

# MEMORANDUM

## DEPARTMENT OF COMMUNITY DEVELOPMENT/PLANNING DIVISION

**TO:** Board of Adjustment

**FROM:** Carlos Espinosa, Assistant City Planner

**DATE:** April 27, 2012

**SUBJECT:** CD Corp. Frac Sand CUP Application

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Please see Attachment "A" for a resolution related to the CD Corp. frac sand CUP application at 890 Riverview Drive. Should the Board wish to approve the CUP, a motion to approve this attachment would be in order. If the Board wishes to attach additional conditions to the approval, such conditions may be added to the resolution.

If the Board wishes to deny the CUP, the Board should articulate reasons for denial, and a motion should be made to deny the proposal. Staff will then draft a resolution of denial for adoption at the next meeting.

Should the Board require more information to make a decision, the item may be tabled.

Attachment B is the application which was submitted – including the narrative, preliminary site plan, and required dust control plan.

For the Board's reference, Attachment C shows 2006/2007 traffic volumes for the proposed truck route. The numbers are average daily traffic volumes for the segments of road indicated.

If Board members have any questions before the meeting please contact me at 457-8250.

Attachments:

- A) Resolution of Approval
- B) CUP Application
- C) Traffic Volumes on Proposed Truck Route

CITY OF WINONA, MINNESOTA  
BOARD OF ADJUSTMENT RESOLUTION 12-10

A RESOLUTION OF THE BOARD OF ADJUSTMENT OF THE CITY OF WINONA,  
MINNESOTA APPROVING THE REQUEST FOR A CONDITIONAL USE PERMIT TO  
ALLOW A SAND TRANSPORTATION FACILITY

WHEREAS, the applicant, CD Corp., seeks a Conditional Use Permit under Winona City Code Sec. 43.63(b)(40) to allow a sand transportation facility (the “project”, “operation” or “facility”) at 890 Riverview Drive, Winona, Minnesota, legally described on the attached Exhibit A (the “property” or “site”), which property is zoned M-2; and

WHEREAS, the Board of Adjustment conducted a public hearing on May 2, 2012, and received public testimony regarding the proposed Conditional Use Permit; and

WHEREAS, all required notices regarding the public hearing were properly made; and

WHEREAS, the Board of Adjustment subsequently reviewed the requested Conditional Use Permit at its meeting on May 2, 2012.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF ADJUSTMENT OF THE CITY OF WINONA, MINNESOTA, that it adopts the following findings of fact related to the requested Conditional Use Permit:

**Standard #1 Fire and explosion hazard. All activities involving and all storage of inflammable and explosive materials shall be provided at any point with adequate safety devices against the hazard of fire and explosion and adequate firefighting and fire suppression equipment and devices standards in the industry. Burning of waste materials in open fire shall be prohibited at any point. The relevant provisions of state and local laws and regulations shall also apply.**

Finding #1 Does not apply to the proposed project on the site.

**Standard #2 Radioactivity or electric disturbance. No activities shall be permitted which emit dangerous radioactivity at any point or electrical disturbance adversely affecting the operation at any point.**

Finding #2 Does not apply to the proposed project on the site.

**Standard #3 Noise. Maximum decibel levels in accordance with City Code Chapter 39 and as measured the MPCA document “A Guide to Noise Control in Minnesota”:**

Zoning District	Day (7 a.m. - 10 p.m.)		Night (10 p.m. - 7 a.m.)	
	L <sub>50</sub>	L <sub>10</sub>	L <sub>50</sub>	L <sub>10</sub>
RMHP, R-S, R-R, R-1.5	60	65	50	55
R-1, R-2, R-3, C-1	60	65	50	55
B-1, B-2, B-3	65	70	65	70
B-2.5, M-1, M-2, A-G	75	80	75	80

Finding #3 The applicant will comply with this standard.

**Standard #4 Vibration. No vibration shall be permitted which is discernible without instruments at the boundary of the M-2 district or in the nearest R district.**

Finding #4 Does not apply to the proposed project on the site.

**Standard #5 Smoke. No emission shall be permitted at any point, from any chimney or otherwise, of visible gray smoke of a shade equal to or darker than No. 2 of the Power's Micro-Ringlemann Chart, published by McGraw-Hill Publishing Company, Inc., and copyright 1954 (being a direct facsimile reduction of the standard Ringlemann Chart as issued by the United States Bureau of Mines), except that visible gray smoke of a shade equal to No. 2 on said Chart may be emitted for 4 minutes in any 30 minutes. These provisions applicable to visible gray smoke shall also apply to visible smoke of different color but with an apparently equivalent capacity.**

Finding #5 Does not apply to the proposed project on the site.

