule 1157 – PM10 Emission Reductions from Aggregate and Related Operations was adopted in January 2005. Rule 1157 aimed to reduce PM10 emissions from permanent and temporary aggregate and related operations in the Basin.

In February 2005, the California Mining Association filed a complaint against the South Coast AQMD alleging that Rule 1157 contained an unworkable high wind (instantaneous wind speeds exceeding twenty-five miles per hour) exemption. In September 2005, California Mining Association and the South Coast AQMD executed a formal settlement agreement that the South Coast AQMD would bring to the Governing Board language to address the high wind exemption. The rule was amended in September 2006 to improve the implementation of the high wind exemption which included the elimination of requirements considered infeasible to the industry and allows only limited activities to continue during high winds, provided appropriate dust suppressants are applied according to South Coast AQMD rules. The inclusion of the high wind exemption would protect the public from exposure to high particulate concentrations during high winds without causing negative economic impacts to the industry.

NEED FOR PROPOSED AMENDED RULE 1157

Within the South Coast AQMD jurisdiction, there are approximately 862 facilities classified as aggregate and related operations. These facilities are located across the basin; however, some areas have a larger concentration of facilities within a general area than others. In February 2025, Senator Caroline Menjivar introduced Senate Bill 526 (SB 526) to address her constituents concerns regarding aggregate facilities in Sun Valley.[7] During the processing of SB 526, South Coast AQMD staff collaborated with Senator Menjivar's staff on ways to address community concerns and strengthen existing Rule 1157.

Staff identified several regulatory gaps – limitations of general performance standards, facility/operator discretion, limited track-out provisions, unregulated storage piles near property boundary – in Rule 1157.

During site visits and surveillance of areas identified by community members, staff identified the following issues regarding aggregate and related operations:

- Open storage piles near property boundary
    - Community members expressed concerns of fugitive dust coming from high open storage piles near property boundary
- Construction and demolition debris transfer stations receive, store, and transfer aggregate material and have similar concerns regarding track-out and storage piles
- Track-out that did not exceed Rule 430 limits extended into a public street where vehicular traffic would generate fugitive dust

An assessment of Rule 1157 was conducted and determined the following regulatory gaps:

- Requirements allow facility/operator discretion on stabilization methods and frequency of dust control application
    - Frequency is specified "as necessary"
    - Unclear of what frequency would be "as necessary"
- Track-out provisions were limited and could be expanded to reduce fugitive dust emissions
- Open storage piles near the property boundary are regulated the same as other open storage piles in the center of the facility
- Limits recordkeeping requirements to demonstrate compliance with applicable requirements
    - Content and frequency for recordkeeping is left to facility/operator discretion
    - Creates challenge to verify past compliance

PAR 1157 aims to address the identified issues and regulatory gaps by:

- Expand applicability to include construction and demolition debris transfer facilities

[7] "SB-526 South Coast Air Quality Management District: Air Quality." *California Legislative Information*, 29 Apr. 2025, leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260SB526. Accessed 29 Apr. 2026.

- Specifying frequency to inspect potential sources or to apply dust control to potential sources
- Add enhanced recordkeeping
- Expand requirements that are triggered by recurring violations

AFFECTED INDUSTRIES

Rule 1157 applies to all permanent and temporary aggregate and related operations. Aggregate operations would include operations that produce sand, gravel, crushed stone, and/or quarried rocks. Related operations are operations that use sand, gravel, cement, crushed stone, and/or quarried rocks in their products, or crushed miscellaneous base, and inert landfills that handle construction and demolition debris. Transfer stations handling only construction and demolition debris would also be included in the proposed amendments, except those transfer stations subject to South Coast AQMD Rule 410 – Odors from Transfer Stations and Material Recovery Facilities.

The initial development of Rule 1157 in 2005 relied on information from the South Coast AQMD permit system and the 2001-2002 Annual Emissions Reporting database where South Coast AQMD staff identified 316 aggregate and related facilities included in the applicable universe. With the assistance of the Southern California Rock Products Association and the Southern California Ready Mixed Concrete Association, an additional 79 facilities were identified as potentially subject to Rule 1157. This preliminary inventory was refined through an industry survey and the collected data was relied upon to identify and characterize facilities that would subject to the rule, estimate PM10 emissions generated by the facilities, and establish the baseline PM10 emissions for this industry within South Coast AQMD's jurisdiction.

The current development of PAR 1157 also relied on data from the previous rule development except that the universe of applicable facilities was updated to include additional facilities that were not previously identified. In January 2026, staff distributed a new survey to potentially applicable facilities within the South Coast AQMD jurisdiction. The survey inquired about the type of operations, types of material handled, annual throughput of processed materials, control equipment, and dust mitigation methods. The survey was distributed to gain the latest up-to-date information regarding the potential operational changes and to assist in the development of proposed rule concepts. The survey was distributed to over a thousand facilities potentially applicable to PAR 1157. The list of surveyed facilities was compiled using South Coast AQMD facility data filtered with a combination of Rule 1157 applicability and North American Industry Classification System (NAICS) codes from the 2023 federal Employment Development Department database. Additional information regarding the NAICS data for PAR 1157 is discussed in Chapter 3 of this staff report.

Transfer stations that handle construction and demolition debris would be included in the current universe as these operations create fugitive dust. The California Department of Resources Recycling and Recovery (CalRecycle) is a state agency responsible for managing waste reduction, recycling, and resource recovery programs to protect the environment. Based on the CalRecycle database, approximately 177 additional facilities would be added into the PAR 1157 universe to include construction and demolition debris transfer stations. After filtering facility data based on survey results and addition of facilities from CalRecycle, staff estimates a total of 862 facilities are expected to be affected by PAR 1157.The total number of potentially impacted facilities may be higher than originally estimated since smaller facilities may not be included in the CalRecycle database.

PUBLIC PROCESS

The development of PAR 1157 has been conducted through a public process. A Working Group was formed to allow the public and stakeholders to discuss details of the proposed rule amendment and provide South Coast AQMD staff with input during the rule development process. South Coast AQMD has held four Working Group Meetings via Zoom videoconference and teleconference. The meetings were held on September 2, 2025, January 8, 2026, May 7, 2026, and June 4, 2026. A Public Workshop was held on July 8, 2026 to present the preliminary draft rule language for PAR 1157 and receive public comment. A Stationary Source Committee meeting was held on June 26, 2026 to present an overview of the proposed rule amendments.

CHAPTER 2- SUMMARY OF PROPOSED AMENDED RULE 1157

OVERALL APPROACH

PAR 1157 addresses community concerns regarding PM10 emissions coming from aggregate and related operations by specifying frequencies and enhancing recordkeeping requirements. The related operations definition will be clarified, and the construction and demolition debris transfer station definition will be added. For this chapter, when referring to PAR 1157-specific terms that are defined in the rule language, the terminology will be capitalized.

The following is a summary of the proposed amendments to Rule 1157.

Definitions – Subdivision (c)

Bunker

PAR 1157 will update the definition of Bunker to clarify that the enclosure must have a minimum of two sides of Non-Porous Walls.

Chemical Stabilizers

PAR 1157 will update the definition of Chemical Stabilizers for clarity.

Construction And Demolition Debris

PAR 1157 will define Construction And Demolition Debris as nonhazardous waste, as defined in the California Code of Regulations, Title 22, section 66261.3 et. Seq., materials generated from construction, deconstruction, remodeling, repair, cleanup, or demolition of any part of a structure or building, including the foundations, or the utility/commodity pipeline of the structure or building. Such materials may include, but are not limited to, concrete, fully cured asphalt, brick, slag, ceramics, plaster, clay and clay products.

Construction And Demolition Debris Transfer Station

PAR 1157 will define a Construction And Demolition Debris Transfer Station as a facility that only receives, stores, and Transfers Construction And Demolition Debris. Inert landfills or facilities that crush received materials are not considered a Construction And Demolition Debris Transfer Station.

Existing Facility/Operation

PAR 1157 will remove the definition of Existing Facility/Operation as there is no longer a need to bifurcate the facility or operation between new and existing.

New Facility/Operation

PAR 1157 will remove the definition of New Facility/Operation as there is no longer a need to bifurcate the facility or operation between new and existing.

Open Storage Pile

PAR 1157 will update the definition of Open Storage Pile to provide clarification on qualifications for storage piles to be considered fully enclosed. To be fully enclosed means the storage pile is in a structure with Non-Porous Walls. Definition on Non-Porous Walls can be found in PAR 1157 paragraph (c)(27).

Related Operations

PAR 1157 will amend the definition of Related Operations to include Construction And Demolition Debris Transfer Stations.

Sensitive Receptor

PAR 1157 will revise the definition of Sensitive Receptor to mean any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (k-12) schools; daycare centers; and health care facilities such as hospitals or retirement and nursing homes. A Sensitive Receptor includes long term care hospitals, hospices, prisons, and dormitories or similar live-in housing.

The revised definition serves to align the definition for Sensitive Receptor in PAR 1157 with other South Coast AQMD regulations. South Coast AQMD currently uses a definition of Sensitive Receptor which does not include parks. Based on previous staff conversations with the Office of Environmental Health Hazard Assessment during prior rule developments, this is consistent with their interpretation that although Sensitive Receptors can be found at a park, the time spent at a park is intermittent and is not repeated long-term exposure, such as homes.

Validated Notice of Violation

PAR 1157 will amend definition of Validated Notice of Violation by removing references to settlements “resulting in the payment of civil penalty in any amount.” Settlements to violations do not always result in payments. For example, a settlement may include requirement to perform a supplemental environmental project(s), which provide direct benefit the affected community, in lieu of a monetary payment.

Requirement – Subdivision (d)

Subdivision (d) of PAR 1157 establishes requirements for the owner or operator of any Permanent and Temporary Aggregate and Related Facility/Operation to comply with dust control measures to prevent Fugitive Dust formation.

General Performance Standards

Subparagraph (d)(1)(A) outlines General Performance Standards that applicable facilities and operations are subject to at all times.

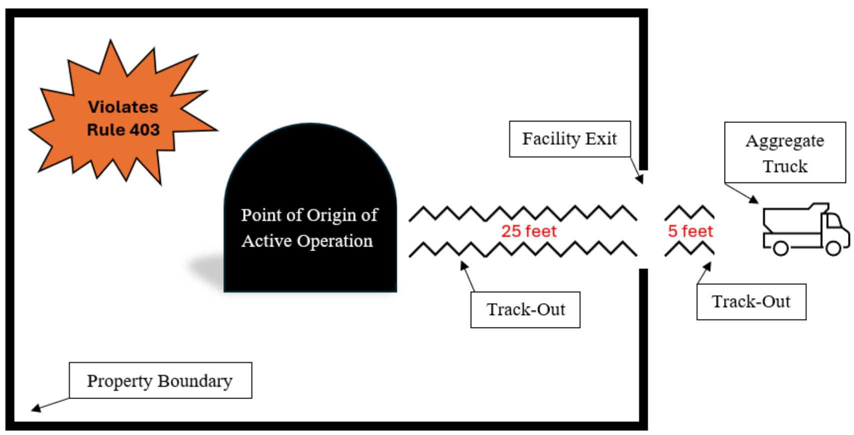
PAR 1157 will include a new provision limiting Track-Out specified in clause (d)(1)(A)(iv). Track-Out requirements were not previously included in Rule 1157 and mitigation of Track-Out was deferred to requirements in Rule 403 – Fugitive Dust (Rule 403). Clause (d)(1)(A)(iv) will prohibit Track-Out to extend 15 feet or more in cumulative length from the exit of the applicable facility or operation onto either a public or private roadway. Staff evaluated the width of a typical two-lane roadway and determined that the maximum distance of 15 feet of cumulative Track-Out helps to limit Track-Out from reaching the center of active roadways where deposits are most likely to encounter vehicle traffic. South Coast AQMD’s Rule 403 prohibits Track-Out to extend beyond 25 cumulative feet from the point of origin of an active operation and the 15 cumulative feet from facility exit required by PAR 1157 would also avoid duplication of Rule 403 requirements.

For instances of Track-Out which involve multiple tracks, such as individual Track-Out from both left and right side of a truck, the cumulative length of Track-Out in this case will be the sum of both track lengths. This is consistent with the implementation of Track-Out requirements in Rule 403. South Coast AQMD's Rule 403 has similar requirements regarding cumulative Track-Out extension of 25 feet or more from an active operation. Track-Out requirements of PAR 1157 differ from Rule 403 by focusing on Track-Out from a facility's exit and limiting cumulative Track-Out to 15 feet total, which is more stringent than Rule 403's Track-Out requirement in cumulative length. Table 2-1 provides a comparison of the Track-Out requirements in PAR 1157 and Rule 403. Both Track-Out requirements for PAR 1157 and Rule 403 could apply to the same facility. Additional information can be found in the Comparative Analysis in Chapter 3.

Three case studies are outlined below to provide clarification on the applicability and synergy of Track-Out requirements for PAR 1157 and Rule 403:

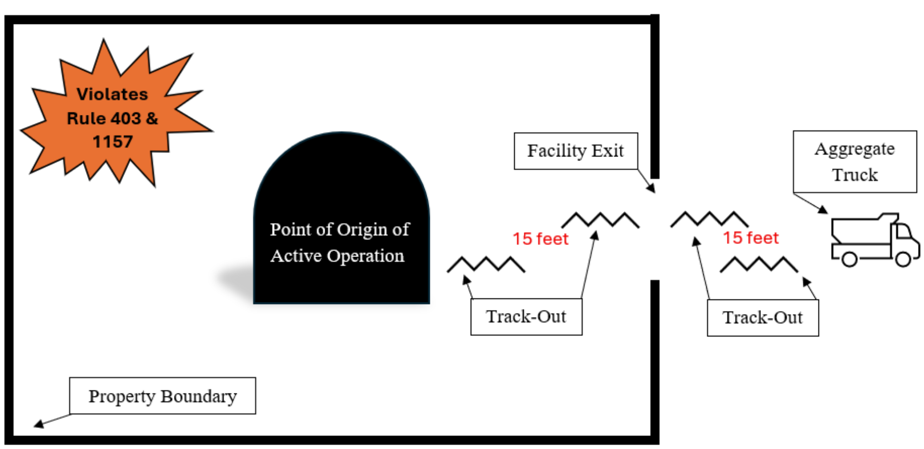
- Case Study A: Track-Out to extend a total of 30 feet (30 feet from the point of origin of active operation but only five feet outside the facility exit), the facility would be in violation of Rule 403;

Figure 2-1: Display of Case Study A



- Case Study B: Track-Out to extend a total of 30 feet (30 feet from the point of origin of active operation but 15 feet outside the facility exit) due to either one single length or multiple lengths, the facility would be in violation of both Rule 403 and PAR 1157; and

Figure 2-2: Display of Case Study B



- Case Study C: Track-Out to extend a total of 20 feet (five feet from the point of origin of active operation but 15 feet outside the facility exit), the facility would be in violation of Rule 1157.

Figure 2-3: Display of Case Study C

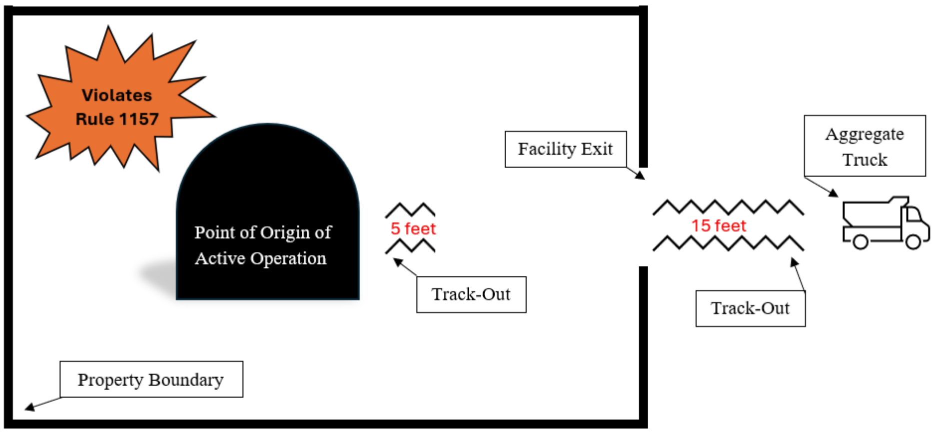


Table 2-1: Track-Out Comparative Analysis between PAR 1157 and Rule 403

Rule Aspect	PAR 1157	Rule 403
Applicability	Aggregate and Related Operations	any activity or man-made condition capable of generating Fugitive Dust
Allowed Length	<15 feet	<25 feet
Accumulation	cumulative	cumulative
Distance Origin	facility exit	active operation
Minimum Maintenance Frequency	End Of Work Day or conclusion of each Production Work Shift	conclusion of each workday or evening shift.

Amendments to subparagraph (d)(1)(B) will replace the existing "promptly" language for Material Spillage cleanup. PAR 1157 will require all Material Spillage on internal Paved Roads to be cleaned up within an hour of identification. If Dust Suppressants are applied to the Material Spillage, then the Material Spillage must be removed no later than the End of Work Day. The requirements of subparagraph (d)(1)(B) does not apply to Construction And Demolition Debris Transfer Stations which are subject to subparagraph (d)(1)(C).

PAR 1157 adds subparagraph (d)(1)(C) that requires the removal of Material Spillage on any internal Paved Roads located at a Construction And Demolition Debris Transfer Station within one hour of being identified. Materials from Construction And Demolition Debris Transfer Stations are generally larger in size compared to those at an aggregate facility or operation and applying Dust Suppressants to the spillage of those larger materials on active internal roadways would not be as effective. For additional clarification, the Material Spillage as defined in this rule refers to materials that are inadvertently lost or scattered by spilling. For example, a transferred load when a truck pours out contents into a Construction And Demolition Debris Transfer Station would not be considered Material Spillage since the action was intentional as part of the facility process. If a truck was being loaded and the loaded material was spilled out of the truck bed, that is considered Material Spillage.

PAR 1157 will remove the existing requirement in subparagraph (d)(1)(D) which required the sufficient use of Dust Suppressants or Other Dust Control Methods to meet the performance standards in subparagraph (d)(1)(A). PAR 1157 incorporates the language of existing subparagraph (d)(1)(D) across the requirement in subdivision (d). With the improved recordkeeping requirements in subdivision (f), the language of existing subparagraph (d)(1)(D) is redundant and can be removed without impacting the effectiveness of PAR 1157. Subparagraph (d)(1)(D) in PAR 1157 will specify application frequency of Dust Suppressants, except for Chemical Stabilizers, for all other Material Spillage or Carry-Back not on internal Paved Roads to no less than once every hour. The application frequency for Chemical Stabilizers is in accordance with manufacturer recommendations.

Subparagraph (d)(1)(E) will expand the requirement for installation and maintenance of gravel pads. Requirement to replace the gravel pad as necessary has been expanded to require gravel pads to be replaced at least once every ten years or as necessary, whichever is sooner. Periodic maintenance of gravel pads is necessary to ensure the gravel pad itself does not become a source of Track-Out. Facilities will be required to maintain gravel pads to comply with applicable Track-Out requirements from both Rule 403 and PAR 1157.

Subparagraph (d)(1)(F) will establish a general performance standard for the installation and maintenance of wind barriers requiring a minimum porosity of 50 percent as well as ensuring the barrier is free from breaks, tears, or non-designed openings. Examples of non-designed openings include, but are not limited to, missing coverage areas or damage by natural events.

Active Operations

Amendments to paragraphs (d)(2) and (d)(3) are administrative to provide clarifications and do not affect applicability from existing Rule 1157.

Amendments to paragraphs (d)(4) and (d)(5) revises existing requirements for baghouses to allow for any permitted PM10 emission control device. Control devices will be evaluated at the time of permitting and subject to Best Available Control Technology (BACT) requirements.

Open Storage Piles

Additions to subparagraph (d)(6)(A) will establish a specific frequency for the application of Dust Suppressants or Chemical Stabilizers for all Open Storage Piles. The amended subparagraph will provide two options for applicable facilities or operations to stabilize Open Storage Piles.

The first option is to apply Dust Suppressants, excluding Chemical Stabilizers, twice per day on all sides of the Open Storage Piles, excluding the area of the Open Storage Pile that is actively disturbed, and as necessary to meet the applicable performance standards in subparagraph (d)(1)(A). Subsequent Dust Suppressant application must be at least four hours from the time Dust Suppressant was previously applied; however, facilities may apply Dust Suppressant as often as necessary to comply with requirements in subparagraph (d)(1)(A). The proposed application interval provides facilities with the flexibility to apply Dust Suppressants based on facility operational needs but leaves a minimum gap between applications to ensure proper coverage throughout a full day of operation. For example, a facility with operating hours from 8:00 am to 5:00 pm applies the first round of Dust Suppressants at 10:00 am will have to wait until 2:00 pm to apply the second round of prescribed Dust Suppressant application; however, additional Dust Suppressant applications may be applied between 10:00 am to 2:00 pm based on need, but the second prescribed Dust Suppressant application must still occur at 2:00 pm.

The second option is to apply Chemical Stabilizers on all sides of the Open Storage Piles, excluding the area of the Open Storage Pile that is actively disturbed, in accordance to manufacturer's recommended frequency or as necessary to meet the applicable performance standards in subparagraph (d)(1)(A). Chemical Stabilizers are generally longer lasting and reapplication are not required as frequently as other forms of Dust Suppressants, such as watering.

New subparagraph (d)(6)(B) will provide an alternative to subparagraph (d)(6)(A) by allowing the owner or operator to inspect and determine if an Open Storage Pile would need the application of Dust Suppressants in lieu of the prescribed Dust Suppressant application frequency requirements of subparagraph (d)(6)(A). Inspection of each Open Storage Pile for all sides of the Open Storage Pile located within the facility or operation is required at least twice per day and in line with Dust Suppressant application frequency of subparagraph (d)(6)(A). Owner or operators utilizing this option are still responsible to meet the general performance standards of subparagraph (d)(1)(A).

Recordkeeping of the Dust Suppressant applications and inspections are required and more details will be provided later in this chapter under subdivision (f).

New subparagraph (d)(6)(C) includes the alternative compliance option to store materials in a Silo or Bunker that was previously outlined in subparagraph (d)(6)(A) of Rule 1157.

Amendments to subparagraph (d)(6)(D) are administrative to provide clarifications and do not affect applicability from existing Rule 1157.

New subparagraph (d)(6)(E) requires the stabilization of inactive, undisturbed portions of Open Storage Piles at the End of Work Day prior to any periods of facility inactivity for more than 24 hours. This requirement is to ensure facilities properly stabilize all inactive portions of Open Storage Piles at the facility to prevent Fugitive Dust from those piles when facilities shut down for the weekend or planned periods of inactivity. This provision does not impact the requirement of subparagraph (d)(6)(C) which requires active portions of Open Storage Piles to be re-stabilized daily.

Requirements of subparagraph (d)(6)(C) in Rule 1157 are in subparagraph (d)(6)(F) in PAR 1157. Rule 1157 subparagraph (d)(6)(C) restricted height of Open Storage Piles to less than or equal to eight feet if such piles are within 300 feet of off-site occupied buildings or houses.

PAR 1157 will amend the qualification from off-site occupied buildings or houses to Sensitive Receptors. This change serves to expand protections to Sensitive Receptors that were excluded previously. The distance of Open Storage Pile to Sensitive Receptors is determined by the nearest outer edge of the storage pile to the property line of the Sensitive Receptor. Existing language provided an alternative option for owners or operators of facilities or operations to exceed the eight feet height restriction by operating a Water Irrigation System. Additional information regarding alternative options for Open Storage Piles near Sensitive Receptors will be provided later in this chapter under subparagraph (d)(6)(H).

The height of an Open Storage Pile is determined as the vertical distance from the lowest point the Open Storage Pile meets the base to the highest point of the Open Storage Pile. The base of an Open Storage Pile begins where the material of the storage pile meets the compressed foundation of which the pile sits upon. Figures 2-4 and 2-5 illustrate different scenarios for the height measurements of an Open Storage Pile.

Figure 2-4: Demonstration of Open Storage Pile Height Measurement

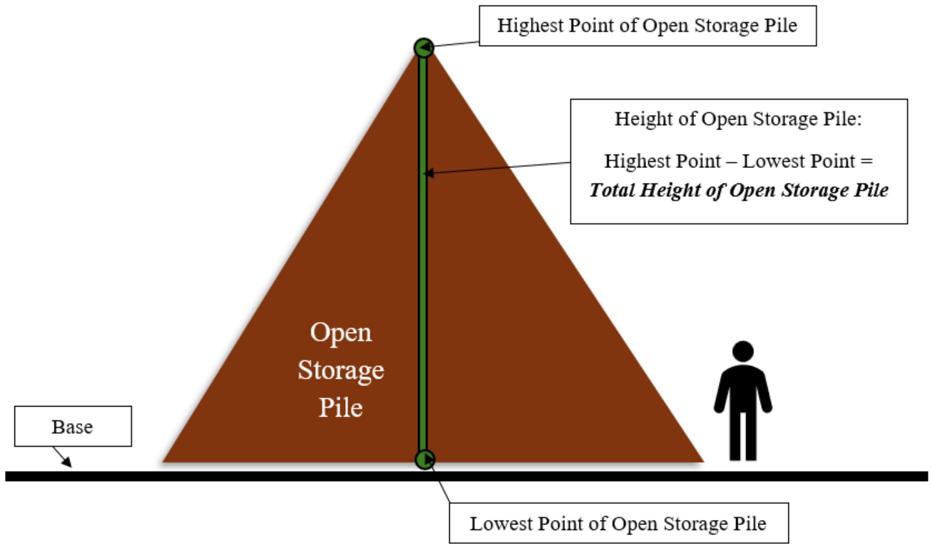
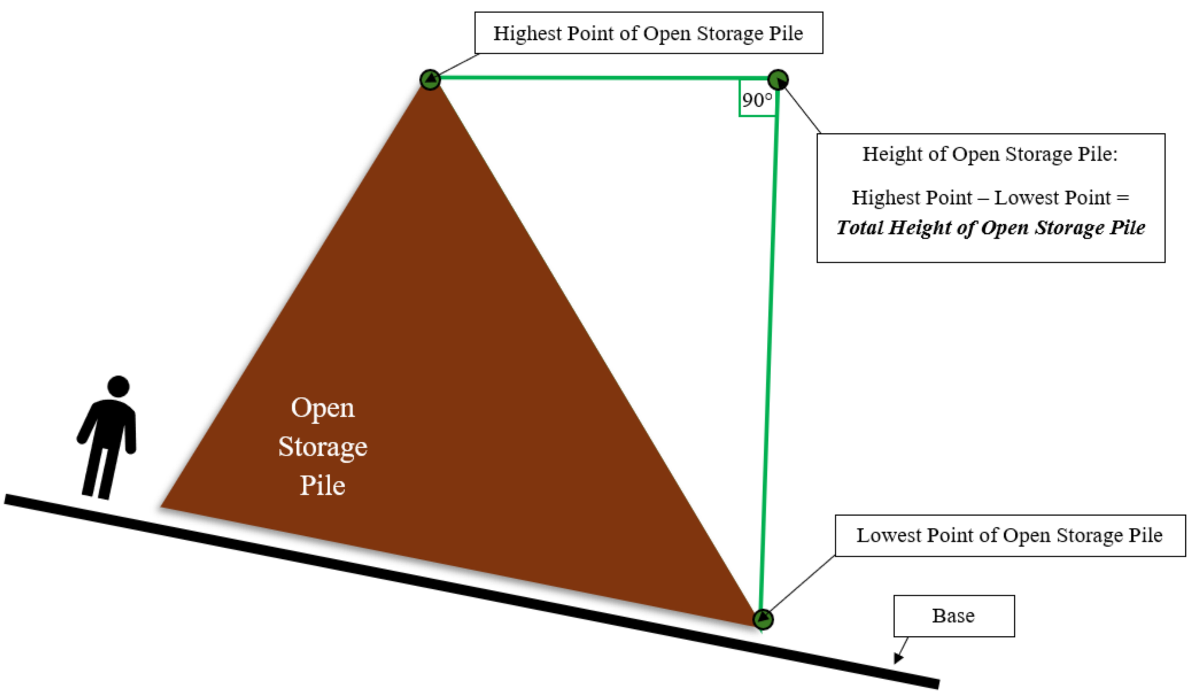
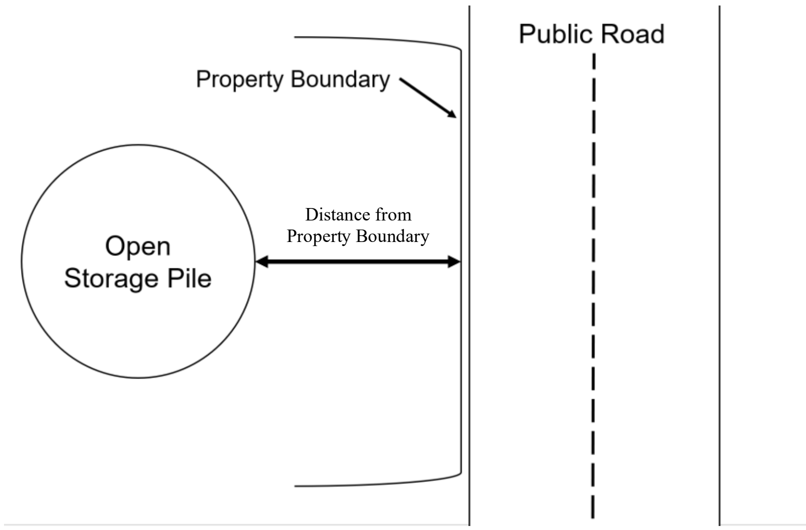


Figure 2-5: Demonstration of Open Storage Pile Height Measurement



New subparagraph (d)(6)(G) restricts Open Storage Piles from being located within 30 feet of the facility's property boundary that faces any public road. Distance of Open Storage Pile to property boundary is determined by distance of the nearest outer edge of the storage pile to the property line of the facility. Figure 2-6 shows an illustrative example of how distance between an Open Storage Pile to the property boundary is calculated. An alternative to the Open Storage Pile location restriction in this subparagraph will be outlined in new subparagraph (d)(6)(H), which will also provide alternatives to the requirements of subparagraphs (d)(6)(F) and (d)(6)(G).

Figure 2-6: Demonstration of Open Storage Pile Height Measurement



In lieu of the requirements specified in subparagraphs (d)(6)(F) and (d)(6)(G), the owner or operator of a facility or operation shall implement one of the options specified in subparagraph (d)(6)(H) by installing a Water Irrigation System, such as a sprinkler system, and either:

1. Conduct periodic inspections for all sides of the Open Storage Pile, except for areas of the Open Storage Pile that is actively disturbed during the Loading and/or Unloading activities, and operate the Water Irrigation System as necessary, except for areas of the piles that are actively disturbed during Loading and/or Unloading activities, and to meet the applicable performance standards in subparagraph (d)(1)(A).
2. Apply water to the Open Storage Pile, except for areas of the Open Storage Pile that is actively disturbed during the Loading and/or Unloading activities, using a Water Irrigation System at least once every other hour as necessary, except for areas of the piles that are actively disturbed during Loading and/or Unloading activities, and meet the applicable performance standards in subparagraph (d)(1)(A).

The first option allows the facility/operator to determine whether an Open Storage Pile would need to be stabilized depending on the inspection results. For both options, only the undisturbed areas of the Open Storage Pile would need actions taken as the disturbed areas of the Open Storage Pile would be re-stabilized at the end of each work day as described in subparagraph (d)(6)(D).

3. The third option is to install and maintain a wind barrier that meets the criteria set in subparagraph (d)(1)(F) with height equal to or greater than the height of the Open Storage Pile.
4. The last option is to store materials in a Silo or Bunker that meets the criteria set forth in clause (d)(6)(C)(ii) and, if applicable, clause (d)(6)(C)(iii) for Bunkers.

Internal Roads

Amendments to clause (d)(7)(A)(i) are administrative to provide clarifications and do not affect applicability from existing Rule 1157.

Amendments to clause (d)(7)(A)(ii) include prescribed language to include in facility signage to bring consistency across all facilities subject to PAR 1157. The signage shall inform all Haul Trucks traveling on-site to utilize roads stabilized as required in clause (d)(7)(A)(i) and must include the following language "HAUL TRUCKS SHALL USE THESE ROADS UNLESS TRAVELING TO MAINTENANCE AREAS." Since this was an existing signage requirement, a delayed implementation approach is taken for the new signage to reflect updated language and signage requirements pursuant to paragraph (i)(1).

Amendments to subparagraphs (d)(7)(B) and (d)(7)(C) are administrative to provide clarifications and do not affect applicability from existing Rule 1157.

Amendments to subparagraph (d)(7)(C) will provide administrative changes for clarification and strengthen the requirements by phasing out street sweepers purchased prior to December 3, 2004 which does not meet the criteria of PM10 efficient Rule 1186 certified sweepers. As part of the current Rule 1157 requirements, all new sweepers purchased after December 3, 2004 are required to be Rule 1186 certified sweepers. Rule 1186 certified sweepers are certified to meet a minimum pick up efficiency of 80% which provides improved performance compared to units that are not certified.

Track-Out

New subparagraph (d)(8)(A) will establish requirements for the removal of all Track-Out at the end of each work day or conclusion of each Production Work Shift, whichever is sooner. Similar requirements are established in Rule 403, and inclusion in PAR 1157 aims to reduce Fugitive Dust emissions from Aggregate or Related Operations.

Amendments to subparagraph (d)(8)(B) is administrative to provide clarifications and do not affect applicability from existing Rule 1157.

Amendments to subparagraph (d)(8)(C) include prescribed language to include in facility signage to bring consistency across all facilities subject to PAR 1157. The signage shall inform all Haul Trucks exiting the facility to comply with requirements specified in paragraph (d)(8)(B) and must include the following language "ALL LOADS MUST BE STABLIZED OR COVERED PRIOR TO EXITING THE FACILITY." Since this was an existing signage requirement, a delayed implementation approach is taken for the new signage to reflect updated language and signage requirements pursuant to paragraph (i)(1).

Subparagraphs (d)(8)(D) and (d)(8)(E) expand on requirements for the utilization of Rumble Grates, Wheel Washers, and Truck Washers. The Rumble Grates will be required to be of equal width as the facility exit with a minimum length of 10 feet to ensure proper efficacy. For example, if the facility exit is 20 feet wide, the Rumble Grates will need to be 20 feet wide to cover the entire width of the exit as well as 10 feet in length. Additionally, facilities will be required to post signage instructing drivers to go through the dedicated pathway that leads to the Rumble Grate, Wheel Washer, or Truck Washer while on the way to leave the facility. Additional information on signage requirements will be provided later in this chapter under subdivision (i).

Clauses (d)(8)(D)(v) and (d)(8)(E)(v) include prescribed language to include in facility signage to bring consistency across all facilities subject to PAR 1157. The signage informs all Haul Trucks exiting the facility to utilize Track-Out controls and must include the following language "AGGREGATE AND MIXER TRUCKS MUST STAY ON DEDICATED PATHWAY AND UTILIZE TRACK-OUT CONTROLS PRIOR TO LEAVING THE FACILITY." Implementation of this signage requirement is pursuant to the deadline specified in paragraph (i)(1).

Other Requirements

Paragraph (d)(9) of Rule 1157 is removed to improve clarity as the determination of Best Available Control Technology is determined at the time of equipment permitting.

Amendments to paragraph (d)(9) of PAR 1157, paragraph (d)(10) of Rule 1157, are administrative to provide clarifications and do not affect applicability from existing Rule 1157.

New paragraph (d)(10) will require facilities utilizing Chemical Stabilizers to maintain up to date copies of documentation for all Chemical Stabilizers used on site, such as specification sheets, direction for application, material safety data sheets, and technical data sheets .

Construction and Demolition Debris Transfer Station – Subdivision (e)

This new subdivision establishes registration requirements for a Construction And Demolition Debris Transfer Station. Construction And Demolition Debris Transfer Stations are often operating without a need to apply for South Coast AQMD permits to operate. The registration requirement outlined in subdivision (e) will provide facility information for Construction And Demolition Debris Transfer Stations to assist with the implementation of PAR 1157.

Paragraph (e)(1) applies to all Construction And Demolition Debris Transfer Stations. Within six months of PAR 1157 adoption or three months of initial operation, whichever is later, all Construction And Demolition Debris Transfer Station will be required to submit registrations with the South Coast AQMD. The registration will include the facility's name, location address, mailing address, name, telephone number, email address, and mailing address of legal owner(s), name, email address, and telephone number of site manager, hours of operation, size in acreage, and South Coast AQMD issued identification number.

Paragraph (e)(2) applies to Construction And Demolition Debris Transfer Stations that change owners after six months of PAR 1157 adoption, an updated registration must be submitted by the new owner or operator to reflect the ownership change no later than three months after the change of ownership.

Paragraph (e)(3) specifies facilities subject to the registration requirements in paragraphs (e)(1) and (e)(2) shall pay the plan filing fee pursuant to Rule 306 – Plan Fees (Rule 306) at the time of registration submittal or registration update submittal.

Recordkeeping – Subdivision (f)

Amendments to subdivision (f) include additional recordkeeping requirements for Permanent and Temporary Aggregate and Related Operations. Newly added recordkeeping provisions will assist in implementation and enforcement of both new and existing requirements. Records shall be maintained for a minimum of three years, or five for a Title V facility, and be made available to the Executive Officer upon request. Examples of recordkeeping forms that can satisfy requirements can be found in Appendix A – Examples of Recordkeeping.

Amendments to paragraph (f)(1) serve to clarify the existing rule language to include the total number of daily Aggregate and/or Mixer Tracks exiting the facility. The existing recordkeeping provision serves to determine the compliance pathways that are dependent on daily truck traffic such as the requirements in subparagraphs (d)(7)(C) and (d)(8)(E). Specifying the recordkeeping requires the daily total number of Aggregate and/or Mixer Trucks exiting the facilities better serves the purpose of this requirement.

New paragraph (f)(2) outlines records required to demonstrate compliance with applicable requirements in paragraph (d)(1) for General Performance Standards. Subparagraph (f)(2)(A) outlines recordkeeping required to demonstrate compliance with either subparagraph (d)(1)(B) or (d)(1)(C) for Material Spillage on internal Paved Roads, including date and time Material Spillage was identified, time and date of Material Spillage removal, and time and date of Dust Suppressant application with type of Dust Suppressant used. Clause (f)(2)(A)(iii) would not apply to Construction And Demolition Debris Transfer Stations.

Subparagraph (f)(2)(B) outlines recordkeeping required to demonstrate compliance with subparagraph (d)(1)(D) for all other Material Spillage and Carry-Back. Information required are the same as records required in subparagraph (f)(2)(A).

Subparagraph (f)(2)(C) outlines recordkeeping required to demonstrate compliance with gravel pad installation and maintenance requirements in subparagraph (d)(1)(E), including date of water flush and date of latest gravel pad replacement.

New paragraph (f)(3) outlines records required to demonstrate compliance with applicable requirements in paragraph (d)(6) for Open Storage Piles. Facilities will be required to maintain an up-to-date facility plot plan with identifier and location of each Open Storage Pile. Aggregate facilities and operations often move Open Storage Piles around the facility/operation based on facility needs and introduce challenges on keeping track of Open Storage Pile location as well as the Dust Suppressant application or inspection schedule for each pile. The up-to-date facility plot plan would allow the proper identification of Open Storage Piles.

Additional records for each Open Storage Piles demonstrate compliance with the applicable Dust Suppressant application and inspection requirements specified in paragraph (d)(6). This includes a detailed record of Dust Suppressant applications for each Open Storage Pile and applicable information for each inspection such as observed pile condition, facility weather conditions, and information regarding dust suppression actions taken based on inspection results.

New paragraph (f)(4) outlines records required to demonstrate compliance with applicable requirements in paragraph (d)(7). Subparagraph (f)(4)(A) outlines recordkeeping required to demonstrate compliance with clause (d)(7)(A)(i) for internal unpaved Haul Roads including time, date, and stabilizer type used. Subparagraph (f)(4)(A) outlines recordkeeping required to demonstrate compliance with subparagraph (d)(7)(B) for non-haul roads as well as parking and Staging Areas including time, date, and stabilizer type used. Subparagraph (f)(4)(C) outlines recordkeeping required to demonstrate compliance with clause (d)(7)(C)(iv) for street sweeper activity including date, time, and location sweeper was used.

Amendments to paragraph (f)(5) are administrative and do not affect applicability or requirement of existing rule language.

New paragraph (f)(6) outlines recordkeeping required to demonstrate inspection and maintenance for additional requirements triggered upon facilities due to recurrent violations specified in subdivision (h).

Amendments to paragraphs (f)(7), (f)(8), (f)(9), and (f)(10) are administrative and do not affect applicability or requirement of existing rule language.

Additional Requirements Trigger by Recurrent Violation – Subdivision (h)

In Rule 1157, this subdivision established requirements for applicable facilities or operations located within 500 meters of off-site occupied buildings, houses, or Sensitive Receptors with more than three recurrent Validated Notices Of Violation within a rolling 12-month period. PAR 1157 will amend this subdivision and restructure provisions separated into requirements for two main triggers – violations of Fugitive Dust plume requirements and violations of Track-Out requirements.

The proposed amended rule will also update qualification from off-site occupied buildings, houses, or Sensitive Receptors to focus on distance to Sensitive Receptors to be consistent with similar requirements for health protective provisions in paragraph (d)(6). Additionally, the period of validity for accrual of Validated Notice of Violation in respect to this subdivision is revised from the existing rolling 12-month period to a 36-month period. This change is to align with the three-year statute of limitation for violations. The rolling period of accrual begins on the date of issuance for any Validated Notice of Violation. For example, if a facility was issued a notice of violation in December 2021 and a subsequent violation in December 2022 and only the violation from December 2022 was validated, the rolling period for additional accruals will begin in December 2022. The qualifying distance for this subdivision has also been changed from 500 meters to an equivalent of 1,640 feet to maintain consistent units of measure throughout PAR 1157.

The first tier of requirements will be triggered at three Validated Notices of Violation, and the second tier of requirements will be triggered at six Validated Notices of Violation. The applicable facilities will have to adhere to the additional requirements triggered by recurrent violations within 90 days of resolution of the third and sixth Validated Notice of Violation.

Paragraph (h)(1) will establish requirements for applicable facilities or operations with recurrent violations of the Fugitive Dust plume requirements. The first tier of requirements for facilities exceeding three Validated Notices of Violation will require installation of wind barrier along the facility/operation property boundary facing any off-site Sensitive Receptor(s) within 1,640 feet as well as not allowing any Open Storage Piles to exceed the height of the installed wind barrier. The second tier of requirements triggered at six Validated Notices of Violation will require installation of Non-Porous Walls along the facility/operation property boundary facing any off-site Sensitive Receptor(s) within 1,640 feet and not allowing any Open Storage Pile to exceed the height of the installed Non-Porous Walls.

Paragraph (h)(2) will establish requirements for applicable facilities or operations, no larger than 25 acres or with a designed daily throughput of less than 750 tons, with recurrent violations of the Track-Out requirements. The first tier of requirements for facilities exceeding three Validated Notices of Violation will require installation of a Rumble Grate and a Wheel Washer or Truck Washer as well as prohibiting all Haul or Mixer Trucks from leaving the facility without passing through the installed wash system. The second tier, which is triggered after six Validated Notices of Violation, will require all Internal Roads used by Haul or Mixer Trucks to be paved. Also, when the second tier is triggered, Haul or Mixer Trucks will be limited to travel only on newly Paved Roads and signage will need to be posted that restricts vehicle speed to 15 miles per hour.