**Standard #6 Odors. No emission shall be permitted of odorous gases or other odorous matter in such quantities as to be offensive at the boundary of the M-2 district or in the nearest R district. Any process which may involve the creation or emission of any odors shall be provided with a secondary safeguard system, so that control will be maintained if the primary safeguard system should fail. There is hereby established as a guide in determining such quantities of offensive odors Table III, "Odor Thresholds," in Chapter 5 "Air Pollution Abatement Manual," copyright 1951 by Manufacturing Chemists' Assn., Inc., Washington, D.C.**

Finding #6 Does not apply to the proposed project on the site.

**Standard #7 Fly ash, dust, fumes, vapors, gases, and other forms of air pollution. No emission shall be permitted which can cause any damage to health, to animals, vegetation or other forms of property, or which can cause any excessive soiling, at any point; and in no event any emission, from any chimney or otherwise, of any solid or liquid particles in concentrations exceeding 3/10 grains per cubic foot of the conveying gas at any point. For measurement of the amount of particles in gases resulting from combustion, standard corrections shall be applied to a stack temperature of 500 degrees**

**Fahrenheit and 50 percent excess air. All activities shall comply with applicable state law, rules and local ordinances for dust and Particulate Matter generation, and any stockpiles (including sand and dirt) which produce windblown dust shall be covered. A fugitive dust control plan is required detailing dust control measures both on-site and off-site.**

Finding #7 The applicant will comply with this standard. See Exhibit B for the required fugitive dust control plan.

**Standard #8 Glare. No direct or sky-reflected glare, whether from floodlights or from high-temperature processes, such as combustion, welding or otherwise, so as to be visible at the boundary of the M-2 district or in the nearest R district. This restriction shall not apply to signs otherwise permitted by the provisions of this chapter.**

Finding #8 The applicant will comply with this standard.

**Standard #9 Liquid or solid wastes. No discharge at any point into any public sewer, private sewage disposal system or stream or into the ground, except in accord with standards approved by the department of health of the state or standards equivalent to those approved by such department for similar uses of any materials of such nature or temperature as can contaminate any water supply or otherwise cause the emission of dangerous or offensive elements.**

Finding #9 The applicant will comply with this standard.

BE IT FURTHER RESOLVED that the requested Conditional Use Permit is hereby granted subject to the following conditions:

- (1) **Compliance With Standards and Laws**  
Completion of and continued compliance of the applicant, site and operation with all of the above performance standards 1-9, Winona City Code Sec. 43.33, as it may be amended from time to time, and all Federal, State and local laws, statutes, ordinances, rules and regulations now in effect or hereinafter adopted.
- (2) **Hard Surfacing**  
A combination of concrete and recycled asphalt will be used on the driveway after trucks unload their product. Additional hard surfacing or another suitable hard surfacing material may be required in the future as directed by the City of Winona ("City") City Engineer. See Exhibits B and C.
- (3) **Truck Washing Equipment and/or Tracking Pads**  
Tracking pads will be installed if necessary due to the long run of solid surface before trucks re-enter the street. A plan for tracking pads and/or truck washing and truck washing equipment may be required in the future for the property as directed by the City Engineer.

- (4) **Truck Route Designation**  
Trucks going to and leaving the property will use the truck route(s) specified in Exhibit D, subject to future changes as deemed necessary or appropriate by the City Manager or in accordance with City ordinances. The designated truck route(s) used by the applicant for all operations at, to and from the site shall avoid residentially zoned property to the greatest degree possible in the judgment of the City Engineer.
- (5) **Enclosure and Covering of Processing Equipment and Stockpiles**  
All equipment and sand stockpiles on the property will be greater than 500 feet from any R or B zoning districts.
- (6) **Stockpile Watering**  
Uncovered stockpiles located on the property shall be watered regularly to prevent surface areas from drying out and becoming susceptible to wind erosion.
- (7) **Hours of Operation**  
Hours of operation for sand related truck traffic and equipment/machinery on the property will be 7 a.m. to 7 p.m. A plan for modification or altering hours/days of operations of equipment and/or trucks on the site or related to trucks hauling sand or other materials to and from the site may be required in the future as directed by the City Manager or City Engineer to mitigate noise or traffic congestion as well as other impacts of operations on adjacent properties.
- (8) **Landscaping and Screening**  
Due to location of the proposed use in an industrial port area, additional landscaping and screening is not proposed for this use. A plan for additional screening may be required in the future for the property and operations on the site as directed by the City Manager or City Engineer to mitigate visual impacts of operations at the site on adjacent properties or as determined necessary by the City Manager or Engineer to mitigate adverse impacts from operations.
- (9) **Contact Information**  
Facility operators at the site shall provide current contact information to the City of Winona to facilitate prompt response to concerns and shall update that information in writing to the City Manager within 30 days of any changes.
- (10) **Permits and Reports Obtained and Placed on File**  
Any applicable local, state or federal permits shall be obtained and placed on file at the City with the City Clerk. Any reports generated to fulfill permit requirements shall be submitted to the City Engineer. Continued compliance with all applicable permits and permit conditions is required. A Storm Water Pollution Prevention Plan is on file at the City with the City Clerk.