Paragraph (h)(3) will establish requirements for applicable facilities or operations, greater than 25 acres or with a designed daily throughput of at least 750 tons, with recurrent violations of the Track-Out requirements. The first tier, which is triggered when any facilities receives three Validated Notices of Violation, will: 1) require the installation of a Truck Washer; 2) require the replacement of any existing gravel pad or Rumble Grate; 3) prohibit all Haul or Mixer Trucks from leaving the facility without passing through the installed truck wash system. The second tier, which is triggered when any facility receives six Validated Notices of Violation, will require: 1) paving of all Internal Roads used by Haul or Mixer Trucks; 2) Haul or Mixer Trucks to only travel on newly Paved Roads; and 3) the posting of signage restricting vehicle speed to 15 miles per hour.

The accruals for Validated Notice of Violation for paragraphs (h)(1), (h)(2), and (h)(3) are all considered independent from each other. For example, a facility that was issued one Validated Notice of Violation for Track-Out and a second Validated Notice of Violation for opacity would have one count towards paragraph (h)(1) and one count towards paragraph (h)(2), or (h)(3) depending on facility applicability to either subparagraph (d)(8)(D) or (d)(8)(E).

Paragraph (h)(4) will require owners or operators of the facility/operation subject to additional requirements of subdivision (h) to conduct routine inspections and maintain appropriate recordkeeping to ensure the installed equipment and/or structures are in good working order to reduce PM10 emissions.

Paragraph (h)(5) will require owners or operators of the facility/operation subject to additional requirements of subdivision (h) to make the necessary repairs to ensure the installed equipment and/or structures are in good working order within a limited allotted time and maintain appropriate recordkeeping.

Paragraph (h)(6) provides a one-time extension to the applicable compliance dates in paragraphs (h)(1), (h)(2), (h)(3), and (h)(4) provided that the owner or operator of the facility/operation submit documentation demonstrating the delay was caused by reasons beyond the facility/operation’s control. The request must be submitted to the Executive Officer no later than 30 days prior to the applicable compliance date. Examples of documentation that can be used to substantiate the facility/operation’s claim are service utility hook up delays, permitting delays from local municipalities, or supply chain disruptions.

Paragraph (h)(7) outlines the approval process for the extension request pursuant to paragraph (h)(6). The documentation submitted by the facility/operation to substantiate that the reason was beyond the facility/operation’s control will determine whether the request is approved and how long of an extension is granted. The Executive Officer will respond in writing whether the extension was granted and the revised compliance date. In the event that an extension is denied, the facility/operation may reapply with additional information after receipt of the decision.

In an instance where a facility/operation receives one or more Notice(s) of Violation from the Executive Officer or representative regarding Rule 1157, subdivision (h) does not limit the Executive Officer’s enforcement authority to seek alternative or additional remedies available under law including, but not limited to, an administrative Order for Abatement from the Hearing Board of the South Coast AQMD (Hearing Board). Likewise, in considering any petition for an Order for Abatement, this section does not limit the discretion or authority of the Hearing Board to impose any additional mitigation determined appropriate to correct the violation(s), including imposing additional control measures not listed in subdivision (h) and/or imposing control measures for a different duration or frequency than specified in subdivision (h).

Signage Requirements – Subdivision (i)

This new subdivision establishes standardization for the installation and maintenance of on-site signage across the facility. Requirements listed in this subdivision standardize the size of required signage, promote awareness of PAR 1157 requirements, and provide the public key contact information. To account for facilities procurement of newly required signed or to update existing signage, the provisions of this subdivision will have a delayed implementation period of six months after rule amendment.

Paragraph (i)(1) established standardized format for signage required by rule requirements in subdivision (d). Signage shall be installed and maintained in a location from six to seven feet above grade as measured from the bottom of the sign and be made visible to all drivers of Aggregate or Mixer Trucks traveling across the facility/operation. Letters used in the required signage shall be at least four inches tall with text contrasting sign backgrounds. Examples of color combination includes, but are not limited to, white text on black background and black text on white background.

Paragraph (i)(2) establishes requirement to install and maintain an outward facing sign to provide contact information of both the facility and South Coast AQMD in the event of air quality issues from the facility. The required signage shall be visible to the public with a minimum dimension of 48 inches by 96 inches and installed in a location between six to seven feet above grade from the bottom of the sign. Signage must be within 50 feet of each entrance to the facility. If two entrances are within 50 feet of each other, one sign is sufficient for both entrances. Signage must be constructed with on-inch-thick A/C laminated plywood board or a similar material with equivalent strength and durability. Letters used in the required signage shall be at least four inches tall with text contrasting sign backgrounds, same as signage required in paragraph (i)(1). The notification statements for the signs is required to be in both English and Spanish as specified in Table 2-2. The notification statement provides placeholder language which would be the facility-specific contact information and phone number. Facility contact number must be either a local or toll-free number that is assessable to the public 24 hours per day and 7 days per week.

Table 2-2: Notification Statement Required for Paragraph (i)(2)

English Notification Statement	Spanish Notification Statement
“TO REPORT AIR QUALITY ISSUES SUCH AS DUST FROM THIS FACILITY, PLEASE CALL [FACILITY CONTACT AND PHONE NUMBER] OR THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT AT 1-800-CUT-SMOG”;	“PARA REPORTAR PROBLEMAS DE CALIDAD DEL AIRE COMO OLORES, POLVO O HUMO DE UNA INSTALACIÓN, LLAME A [CONTACTO DE LA INSTALACIÓN Y NÚMERO DEL TELÉFONO] O AL EL DISTRITO DE ADMINISTRACIÓN DE LA CALIDAD DEL AIRE DE LA COSTA SUR AL 1-800-CUT-SMOG”.

For Construction And Demolition Debris Transfer Stations, the implementation timeline for signage in subdivision (i) is consistent with the phase in implementation schedule for Construction And Demolition Debris Transfer Stations specified in paragraph (j)(12).

Exemptions – Subdivision (j)

Amendments to paragraphs (j)(1) through (j)(9) are administrative and do not affect applicability or requirement of existing rule language.

Clarifications to paragraph (j)(10) specify that facilities applicable to this paragraph are exempt from installing and operating a Wheel Washer pursuant to the requirements of paragraph (d)(8). However, the facility could still be required to install a Wheel Washer pursuant to the new PAR 1157 requirements of subdivision (h), if applicable.

Amendments to paragraph (j)(11) are administrative and do not affect applicability or requirement of existing rule language.

New paragraph (j)(12) will add a limited exemption for Construction And Demolition Debris Transfer Stations. Within the first six months after PAR 1157 adoption, Construction And Demolition Debris Transfer Stations will be exempt from the applicable requirements listed in subdivision (d) and subdivision (f). The delayed period of implementation allows owners or operators of applicable Construction and Demolition Debris Transfer Stations to submit applicable registration with the South Coast AQMD as well as providing additional time for facilities to install necessary equipment and signage to comply with PAR 1157. Six months after PAR 1157 has been adopted, the Construction And Demolition Debris Transfer Station will be subject to all requirements of PAR 1157.

New paragraph (j)(13) provides an exemption for facilities subject to South Coast AQMD Rule 410 – Odors From Transfer Stations and Material Recovery Facilities (Rule 410). Rule 410 applies to new and existing transfer stations and material recovery facilities with a permitted throughput greater than 100 tons per day. This exemption serves to exclude facilities which handle a combination of Construction And Demolition Debris with other materials such as municipal solid waste. Exempt facilities are still potentially subject to Fugitive Dust requirements of Rule 403. Transfer Stations, which exclusively handle Construction And Demolition Debris, are not subject to Rule 410 and will be subject to PAR 1157.

Alternative Control Options – Subdivision (i)

PAR 1157 will remove the original subdivision (i) regarding Alternative Control Options, which allowed for a Facility/Operation to demonstrate compliance with Rule 1157 in lieu of using Dust Suppressants by submitting of a plan to achieve equivalent emission reductions with alternative control measures. The submitted plan must be approved by the Executive Officer as well as the U.S. Environmental Protection Agency.

Staff is unaware of any facilities opting to comply with Rule 1157 with the alternative compliance option outlined in this subdivision since the rule was originally adopted on January 7, 2005.

CHAPTER 3- IMPACT ASSESSMENT

EMISSIONS AND EMISSION REDUCTIONS

Amendment to PAR 1157 mainly focuses on setting minimum dust control frequencies and improved recordkeeping to assist in the enforcement of dust control measures already required in Rule 1157. The proposed amendments for recordkeeping provisions include new specifications for recordkeeping materials and do not change emission reduction potential compared with existing recordkeeping requirements. Therefore, there will not be any additional emission reductions from enhanced recordkeeping requirements. The additional requirements that will only be triggered by recurrent Notices of Violations are intended to serve as a deterrent to violating rule requirements, and staff do not foresee any facilities triggering these additional requirements.

Construction and demolition debris transfer stations are subject to the fugitive dust requirements in Rule 403 and therefore, have already implemented multiple measures that will be required by PAR 1157. PAR 1157 will require construction and demolition debris transfer stations to install rumble grates and gravel pads. Rumble grates have an 80% control efficiency[8], as such the installation of rumble grates would reduce PM10 emissions from construction and demolition debris transfer stations. More robust emission data is necessary to accurately quantify the emission reductions from construction and demolition debris transfer stations.

COST AND COST-EFFECTIVENESS

Implementation Costs

The proposed amendments to Rule 1157 would enhance recordkeeping and accountability of current rule requirements. Enhancements would include specifying dust control and maintenance frequencies as well as improved recordkeeping. While staff does not expect facilities to violate the requirements in PAR 1157, if repeated violations occur, PAR 1157 contains provisions triggering additional requirements. The additional requirements are intended to serve as a deterrent for facilities to remain in compliance with Rule 1157 and are not applicable to all facilities subject to the rule. As a result, the cost impacts are expected to be minimal for facilities currently subject to Rule 1157 requirements.

For construction and demolition debris transfer stations that are not subject to the current Rule 1157, staff foresee potential costs associated with newly required equipment. Construction and demolition debris transfer stations are currently subject to the fugitive dust requirements in Rule 403; however, PAR 1157 includes provisions which go beyond Rule 403 requirements by including provisions for affected facilities to implement dust control measures, such as installing gravel pads and rumble grates.

PAR 1157 also includes registration requirements for construction and demolition debris transfer stations which will incur a registration fee as set forth in Rule 306. Staff also assume four hours of additional staff time would be needed to complete the registration documentation for each facility. Staff are evaluating additional potential costs for these facilities and will include additional information on findings as part of the Socioeconomic Impact Assessment.

[8] South Coast Air Quality Management District. (2005, January). Final staff report: Proposed Rule 1157 – PM10 emission reductions from aggregate and related operations.

Cost-Effectiveness

Cost-effectiveness is the analysis of costs-to-benefits by comparing the cost of rule implementation compliance to the potential emission reduction outcomes. South Coast AQMD generally compares factors such as initial capital costs, operating and maintenance costs, and installation costs to the anticipated emission reductions that will result in the South Coast AQMD jurisdiction and calculates the cost of removing one ton of pollutant as a result of implementing a new or amended rule or regulation.

Since the emission reductions from the newly added construction and demolition debris transfer stations cannot be quantified, the cost-effectiveness of PAR 1157 cannot be calculated at this time. To provide transparency of the cost considerations for the PAR 1157, the estimated implementation costs as previously discussed in the prior sections are also considered in the Socioeconomic Impact Assessment of this Staff Report.

Incremental Cost-Effectiveness

Health and Safety Code Section 40920.6(a)(3) requires the South Coast AQMD to perform an incremental cost-effectiveness analysis prior to adopting rules to meet the requirements for a Best Available Retrofit Control Technology (BARCT) rule, or to implement feasible measures pursuant to use of an alternative emission reduction strategy under Health and Safety Code Section 40914. However, this requirement does not apply to particulate matter. (Health and Safety Code Section 40910.) Since PAR 1157 is not being adopted to meet a BARCT requirement or incorporate a feasible measure pursuant to an alternative reduction strategy under Health and Safety Code Section 40914, an incremental cost-effectiveness analysis is not required and has not been prepared.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Pursuant to CEQA Guidelines Sections 15002(k) and 15061, the proposed project (PAR 1157) is exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3). A Notice of Exemption will be prepared pursuant to CEQA Guidelines Section 15062, and if the proposed project is approved, the Notice of Exemption will be filed with the county clerks of Los Angeles, Orange, Riverside, and San Bernardino counties, and with the State Clearinghouse of the Governor's Office of Land Use and Climate Innovation.

SOCIOECONOMIC IMPACT ASSESSMENT

On March 17, 1989, the South Coast AQMD Governing Board adopted a resolution which requires an analysis of the socioeconomic impacts associated with adopting and amending rules and regulations. In addition, Health and Safety Code Sections 40440.8 and 40728.5 require a socioeconomic impact assessment for proposed and amended rules resulting in significant impacts to air quality or emission limitations. Thus, this Socioeconomic Impact Assessment has been prepared in accordance with Health and Safety Code and South Coast AQMD Governing Board requirements, and it addresses the type of industries or businesses affected and the range of probable costs.

Lastly, since PAR 1157 is not being amended to meet a BARCT requirement or incorporate feasible measures pursuant to an alternative reduction strategy under Health and Safety Code Section 40914, the requirement set forth in Health and Safety Code Section 40920.6 to conduct an incremental cost-effectiveness analysis for a proposed rule or amendment which imposes BARCT or "all feasible measures" requirements relating to emissions of ozone, carbon monoxide (CO), sulfur oxides (SOx), nitrogen oxides (NOx), volatile organic compounds (VOC), and their precursors is not applicable to this project. Therefore, an incremental cost-effectiveness analysis is not required for PAR 1157 and has not been prepared.

INTRODUCTION

Rule 1157, which contains requirements for aggregate and related operations to reduce PM10 emissions, is being amended to address community concerns regarding further reducing PM10 emissions from aggregate and related operations located in areas of high facility concentration in the South Coast AQMD jurisdiction.

PAR 1157 seeks to: 1) expand the applicability to include construction and demolition debris transfer stations; 2) specify frequencies for when the application of dust control/suppressants or chemical stabilizers is required; 3) add enhanced recordkeeping requirements; 4) expand requirements that are triggered by recurring violations; and 5) remove obsolete requirements. Costs associated with implementing PAR 1157 include: 1) installation of prescriptive signage at all affected facilities; 2) installation of rumble grates and gravel pads at transfer station facilities that handle construction and demolition debris; and 3) requiring transfer station facilities that handle construction and demolition debris to register with the South Coast AQMD. Implementing the dust control requirements and enhanced recordkeeping provisions in PAR 1157 are expected to have minimal to no cost for the affected facilities. Lastly, PAR 1157 proposes the addition of more stringent requirements to be imposed on any facility with recurring violations. Since no recurring violations have been observed at facilities currently subject to Rule 1157, these requirements are intended as a deterrent. The potential costs associated with these requirements are presented in the Implementation Cost section for informational purposes only.

LEGISLATIVE MANDATES

The legal mandates directly related to the Socioeconomic Impact Assessment of PAR 1157 include South Coast AQMD Governing Board resolutions and various sections of the Health and Safety Code.

South Coast AQMD Governing Board Resolution

On March 17, 1989, the South Coast AQMD Governing Board adopted a resolution that calls for an economic analysis associated with adopting and amending rules and regulations that consider all of the following elements:

- Affected industries;
- Range of probable costs;
- Cost-effectiveness of control alternatives; and
- Public health benefits.

The economic elements outlined in the March 17, 1989 resolution are also required by various Health and Safety Code sections which are discussed in the following section.

Health and Safety Code Requirements

The state legislature adopted legislation which reinforces and expands the South Coast AQMD Governing Board resolution requiring socioeconomic impact assessments for rule development projects. Health and Safety Code Section 40440.8 requires a socioeconomic impact assessment for any proposed rule, rule amendment, or rule repeal which "will significantly affect air quality or emissions limitations."

To satisfy the requirements in Health and Safety Code Section 40440.8, which includes requirements defined in Health and Safety Code 40922, the scope of the socioeconomic impact assessment should include all of the following information, as applicable:

- Type of affected industries;
- Impact on employment and the regional economy;
- Range of probable costs, including those to industry;
- Availability and cost-effectiveness of alternatives to the rule;
- Emission reduction potential; and
- Necessity of adopting, amending, or repealing the rule in order to attain state and federal ambient air quality standards.

The compliance cost of PAR 1157 is estimated to be less than one million U.S. dollars per year, which is less than the minimum threshold necessary for conducting macroeconomic modeling that would produce reliable employment impact estimates. Therefore, a job impact analysis was not conducted for PAR 1157.

Health and Safety Code Section 40728.5 requires the South Coast AQMD Governing Board to: 1) actively consider the socioeconomic impacts of regulations; 2) make a good faith effort to minimize adverse socioeconomic impacts; and 3) include small business impacts. To satisfy the requirements in Health and Safety Code Section 40728.5, the socioeconomic impact assessment typically includes the following information:

- Type of industries or business affected, including small businesses; and
- Range of probable costs, including costs to industry or business, including small business.

Finally, Health and Safety Code Section 40920.6 requires an incremental cost-effectiveness analysis for a proposed rule or amendment which imposes BARCT or "all feasible measures" requirements relating to emissions of ozone, CO, SOx, NOx, VOC, and their precursors. However, PAR 1157 is not being amended to meet a BARCT requirement nor is it being amended as a feasible measure pursuant to an alternative reduction strategy under Health and Safety Code Section 40914. Therefore, an incremental cost-effectiveness analysis is not required and has not been prepared.

Public Health

PAR 1157 does not have quantifiable emission reductions; therefore, a health impacts assessment with quantified avoided health incidences cannot be performed. However, by controlling PM10 emissions from dust sources at the affected facilities subject to PAR 1157, public health benefits are expected from the minimization of short- and long-term exposures to PM10 via inhalation which can help avoid adverse outcomes of: 1) decreased lung function; 2) irritation of airways 3) worsening asthma; 4) chronic obstructive pulmonary disease; and 5) and irregular heartbeats.[9]

Cost-Effectiveness of Control Alternatives

Health and Safety Code Section 40440.8(b)(4) requires an assessment of the availability and cost-effectiveness of alternatives to the proposed rule or regulation per the definition of "Socioeconomic Impact" as set forth in Health and Safety Code Section 40922. Cost-effectiveness is the analysis of cost-to-benefit by comparing the relative cost of implementing the new or amended rule or regulation to the emission reduction outcomes. Since the emission reductions are not quantifiable for PAR 1157, the cost-effectiveness of control alternatives for PAR 1157 also cannot be quantified.

AFFECTED FACILITIES AND INDUSTRIES

Implementation of PAR 1157 would affect approximately 862 facilities in the South Coast AQMD jurisdiction with 438 facilities in Los Angeles County, 156 facilities in Orange County, 136 facilities in San Bernardino County, and 132 facilities in Riverside County. Of the 862 facilities, 177 qualify as construction and demolition debris transfer station facilities which will be newly applicable to PAR 1157. Table 3-1 presents the distribution of 862 affected facilities across various North American Industrial Classification System (NAICS) sectors. More than half of the affected facilities are from the sectors of Waste Management and Remediation Services (NAICS 562), State and Local Government (NAICS 92), and Nonmetallic Mineral Product Manufacturing (NAICS 327), which account for about 22.6 percent, 14.4 percent, and 13.5 percent of all the affected facilities, respectively.

Table 3-1: PAR 1157 Affected Industries

NAICS	Industry Name	Number of Facilities	Percentage of Facilities
562	Waste management and remediation services	195	22.62%
92	State and Local Government	124	14.39%
327	Nonmetallic mineral product manufacturing	116	13.46%
42	Wholesale trade	72	8.35%
23	Construction	45	5.22%
44-45	Retail trade	36	4.18%
324	Petroleum and coal products manufacturing	31	3.60%
326	Plastics and rubber product manufacturing	24	2.78%
325	Chemical manufacturing	24	2.78%
561	Administrative and support services	23	2.67%
22	Utilities	18	2.09%
212	Mining (except oil and gas)	17	1.97%

[9] California Air Resources Board (CARB), Inhalable Particulate Matter and Health (PM2.5 and PM10), https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health, accessed July 2026.

NAICS	Industry Name	Number of Facilities	Percentage of Facilities
331	Primary metal manufacturing	13	1.51%
54	Professional, scientific, and technical services	10	1.16%
332	Fabricated metal product manufacturing	8	0.93%
532-533	Rental and leasing services; Lessors of nonfinancial intangible assets	8	0.93%
484	Truck transportation	8	0.93%
339	Miscellaneous manufacturing	8	0.93%
531	Real estate	5	0.58%
311	Food manufacturing	4	0.46%
61	Educational services	3	0.35%
312	Beverage and tobacco product manufacturing	3	0.35%
333	Machinery manufacturing	3	0.35%
313-314	Textile mills; Textile product mills	3	0.35%
321	Wood product manufacturing	3	0.35%
322	Paper manufacturing	3	0.35%
482	Rail transportation	3	0.35%
812	Personal and laundry services	2	0.23%
813	Membership associations and organizations	2	0.23%
111-112	Farm	2	0.23%
3364-3369	Other transportation equipment manufacturing	2	0.23%
721	Accommodation	1	0.12%
722	Food services and drinking places	1	0.12%
334	Computer and electronic product manufacturing	1	0.12%
517	Telecommunications	1	0.12%
493	Warehousing and storage	1	0.12%
621	Ambulatory health care services	1	0.12%
211	Oil and gas extraction	1	0.12%
624	Social assistance	1	0.12%
713	Amusement, gambling, and recreation	1	0.12%
487-488	Scenic and sightseeing transportation; Support activities for transportation	1	0.12%
115	Agriculture and forestry support activities	1	0.12%
335	Electrical equipment and appliance manufacturing	1	0.12%
3361-3363	Motor vehicles, bodies and trailers, and parts manufacturing	1	0.12%
*Unclassified	N/A	31	3.59%

NAICS	Industry Name	Number of Facilities	Percentage of Facilities
Total		**862**	**100%**

*Facilities with no NAICS codes assigned are categorized as "unclassified."

SMALL BUSINESS ANALYSIS

For the purpose of assessing fees, the South Coast AQMD defines a small business in Rule 102 as one which employs 10 or fewer persons and which earns less than $500,000 in gross annual receipts. For the purpose of qualifying for access to services from the South Coast AQMD's Small Business Assistance Office, a small business has annual receipts of $5 million or less, or has 100 or fewer employees. In addition to the South Coast AQMD's criteria for small businesses, the United States (U.S.) Small Business Administration and the federal 1990 Clean Air Act Amendments (1990 CAAA) each have their own definition of a small business.

The 1990 CAAA classifies a business as a "small business stationary source," if among other conditions, it: 1) employs 100 or fewer employees; 2) does not emit more than 10 tons per year of either VOC or NOx in an extreme nonattainment area for ozone; and 3) is a small business as defined by the U.S. Small Business Administration.[10,11] Based on firm revenue and employee count, the U.S. Small Business Administration definition of a small business varies by six-digit NAICS codes.[12] Most of the facilities potentially affected by PAR 1157 are within the Ready Mix Concrete Manufacturing industry (NAICS 327320), and based on the U.S. Small Business Administration definition, businesses with fewer than 500 employees in this industry are classified as small businesses.

The small business analysis of facilities potentially affected by PAR 1157 relied mostly on Dun and Bradstreet data. In cases where the Dun and Bradstreet data are unavailable or unreliable, other external data sources such as Manta, Hoover, LinkedIn, and company website data were used. The determination of data reliability is based on data quality confidence codes in the Dun and Bradstreet data as well as South Coast AQMD staff's discretion. Revenue and employee data for publicly owned companies was retrieved from filings with the Securities and Exchange Commission (SEC). Since subsidiaries have shared business interests with their parent company, the revenue and employee data of each facility's parent company, as applicable, was used for determining their small business status.

Of the 862 affected facilities, 117 are classified in the State and Local Government sector (NAICS 92), which are not private businesses and thus are excluded from the small business analysis. Of 745 remaining non-government facilities, employment and revenue estimates from 2025 Dun and Bradstreet data as well as other external sources are only available for 608 facilities. Although the

[10] Office of the Law Revision Control: United States Code, Title 42 – The Public Health and Welfare, Chapter 83 – Energy Extension Service, Subchapter V-Permits, §7661f. Small business stationary source technical and environmental compliance assistance program, (c) Eligibility, https://uscode.house.gov/view.xhtml?req=code+of+federal+regulations&f=treesort&num=2110, accessed July 2026.

[11] For the threshold of 10 tons per year of VOC/NOx emission for extreme nonattainment areas, please refer to National Archives and Records Administration, Title 40 – Protection of Environment, Chapter 1 – Environmental Protection Agency, Subchapter C – Air Programs, §51.165(a)(1)(iv)(A)(1)-(2), https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-51/subpart-I, accessed July 2026.

[12] U.S. Small Business Administration, 2023 Small Business Size Standards, https://www.sba.gov/document/support-table-size-standards, accessed July 2026.

employment and revenue data for some facilities are unknown or missing, the current data relied upon for this small business analysis represents the most thorough and accurate information available to date.

Table 3-2 presents the number of affected facilities that qualify as small businesses, based on each of the four small business definitions. For the 608 facilities with available employment and revenue data, 440 facilities may qualify as small businesses under the U.S. Small Business Administration definition, which yields the largest proportion (72.4 percent) of small businesses among the four definitions. Note that only 114 of the 608 facilities have reported their annual VOC and/or NOx emissions to the South Coast AQMD, and 42 of these facilities qualify as small businesses, based on the 1990 CAAA definition.

Table 3-2: Number of Small Businesses Based on Various Definitions

Small Business Definition	Number of Facilities	Percentage of Facilities Qualifying as Small Businesses
South Coast AQMD Rule 102	60	9.87%
South Coast AQMD Small Business Assistance Office	410	67.43%
U.S. Small Business Administration	440	72.37%
1990 CAAA	42	6.91%

IMPLEMENTATION COSTS

By adding construction and demolition debris transfer stations to the universe of facilities that would be subject to PAR 1157, additional provisions would apply that extend beyond the existing fugitive dust requirements in Rule 403[13] and Rule 1157. For example, the new elements of PAR 1157 will now require construction and demolition debris transfer station facilities to: 1) register with the South Coast AQMD which is subject to a plan filing fee in Rule 306; and 2) install gravel pads and rumble grates under certain conditions.[14] Additionally, each of the 862 facilities subject to PAR 1157, which include the existing facilities currently subject to Rule 1157, will be required to install four prescriptive signs. Implementation Costs associated with implementing PAR 1157 are projected to occur over a 25-year period, from 2027 through 2051, based on the expected 25-year useful life of each prescriptive sign. The following section discusses the anticipated costs associated with PAR 1157, presented in 2025 dollars.

Registration Fees

The 177 construction and demolition debris transfer station facilities will be required to register with the South Coast AQMD and incur a plan filing fee under Rule 306. The amount of the applicable plan filing fee will be based on whether the facility qualifies as a major source of emissions as defined in Regulation XXX – Title V permits. However, since these construction and demolition debris transfer station facilities do not currently have permits, the available facility-

[13] South Coast AQMD, 2005, Rule 403 – Fugitive Dust, https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf, accessed July 2026.

[14] South Coast AQMD, 2026, Rule 306 – Plan Fees, https://www.aqmd.gov/docs/default-source/rule-book/reg-iii/rule-306.pdf, accessed July 2026.

specific information is limited such that the number of facilities that would qualify as a Title V facility is unknown. For a worst-case analysis that represents the potential maximum registration fees that could be incurred, all 177 construction and demolition debris transfer stations are assumed to be Title V facilities. The plan-filing fee is $280.15 per Title V facility therefore the maximum total registration fees for all 177 transfer station facilities is $49,587. However, as a practical matter, the actual registration fees will likely be less since not all facilities are expected to qualify as Title V. Consistent with the Socioeconomic Impact Assessment for the adoption of Rule 1460[15] in 2022, this analysis assumed that four hours of additional staff time at a rate of $30 per hour (adjusted to 2025 dollars) would be needed to complete the registration documentation for each facility. Therefore, the total labor cost to complete the registration documentation for all 177 transfer stations is $21,240. As such the total cost to register the 177 transfer stations over the 25-year analysis period is approximately $70,827.

Purchase and Installation of Rumble Grates

It is anticipated that the 177 construction and demolition debris transfer station facilities will need to install rumble grates in accordance with the proposed dust control measures in PAR 1157. As noted earlier in this Staff Report, the average facility has a standard 8-foot-wide entrance/exit. Since each rumble grate measures 4 feet by 8 feet, an average facility would require two rumble grates (one set). While some facilities may have entrances/exits that are smaller or larger (or more than one) and these facility-specific differences may require fewer or additional rumble grates, as applicable, this analysis assumes that all 177 construction and demolition debris transfer stations have a standard-sized entrance/exit and would each require one set of two rumble grates.[16] Based on stakeholder feedback, the cost of each set of rumble grate is estimated at $7,000. Consistent with the Socioeconomic Impact Assessment for the adoption of Rule 1157 in 2005[17], the installation cost of rumble grates is assumed to be 10 percent of the purchase price, or $700 per set. As such, if 177 transfer station facilities install one pair of rumble grates at $7,700 per facility, the one-time cost of purchasing and installing rumble grates will be $1,362,900. Stakeholders indicated a 10-year useful life for rumble grates, meaning each installed rumble grate will need to be replaced every 10 years. Therefore, over the 25-year analysis period, the initial purchase will occur in 2027, and then the first replacement will occur in 2037, and second replacement will occur in 2047. However, because the analysis only runs through 2051, only the first five years' worth of costs from the second replacement are included. As such, the total cost for all 177 transfer stations is $3,407,250 over the 25-year analysis period as calculated in Table 3-3:

Table 3-3: Cost Calculation for Rumble Grates Over 25-year Analysis Period

Purchase Period	Cost Calculation

[15] South Coast AQMD, 2022, Governing Board Meeting Agenda No. 28, Proposed Rule 1460 - Control of Particulate Emissions from Metal Recycling and Shredding Operations, Final Socioeconomic Impact Assessment within Final Staff Report, Attachment G, https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2022/2022-Nov4-028.pdf, accessed July 2026.

[16] Data on the actual exit dimensions for the 177 construction and demolition transfer stations is not available; therefore, this analysis assumes a standard exit width for all facilities when estimating the number of rumble grates needed.

[17] South Coast AQMD, January 2005, Governing Board Meeting Agenda No. 24, Proposed Rule 1157 - PM10 Emission Reductions from Aggregate and Related Operations, Final Socioeconomic Report, Attachment D, https://xappp.aqmd.gov/hb/2005/January/050124a.html, accessed July 2026.

Initial purchase (2027-2036)	177 transfer stations * $7,700 = $1,362,900
First Replacement (2037–2046)	$1,362,900.00
Second Replacement (2047-2051)	(5/10 useful-life years) *$1,362,900 = $681,450
Total Cost (2027-2051)	**$3,407,250**

Purchase and Installation of Gravel Pads

Construction and demolition debris transfer station facilities are also anticipated to install gravel pads in accordance with the dust control measures in PAR 1157. Based on stakeholder feedback, the cost of a gravel pad is $2,000. Consistent with assumptions for calculating the costs associated with the installation of rumble grates, the installation cost of gravel pads is assumed to be 10 percent of the purchase price, or $200 per gravel pad. As such, if 177 transfer station facilities install a gravel pad at $2,200 per facility, the one-time cost of purchasing and installing rumble grates will be $389,400. The rumble grates have an assumed 10-year useful life, meaning they are assumed to be repurchased every 10 years. Therefore, over the 25-year analysis period, the initial purchase will occur in 2027, and then the first replacement will occur in 2037, and second replacement will occur in 2047. However, because the analysis only runs through 2051, only the first five years' worth of costs from the second replacement are included. As such, the total cost for all 177 transfer stations is $973,500 over the 25-year analysis period as calculated in Table 3-4:

Table 3-4: Cost Calculation for Gravel Pads Over 25-year Analysis Period

Purchase Period	Cost Calculation
Initial purchase (2027-2036)	· 177 transfer stations * $2,200$= $389,400$
First Replacement (2037–2046)	$$389,400
Second Replacement (2047-2051)	(5/10 useful-life years) *$389,400= $194,700
Total Cost (2027-2051)	**$973,500**

Purchase and Installation of Prescriptive Signs

All 862 facilities that will be subject to PAR 1157, which include the existing facilities subject to the current Rule 1157 plus the newly added construction and demolition debris transfer station facilities, are anticipated to install four prescriptive signs per facility. Each sign costs approximately $1,127.45.[18] Similar to the cost assumptions made for the installation of rumble

[18] The cost for the prescriptive sign is based on the past Socioeconomic Impact Assessment for the 2022 amendments to Rule 1460 - Control of Particulate Emissions from Metal Recycling and Shredding Operations. For further detail please see: South Coast AQMD, November 2022, Governing Board Meeting Agenda No. 28, Proposed Rule 1460 - Control of Particulate Emissions from Metal Recycling and Shredding Operations, Final Socioeconomic Impact Assessment within the Final Staff Report, Attachment G, p. 63, https://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2022/2022-Nov4-028.pdf, accessed July 2026.

grates and gravel pads, this analysis assumed an installation cost equal to 10 percent of the sign purchase price (or $112.75 per sign). Therefore, the cost for each facility to install four prescriptive signs is approximately $4,960.78, and the total cost for all 862 affected facilities to purchase and install prescriptive signs is calculated to be $4,276,192 for the 25-year forecast period.

Total Costs of Implementing PAR 1157

The total estimated costs of implementing PAR 1157 cover a 25-year forecast period, from 2027 to 2051, based on the 25-year useful life of a prescriptive sign. To calculate the present value of the total implementation costs, all amortized/annualized implementation costs have been discounted to year 2026. Table 3-5 presents the present value as well as annual average of the amortized costs from 2027 to 2051. The total present value of the amortized implementation costs of PAR 1157 is estimated to be $10,467,436 and $7,425,054 at a one percent and four percent discount rate, respectively. The average annual implementation cost over the period from 2027 to 2051 is estimated to range from $378,609 to $475,292 at a one percent to four percent real interest rate, respectively.

Table 3-5: Estimated Implementation Costs of PAR 1157

Cost Categories	Present Value (2026)		Annual Average (2027-2051)	
	1% Discount Rate	4% Discount Rate	1% Real Interest Rate	4% Real Interest Rate
Registration Fees	$96,008	$68,103	$3,184	$4,359
Rumble Grates	$3,558,290	$2,524,066	$142,473	$161,570
Gravel Pads	$1,016,654	$721,162	$40,707	$46,163
Prescriptive Signs	$5,796,483	$4,111,723	$192,246	$263,199
Total	**$10,467,436**	**$7,425,054**	**$378,609**	**$475,292**

Compliance Costs Associated with Recurrent Violations

PAR 1157 contains requirements, as outlined in Subdivision (h) – Additional Requirements Triggered by Recurrent Violation, that are only triggered for any facility with multiple, recurring violations. No recurring violations have been observed at facilities which are currently subject to Rule 1157 and it is not possible to forecast future violations. As such, the proposed addition of the requirements in subdivision (h) is intended primarily as a deterrent. Therefore, the costs associated with triggering the requirements in subdivision (h) in order to return to compliance with PAR 1157, which are presented in Table 3-6, have been provided for informational purposes only. The costs shown are examples of what the potential future costs could be; however, the actual costs are unknown and will be dependent upon facility-specific circumstances associated with the violations, if any, that have occurred.

Table 3-6: Recurrent Violation Costs by Type of Violation

<table>
<tr><th></th><th>Required Equipment*</th><th>Per Unit Capital Cost</th><th>Operating and Maintenance Cost</th></tr>
<tr><td colspan="4">Paragraph (h)(1) - Recurrent Violations of the Fugitive Dust Plume requirements</td></tr>
<tr><td>First Tier</td><td>Wind barrier**</td><td>$2,722.96 per wind barrier</td><td>N/A</td></tr>
<tr><td>Second Tier</td><td>Non-porous wall***</td><td>$36 per square foot</td><td>N/A</td></tr>
<tr><td colspan="4">Paragraph (h)(2) - Recurrent Violations of the Track-Out Requirements:
Applicable to facilities or operations no larger than 25 acres
and with a designed daily throughput of less than 750 tons</td></tr>
<tr><td>First Tier</td><td>Installation of rumble grate in combination with either wheel washer or truck washer****</td><td>• Rumble grate (one set): $7,700
• Wheel washer (includes installation and soil preparation cost): $122,623.35
• Truck washer: $1,353.09 per pressure washer</td><td>• Rumble grate: N/A
• Wheel washer operating and maintenance cost: $10,218.61
• Wheel and truck washer water cost: $4.69 per 1,000 gallons of water</td></tr>
<tr><td rowspan="2">Second Tier</td><td>Paving of internal roads used by haul or mixer trucks*****</td><td>$7.20 per square foot</td><td>N/A</td></tr>
<tr><td>Installation of signage restricting vehicle speed to 15 miles per hour</td><td>$1,240.20 per sign</td><td>N/A</td></tr>
<tr><td colspan="4">Paragraph (h)(3) - Recurrent Violations of the Track-Out Requirements:
Applicable to facilities or operations greater than 25 acres
with a designed daily throughput of at least 750 tons</td></tr>
<tr><td>First Tier</td><td>Truck washer</td><td>$1,353.09 per pressure washer</td><td>Truck washer water cost: $4.69 per 1,000 gallons of water</td></tr>
</table>

	Required Equipment*	Per Unit Capital Cost	Operating and Maintenance Cost
	Replacement of all existing rumble grates and/or gravel pads	• Rumble grates (one set): $7,700 • Gravel pads: $2,200 per gravel pad	N/A
Second Tier	Paving of internal roads used by haul or mixer trucks	$7.20 per square foot	N/A
	Installation of signage restricting vehicle speed to 15 miles per hour	$1,240.20 per sign	N/A

*Costs for rumble grates, gravel pads, and signs are derived from the Implementation Costs section.

**Costs were derived from the Final Socioeconomic Impact Assessment for the 2017 amendments to Rule 1466 and converted from 2016 to 2025 dollars using the Marshall and Swift Index (South Coast AQMD, December 2017, Governing Board Item 33, Attachment G, p. 11: https://www.aqmd.gov/docs/default-source/agendas/governing-board/2017/2017-dec1-033.pdf).

***Costs were calculated using the Caltrans Contract Cost Data tool by searching "Structure Concrete" and averaging 2025 costs (https://sv08data.dot.ca.gov/)

****Wheel washer costs were derived from the Final Socioeconomic Impact Assessment for the 2005 adoption of Rule 1157 and converted from 2004 to 2025 dollars using the Marshall and Swift Index (South Coast AQMD, January 2005, Governing Board Agenda Item 24, Attachment D: https://xappp.aqmd.gov/hb/2005/January/050124a.html). Truck washer costs are based on the cost of medium-duty pressure washers, however, facilities may choose other equipment to satisfy the truck washer requirement. Pressure washer pricing was based on average costs from Grainger: https://www.grainger.com/category/outdoor-equipment/pressure-washers/gas-powered-pressure washers?attrs=Duty+Rating%7CMedium+Duty&filters=attrs&categoryIndex=2.

*****Costs were based on the 2002 Craftsman National Construction Estimator, Site Works 2 Section, p. 345 ("Total Estimated Cost for Typical 10-ft Wide Roadway, 4-inch Paving Over 4-inch Aggregate Base") adjusted for a 6-inch stone aggregate base. Costs were converted from 2002 to 2025 dollars using the Marshall and Swift Index.

MACROECONOMIC IMPACTS ON THE REGIONAL ECONOMY

Regional Economic Models, Inc. (REMI) developed the Policy Insight Plus Model (PI+ v3) is a tool that South Coast AQMD typically uses to assess the impacts of rule development projects on the job market, prices, and other macroeconomic variables in the region when the average annual compliance cost is greater than one million current U.S. dollars ($1 MM).[19] However, when the average annual implementation cost of a project is less than $1 MM, the model cannot reliably forecast the macroeconomic impacts, because resultant impacts from the project would be too small relative to the baseline economic forecast.

Since the total average annual implementation cost of PAR 1157 is estimated to range from $378,609 to $475,292 at a one percent and four percent real interest rate, respectively, which is

[19] Regional Economic Modeling Inc. (REMI). Policy Insight® for the South Coast Area (70-sector model). Version 3. 2023.

less than the $1 MM threshold, a macroeconomic impact analysis was not conducted for PAR 1157.

DRAFT FINDINGS UNDER HEALTH AND SAFETY CODE SECTION 40727

Requirements to Make Findings

Health and Safety Code Section 40727 requires that prior to adopting, amending, or repealing a rule or regulation, the South Coast AQMD Governing Board shall make findings of necessity, authority, clarity, consistency, non-duplication, and reference based on relevant information presented at the public hearing and in the staff report.

Necessity

PAR 1157 is needed to reduce PM10 emissions from aggregate and related operations that will further improve the quality of air in the region.

Authority

The South Coast AQMD Governing Board has authority to adopt PAR 1157 pursuant to the Health and Safety Code Sections 39002, 40000, 40001, 40440, 40702, 40725 through 40728, and 41508.

Clarity

PAR 1157 is written or displayed so that its meaning can be easily understood by the persons directly affected by it.

Consistency

PAR 1157 is in harmony with and not in conflict with or contradictory to, existing statutes, court decisions, or state or federal regulations.

Non-Duplication

PAR 1157 will not impose the same requirements as any existing state or federal regulations. The proposed amended rule is necessary and proper to execute the powers and duties granted to, and imposed upon, South Coast AQMD.

Reference

By adopting PAR 1157, the South Coast AQMD Governing Board will be implementing, interpreting, and making specific provisions of the Health and Safety Code Sections 40001 (rules to achieve ambient air quality standards) and 40440(a) (rules to carry out the AQMP), and federal Clean Air Act Sections 188(e) for Most Stringent Measures and 172(c)(9) for contingency measure requirements for PM10.

COMPARATIVE ANALYSIS

Under Health and Safety Code Section 40727.2, South Coast AQMD is required to perform a comparative written analysis when adopting, amending, or repealing a rule or regulation. The comparative analysis is relative to existing federal requirements, existing or proposed South Coast AQMD rules and air pollution control requirements and guidelines which are applicable to the same source. The proposed amendments to Rule 1157 would not conflict or overlap with existing federal requirements for PM10 for aggregate and related operations. See Table 3-7 for the comparative analysis by rule provision.