(11)

**Other Conditions**

- (a) All trucks entering or departing the site will be properly loaded and covered in accordance with state law and local ordinances, and trucks shall be cleaned to prevent material adhering to truck tires or to the exterior of truck trailers before entering or leaving the site to minimize to the greatest extent possible sand or other material or debris being deposited on any streets, public rights-of-way or private property located within the City. Any spillage of any sand or other materials by trucks from site operations shall be cleaned up by the applicant at the direction of the City Manager, and the applicant shall reimburse the City for the costs and expenses incurred by the City due to any extra street sweeping made necessary in the judgment of the City Manager to clean up spillage attributable to site operations.
- (b) A plan for additional monitoring and monitoring equipment and/or an additional or amended control plan(s) may be required in the future as directed by the City Manager or City Engineer to mitigate adverse dust, noise, air quality, water quality or stormwater impacts from or attributable to site operations. The minimum fugitive dust control plan shall be as attached.
- (c) The attached exhibits to this Conditional Use Permit are incorporated herein and shall be part hereof.
- (d) The applicant shall cooperate with the City in satisfactorily addressing future negative effects identified by the City of operations, both on and off site, including modifications or amendments to this Conditional Use Permit deemed necessary or appropriate by the City.
- (e) This Conditional Use Permit shall lapse and terminate without further action by the City Council if the use for which this permit is issued shall cease for a continuous two year period.
- (f) This Conditional Use Permit shall be subject to suspension or revocation, following notice and hearing, for violation(s) of the terms or conditions hereof or other applicable laws, regulations and ordinances.
- (g) This Conditional Use Permit, while in effect, shall run with the land and be binding upon and inure to the successors and assigns of the applicant.
- (h) The applicant, its successor and assigns shall indemnify the City and hold it harmless from any and all liability, claims, damages and expenses, which may arise as a result of the maintenance or operation of the facility on the property permitted hereby, including but not limited to expenses, costs and reasonable attorneys fees incurred by the City as a result of any claim.

[If applicable] BE IT FURTHER RESOLVED that the requested Conditional Use Permit shall be granted subject to the following additional conditions:

(1)

(2)

Passed by the Board of Adjustment of the City of Winona, Minnesota this \_\_\_\_ day of \_\_\_\_\_, 2012.

VOTE: \_\_ KOUBA \_\_ SANCHEZ \_\_ PRIEM \_\_ EINSMAN \_\_ SMITH  
\_\_ KROFCHALK \_\_ STONE

ATTEST:

\_\_\_\_\_  
Secretary

\_\_\_\_\_  
Chairman

## EXHIBIT A

### **Legal Description**

890 Riverview Road. Property is described as Sect-21, Twp-107, Range-007, LIMITS Lot-006 9.18 AC PART GOVT LOT 6 SEC 21 & PART GOVT LOT 3 SEC 22 COM AT W 1/4 CORNER OF SEC 22, N 0 DEG E ALONG W LINE OF SEC 22 939.66 TO CENTER LINE OF U.S. ARMY CORPS OF ENGINEERS FLOOD CONTROL DIKE, N 88 DEG E ALONG SAID CENTER LINE 485.36, N 639.87 TO SLY LINE OF CROOKED SLOUGH CHANNEL EASEMENT AS DESCRIBED IN PERPETUAL ROW EAS DATED 6/22/1956 RECORDED AS BK 19 OF MISC PG 267 & PT OF BEG, S 639.87 MORE OR LESS TO FLOOD CONTROL DIKE CENTER LINE, S 88 DEG W ALONG FLOOD CONTROL DIKE CENTER LINE 704.84, N 2 DEG W 533.66 MORE OR LESS TO SLY LINE OF CROOKED SLOUGH CHANNEL EASEMENT, NELY ALONG SLY LINE OF CROOKED SLOUGH CHANNEL EASEMENT 740.78 MORE OR LESS TO PT OF BEG EX: PART LYING SLY OF A LINE DISTANT 35 NLY OF AS MEASURED AT RIGHT ANGLES TO & PARALLEL WITH THE FOLLOWING DESCRIBED LINE: COM AT W 1/4 CORNER OF SEC 22, N 0 DEG E ALONG W LINE OF SEC 22 934.95 N 88 DEG E 485.41 TO PT OF BEG OF LINE TO BE HEREIN DESCRIBED, S 88 DEG W 485.41 TO W LINE OF SEC 22, S 88 DEG W 219.22 & HEREIN DESCRIBED LINE THERE TERMINATING; THE NLY LINE OF SAID EXCEPTION IS TO BE PROLONGED OR SHORTENED ELY TO TERMINATE ON THE ELY LINE OF SAID HEREINABOVE DESCRIBED PROPERTY & IS TO BE PROLONGED OR SHORTENED WLY TO TERMINATE ON WLY LINE OF HEREINABOVE DESCRIBED PROPERTY.