Table 3-7: PAR 1157 Comparative Analysis

Rule	Purpose and Applicability	Requirements	Monitoring, Reporting, Recordkeeping	Exemptions

South Coast AQMD PAR 1157	• Reduce PM10 from aggregate and related operations
	• Applies to All permanent and temporary aggregate and related operations (including construction and demolition debris transfer stations)
		General Performance Standards
		• Plume Opacity
		  ○ Limit to ≤ 20% opacity over 12 readings per South Coast AQMD Method 9B
		  ○ Limit to ≤ 50% opacity over five readings per South Coast AQMD Method 9B
		• Plume Size
		  ○ Limit to ≤ 100 ft in length
		• Track-Out
		  ○ Limit to < 15 ft in length from facility exit
		Loading, Unloading, and Transferring
		• Apply dust suppressant or other dust control methods during activity
		Crushing, Screening, and Conveying Equipment
		• Apply dust suppressant or other dust control methods during activity
		Storage Piles
		• Apply dust control during each workday at least every four hours
		  ○ Chemical stabilizers application according to manufacturer recommendations
		  ○ Option to inspect in lieu of watering
		• Additional requirements for open storage piles within 300 feet of sensitive receptors or within 30 feet of property boundary
		Internal Roads
			• Recordkeeping required for truck traffic, dust control measures and inspections	• Start-up/shutdown
				• High winds of > 25 miles per hour

Rule	Purpose and Applicability	Requirements	Monitoring, Reporting, Recordkeeping	Exemptions
		• Apply chemical stabilizers to internal unpaved haul roads, unpaved roads, and parking and staging areas • Sweeping requirements based on truck throughput Track-Out • Remove by end of workday or production work shift, whichever is sooner • Install and use rumble grates and wheel washers or truck washers Registration • Construction and demolition debris transfer stations are required to submit facility registration Recurrent Violations • Additional requirements after consecutive validated Notice of Violations within 36 month rolling period		
South Coast AQMD Rule 403	• Reduce particulate matter entrained in the ambient air as a result of man-made fugitive dust sources • Applies to any activity or man-made condition capable of generating fugitive dust	General Performance Standards • Plume Opacity ○ Limit to ≤ 20% opacity if caused by motorized vehicle • Plume Size ○ Limit to within property line • Track-Out ○ Limit to < 25 ft in length from point of origin from an active operation Storage Piles • Apply dust suppression daily ○ Option to apply chemical stabilizer	• Test methods in Rule 403 Implementation Handbook for opacity • Recordkeeping required for daily dust control actions	• Unpaved service roads • Unpaved public alley roads • Unpaved roads for wind-generating equipment • High winds of > 25 miles per hour

Rule	Purpose and Applicability	Requirements	Monitoring, Reporting, Recordkeeping	Exemptions
		○ Option to install enclosures or temporary coverings in lieu of water or chemical stabilizer Unpaved Roads • Apply dust suppression ○ Option to apply chemical stabilizer in lieu of water Contingency Measures • Additional requirements if standard measures cannot be met		
San Joaquin Valley Air Pollution Control District Regulation 8	• Reduce ambient concentrations of fine particulate matter by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions • Applies to specified outdoor fugitive dust sources such as paved and unpaved roads, construction, demolition, excavation, extraction, and other earthmoving activities, and outdoor handling, storage, and transport of bulk materials	General Performance Standards • Plume Opacity (Rule 8031) ○ Limit to ≤ 20% opacity per Rule 8011 • Track-Out (Rule 8041) ○ Limit to < 50 feet from nearest unpaved surface exit point of site Active Operations (Rule 8031) • Apply dust suppressant or other dust control methods during activity ○ Option to install and maintain wind barrier Storage Piles (Rule 8031) • Maintain stabilized surface ○ Additional options in lieu of stabilizing Unpaved Roads (Rule 8061) • Apply dust control such as water or chemical/organic dust stabilizers/suppressants • Option to pave or use washed gravel Track-Out (Rule 8041) • Remove by end of each work day • Install and use track-out control devices such as grizzlies or gravel pads	• Recordkeeping required for used dust control measures	• High elevations of ≥ 3,000 ft (Rule 8011)

Rule	Purpose and Applicability	Requirements	Monitoring, Reporting, Recordkeeping	Exemptions

Ventura Air Pollution Control District Rule 55	• Reduce fugitive dust from major local sources
	• Applies to any operation, disturbed surface area, or man-made condition capable of generating fugitive dust
		General Performance Standards
		• Plume Opacity
		  ○ Limit to < 20% opacity per U.S. EPA Method 9
		• Plume Size
		  ○ Limit from < 50 ft from property line or midpoint of public street
		  ○ Limit to < 100 ft in length
		• Track-Out
		  ○ Limit to < 25 ft in length
		Storage Piles
		• Apply dust suppression daily
		  ○ Option to apply chemical stabilizer
		Track-Out
		• Apply chemical stabilizer
		  ○ Option to pave roads
		• Remove within one hour
		  ○ Option to use sweeper and remove at end of each work day or evening shift
		• Vehicle inspection and maintenance
		Bulk Material Handling
		• Install and use washed gravel, wheel shaker, or wheel washing system
			• Recordkeeping required for bulk material handling, exemptions, and opacity readings	• Demolition operations using blasting explosives
				• High winds of > 25 miles per hour for at least five min within an hour

CHAPTER 4– COMMENTS AND RESPONSE TO COMMENTS

ORAL COMMENTS RECEIVED DURING PUBLIC WORKSHOP AND COMMENT RESPONSES

A PAR 1157 public workshop was held on July 8, 2026. Several oral comments were received during the public workshop. The following are responses to these oral comments, followed by South Coast AQMD responses.

Public Workshop Comment 1

Is there an exemption for construction and demolition debris operations that are in an enclosed building?

PW-1 Response:

Rule 1157 establishes requirements to regulate open storage piles located at construction and demolition debris transfer stations. Open storage piles are not piles of material that are fully enclosed in a structure with non-porous walls, covered, or chemically stabilized. If the construction and demolition debris transfer station is fully enclosed in a structure with non-porous walls, storage piles would not be subject to the rule requirements for open storage piles. Additionally, utilizing an enclosure to comply with other requirements that allows other dust control methods would be acceptable. However, other requirements in PAR 1157 would still apply including the general performance standards specified in paragraph (d)(1).

Public Workshop Comment 2

What is the allotted period for comments on CEQA?

PW-2 Response:

As explained in Chapter 3 - Impact Assessment, the proposed project (PAR 1157) qualifies for an exemption from CEQA. The CEQA Statute and Guidelines do not require a public review and comment period for a project that is exempt from CEQA. For any questions or comments regarding the CEQA analysis of PAR 1157, please contact Kevin Ni at kni@aqmd.gov.

Public Workshop Comment 3

Can PAR 1157 and other South Coast AQMD rules include language to require the application for necessary city permits and regulations?

PW-3 Response:

South Coast AQMD rules do not generally include requirements for application of necessary city permits and regulations. All facilities subject to PAR 1157 as well as other South Coast AQMD rules are also required to adhere to all applicable requirements from local municipalities and compliance with South Coast AQMD rules does not exempt those facilities from the other additional requirements.

Public Workshop Comment 4

Why is track-out to be measured at a maximum of 15 feet? Why not any other number?

PW-4 Response:

South Coast AQMD staff determined the maximum distance from evaluating typical roadway width of two-lane roads. The purpose of the track-out requirements both PAR 1157 and Rule 403 is to prevent track-out deposits on active roadways where vehicle traffic could agitate the deposits to form airborne PM emissions. The maximum distance of 15 feet of cumulative track-out in PAR 1157 helps to limit track-out from reaching the center of active roadways where deposits are most likely to encounter vehicle traffic. South Coast AQMD's Rule 403 prohibits track-out to extend beyond 25 cumulative feet from the point of origin of an active operation and the 15 cumulative feet from facility exit required by PAR 1157 would also avoid duplication of Rule 403 requirements.

Public Workshop Comment 5

Why are there height limitations for storage piles that are 300 feet from off-site occupied buildings and 30 feet from property boundary?

PW-5 Response:

PAR 1157 restricts open storage pile height to no greater than eight feet for open storage piles located within 300 feet from sensitive receptors and prohibits an open storage pile located within 30 feet from the property boundary facing any public roads as a measure to prevent fugitive dust from impacting the local community and active roadways, respectively. It is important to note that the height restriction of no greater than eight feet was an existing requirement in the original Rule 1157. During development of PAR 1157, staff observed that higher open storage piles may experience increased potential for fugitive dust formation. Open storage piles near active public roadways also have increased potential to deposit particulate matter onto those roadways which could become airborne due to vehicle traffic. Please see Chapter 1 of this staff report for additional information related to open storage piles.

Since the Public Workshop, staff has further amended PAR 1157 to allow for options for facilities to implement prescribed dust control methods in lieu of the limitations for open storage pile height and placement. Please see Chapter 2 of this staff report for additional information.

Public Workshop Comment 6

Why is the measurement 1,640 feet from off-site occupied buildings?

PW-6 Response:

Current Rule 1157 language for Additional Requirements Triggered by Recurrent Violations applies to facilities within 500 meters from off-site occupied buildings or houses or a sensitive receptor. This was the only measurement in the rule which quantified distance in meters. To align with the rest of the rule, the 500 meters was converted to 1,640 feet for PAR 1157.

Public Workshop Comment 7

What is the timeline leading to the public hearing?

PW-7 Response:

PAR 1157 will be presented to the South Coast AQMD Governing Board for approval during the public hearing on September 4, 2026. The Notice of Public Hearing, Draft Rule Language, Draft Staff Report, and applicable Socioeconomic Impact Assessment will be released no later than August 5, 2026, 30 days prior to the date of Public Hearing. Open comment period was initiated with the release of the Notice of Public Workshop on June 18, 2026 and concluded on July 24, 2026.

WRITTEN COMMENTS RECEIVED DURING COMMENT PERIOD AND COMMENT RESPONSES

In addition to the oral comments at the meeting, staff received written comments for PAR 1157 during a comment period that closed on July 24, 2026. The following are responses to these written comments, followed by South Coast AQMD responses.

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Comment Letter #1

COMMUNITIES for a BETTER ENVIRONMENT est. 1978

June 26, 2026
Ashley Dang, Kalam Cheung, Neil Fujiwar, and Michael Krause
Planning, Rule Development and Implementation
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: Comments on Proposed Amended Rule 1157 - PM10 Emission Reductions from Aggregate and Related Operations

To the Planning, Rule Development and Implementation team:

Communities for a Better Environment ("CBE") submits these comments on Proposed Rule 1157 ("Rule"). While we appreciate staff's work on amending an outdated Rule, we remain concerned that the current proposed requirements will not meaningfully regulate an industry that has been polluting our communities for years.[1] It is critical that the South Coast Air Quality Management District ("AQMD") do everything in its authority to reduce PM10 emissions from Aggregate and Related Operations ("Operations") especially in environmental justice communities who face a disproportionate amount of pollution from transportation, industry, warehouses, and many other sources.

CBE has been part of the Southeast Los Angeles ("SELA") AB 617 Steering Committee since 2021 while simultaneously attending Proposed Amended Rule 1157 working group meetings. The mission of CBE is to build people's power in California's frontline communities to achieve environmental health and justice by preventing and reducing pollution and building green, healthy, and sustainable communities and environments. Our membership includes youth and adult members who live, work, learn, and play in homes and schools, at times, directly adjacent to aggregate operations. 1-1

One of these Operations was located across a neighborhood in Huntington Park, CA in the early 1990s.[2] Residents called it, "La Montaña," or the mountain, because of the 50-foot-high mountain of concrete debris from the collapse of the Santa Monica Freeway during the 1994 Northridge earthquake.[3]

[1] Patrick J. Mcdonnell, *'Rubble Rousers' Fight Dump*, Los Angeles Times (March 17, 1996), https://www.latimes.com/archives/la-xpm-1996-03-17-me-48072-story.html. And
[2] Richard Marosi, *The Mountain Is Crumbling at Long Last*, Los Angeles Times (May 1, 2001), https://www.latimes.com/archives/la-xpm-2001-may-01-me-57932-story.html.
[3] Elson Trinidad, *January 1994 - 6.7 Northridge Earthquake Rocks Southern California*. PBS SoCal (Sep. 2, 2014), https://www.pbssocal.org/kcet-50th-anniversary/january-1994-6-7-northridge-earthquake-rocks-southern-california.

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Figure 1: La Montaña in Huntington Park, CA (1990s)[4]

In an effort to clean up the earthquake rubble swiftly, the state began sending rubble to aggregate facilities in tons, one of them being the Aggregate Recycling System ("ASR") in Huntington Park[5], who violated their permits of permittable aggregate.[6] Shortly after, residents began experiencing a range of health issues: shortness of breath, headaches, bloody noses, and other respiratory issues[7] due to noise and dust emissions from the crushing of rubble, high uncovered stockpiles of aggregate, and the daily trucks that transported aggregate materials in the residential neighborhood. SELA communities have some of the highest rates of respiratory issues in the county, given incompatible zoning of industrial uses in adjacent residential areas[8]. It wasn't until a Huntington Park council member, Rick Loya, was hospitalized during a 20-minute site visit due to breathing airborne debris; that incident shed light to the site and its impact to the residents.[9] Linda Marquez was a CBE member who lived on Cottage Street directly across La Montaña and was one of the most vocal community leaders who fought against this struggle. 1-1

[4] David Bacon, et al., Holding Our Breath: The Struggle for Environmental Justice in Southeast Los Angeles, Communities for a Better Environment, 1998. Pg. 6.
[5] Rossmery Zayas, *La Montaña,* WordPress (2015), https://rossmeryzayas.wordpress.com/la-montana/.
[6] Interview by Ambar Rivera with Roberto Cabrales, Southern California Program Co-Director (Wilmington), Communities for a Better Environment, virtual, May, 4 2026.
[7] Marosi, *supra* note 2.
[8] *Environmental Health & Justice in Southeast Los Angeles: Community-Based Mapping of Air Quality, Urban Heat Islands, and Green Space in Southeast Los Angeles*, CBE & UC Irvine, (2026) (containing an interactive data dashboard displaying health data and emergency department visits), https://storymaps.arcgis.com/stories/2669fe999ca84a70bb2e701e8e86259c.
[9] Mcdonnell, *supra* note 1; Zayas *supra* note 4.

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Figure 2: Linda Marquez, Leilani and Dean Hickman, leaders in the neighborhood living next to the aggregate facility known as ASR.[10]

Despite the acute impacts on the council member and years of protests by Marquez and community residents, the cheap solution posed by the city was to put a screen to stop the dust emissions from landing on homes and gardens. It failed.[11] 1-1

[10] David Bacon, et al., Holding Our Breath: The Struggle for Environmental Justice in Southeast Los Angeles, Communities for a Better Environment, 1998. Pg. 7.
[11] Mcdonnell, *supra* note 1; Zayas *supra* note 4; Figure 3.

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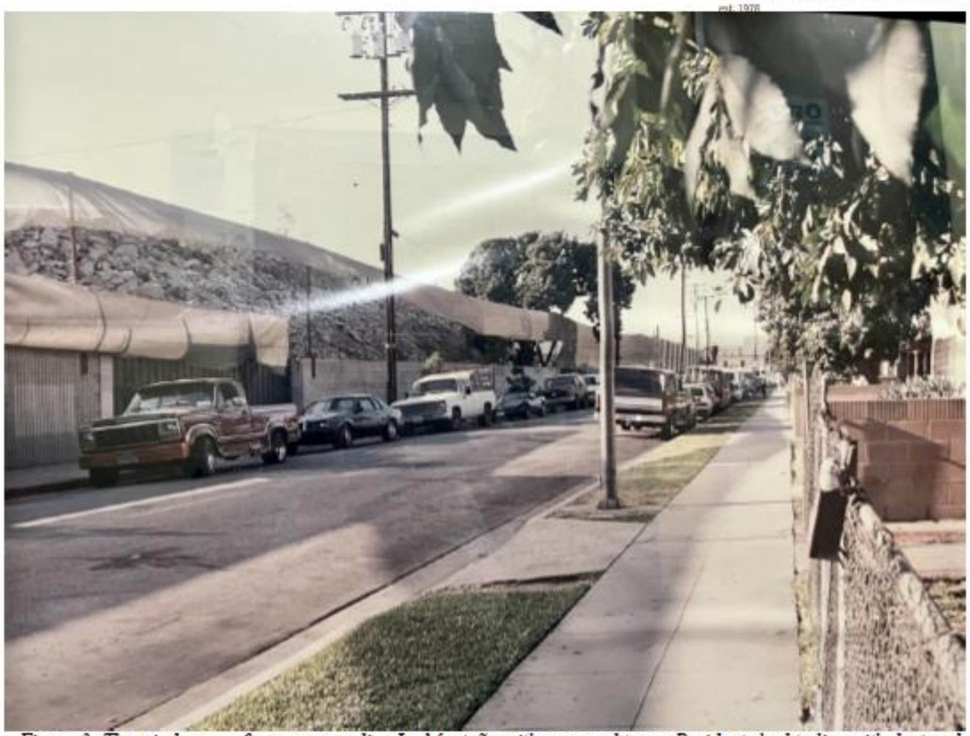

Figure 3: The wind screen fence surrounding La Montaña with gaps and tears. Residents had to live with dust and aggregate material spilling into their homes, cars, and public streets.

Even AQMD failed to link health problems to the rubble[12] despite years of residents voicing concerns of dust impacts on their health and their plants, making daily life uncomfortable. After years of community organizing, city officials declared the site a public nuisance law and eventually Aggregate Recycling System was shut down.[13] The former aggregate site is now home to the Linda Marquez High School, which is part of the AB 617 Southeast Los Angeles Public School Prioritization List.[14] 1-1

It is our hope that the final Rule adopted by AQMD will not only help prevent another incident like La Montaña but prevent any health impacts of these permanent and temporary Operations on the surrounding communities by (1) clarifying definitions, (2) establishing health protective requirements (3) creating recordkeeping requirements, (4) adding further requirements for

[12] Marosi, *supra* note 2.
[13] Marosi, *supra* note 2.
[14] S. Coast Air Quality Mgmt. Dist., *AB 617 Southeast Los Angeles School Prioritization List (Public Schools)*, https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/southeast-los-angeles/public-school-handout-list.pdf?sfvrsn=f46da461_8 (last visited June 22, 2026).

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facilities with recurrent violations, (5) addressing data gaps for mining and blasting operations, and (6) considering additional recommendations to protect public health. 1-1

I. Definitions

AQMD should clarify the definition for Blasting Operations given that the current Rule highlights the use of explosives, whereas AQMD staff expressed that mining operations have a mechanical process.[15] Mining operations can release particulate matter at any stage of the process regardless of the blasting method,[16] therefore having a clear definition on the types of blasting operations (e.g. explosives or mechanical) can support with both record keeping practices and that all facilities are adhering to the Rule and preventing fugitive PM10 emissions. 1-2

As it currently stands, the Rule Definitions only include Fugitive Dust emissions.[17] We urge AQMD to include a definition for dust plume to show differentiation with dust emissions. Dust emissions[18] describe the movement or release of dust particles, whereas dust plumes[19] are the result and visibility of fugitive dust emissions. Including this definition can alleviate any misalignment when community members report dust complaints from any Operations. 1-3

Lastly, AQMD needs to update their definition for Sensitive Receptors beyond "a school (kindergarten through grade 12), licensed daycare center, hospital, or convalescent home."[20] CBE urges AQMD to expand the definition to include residential areas, schools of all levels not just K-12, public parks, and recreational areas as stated in Senate Bill 526 - Accountability for Aggregate Facilities.[21] Limiting Sensitive Receptors to a shallow definition hurts communities who bear inequitable pollution burdens like SELA residents who experience incompatible land use, contamination from former lead battery recyclers,[22] and urban heat islands.[23] 1-4

II. Requirements

[15] S. Coast Air Quality Mgmt. Dist., *Proposed Amended Rule 1157 - Working Group Meeting #3*, May 7, 2026, https://www.aqmd.gov/home/news-events/calendar_v2?month=5&day=7&year=2026&id=b80808f0-c2b6-6f27-bf6f-ff02004a91a9.
[16] Viney P. Aneja, Aaron Isherwood, & Peter Morgan, *Characterization of particulate matter (PM10) related to surface coal mining operations in Appalachia*, 54 Atmospheric Env't 496-501, (2012) https://airqualityresearch.wordpress.ncsu.edu/files/2018/11/150.pdf.
[17] *Rule 1157 - PM10 Emission Reductions from Aggregate and Related Operations*, S. Coast Air Quality Mgmt. Dist., 1, 1-5 (Sep. 8, 2006), https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1157.pdf.
[18] U.S. Env't Prot. Agency, *Particulate Matter Basics* (May 21, 2026), https://www.epa.gov/pm-pollution/particulate-matter-pm-basics/.
[19] *See* Chelsea Harvey & E&E News, *Saharan Dust Plume Slams U.S., Kicking Up Climate Questions*, Sci. Am. (June 26, 2020), https://www.scientificamerican.com/article/saharan-dust-plume-slams-u-s-kicking-up-climate-questions/.
[20] *Rule 1157*, *supra* note 15, at 4.
[21] *California Senate Bill 526*, LegiScan, (Feb. 20, 2025), https://legiscan.com/CA/text/SB526/id/3134922?__cf_chl_tk=kBd0QGDPdhtCuYP28UytBY3OSgAOhxS3kr5VW.9uDuo-1779490330-1.0.1.1-t3UowybHzH3ja5vcN7qdariX4T5g_ONGMvMgHUC6nq0.
[22] *See* Dep't of Toxic Substances Control, *Exide Home: Site Mitigation & Restoration Program*, https://dtsc.ca.gov/exide-home/ (last visited June 22, 2026).
[23] *See Environmental Health & Justice in Southeast Los Angeles: Community-Based Mapping of Air Quality, Urban Heat Islands, and Green Space in Southeast Los Angeles*, *supra* note 5.

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Per section (d)(1)(A), a facility will not allow a discharge of fugitive dust emissions from any activity that exceeds 20% opacity.[24] CBE believes this opacity is too high and should instead be lowered to 5% opacity. Given the concentration of industrial and commercial areas, paired with high truck traffic throughout the 710 corridor, lowering the opacity level for these Operations can reduce any health impacts from fugitive dust emissions into residential areas. Having low opacity levels means that aggregate piles are not disturbed, and requirements are being implemented on site. Additionally, section (d)(1)(A)(iii) should be amended by lowering the 100 feet exceedance of visible fugitive dust to the site parameters, with little to no fugitive dust plumes leaving these Operations. 1-5

During Working Group #4,[25] AQMD proposed that gravel pads be replaced "every 10 years or as necessary" for the purpose of establishing minimum replacement frequency. Rule provisions that include phrases like "as necessary" can create unrealistic or incorrect expectations, making it difficult to hold Operations accountable, and potentially cause more fugitive emissions. Even AQMD Proposed Rule Language removes the use of dust suppressants "as necessary" for active operations and instead recommends continuously applying dust suppressants at every processing stage.[26] It was the loose language from the original 2005 Rule that failed to reduce fugitive emissions, and AQMD should refrain from repeating the same mistake as it can continue to further harm for communities living near these Operations. 1-6

CBE appreciates AQMD amending the outdated Requirements for Storage Piles at Operations given the detrimental environmental and health impacts. To make the Rule stronger and more health protective for communities near these Operations, CBE urges AQMD to change the use of Dust Suppressants to every hour regardless of Storage Pile height. Additionally, we highly discourage the use of wind screen fences as a standalone mitigation measure for any Storage Piles, especially within 500 feet of a Sensitive Receptor as per the Green Zone Ordinance.[27] Wind screens are known to tear due to the type, weight, and movement of aggregate materials during active operations. For example, in the case of La Montaña, these materials spilled into residential areas, exposing communities to fugitive emissions and potential threats from the shards and crushed materials, impacting residents' daily life [refer to Figure 3]. Wind screen fences should be required to be paired with a Dust Suppressant regardless of Storage Pile heights, distance from off-site occupied buildings or homes, and/or public roads. 1-7

We support the amendments for paved and unpaved roads, but CBE believes the Rule would be stronger if the speed limit was reduced to 10 miles per hour for paved roads and 5 miles per hour for unpaved roads. According to EPA, limiting vehicles speeds minimize fugitive dust due to 1-8

[24] *Rule 1157*, *supra* note 15, at 6.
[25] S. Coast Air Quality Mgmt. Dist., Proposed *Amended Rule 1157 - Working Group Meeting #4*,,at 13 (May 7, 2026), https://www.aqmd.gov/home/news-events/calendar_v2?month=6&day=4&year=2026&id=6ee108f0-c2b6-6f27-bf6f-ff02004a91a9.
[26] S. Coast Air Quality Mgmt. Dist., Proposed *Amended Rule 1157 - Working Group Meeting #4*,,at 13 (May 7, 2026), https://www.aqmd.gov/home/news-events/calendar_v2?month=6&day=4&year=2026&id=6ee108f0-c2b6-6f27-bf6f-ff02004a91a9.
[27] Los Angeles Cnty. Dep't of Reg'l Plan., *Green Zones Program*, County of Los Angeles, https://planning.lacounty.gov/long-range-planning/green-zones-program/ (last visited June 22, 2026).

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wind erosion and mechanical forces at industrial facilities like Rule 1157 Operations.[28] Fugitive Dust emissions from high vehicle traffic speed can aggravate heart and lung conditions in already heavily burdened AB 617 communities like SELA. 1-8

III. Recordkeeping

CBE recommends that the Rule include recordkeeping requirements for the following items: records of when dust plumes travel beyond site parameters, records of opacity levels past 5%, and records of surrounding Sensitive Receptors near or adjacent these Operations. Given the extremities and impacts of fugitive dust emissions to public health and the environment,[29] it's important that these Operations adhere to the Rule to reduce any PM10 exposures. 1-9

Since the Rule has truck type definitions (e.g. Mixer Truck and Haul Truck), AQMD should require a recordkeeping provision for the number and types of trucks[30] leaving and entering these Operations monthly. Having this data allows for future opportunities and assessments of deploying zero-emission electric truck technology at these Operations given the amount of air pollutants released from diesel heavy-duty trucks[31][32] 1-10

IV. Additional Requirements Triggered by Recurrent Violations

It's disappointing that for 20 years the Rule allowed aggregate facilities to continue operating despite accruing three or more Notices of Violations for causing fugitive dust emissions.[33] And now AQMD is allowing these Operations to continue operating despite accruing multiple Notices of Violation in any 24-month period. Requiring additional requirements only after multiple violations is unacceptable and harmful to communities who experience cumulative impacts from many polluting sources like SELA communities.[34] As mentioned previously, exposures to PM10 emissions can have detrimental impacts on respiratory and neurological health.[35] AQMD needs to amend this Rule with a *cease of operations* until fugitive dust reduction measures are implemented, and communities are informed. Frontline communities should not bear the brunt of AQMD's lax provisions and Operations slow response in mitigating 1-11

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[28] U.S. Env't Prot. Agency, *Fugitive Dust Control Measures and Best Practices*, (Jan. 2022),, https://www.epa.gov/system/files/documents/2022-02/fugitive-dust-control-best-practices.pdf.

[29] California Air Res. Bd., *Inhalable Particulate Matter and Health (PM2.5 and PM10)*, https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health. (last visited June 22, 2026).

[30] Universal Technical Institute Editorial Team, *A Guide to Truck Classifications*," Universal Technical Institute, (Jan. 18, 2022), https://www.uti.edu/blog/diesel/truck-classifications.

[32] David Quiros, Jeremy Smith, Arvind Thiruvengadam, Tao Huai, & Shaohua Hu, *Greenhouse gas emissions from heavy-duty natural gas, hybrid, and conventional diesel on-road trucks during freight transport*, 168 Atmospheric Env't 36-45 (Nov. 2017), https://www.sciencedirect.com/science/article/pii/S1352231017305794.

[33] *Rule 1157*, *supra* note 15, at 12.

[34] California Air Res. Bd., *Southeast Los Angeles*, https://ww2.arb.ca.gov/capp/com/cip/southeast-los-angeles. (last visited June 22, 2026).

[35] Pamela J. Lein & Anthony Wexler, *What Every Breath of Dirty Air May Be Doing to Your Neurological Health*, Env't Health Sciences Ctr., UC Davis (April 3, 2026), https://environmentalhealth.ucdavis.edu/air-pollution/brain-health.

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fugitive dust emissions while violations continue. This is a clear example of how AQMD fails to hold facilities accountable and protect communities from pollution sources. 1-11

V. Exemptions

Given the significant risks and complexities of blasting operations,[36] CBE recommends that AQMD draft a new standalone Rule for mining operations. The U.S. Department of Labor states that every stage of the blasting process – from storage and transportation to detonation – requires strict adherence to safety practices to prevent accidents and injuries. The current Rule has little information about blasting and mining operations, except that these operations use explosives to break rocks and a brief but incongruous definition.[37] The Rule defines Blasting Operations by means of explosives, but AQMD staff shared that it's done through a mechanical process. This shows inconsistencies between what's being observed and what data is actually reported. In Working Group Meeting #3, AQMD staff shared that they can't require facilities to fill out the surveys given that it's a voluntary action.[38] The lack of integrity and transparency from these Operations can have detrimental impacts on environmental justice communities and frontline workers. Data gaps can compromise scientific integrity and cause further distrust between government agencies and communities. 1-12

VI. Alternative Control Options

CBE recommends that AQMD provide more information for Alternative Control Options given the latest developments in best available control technology and policy changes at the federal level. AQMD should do an assessment to ensure this Rule provision is still applicable and valid in reducing fugitive dust emissions. 1-13

VII. Additional Recommendations for Rule 1157

Additional provisions that AQMD should implement are truck routes that avoid Sensitive Receptors for both temporary and permanent Operations to prevent additional harm from truck-related emissions and active Operations. Since AQMD supports programs that are designed to switch to cleaner, zero-emissions technology,[39] we encourage AQMD to add a Rule provision that requires facilities to start planning a transition from old diesel trucks to electric-vehicles. 1-14

AQMD should begin a process for enhancing interagency coordination in regulatory oversight for the purpose of interdependent problem solving that protects public health and the environment, engaging an on-going relationship with frontline communities, and holding agencies accountable for where there is a specific problem or need. AQMD already acknowledges regulations of the local Water Quality Control Board or other government 1-15

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[36] Mine Safety and Health Admin., *Blasting Safety*, U.S. Dep't of Lab., https://www.msha.gov/safety-health/safety-health/safety-health-materials/safety-topics/blasting-safety. (last visited June 22, 2026).
[37] *Rule 1157*, *supra* note 15, at 1.
[38] S. Coast Air Quality Mgmt. Dist., *Proposed Amended Rule 1157 - Working Group Meeting #3*,, https://www.aqmd.gov/home/news-events/calendar_v2?month=5&day=7&year=2026&id=b80808f0-c2b6-6f27-bf6f-ff02004a91a9.
[39] S. Coast Air Quality Mgmt. Dist., *Incentives & Programs*, https://www.aqmd.gov/home/programs. (last visited June 22, 2026).

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100 Hegenberger Rd., Suite 270
Oakland, CA 94621

Richmond
340 Marina Way
Richmond, CA 94801

Southeast Los Angeles
6325 Pacific Blvd., Suite 300
Huntington Park, CA 90255

Wilmington
113 E Anaheim St
Wilmington, CA 90744

COMMUNITIES for a BETTER ENVIRONMENT

agencies for Exemptions regarding chemical stabilizers for internal unpaved roads.[40] Other agencies that should be included are the Department of Toxic Substances Control, Department of Public Health, and planning departments. Interagency collaboration of these agencies can ensure that no hazardous materials are leaking or migrating offsite; community health is not at risk, and Sensitive Receptors are not susceptible to incompatible land use. 1-16

Most importantly, AQMD should require fenceline monitoring at Aggregate and Related Operations for all dust-related emissions. The lack of real-time fenceline and community air monitoring causes uncertainties and significant health and safety risks to workers and surrounding communities. Some particulate matter are known to travel for miles and can stay in the air for weeks at a time.[41] Fenceline monitoring helps both facilities and communities understand if emissions control measures put in place are working in mitigating fugitive dust emissions, acting as a backup to the regular emission control provisions. By requiring fenceline monitoring, AQMD is protecting public health and ensuring transparency for communities living near these Operations. 1-17

VIII. Conclusion

CBE appreciates the opportunity to comment on Proposed Rule 1157. We welcome any discussion with AQMD to discuss these matters. Please reach out if you have any questions or comments.

Sincerely,

Ambar Rivera
Staff Researcher

[40] *Rule 1157*, *supra* note 15, at 14.
[41] U.S. Env't Prot. Agency, *Particle Pollution and Your Patients' Health: Particle Pollution and Respiratory Effects*, (June 10, 2026), https://www.epa.gov/pmcourse/what-particle-pollution

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Staff Response to Comment Letter #1

1-1 Response:

Staff agree with the commentor that control measures such as those required in PAR 1157 must be properly implemented and maintained, unlike the wind barrier shown in Figure 3 of this letter, to achieve the outcome needed to protect public health and control fugitive dust.

Further clarifications to the five items the commentor stated at the end of Comment 1-1 will be provided in subsequent responses.

1-2 Response:

Rule 1157 defines blasting operations as operations that break or displace rock by means of explosives. Blasting operations are not defined as rocks being broken or displaced by means of a mechanical process. During the PAR 1157 public process, staff commented that mining operations observed within South Coast AQMD jurisdiction appears to be mostly mechanical methods instead of blasting with explosives.

Staff agree with the commentor that recordkeeping practices are crucial to demonstrate facilities are complying with the proposed amended rule. PAR 1157 will expand the recordkeeping requirements for all applicable facilities to mitigate PM10 emissions from aggregate and related operations. Additional information on the expanded recordkeeping requirements can be found in Chapter 2 of this staff report.

1-3 Response:

Community members do not need to differentiate between a dust plume or dust emissions. At the time of inspection, South Coast AQMD inspectors will assess the compliance with applicable dust plume or dust emission requirements in PAR 1157 or Rule 403.

1-4 Response:

Staff have received feedback from stakeholders and revised PAR 1157 to update applicable rule language to sensitive receptors to improve clarity and align definition with other recent South Coast AQMD rules. Additional information is provided in Chapter 2 of this staff report.

1-5 Response:

PAR 1157 did not modify the general performance standard for the opacity levels of dust plumes from existing Rule 1157 requirements. The current practices regarding dust plume opacity levels are consistent with the practices and implementations from South Coast AQMD Rule 401, the California Air Resource Board, and U.S. Environmental Protection Agency.

PAR 1157 clause (d)(1)(A)(iii) restricts size of dust plume to 100 feet in length; however, Rule 403 subparagraph (d)(1)(A) restricts any visible emissions from crossing the property line which addresses the commentor's concerns. Please refer to South Coast AQMD Rule 403 for additional information regarding fugitive dust that crosses the property boundary.

1-6 Response:

Staff acknowledge the ambiguity of "as necessary" in the existing Rule 1157 language, and PAR 1157 removes the ambiguity of this type of language by providing needed specificity. The proposed amended rule requires gravel pads to be replaced every 10 years or as necessary, whichever is sooner. The "as necessary" language is added here to allow flexibility for the facility/operator to replace the gravel pad sooner than the prescribed 10-year interval depending on site-specific factors. However, if the gravel pad does not need to be replaced within that decade, the facility/operator must replace the gravel pad at the 10-year mark to comply with the rule. It is important to note that facilities are still required to adhere to the general performance requirements in PAR 1157 as well as Rule 403 independent of gravel pad replacement intervals.

1-7 Response:

As part of development of PAR 1157, staff conducted numerous site visits to different types of applicable facilities. PAR 1157 has been revised to have a set dust suppressant application interval of once every four hours. To account for different types of facility operations and aggregate moisture requirements, PAR 1157 has also included multiple options for facilities to comply with Dust Suppressant application intervals while keeping an emphasis on accountability and enforceability. All options will include strengthened recordkeeping provisions as well as improved specificity in rule requirements. For additional information, please see Chapter 2.

Staff agree with the commenter that poorly maintained wind barriers would be inadequate for preventing fugitive dust from impacting the local community. PAR 1157 will include requirements for minimum performance specifications for wind barriers such as a 50 percent porosity requirement as well as ensuring proper maintenance of wind barriers to keep them free of tears and damage. Wind barriers are effective tools for controlling fugitive dust by altering wind patterns and lowering wind speeds in targeted areas. These specific performance and maintenance requirements serve to ensure proper upkeep and operation of wind barriers that will in turn effectively control fugitive dust from open storage piles.

1-8 Response:

PAR 1157 currently includes speed limit of vehicles driving over rumble grates, wheel washers, and truck washers to five miles per hour. Facilities that have multiple Notices of Violations will be required to pave all haul roads and post signage that states the speed limit is restricted to 15 miles per hour.

While PAR 1157 will not require a reduction in speed on paved or unpaved road, PAR 1157 includes other enhanced requirements for paved and unpaved roads that will further minimize the generation of fugitive dust as discussed in Chapter 2.

1-9 Response:

The proposed recordkeeping requirements serve as a mechanism to demonstrate compliance with applicable rule provisions such as, but not limited to, records of dust control application of open storage piles and maintenance of internal haul roads. The owner or operator of the facility/operation will be required to provide the recordkeeping documentation when requested by South Coast AQMD inspectors. At this time, staff are not recommending any changes to the proposed recordkeeping requirements. For additional information on the proposed recordkeeping requirements, please see Chapter 2.

1-10 Response:

The purpose of PAR 1157 is to further reduce fugitive dust from aggregate and related operations. The recordkeeping requirements for aggregate/mixer trucks serve as a mechanism to demonstrate rule compliance from on-site truck activities. For additional information on the proposed recordkeeping requirements, please see Chapter 2.

1-11 Response:

As discussed in Chapter 2, PAR 1157 does not limit the Executive Officer's enforcement authority to seek alternate or additional remedies available under law. This can include requiring facilities to install enclosures, conduct fenceline air monitoring, and even shut down the facility.

1-12 Response:

Please refer to response to comment 1-2 regarding blasting.

Even though blasting operations are exempt from the opacity and dust plume requirements of PAR 1157, associated mining operations would be subject to PAR 1157 requirements for the storage, handling, and transport of aggregate materials.

Surveys were last distributed for industry feedback during the initial rulemaking of Rule 1157. Since then over two decades have passed and facilities' needs may have changed. To conduct due diligence in receiving the most accurate, up-to-date information, staff distributed a facility survey across the applicable universe during the PAR 1157 rulemaking. The information gathered was used to gain better insight on the industry's current practices and equipment, which ultimately assisted in the development of PAR 1157 concepts. Staff acknowledge the effects of inconsistent responses to facility surveys. Although South Coast AQMD did not require survey responses, facilities are periodically inspected by South Coast AQMD inspectors. During inspection, the facility and its equipment would be subject to evaluation for compliance of applicable regulations as well as permit conditions, if applicable.

1-13 Response

PAR 1157 will remove existing subdivision (i) for Alternate Control Options. Staff are unaware of any facilities opting to comply with Rule 1157 with the alternative compliance option outlined in this subdivision since the rule was originally adopted on January 7, 2005.

1-14 Response:

PAR 1157 regulates aggregate and related operations. Facilities are responsible for controlling truck operator behavior while within the property boundary; however, truck operator behavior beyond property lines would be subject to other authorities, such as California Highway Patrol or local municipalities.

1-15 Response:

Staff recognize the importance of engaging in discussions with other agencies for the purpose of protecting the environment and public health. South Coast AQMD continuously and actively engages in interagency discussions regarding air quality issues. Additionally, staff have numerous discussions with community members and potentially affected industries as part of the rule development process.

1-16 Response:

Fenceline air monitoring is a diagnostic tool to monitor particulate matter that already exists in the air. PAR 1157 serves to mitigate these emissions directly from the source, aggregate and related operations, prior to being entrained into the atmosphere. Additionally, fenceline monitoring may not be as effective in certain areas where multiple facilities are located within close proximity to one another. Visual observations, such as identifying track-out or dust plume size and opacity, are more appropriate for the implementation of PAR 1157.

Comment Letter #2

From: Ricardo Flores <rflores@associatesenvironmental.com>
Sent: Thursday, July 9, 2026 5:44 PM
To: Ashley Dang <adang@aqmd.gov>
Subject: [EXTERNAL] Proposed Amended Rule 1157

Dear Ashley

Thank you for the opportunity to comment on proposed amended Rule 1157.

1. The SCAQMD should consider providing an exemption from the requirements of Rule 1157(d)(6) to washed material open storage piles. Aggregate and sand used at concrete batch plants or received at other plants process material that has been washed thoroughly to remove any impurities and silt. The San Joaquin Valley APCD Permit Processing Policy SSP 1610 has the following language (see attached on Page 11): "In addition, since concrete aggregate and mineral aggregate are thoroughly washed during processing to remove silt, the amount of material that can become entrained in the atmosphere is de minimus. Therefore, no emissions will be ascribed to storage piles exclusively containing finished mineral aggregate, or finished concrete aggregate, of 3/8" size or larger. These storage piles shall be included in the conditions de-fining the finished aggregate storage and loadout operation, but the potential to emit for these storage piles is zero." The washed material is clean of fines and what is being proposed for these types of open storage piles seems excessive. 2-1

2. Proposed Rule 1157(h)(1) indicates "The owner or operator of a Permanent or Temporary Facility/Operation, located within 1,640 feet of off-site occupied building(s) or sensitive receptor(s), accruing at least three Notices of Violation in any rolling 24-month period, starting from the date of any Notice of Violation, for causing or allowing fugitive dust emissions exceeding the opacity limit specified in clauses (d)(1)(A)(i) and (d)(1)(A)(ii) or a visible plume exceeding 100 feet in any direction specified in clause (d)(1)(A)(iii), shall:" Could the SCAQMD please provide some clarification on how we measure the distance of 1640 feet. In other sections of the rule you specify the distance to an off-site occupied building or house. However, in this paragraph you include sensitive receptor. Are we to measure to the sensitive receptor's occupied building or are we to measure to the sensitive receptor's property boundary? 2-2

3. Could you please provide a definition for off-site occupied building? I'm concerned about existing open storage piles that are nearby properties (within 300 feet) that may be primarily used for storage or an adjacent construction project that may install temporary buildings used for offices or a new occupied structure that is built within 300 feet of our existing storage pile (Rule 1157(d)(6)). I think the rule should really be applicable to sensitive receptors or residents and not just any off-site occupied building. I'm not aware of another rule that focuses on off-site occupied buildings that are not sensitive receptors or residences. 2-3

Please let me know if you have any questions.

Thanks

Ricardo Flores
Associates Environmental
18141 Beach Blvd, Suite 200
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C: 562-652-4727
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Staff Response to Comment Letter #2

2-1 Response:

Staff would like to clarify that the reference, San Joaquin Valley Air Pollution Control District (SJVAPCD) Permit Processing Policy SSP 1610 – Aggregate Permit Processing, identified by the commenter is a policy document to standardize permitting requirements for aggregate processing facilities and does not apply to fugitive dust. After the washing process, washed aggregate may be free of silt and other fines; however, washed aggregate could still generate dust. Fines generated from abrasion due to loading/unloading activities as well as accumulating dust on the surface area during storage are capable of being airborne and cannot be ignored. Furthermore, SJVAPCD does not exempt washed material from requirements of Rule 8031, which is the comparable SJVAPCD regulation for fugitive dust emissions from outdoor handling, storage, and transport of bulk materials. Staff do not recommend including an exemption for washed aggregate in PAR 1157.

2-2 Response:

Please refer to response to comment PW-5 regarding the measurement and response to comment 1-5 regarding the definition for sensitive receptor.

2-3 Response:

The height restriction of no greater than eight feet for open storage piles within 300 feet of off-site occupied buildings or houses exist within the current Rule 1157 language. Staff have received feedback from stakeholders and revised PAR 1157 to update applicable rule language to sensitive receptors to improve clarity. Additional information regarding this change can be found in Chapter 2.

Comment Letter #3

The California Asphalt Pavement Association

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July 14, 2026

Wayne Nastri, Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: Rule 1157 – Emission Reductions from Aggregate & Related Operations

Dear Mr. Nasri:

The California Asphalt Pavement Association, founded in 1953, is the oldest and largest construction trade association that focuses exclusively on the asphalt pavement industry in California. Our members include asphalt producers, refiners, paving contractors, testing labs, consultants, equipment manufacturers and many other related companies that make up the industry.

On behalf of the asphalt pavement industry in California, we are writing to express our serious concerns with regard to proposed rule changes to Rule 1157 – Emission Reductions from Aggregate & Related Operations. We have concluded that, based on our close examination of the proposed rules, the language is onerous, unworkable and masks the real issue: a lack of Air District enforcement of existing regulations.