**EXHIBIT B**

**Fugitive Dust Control Plan**

**EXHIBIT D**

**Designated Truck Route**

## Board of Adjustment CUP Application Addendum: Sand Processing and Transportation Operations

Please provide the following information. Provide attachments as needed. A letter will be provided to you within 15 business days if more information is required to declare the application complete.

### Project Narrative

Describe the proposed construction or development, including a description of the proposed machinery, processes, products of the operation, and a conceptual site plan for reference. Also provide a dust control plan per number (7) below. In addition, please provide the following specific information:

A) Proposed hours of operation:

7am-7pm

B) Days of the week:

7 days a week

C) Months of the year:

12 months

D) Anticipated number of trucks per day:

180 trucks per day

E) Source of trucks/product:

Arcadia, WI (sand)

F) Destination of outbound trucks:

N/A

### Dangerous and Objectionable Elements

Describe the mechanisms and techniques to be used in restricting the emission of dangerous and objectionable elements as set forth below. Indicate if an element does not apply to the project:

- (1) Fire and explosion hazard. All activities involving and all storage of inflammable and explosive materials shall be provided at any point with adequate safety devices against the hazard of fire and explosion and adequate firefighting and fire suppression equipment and devices standards in the industry. Burning of waste materials in open fire shall be prohibited at any point. The relevant provisions of

state and local laws and regulations shall also apply.

N/A

(2) Radioactivity or electric disturbance. No activities shall be permitted which emit dangerous radioactivity at any point or electrical disturbance adversely affecting the operation at any point.

N/A

- (3) Noise. Maximum decibel levels in accordance with City Code Chapter 39 and as measured the MPCA document "A Guide to Noise Control in Minnesota":

<u>Zoning District</u>	<u>Day (7 a.m. - 10 p.m.)</u>		<u>Night (10 p.m. - 7 a.m.)</u>	
	<u>L<sub>50</sub></u>	<u>L<sub>10</sub></u>	<u>L<sub>50</sub></u>	<u>L<sub>10</sub></u>
RMHP, R-S, R-R, R-1.5	60	65	50	55
R-1, R-2, R-3, C-1	60	65	50	55
B-1, B-2, B-3	65	70	65	70
B-2.5, M-1, M-2, A-G	75	80	75	80

Will be in compliance

- (4) Vibration. No vibration shall be permitted which is discernible without instruments at the boundary of the M-2 district or in the nearest R district.

N/A

- (5) Smoke. No emission shall be permitted at any point, from any chimney or otherwise, of visible gray smoke of a shade equal to or darker than No. 2 of the Power's Micro-Ringlemann Chart, published by McGraw-Hill Publishing Company, Inc., and copyright 1954 (being a direct facsimile reduction of the standard Ringlemann Chart as issued by the United States Bureau of Mines), except that visible gray smoke of a shade equal to No. 2 on said Chart may be emitted for 4 minutes in any 30 minutes. These provisions applicable to visible gray smoke shall also apply to visible smoke of different color but with an apparently equivalent capacity.

N/A

- (6) Odors. No emission shall be permitted of odorous gases or other odorous matter in such quantities as to be offensive at the boundary of the M-2 district or in the nearest R district. Any process which may involve the creation or emission of any odors shall be provided with a secondary safeguard system, so that control will be maintained if the primary safeguard system should fail. There is hereby established as a guide in determining such quantities of offensive odors Table III, "Odor Thresholds," in Chapter 5 "Air Pollution Abatement Manual," copyright 1951 by Manufacturing Chemists' Assn., Inc., Washington, D.C.

N/A

- (7) Fly ash, dust, fumes, vapors, gases, and other forms of air pollution. No emission shall be permitted which can cause any damage to health, to animals, vegetation or other forms of property, or which can cause any excessive soiling, at any point; and in no event any emission, from any chimney or otherwise, of any solid or liquid particles in concentrations exceeding 3/10 grains per cubic foot of the conveying gas at any point. For measurement of the amount of particles in gases resulting from combustion, standard corrections shall be applied to a stack temperature of 500 degrees Fahrenheit and 50 percent excess air. All activities shall comply with applicable state law, rules and local ordinances for dust and Particulate Matter generation, and any stockpiles (including sand and dirt) which produce windblown dust shall be covered. A fugitive dust control plan is required detailing dust control measures both on-site and off-site. See attached for plan requirements.

Will be in Compliance

- (8) Glare. No direct or sky-reflected glare, whether from floodlights or from high-temperature processes, such as combustion, welding or otherwise, so as to be visible at the boundary of the M-2 district or in the nearest R district. This restriction shall not apply to signs otherwise permitted by the provisions of this chapter.