As you may know, asphalt covers 95% of paved surfaces in California and is an essential component to maintaining the vital transportation infrastructure that connects our neighborhoods and makes possible the efficient movement of people, goods and services around our state. Voters in numerous local and statewide elections over the years have demanded that fixing our roads is a top priority and asphalt pavements, which are durable, safe, economical and 100% recyclable.

Asphalt plants are a critical piece of the transportation puzzle. The plants mix crushed rock and sand with liquid asphalt binder to make what is known as Hot Mix Asphalt that is used in paving projects around the state. Because asphalt is also 100% recyclable, reclaiming old asphalt into new mix is a major sustainable attribute of asphalt plants and increasingly becoming a requirement in many jurisdictions.

At this juncture it is important to point out that employees of our member companies live and work in the communities that make up the South Coast Air Quality Management District, and we also have a strong commitment to the environment and operating our facilities in a responsible manner. Asphalt is in fact, the world's most recycled product. We are proud of our record of sustainability on behalf of the communities we serve.

We understand the motivation behind proposed rule changes to Rule 1157, and we sympathize with community members who feel as though their voices are not being 3-1

WAYNE NASTRI
July 14, 2026
Page 2 of 2

heard on this issue. However, we strongly believe that existing regulations are more than adequate to protect our communities, and more regulations will not make any appreciable difference to the source of the complaints. Rather, more effective enforcement of existing regulations is what is needed. We observe and would like to bring to your attention that this claim has been echoed not only by industry representatives but also by community members during recent working group meetings on the proposed rule.

Our industry has gone to great lengths to comply with existing regulations on managing fugitive dust sources, and we should not be penalized by some bad actors who have eluded air district enforcement on this front. A renewed emphasis by the Air District to ensure companies are following well-established Best Management Practices with regard to fugitive dust mitigation would, in our opinion, address the concerns of the community. 3-1

In addition, we have concerns about proposals with regard to the use of prescriptive watering schedules on facilities as a dust-mitigation measure rather than allowing watering schedules to be determined by the conditions at the site. As you know, Southern California is persistently facing drought conditions, so an increase in the use of water in our facilities is not feasible or environmentally sound. In addition, the use of water may bring with it unintended consequences with regard to water quality regulations. Puddles of water and mud created by overwatering could also create track-out issues at facilities if the current rule language is adopted

It should be noted that asphalt facilities are limited by permits on how much energy they can consume. The overuse of water to wet down aggregate stockpiles will require additional energy to remove the additional moisture. This additional energy will produce greater amounts of combustion pollutants to dry that aggregate before it is suitable to produce Hot Mix Asphalt. This is another unintended consequence that causes an unworkable constraint by the proposed rule. 3-2

It has been suggested that chemical dust suppressants be used in greater quantities to further control emissions. Chemical dust suppressants are unnecessary when water can provide the control necessary to prevent fugitive emissions and the chemicals in the suppressants can create other environmental impacts. Unless the Air District can submit to our industry a list of approved suppressants to be used for this purpose that does not create other impacts, this is also an unworkable proposal. Chemicals that may be acceptable for such uses today may become an environmental liability tomorrow. 3-3

We fear the unintended consequences of the proposed rule language will likely cause severe disruption to the vital road repairs triggered by the Road Repair & Accountability Act of 2017, the federal Infrastructure Investment & Jobs Act of 2022 and other legislation intended to fix and maintain our vital transportation infrastructure. Studies by TRIP, a national transportation research organization, have found that rough roads cost motorists up to $1,000 per year in poor fuel economy, car 3-4

WAYNE NASTRI
July 14, 2026
Page 2 of 2

repairs, lost productivity and other impacts that fall disproportionately on underrepresented groups.

We welcome the opportunity to work with the Air District staff to address the issues raised by these proposed rules and work toward realistic solutions that are fair to all parties, workable and implementable. 3-4

Please feel free to contact me at (916) 791-5044 if you have any questions.

Sincerely,

RUSSELL W. SNYDER, CAE
Executive Director

Staff Response to Comment Letter #3

3-1 Response:

Staff agree with the commenter that more effective enforcement of existing Rule 1157 requirements is needed. PAR 1157 will include additional tools for rule enforcement by expanding recordkeeping requirements as well as the addition of prescribed dust control applications to improve enforceability and implementation. The proposed amendments will also include additional options to comply with some rule requirements which would allow for greater flexibility for facilities demonstrating compliance with current Rule 1157 requirements.

3-2 Response:

Staff have evaluated feedback from stakeholders since the release of the Preliminary Draft Rule Language and revised PAR 1157. Revised proposal will include a new rule compliance option to conduct periodic inspections that will provide flexibility to determine when to apply dust suppressants so long that the open storage piles are maintained with a stabilized surface. This application flexibility would depend on the periodic inspection results. If the facility deems the open storage pile as maintained in a stabilized condition, dust suppressants will not need to be applied to the open storage pile. Facilities would be required to maintain the inspection records on-site and provide the records when requested by the Executive Officer. Additional information can be found in Chapter 2.

3-3 Response:

Staff would like to clarify that PAR 1157 does not specifically call for additional use of chemical stabilizers; however, the proposed amended rule does specify the application frequency of dust suppressants, which includes chemical stabilizers as an option by definition. There are certain requirements in existing Rule 1157 which specifically calls for the use of chemical stabilizers, such as unpaved haul roads, and PAR 1157 will not expand the usage of chemical dust suppressants beyond what is already required in the existing rule. PAR 1157 has been updated to specify the application frequency of chemical stabilizers based on manufacturer specifications. The use of chemical stabilizers was evaluated during the adoption of Rule 1157 in 2005, and further evaluation is not warranted as PAR 1157 does not propose to restrict usage of a type of chemical stabilizer. Additional information can be found in Chapter 2.

3-4 Response:

PAR 1157 provides a more prescriptive approach to controlling fugitive dust from aggregate and related operations. Staff have evaluated feedback from stakeholders since the release of the Preliminary Draft Rule Language and revised proposed language to include more options for facilities to comply with PAR 1157 requirements. Please refer to response 3-2 and Chapter 2 for additional information regarding compliance options for PAR 1157.

Comment Letter #4

CR&R environmental services

July 20, 2026

South Coast AQMD
21865 Copley Drive
Diamond Bar, CA 991765

Attn: Ms. Ashley Dang

Re: Comments on Proposed Amended Rule 1157 (PAR 1157)

Dear Ms. Dang,

On behalf of CR&R Environmental Services, I thank you for the opportunity to comment on South Coast AQMD's Proposed Amendments to Rule 1157 (PAR 1157) for PM 10 emission reductions from aggregate and related operations. In general, we are not opposed to the PAR 1157 amendments however, we have concerns regarding the application of this rule to Construction and Demolition (C&D) operations that take place **completely inside a building.** The PAR 1157 should include language that addresses C&D operations that are fully enclosed inside a building, as discussed below. The purpose of this letter is to provide general comments on PAR 1157 and specific suggested changes to the rule language that will help to address this issue.

Founded in 1963, CR&R Environmental Services (CR&R) is a Southern California-based waste and recycling collection company, serving more than 3 million people and over 25,000 businesses in Orange, Los Angeles, San Bernardino, Imperial, and Riverside counties. CR&R is contracted with approximately 60 local entities to provide waste and recycling services that support compliance with state laws. CR&R has long been a leader in the development of climate-friendly, closed-loop waste collection and processing including C&D facilities. CR&R operates C&D operations within SCAQMD's jurisdiction including operations that are conducted within enclosed buildings. 4-1

Our main concern is that C&D operations that are conducted completely inside a building are not considered at all in the PAR 1157 language. C&D operations that are conducted completely inside a building are enclosed in a way that minimizes or eliminates discharges into the atmosphere and therefore eliminates the need for the use of dust suppressants. In addition, these types of facilities are conducted on a concrete pad inside the building so there is no need for building a operations "pad "out of other materials such as gravel and there is no need for treating unpaved roads. The use of any screening or other processing equipment is conducted inside the building so added covers for processing equipment are not required. Also, there is no need for storage silos or bunkers for the C&D materials located inside a building. Set-backs from adjacent property lines or buildings are also not required. Since the Definitions section (c) of PAR 1157does not include language that specifically addresses C&D facilities that are inside of a building there is gap in the amendment that does not address this issue. In our opinion, most of the requirements listed in the PR 1157 amendments do not apply to C&D operations located

p.1

inside a building, including sections (d) (1),(2),(3),(4),(5),(6),(7),(9) and (10). The PAR 1157 language should include revisions that address the issues associated with C&D operations located completely inside a building. The following paragraph presents some suggested changes to the PAR 1157 language that could accomplish this objective.

The following includes comments, proposed revisions and recommended wording for the PR 1157 Amendments language to address the issues associated with C&D operations that are conducted completely inside a building:

1. Add a sentence or small paragraph to the Definitions Section (c)(9) to include C&D operations that are located completely inside a building. This could include a statement that C&D operations located completely inside a building are exempt from certain Requirements in the rule.
2. Revise the language in the Definitions Section (c)(27) to state that Open Storage Pile located completely 4-1
inside a building are exempt from certain Requirements in the rule.
3. Add a paragraph to the Requirements Section (d)(1)(A) Open Storage Piles that states C&D operations that are located completely inside buildings as are exempt from the requirements listed in sections (d)(1),(2),(3),(4),(5),(6),(7),(9), and (10). This could include statement that the Requirement (d)(8) would still apply to these types of operations.
4. In the Exemptions Section (i) add a small paragraph that states a C&D facility that operates completely inside a building is exempt from all of the rule requirements except section (d) (8).

We respectfully request that the next draft version of the PAR 1157 language include language that addresses these issues associated with C&D operations that are located completely inside a building. CR&R has been a pioneer in circular economy waste collection and processing in California for decades and hopes to see our investments in C&D recycling operations such as locating them inside a building be supported going forward. Again, on behalf of CR&R, I greatly appreciate your consideration of our comments.

Sincerely,
CR&R, Inc.

John McNamara, CPG/CEG
Vice President/Environmental Affairs
CR&R Environmental Services

p. 2

Staff Response to Comment Letter #4

4-1 Response:

The definition of open storage piles in Rule 1157 excludes piles of material that are fully enclosed in a structure with non-porous walls, covered, or chemically stabilized. If the construction and demolition debris transfer station is fully enclosed in a structure with non-porous walls, the enclosed storage piles would not be subject to the rule requirements for open storage piles. Please refer to response to public workshop comment #1 (PW-1) where staff provided additional clarifications regarding construction and demolition debris operations within an enclosed building.

Staff would like to provide additional clarifications for the list provided in page 2 of the comment letter labeled item #3:

- Paragraph (d)(1) specifies requirements for general performance standards which are applicable to all facilities regardless of whether the process is enclosed.
- Paragraphs (d)(2), (d)(3), (d)(4), and (d)(5) include considerations for enclosed processes as a form of applicable dust control as defined under other dust control methods.
- Paragraph (d)(6) applies only to open storage piles which excludes storage piles enclosed within a structure with non-porous walls.
- Paragraphs (d)(7) and (d)(8) apply to internal roads and track-out, respectively, which are applicable to all facilities regardless of whether the process is enclosed.
- Paragraph (d)(9) applies to new or modified equipment and requires that equipment to comply with 40 CFR Part 60, Subpart I and/or 40 CFR Part 60, Subpart OOO as applicable.
- Paragraph (d)(10) is only applicable to facilities using chemical stabilizers.

Comment Letter #5

CIAQC
CONSTRUCTION INDUSTRY AIR QUALITY COALITION

Coalition Members

AGC CALIFORNIA

BIA
Building Industry Association of Southern California

WSTA
Western States Trucking Association

UNITED CONTRACTORS
United Contractors

SCCA
Southern California Contractors Association

July 24, 2026

Ashley Dang
South coast Air Quality Management District
21865 Copley Drive,
Diamond Bar, CA 91765
adang@aqmd.gov

RE: Comments on PAR 1157

Dear Ms. Dang:

The Construction Industry Air Quality Coalition would like to submit the following comments on the July 8th version of the proposed amendments to Rule 1157-PM10 Emission Reductions from Aggregate and Related Operations.

Several of our member companies engage in aggregate and asphalt handling and recycling.
We are pleased that the staff took the time to visit our facilities and better understand the operations and the limitations inherent at some locations. We would also point out that recycling building materials is a high priority for the Governor and State Legislature. It is critical that these operations continue to perform the important functions necessary to reuse and recycle these materials.

We believe many of the issues raised by residents in Sun Valley are the result of a rogue operator who has not complied with SCAQMD rules or the permit requirements of the City of Los Angeles. This is an enforcement problem, not an industry-wide emission problem. Unfortunately, it is unclear how these rules alone are going to get those rogue operators into compliance without some multi-agency targeted enforcement effort. Our members on the other hand have been performing these operations for many years and have adopted extensive protocols and employee training to comply with Rule 1157. A review of your inspection records will indicate that our industry has been successful at significantly reducing dust emissions from our operations. 5-1

As we have discussed previously, we have three major concerns with the draft amendments. They pertain to the horizontal distance requirements and the vertical height limitations.

First, we are concerned about the 300 ft distance requirement from any occupied building. Most of these facilities are located in industrial zones and the adjacent properties are similar uses with PM10 emissions as well. It 5-2

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Major Funding Provided by the Construction Industry Advancement Fund and the Fund for Construction Industry Advancement

might better address the issues raised by some residents who are adjacent to aggregate operations if the distance requirement applied only to sensitive uses. 5-2
Second, Is the 30-foot setback from any public street. We would like some clarification about from which point is this distance measured? From the toe of the slope to pavement? To the right-of-way? We believe for those who cannot maintain that distance additional watering or use of stabilizers would be a far better option than the installation of a wind screen fence that could reach 30 feet in height. Not only would that be prohibitively expensive and take months or years to permit, but it would also not be as effective as water or stabilizers. 5-3

Third, we are concerned about any limitations on the height of the storage piles. As we learned in Rule 403.2, the portable conveyors that are standard in the industry allow for the piles to be no higher than 30 feet. That height is also optimal for water systems that easily control dust and stabilize the surface of piles that are undisturbed. From a operational standpoint it simply makes no sense to try and manage storage piles that are lower than 30 feet and spread across a wider area. 5-4

Finally, there are a few issues that need some clarification. Since this is going to be a rule that relies heavily on record keeping will the staff be developing a standard form for operators to use to ensure that all the data necessary to prove compliance is collected and recorded? Can we get some clarification on the frequency of watering and under what circumstances is the frequency to be adjusted? Is it really necessary to water 24 hours? During high wind situations it is as difficult to control the water as it is to control the dust. 5-5

Thank you for your consideration of these matters. We are available to further discuss the specifics as you finalize the language of the rule.

Sincerely,

Michael W Lewis

Michael Lewis
Senior Vice President
951-206-4420
mike@lewisandco.net

Staff Response to Comment Letter #5

5-1 Response:

Please see response to comment 3-1 regarding the enhanced requirements included in the proposed amended rule which would support enforcement of PAR 1157.

5-2 Response:

Please see response to comment 2-3 and Chapter 2 for additional information on proposed changes regarding storage pile distance and sensitive receptors.

5-3 Response:

The distance of open storage piles to the property boundary is measured as the distance of the nearest outer edge of the storage pile to the property line of the facility. If it is not feasible for a facility to move the open storage pile beyond 30 feet of the property boundary, PAR 1157 has been revised since the release of the Preliminary Draft Rule to provide multiple options to comply, including the option to install and operate a water irrigation system. Please see Chapter 2 and Figure 2-6 for additional information.

5-4 Response:

PAR 1157 does not have a general limitation on the height of open storage piles. The limit of less than eight feet in height applies to open storage piles located within 300 feet of sensitive receptors. Staff have evaluated feedback from stakeholders since the release of the Preliminary Draft Rule Language and revised PAR 1157. The proposed amendments include alternative options for open storage piles near sensitive receptors to provide facilities added flexibility to comply with rule requirements. Additional information can be found in Chapter 2.

5-5 Response:

Specific requirements for recordkeeping are outlined in subdivision (f). PAR 1157 provides flexibility by allowing a facility to maintain records applicable to site specific needs to demonstrate compliance with PAR 1157 requirements. PAR 1157 does not include a prescribed recordkeeping form, but Appendix A includes examples of forms that would satisfy the recordkeeping requirement.

Based on industry stakeholder feedback, the proposed amendments will specify that the prescribed watering requirements in PAR 1157 will occur during each work day. However, the area of an open storage pile which was actively disturbed must be re-stabilized at the end of each work day which is an existing requirement of Rule 1157.

Rule 1157 provides an exemption for high winds with instantaneous wind speeds over 25 miles per hour and will be retained in PAR 1157.

Additional information on recordkeeping and open storage pile requirements, please see Chapter 2.

Comment Letter #6

CALCIMA
California Construction and Industrial Materials Association

July 24, 2026

<u>**VIA E-MAIL**</u>

Ashley Dang
Air Quality Specialist
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
E-Mail: adang@aqmd.gov

Re: <u>**PAR 1157 Follow-up Comments**</u>

Dear Ms. Dang:

The California Construction and Industrial Materials Association ("CalCIMA") is a non-profit organization and trade association for the construction and industrial material industries in California, which includes producers of construction aggregates, industrial minerals, and ready mixed concrete, and which provides the statewide voice of the industry. CalCIMA members operate more than 500 facilities State-wide, and those facilities—and the communities in which they operate—depend on clear, practical rules and consistent enforcement of applicable rules and regulations.

CalCIMA previously submitted letters to the South Coast Air Quality Management District ("SCAQMD") during this PAR 1157 process, most recently on June 17, 2026, and appreciates the opportunity to comment and engage with staff during workshops and other meetings, the most recent of which occurred on July 22, 2026. We want to acknowledge and thank SCAQMD staff for engaging seriously with CalCIMA's concerns within the limitations of this process.

As discussed at the July 22 meeting, CalCIMA supports performance-based requirements that focus on effective and practical considerations while avoiding unnecessary operational complexity for facilities already operating responsibly and in compliance with applicable standards. Following that conversation, and in the spirit of continued cooperation, CalCIMA provides these additional comments for your review and consideration. The first section of the letter discusses direct edits CalCIMA suggests; the second and third sections highlight issues that merit further discussion and analysis outside of this rulemaking process.

1. Proposed Additional Revisions to PAR 1157

As discussed in prior correspondence and in the July 22 meeting with SCAQMD staff, CalCIMA appreciates staff's willingness to engage in constructive discussions regarding the proposed amendments to Rule 1157. However, CalCIMA believes the rule would benefit from limited additional

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revisions to provide greater clarity and precision, and to better meet the rule's stated objectives. We provide our proposed revisions below.

(a) Definition of "Material Spillage"

The definition provided in section (c)(24) of PAR 1157 does not distinguish between minor incidental spillage that can occur during normal operations, and which routine maintenance could address, and larger spills of material that may have the potential for greater dust emissions and therefore may require more immediate corrective action. CalCIMA requests the definition of Material Spillage include the following clarifying language to maintain this distinction: 6-1

> "MATERIAL SPILLAGE means material inadvertently lost or scattered by spilling which contributes to fugitive emissions."

(b) Measurement of Track-Out

Section (d)(1)(A)(iv) of PAR 1157 would define track-out as 15 feet or more of ***cumulative*** length from the exit of the facility. Experience has shown that misinterpretations or misapplications of "cumulative" have sometimes occurred when applying Rule 403, which sometimes resulted in the addition of the lengths of track-out from the same vehicle. This appears contrary to the intent of this section of the rule, which CalCIMA understands to require that operators timely remove tracked-out materials that extend into a public roadway and create a greater risk of airborne spread of that entrained dust.

The current Staff Report for PAR 1157 references three case studies to clarify the track-out requirements PAR 1157 and Rule 403. However, the examples do not address a key ambiguity; that is, whether a "cumulative" track-out calculation includes multiple tires on a single truck axel, the truck axels themselves, or multiple trucks leaving a facility. Under different interpretations, one truck with 18 wheels can generate 15 cumulative feet if the calculation occurs per wheel; if calculated consecutively on a per-vehicle basis, that same truck would cause a one-foot consecutive track-out. 6-2

On this basis, CalCIMA requests the substitution of "consecutive length" for "cumulative length" in this definition. This proposed revision helps clarify the intent of this section of the rule by evaluating each track-out ***instance*** at a facility, and the degree to which it has the potential to permit spread by other vehicles that also use the adjacent public roadway.

(c) Material Spillage Notification Requirements

Section (d)(1)(C) of PAR 1157 would require application of dust suppressants every hour, without reference to any knowledge of a condition requiring its application. CalCIMA requests that SCAQMD condition the application of suppressants upon actual notice that spillage has occurred, as provided below: 6-3

> "The owner or operator of a Permanent or Temporary Facility/Operation shall apply Dust Suppressants to all other Material Spillage and Carry-Back, upon notification to on-site management, every hour until removal and maintain records specified in subparagraph (f)(1)(B)."

The addition of a knowledge requirement provides a definite and fair point in time from which to gauge compliance. 6-3

(d) Flushing Gravel Pads

Section (d)(1)(D) of PAR 1157 would require daily flushing of gravel pads with water. However, that requirement could require the use of substantial volumes of water, particularly for sites with multiple pads of different material sizes. The runoff generated by this substantial increase in daily water use will likely cause facilities to exceed their stormwater treatment and retention capabilities, resulting in violations of the applicable National Pollutant Discharge Elimination System ("NPDES") permit. CalCIMA proposes modifying this requirement as follows: 6-4

> "(iii) Is flushed with water ~~daily~~ when silt and sediment have accumulated in the gravel pad or the gravel pad is completely replaced and maintain records as specified in subparagraph (f)(1)(C)."

This revised language achieves the objective of this portion of the rule by ensuring adequate wetting when conditions warrant, including when an existing pad is replaced or a new pad is established. This ensures more efficient water use, protects existing stormwater treatment and retention systems, and minimizes the potential for runoff from what could otherwise comprise excessive daily watering.