Will be in compliance

- (9) Liquid or solid wastes. No discharge at any point into any public sewer, private sewage disposal system or stream or into the ground, except in accord with standards approved by the department of health of the state or standards equivalent to those approved by such department for similar uses of any materials of such nature or temperature as can contaminate any water supply or otherwise cause the emission of dangerous or offensive elements.

Will be in compliance

#### Specific Conditions

Respond to the following specific CUP conditions for sand processing and transportation operations. Indicate if a condition does not apply to the project:

- (1) Hard Surfacing – Asphalt or concrete surfacing shall be required in any truck or equipment maneuvering area.

Will use a combination of concrete and recycled asphalt

(2) Truck Washing Equipment and/or Tracking Pads – Truck washing equipment or tracking pads, or a combination of both, shall be required at each facility.

We will install tracking pads if necessary due to the long run of solid surface before re-entering the street

(3) Truck Route Designation – All trucks entering and leaving such facilities shall enter and exit Winona on designated truck routes. Such routes shall avoid residentially zoned property to the greatest extent possible.

All trucks will use Riverview Drive to enter the facility which has a very minimal impact on any residential areas.

(4) Enclosure and Covering of Processing Equipment and Stockpiles - Processing equipment (including dryers, washers, and screeners) and stockpiles within 500 feet of any R or B district shall be enclosed by a structure. Stockpiles greater than 500 feet from an R or B district and undisturbed for more than one week shall be covered.

Will be in compliance

(5) Stockpile Watering – Uncovered stockpiles shall be watered regularly to prevent surface areas from drying out and becoming susceptible to wind erosion.

We will monitor daily to determine if watering is needed. Stockpiling will be minimal. We will use a direct transfer system for the majority of our material.

(6) Hours of Operation – Hours of operation for truck traffic and equipment/ machinery with back-up alarms shall be limited to 7 a.m. – 7 p.m.

We will limit the trucks and loaders used for the sand portion of our operation to the specified hours.

(7) Landscaping and Screening – Sufficient landscaping and screening, including but not limited to fences, walls and/or vegetative screens, as approved by the City of Winona, shall be provided to mitigate visual impacts of operations on adjacent properties.

We feel our operation should not require screening due to the location and other similar operations in our area.

- (8) Contact Information – Facility operators shall provide current contact information to the City of Winona to facilitate prompt response to concerns.

Our information is on file with the City of Winona and the Port Authority due to our current working relationship.

- (9) Permits and Reports Obtained and Placed on File – Any applicable state or federal permits shall be obtained and placed on file at the City of Winona. Any reports generated to fulfill permit requirements shall be submitted to the City of Winona. An informational sheet on state permits which may apply to the project is attached to this application. Applicant must document discussion with the all applicable agencies by providing staff names and initial date contacted.

We will have our storm water runoff permit on file with the City of Winona

CD Corp.  
978 Riverview Dr.  
Winona, MN 55987

507-454-5421  
[www.cdterminal.com](http://www.cdterminal.com)

CD Corp. of 978 Riverview Dr. proposes to load sand barges at 890 Riverview Drive in Winona, MN. This property is part of the Winona commercial harbor and is on a long term lease between CD Corp. and the Winona Port Authority. The property where this is proposed is used as a commercial harbor, already zoned to load and unload barges. There have been stockpiles of coal, salt and sand at this location for the last 20 years. We are proposing to bring in up to 180 trucks per day and dump into an underground pit and convey it directly into river barges. We would also have a stockpile area in the same location as the current river sand pile. The trucks would enter off of Riverview Dr. into the property at 890 Riverview Dr. on a gravel road and head toward the river then head north along the river to an underground receiving pit. After dumping into the pit they will proceed across a concrete pad then continue onto a recycled asphalt road. When the trucks get to the property at 978 Riverview Dr. they will turn west and enter Riverview Drive off a 400 foot long concrete drive.

This area is setup for high truck traffic already with Harvest States grain and Fertilizer and ADM Grain all in the same area. Our proposed use is consistent with the proposed and current uses. We will ensure that any truck traffic will used Huff and Riverview Drive coming from Wisconsin and Hwy 14 and Riverview Drive should any material come from Minnesota to minimize any traffic in residential areas.

# Map



Parcel



Road



Railroad

Limits



2008 Imagery

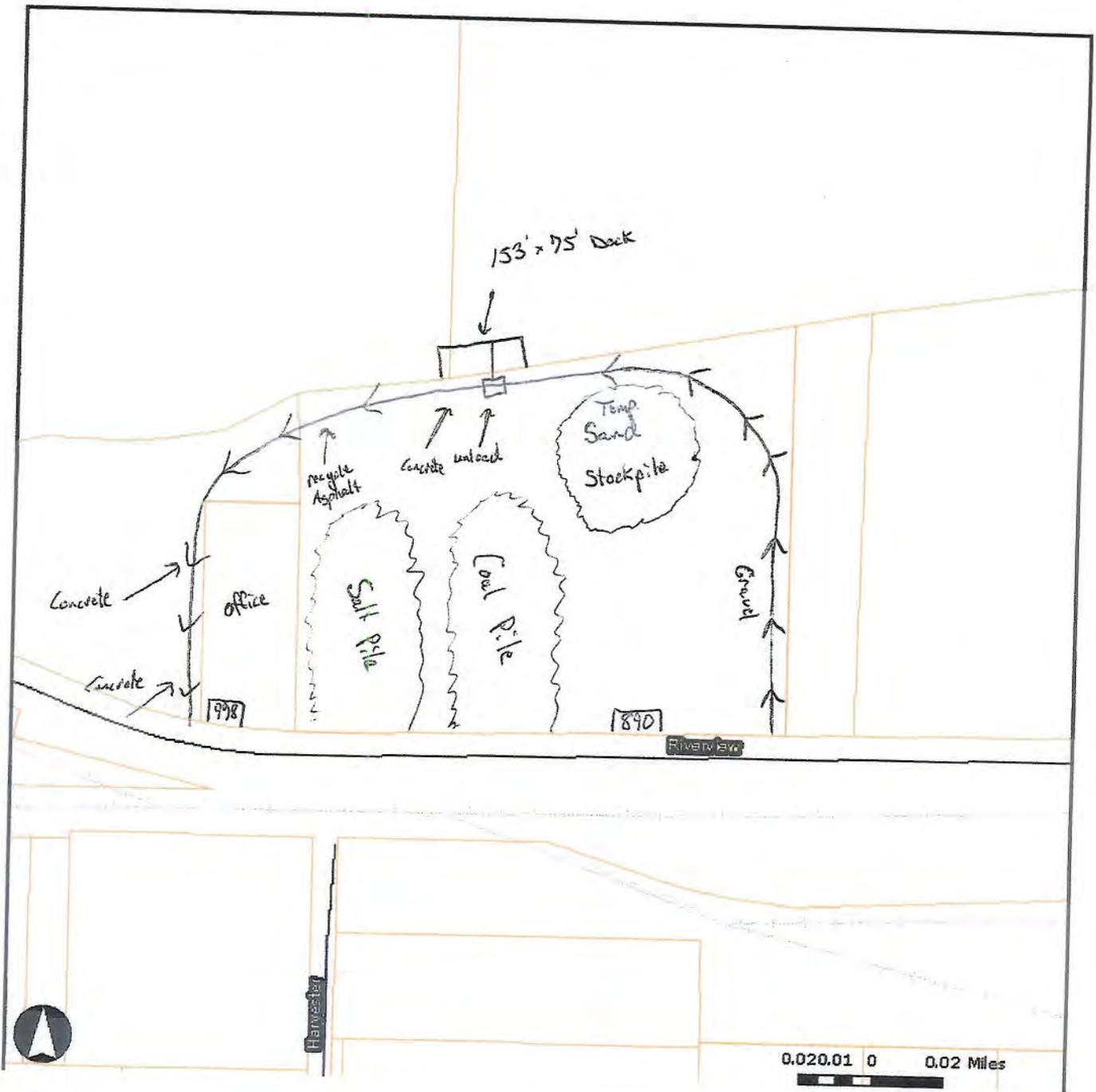
Red: Band\_1

Green: Band\_2

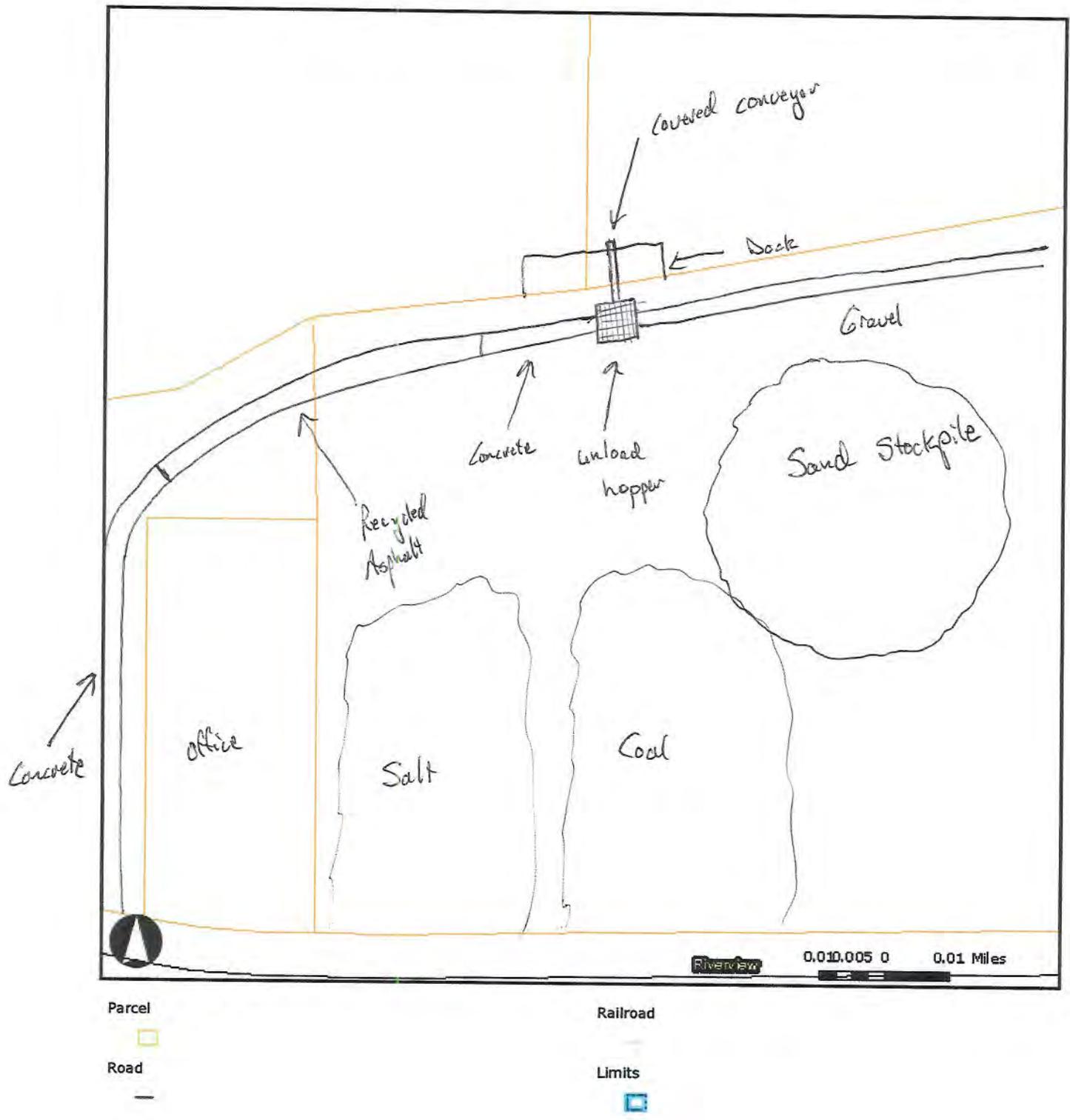
Blue: Band\_3

 indicated Flow of Trucks

Map



# Map



# CD Corp @ 880 Riverview Drive

## Fugitive Dust Control Plan

This plan has been developed to help the facility reduce or eliminate fugitive dust emissions from their operations. Good operational practices set forth in this document were obtained from industry accepted practices.

### 1. Site Roadways / Plant Yard Fugitive Emission Reduction

- a. The dust on the site roadways/plant *may* be controlled by applications of water, calcium chloride or other acceptable and approved fugitive dust control compounds. Applications of dust suppressants *may* be done as often as necessary to meet all applicable emission limits.
- b. All paved roadways/plant yards shall be swept as needed between applications.
- c. Any material spillage on roads shall be cleaned up immediately.
- d. Speed limits will be kept \_\_\_\_\_ to 10 miles per hour or less. Speed limits are posted on haul roads.
- e. Fugitive emissions from haul roads will not exceed 20% opacity at the source.

### 2. Plant Wide Fugitive Emission Reduction

The drop distance at each transfer point shall be reduced to the minimum the equipment can achieve.

### 3. Storage Piles Fugitive Emission Reduction

- a. Stockpiling of all nonmetallic minerals shall be performed to minimize drop distance and control potential dust problems.
- b. Stockpiles shall be watered on an as needed basis in order to reduce fugitive dust emissions. Also, equipment to apply water or dust suppressant shall be available at the site, or on call for use at the site, within a given operating day. A record of all watering shall be kept on file and be made available to the *City*.

### 4. Truck Traffic Fugitive Emission Reduction

On-site vehicles shall be loaded to prevent their contents from dropping, leaking, blowing,

**Fugitive Dust Control Plan**

or otherwise escaping. This shall be accomplished by loading so that no part of the load shall come in contact within six (6) inches of the top of any side board, side panel, or tail gate, otherwise, the truck shall be tarped.

**5. Excessive Fugitive Dust Malfunction Plan**

In the event that excessive dust is generated at the facility, operations creating the dust problem may be shut down until they can be rectified. At that time, operation can recommence.