(e) Moisture Content Modeling as an Additional Alternative to Application of Dust Suppressants to Inactive Storage Piles

The use of dust suppressants is only one of several ways to control fugitive dust and achieve the objective of Section (d)(6) of PAR 1157. Further, oversaturation of material storage piles with water requires the facilities that dry aggregate to use more fuel to dry the materials which in turn generates greater NOx and CO emissions. CalCIMA proposes to add language to Section (d)(6)(B) as follows:

> "(B) In lieu of meeting the requirements of subparagraph (d)(6)(A) the owner or operator of a Permanent or Temporary facility Operations may:
> [. . .]

> "(iv) Maintain moisture content action levels in storage piles by performing monthly moisture sampling to meet the applicable performance standards in (d)(1)(A). The operator shall apply dust suppressants when a sampling result is below the applicable action levels specified until the appropriate moisture content is reached, as specified for each material size range below." 6-5

Common Material Size	Moisture Content Action Level
<= ¾" to >=1/2"	1%
<1/2" to >= 3/8"	1.2%
<3/8" to >= ¼"	1.5%
<= ¼" to Sand	2%

Practice among responsible operators has demonstrated that maintaining moisture levels that correspond to particle size, with higher moisture levels for smaller product, is an effective means of preventing fugitive dust. Providing this compliance option achieves the objective of the rule while providing an alternative to chemical dust suppressant use. 6-5

(f) Water Application Requirements for Storage Piles.

Additionally, we understand certain application requirements of Section (d)(6)(A) and (d)(6)(D) do not apply to piles that are "actively disturbed." However, the rule does not specify a timeframe for active disturbance. To provide clarity, CalCIMA recommends amending references to "actively disturbed" in Section (d)(6)(A)(i) to read:

> "[...] except for areas of the piles that are actively disturbed during the Loading and/or Unloading activities <u>during the business day</u> [...]"

Consistent with the above, CalCIMA recommends amending references to "actively disturbed" in Section (d)(6)(D)(i) to read: 6-6

> "[...] except for areas of the piles that are actively disturbed during the Loading and/or Unloading activities <u>during the business day;</u>"

Also, the proposed language in Section (d)(6)(A) provides for watering every four hours or as necessary to meet the stated performance standard. For the reasons stated above, this could lead to excessive water use and runoff and may require watering that does not yield further benefit for control of fine particulates (for example, recently washed material), and also creates complexity with documentation and tracking, particularly on sites with multiple material piles. CalCIMA recommends substituting the phrase "at least once every four hours" with "<u>at least twice per day</u>." To provide a practical limit and permit simpler tracking.

(g) Storage Pile Height

Section (d)(6)(D) of PAR 1157 would limit the height of storage piles within 300 feet of an off-site occupied building. As demonstrated by industry practice and with the changes to this rule, the use of dust suppressants provides one of several ways to control fugitive dust. Consistent with the concept of the proposed addition of Section (d)(6)(B)(iv) above, CalCIMA proposes to add the following new section (d)(6)(D)(iv): 6-7

> "<u>(iv) Maintain moisture content action level in storage piles by performing monthly moisture sampling. The operator shall apply dust suppressants when a sampling result is below the applicable action levels specified until the appropriate moisture content is reached, as provided for each material size range below:</u>

Common Material Size	Minimum Moisture Content Action Level
<= ¾" to >=1/2"	1%
<1/2" to >= 3/8"	1.2%
<3/8" to >= ¼"	1.5%
<= ¼" to Sand	2%

6-7

As described above, practice among responsible operators demonstrates that maintaining appropriate moisture levels to the material in question is one effective means of preventing fugitive dust. Providing this compliance option achieves the objective of the rule while providing an alternative to chemical dust suppressant use.

(h) Minimum Distance of Storage Piles from Buildings and Uses

Section (d)(6)(E) of PAR 1157 would prohibit maintenance of an open storage pile within 30 feet of a property boundary facing a public road. This presents a significant problem for smaller facilities and hot mix asphalt operations, where site size and/or configuration may render compliance infeasible or impossible. Additionally, requiring setbacks or structural controls such as windscreen fencing may introduce engineering, safety, and/or planning and zoning concerns, including risks related to wall stability, traffic site lines, and placement near property boundaries. To provide one additional means of addressing the underlying concern for this requirement, and consistent with the principles discussed above, CalCIMA requests the SCAQMD add new Section (d)(6)(E)(iii) as follows:

> "(iii) The storage pile maintains moisture content action level in storage piles by performing monthly moisture sampling. The operator shall apply dust suppressants when a sampling result is below the applicable action 6-8
> levels specified until the appropriate moisture content is reached.

Common Material Size	Minimum Moisture Content Action Level
<= ¾" to >=1/2"	1%
<1/2" to >= 3/8"	1.2%
<3/8" to >= ¼"	1.5%
<= ¼" to Sand	2%

As described above, this compliance alternative presents responsible operators of smaller and/or more constrained sites with a safe and feasible option of maintaining their existing operations while providing a proven, effective means of fulfilling the objective of the underlying requirement—preventing fugitive dust—without chemical dust suppressant use.

(i) Chemical Dust Suppressant Use on Internal Unpaved Roads

Sections (d)(7)(A)(i) and (d)(7)(B) of PAR 1157 would require at least daily application of chemical
stabilizers to internal unpaved roads at applicable facilities or operations, depending on the weather and 6-9
condition of the road. However, adding water—such as rainwater—to a chemical stabilizer will in some cases rehydrate the stabilizer and can wash it away, reducing or eliminating its effect on the unpaved

road. Replacing the currently proposed requirement for chemical stabilizers to a requirement for dust suppressant will provide the control needed to meet the performance standard.

In addition, and as expressed in prior meetings, CalCIMA remains concerned about the impact of chemical stabilizers on the environment. Any chemical stabilizer used today may be deemed harmful to the environment in the future, and unintended consequences can have lasting impacts on the environment. Dust suppressants can provide the control desired while presenting a lower environmental risk, and CalCIMA asks SCAQMD to make this change. 6-9

(j) New Proposed Recordkeeping Requirements

Section (f)(4)(A) of PAR 1157 would require detailed and prescriptive recordkeeping of aggregate truck visits, as well as the method of ground stabilization or other track-out prevention measures relating to the internal facility route the truck used. These documentation and reporting requirements are difficult to maintain, particularly when many facilities rely on contracted services or third-party truck operators outside that facility's or operator's direct control. Further, CalCIMA does not believe that increased reporting, by itself, has significant potential to reduce or control dust fugitive dust emissions, and it will not change or improve any best management practices approved under this rule. For all of these reasons, CalCIMA recommends that SCAQMD delete Section (f)(4)(A) in its entirety. 6-10

(k) Additional Requirements Triggered by Recurrent Violations

Sections (h)(1)(A) and (h)(1)(B) of PAR 1157 provide a one-size-fits-all measure in the event of repeated violations, irrespective of the underlying causes of those violations—that is, wind screen fencing is an absolute requirement even if the violations to not involve features or operations that wind screen fencing would address. However, the provisions would apply covers a wide variety of industries which store a wide variety of materials at sites that are a variety of different property sizes. Further, for the reasons described above regarding minimum distances of storage piles from certain property lines, the proposed solution may not be practicable or even possible, depending on the applicable zoning and building regulations for a particular property or facility. Lastly, multiple violations for track out could originate from sources other than the storage piles themselves (e.g., track-out), which automatic limitations on piles would not address.

CalCIMA strongly recommends that the SCAQMD enforcement team work with the individual facilities to determine the best compliance plan for the circumstances, and requests either the deletion of sections (h)(1)(A) and (h)(1)(B) in their entirety, or their replacement with a requirement to work with staff to develop and implement a standards-based compliance program. 6-11

Related to this issue, CalCIMA notes that the proposed modifications to sections (h)(1) and (h)(2) of PAR 1157 also reduce an important enforcement threshold. Specifically, where the existing language of Rule 1157 requires a threshold number of ***validated*** notices of violation to trigger progressive enforcement and certain mandatory requirements, the proposed language requires only *issuance* of notices of violation. CalCIMA believes the previous requirement for validated notices—and the definition of a validated notice of violation formerly at Section (c)(54) of the rule—are both important and fair, because it reserves more stringent enforcement measures and imposes potentially burdensome additional requirements only for those facilities at which the occurrence and severity of air quality violations under this rule have been definitively established, rather than alleged. Consequently, CalCIMA urges SCAQMD to modify sections (h)(1) and (h)(2) to require validated notices of violation as their triggers.

2. CalCIMA Would Welcome the Opportunity to Separately Address with Staff Previously Raised Issues with Certain Components of Rule 1157.

CalCIMA understands that SCAQMD staff focused rulemaking efforts on responding to the community concerns that formed the genesis of California Senate Bill 526 (Menjivar). However, CalCIMA and others previously articulated specific concerns regarding implementation of Rule 1157 that the current rulemaking process does not address but remain appropriate for examination.

(a) Eliminating Chemical Dust Suppressant Use

Rule 1157 in both its current and proposed forms encourages and, in some circumstances, may even require the use of chemical dust suppressants, about which CalCIMA maintains significant concerns regarding effects on the environment and on individuals. CalCIMA would welcome staff's engagement on developing solutions that SCAQMD believes would allow the removal of chemical dust suppressants as a requirement at any facility regulated by SCAQMD, but particularly those subject to Rule 1157. 6-12

(b) Ensuring an Accurate Emissions Inventory.

The prior PM10 emissions inventory in the original Rule 1157 assumed a 20-percent non-compliance rate. It is unclear to CalCIMA whether that assumption carried forward into the emissions inventory for PAR 1157, and CalCIMA would appreciate the opportunity to discuss this assumption and its ramifications with SCAQMD staff. 6-13

3. CalCIMA Wishes to Work as a Partner with SCAQMD to Develop Best Management Practices and Compliance Alternatives Outside of This Rulemaking Process.

CalCIMA understands and supports the SCAQMD's goals of protecting air quality and surrounding communities, and it and its members remain committed to operations that are responsible both to the environment and to the communities that members' facilities call home. Further, CalCIMA and its members collectively bring unparalleled technical and operational experience across the entire range of construction and industrial materials products and processes, including aggregate, concrete and asphalt production and recycling, and related essential materials operations. Similarly, CalCIMA believes that SCAQMD staff are far more qualified and better positioned than the State Legislature to craft best management practices, as well as regulatory and implementation guidelines.

With those shared goals CalCIMA believes it and its technical working group are uniquely qualified to help identify practical, technically sound, and enforceable solutions that can achieve SCAQMD's objectives. As CalCIMA brings forward potential alternatives and technical proposals, we respectfully ask that when questions, concerns, or potential deficiencies are identified, SCAQMD staff proactively engage with CalCIMA to fully understand the concern and work collaboratively toward a viable solution. 6-14

As presented in the July 22 meeting with the SCAQMD staff, examples of CalCIMA's proposals for best management practices that we believe merit continued engagement and consideration include, but are not limited to:

1. Washed aggregate;
2. Process-based fines management;

3. Baghouse fines removal;

4. Moisture maintenance without fixed watering intervals.

These practices relate directly to compliance with Rule 1157 as a particulate-focused regulation. Throughout the rulemaking process CalCIMA has suggested that because the silt has been removed from washed materials, the stockpiles of those washed materials have minimal potential to emit dust. 6-14
We note that other air districts, including San Joaquin, have recognized the relationship between silt content of a material and its dust generation potential.

Accordingly, CalCIMA would like to continue to work with SCAQMD to evaluate how these processes relate to and could support particulate reduction strategies, develop the appropriate technical framework and implementation process for the best management practice, and quantify the potential particulate reduction these processes can achieve. This consideration need not occur through this rulemaking process; CalCIMA asks only that SCAQMD commit to substantive discussions on these topics.

4. Additional Comments on the Staff Report

The Staff Report references the 2005 litigation and settlement agreement between the South Coast Air Quality Management District ("SCAQMD") and the California Mining Association (the "CMA Settlement"). The discussion of the litigation and CMA settlement lists the High-Wind Exemption as the sole issue. CalCIMA wishes to clarify that the CMA Settlement encompassed a range of issues that also included: (1) the accuracy of the emissions inventory, (2) Method 9B, (3) other measurements of visible 6-15
dust plumes, and (4) the required use of chemical dust suppressants. The CMA Settlement established processes specifically to ensure development and implementation of workable standards for these issues within the context of Rule 1157, and CalCIMA understands the SCAQMD engaged in good-faith discussions regarding these issues. However, some remain unresolved and would benefit from additional discussion, clarification, and/or analysis outside of this rulemaking process, as discussed in Section 2, above.

5. Conclusion

CalCIMA appreciates SCAQMD's productive engagement and stands ready to provide additional technical information or facility context as PAR 1157 moves forward. Please feel free to contact me at sseivright@calcima.org or (951) 941-7981.

Very truly yours,

Suzanne Seivright-Sutherland
Director of Regional Governmental Affairs and Grassroots Operations

cc: Michael Krause, Assistant Deputy Executive Director
Neil Fujiwara, Program Supervisor
Shawn Wang, Program Supervisor
D. Marisa Gonzalez, Ph. D, Air Quality Specialist

Staff Response to Comment Letter #6

6-1 Response:

PAR 1157 provides flexibility on the handling of material spillage by providing multiple options to comply in line with what the commenter noted for minor and large spills. All material spillage, when left untended, can become a contributor of fugitive dust. The suggested edit does not provide additional criteria or further clarification. The definition for material spillage will remain unchanged.

For additional information on requirements for material spillage, please see Chapter 2.

6-2 Response:

Staff provided clarification on the calculation of cumulative track-out in Chapter 2 which specifies instances of track-out with multiple tracks, such as individual track-out from both left and right side of a truck, the cumulative length in this case will be the sum of both track lengths. The distinction of left and right sides of a truck means that, at most, one truck will have two sets of tracks assuming both sides of the truck is causing track-out regardless of number of wheels per axle or number of axles per truck. The basis for track-out is the length of track-out on the ground regardless of the length of the vehicle or number of wheels deposited the track-out. A longer vehicle is not allowed to generate more track-out than a smaller vehicle. The provided clarification is consistent with implementation of Rule 403 track-out requirements.

Based on Staff observations, it is not uncommon for a single stretch of track-out to be broken up into smaller segments due to vehicle traffic. The commenter's recommendation will therefore reduce the effectiveness of the requirement by imposing the applicability to only consecutive, unbroken lengths of track-out. Staff does not recommend changing rule language for clause (d)(1)(A)(iv).

6-3 Response:

Staff have evaluated feedback from stakeholders since the release of the Preliminary Draft Rule Language and revised the draft proposal. PAR 1157 will include clarifications that material spillage requirements for cleanup and dust suppressant application for the spill must be implemented within one hour of identification. For additional information, please see Chapter 2.

6-4 Response:

Staff have evaluated feedback from stakeholders since the release of the Preliminary Draft Rule Language and revised the draft proposal. PAR 1157 will retain the existing requirement for flushing gravel pads as necessary to comply with the track-out thresholds of Rule 403 and PAR 1157. For additional information, please see Chapter 2.

6-5 Response

Please see response to comment 3-2 and Chapter 2 for additional options to comply with PAR 1157 in lieu of prescribed application of dust suppressants.

Staff does not recommend inclusion of the suggesting language since PAR 1157 does not preclude facilities from controlling fugitive dust while maintaining minimum moisture content as long as the open storage pile complies with the general performance requirements specified in clauses (d)(1)(A)(i) through (d)(1)(A)(iii). The suggested language does not verify performance at the same frequency for the entire open storage pile.

6-6 Response

As the commenter noted, certain requirements of PAR 1157 do not require dust suppressant application for areas of open storage piles that are actively disturbed. Existing requirement of Rule 1157 requires the area of an open storage pile, which was actively disturbed, to be re-stabilized at the end of each work day which serves the same function as the commenter's recommended language.

Please see response to comment 3-2 and Chapter 2 for additional options to comply with PAR 1157 in lieu of prescribed application of dust suppressants. Staff have evaluated feedback from stakeholders since the release of the Preliminary Draft Rule Language and revised the draft proposal to allow facilities to apply dust suppressants at least twice a day with a minimum of four hours in between applications. Please see Chapter 2 for more details on the latest proposal.

6-7 Response

Please see responses 5-4 for additional clarification on compliance options for open storage piles near sensitive receptors and response to comment 6-5 for storage pile moisture content.

6-8 Response

Please see responses 5-3 for additional clarification on compliance options for open storage piles near property boundary and response to comment 6-5 for storage pile moisture content.

6-9 Response

PAR 1157 does not impact the current practice for usage of chemical stabilizers as required in Rule 1157. As noted in the December 2004 Final Staff Report for Proposed Rule 1157, multiple chemical stabilizers are available for various applications and some are more moisture resistant than others. In some cases, renewal application of the chemical stabilizer might be necessary for proper dust suppression. PAR 1157 also includes the requirement for facilities to maintain the latest copies of documentation for all chemical stabilizers such as safety data sheets. Facilities or operations also have the option to pave the roads that are subject to application of chemical stabilizers.

Please see response to comment 3-3 for additional clarification on chemical stabilizer application in PAR 1157.

6-10 Response

Staff agree with the commenter and have removed subparagraph (f)(4)(A) that was part of the preliminary draft rule language. PAR 1157 will retain the existing Rule 1157 recordkeeping for records of total number of daily aggregate and/or mixer trucks existing the facility for those records are necessary to determine certain compliance pathways in subdivision (d). For additional information please see Chapter 2.

Please see response to comment 3-1 for additional information on the significance of recordkeeping and PAR 1157 implementation.

6-11 Response

Staff would like to clarify that the additional requirements triggered by recurrent violations outlined in subdivision (h) is specific for violations of subparagraph (d)(1)(A), such as dust plume or track-out, and not a "one-size-fits-all" measure. It is also important to note that violations are tallied based on the cause of the violation and not in one combined pool. This means that a facility with two notices of violation for dust plume and one notice of violation for track-out would not trigger any of the additional requirements. The prescribed actions required by facilities that trigger subdivision (h) requirements are also mitigation measures specific to the triggering NOVs. The commenter's example of a wind barrier being required for track-out violations is not possible for the wind barrier requirement is only applicable for facilities with three dust plume related violations.

On the commenter's request that the South Coast AQMD work with individual facilities to determine the best compliance plan for the circumstances, it is important to note that the requirements of subdivision (h) do not limit the Executive Officer's enforcement authority to seek alternative remedies such as Administrative Orders for Abatement through the Hearing Board.

Staff have evaluated feedback from stakeholders since the release of the Preliminary Draft Rule Language and revised the draft proposal to retain Validated Notice of Violation for the qualification framework of additional requirements for recurrent violations. Additional information on subdivision (h) and implementation with the existing South Coast AQMD framework can be found in Chapter 2.

6-12 Response

Please see response to comment 3-3 and 6-9 for chemical stabilizer usage. PAR 1157 is retaining requirements which require usage of chemical stabilizers from existing Rule 1157.

6-13 Response

PAR 1157 does not claim any emission reduction, and Staff have not modified the established emissions inventory that was ratified by the South Coast AQMD Governing Board on December 1, 2006.

6-14 Response

Please see response to comment 2-1 for washed aggregate and response to comment 6-5 for moisture testing.

Staff look forward to continuing discussions to clarify how the Rule 1157 framework regulates process-based fines management and baghouse fines removal with the commenter outside of the rule development process.

6-15 Response

Stakeholders are always free to raise with South Coast AQMD staff any issues they would like regarding rule implementation. However, we have been implementing the rule for 20 years since the settlement without significant issues regarding enforcement, and we are not aware of any ongoing matters that need further discussion. Should you wish to discuss a particular issue, please contact Neil Fujiwara via email at nfujiwara@aqmd.gov or phone at (909) 396-3512, who will coordinate our response and/or discussions.

APPENDIX A– EXAMPLES OF RECORDKEEPING

Background

This Appendix provides examples for acceptable recordkeeping formats for facilities and operations subject to PAR 1157 requirements. The examples provided serve as a template, but owners and operators of facilities/operations are not required to follow the provided examples as long as sufficient records specified in subdivision (f) are maintained to demonstrate compliance with applicable requirements in PAR 1157.

Recordkeeping Example for Paragraph (f)(1) – Truck Activity:

Date	Total Trucks Exiting Facility

Recordkeeping Example for Paragraph (f)(2) – Spillage and Carry-Back:

<table>
<tr><th colspan="2">Spillage/Carry-Back Identification</th><th colspan="3">Dust Depressant Application</th><th colspan="2">Spillage/Carry-Back Removal</th></tr>
<tr><th>Date</th><th>Time</th><th>Date</th><th>Time</th><th>Type</th><th>Date</th><th>Time</th></tr>
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Recordkeeping Example for Paragraph (f)(3) – Open Storage Piles:

Identifier	Material	Is the Open Storage Pile Check All Applicable		Observed Condition	Weather	Wind (Speed & Direction)	Dust Suppressant Date	Dust Suppressant Time	Dust Suppressant Type of Suppressant
			Greater than 8 Feet?						
			Within 300 Feet of Sensitive Receptor						
			Within 30 Feet of Facility Property Boundary Facing Public Road?						
			Greater than 8 Feet?						
			Within 300 Feet of Sensitive Receptor						
			Within 30 Feet of Facility Property Boundary Facing Public Road?						
			Greater than 8 Feet?						
			Within 300 Feet of Sensitive Receptor						
			Within 30 Feet of Facility Property Boundary Facing Public Road?						

Recordkeeping Example for Paragraph (f)(4) – Internal Unpaved Roads

Date	Time	Location	Stabilizer Type

Recordkeeping Example for Paragraph (f)(4) – Sweeper Activity

Date	Time	Location

Recordkeeping Example for Paragraph (f)(6) – Inspections for Additional Requirements Triggered by Recurrent Violations

Inspections					Repairs		
Date	Time	Equipment/Structure Inspected	Observations	Issue(s) Identified	Date	Time	Repairs Completed