**7. City Inspection**

The provisions and procedures of this plan are subject to adjustment if following an inspection and written notification, the *City* finds fugitive dust management practices a problem.

**8. List of Staff Responsible for Implementation of Plan**

All staff members will be required to notify the operations manager of excessive fugitive emissions when observed. This will include a description of the source of the excessive emission. The operations manager will be responsible for directing dust control measures. Daily inspections will be recorded on the form below.

**9. List of Equipment**

The following is a list of equipment onsite or readily obtainable for control and cleanup to reduce fugitive dust.

- 1. Watering truck/wagon or dedicated sprinkler systems.
- 2. Frontend loader/trucks (cleaning up spillage)
- 3. Brooms
- 4. Sweeper



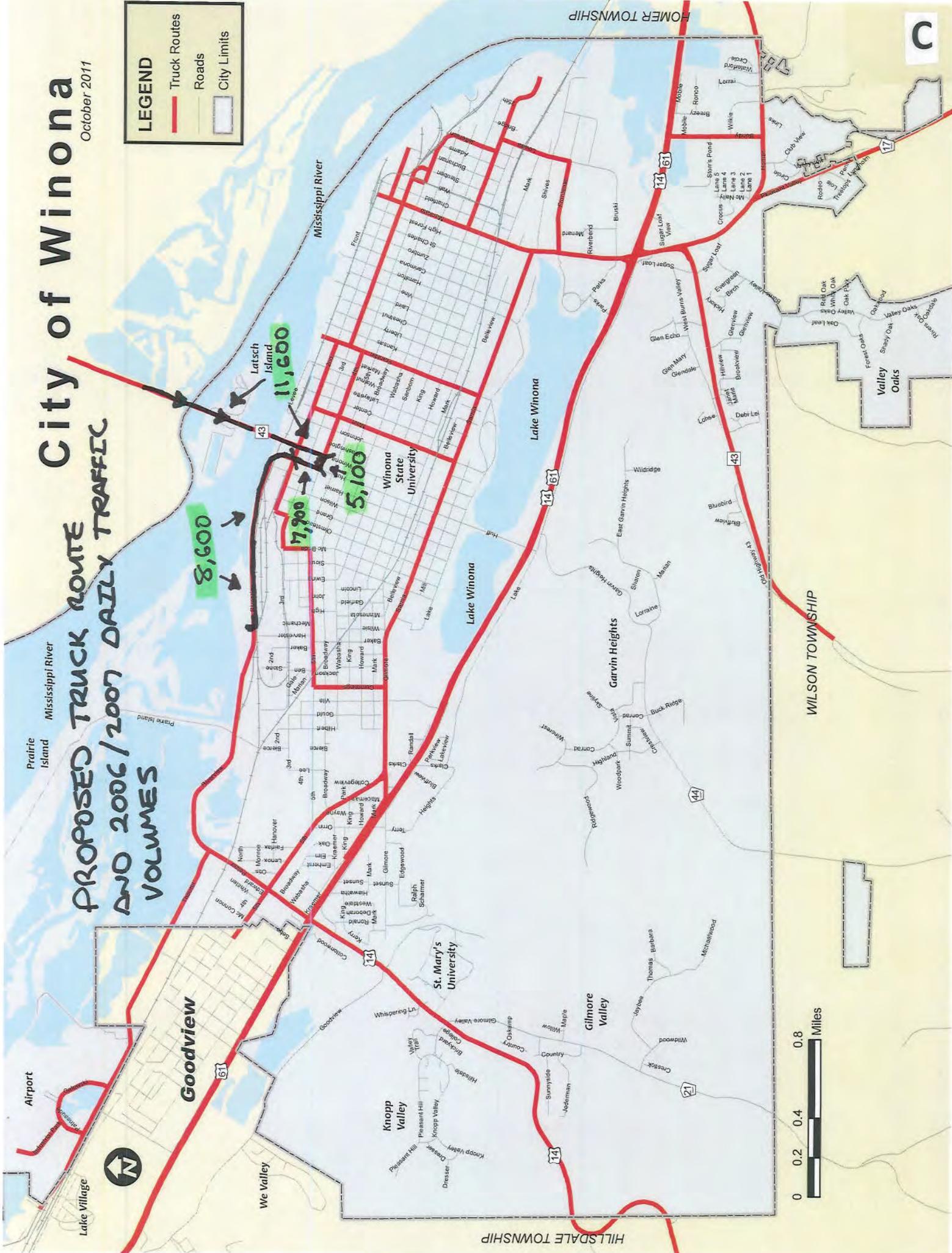
# City of Winona

October 2011

**PROPOSED TRUCK ROUTE  
AND 2006/2007 DAILY TRAFFIC  
VOLUMES**

**LEGEND**

- Truck Routes (Red line)
- Roads (Black line)
- City Limits (Grey outline)



C