

State of Vermont
Department of Environmental Conservation
Air Quality & Climate Division
Davis Building – 2nd Floor
One National Life Drive
Montpelier, VT 05620-3802
(802) 498-7338

September 27, 2013

John Hinckley, QEP, Senior Consultant
Resource Systems Group, Inc.
55 Railroad Row
White River Junction, VT 05001

SUBJECT: C.A. Denison Lumber Company Permit Determination Request

Dear Mr. Hinckley:

The Agency of Natural Resources, Air Quality & Climate Division (Agency) received a letter from Resource Systems Group, Inc. (RSG), on behalf of C.A. Denison Lumber Company on September 25, 2013 requesting a permit determination for operation of a dimensional stone quarry in Halifax, Vermont. The quarry will be operated by Ashfield Stone, LLC and will be located on C.A. Denison Lumber Company property. RSG has indicated that the quarry operations will include excavating, drilling and hauling. In addition, a 49 brake horsepower Atlas Copco generator (or equivalent) will be operated on site. No blasting, crushing or screening will be performed at the quarry.

Due to the fact that no crushing or screening equipment and no diesel engines greater than 450 brake horsepower will be operated at the quarry, no Air Pollution Control permit is required at this time. However, the Agency will request that a permit condition be included in the Act 250 permit to inform and require the Permittee that, pursuant to Sections 5-401(5) and 5-501 of the *Vermont Air Pollution Control Regulations*, an Air Pollution Control permit must be obtained if a crusher with a maximum rated capacity of greater than 150 tons per hour is to be operated at the quarry.

Additionally, Section 5-231(4) of the *Vermont Air Pollution Control Regulations* requires that reasonable precautions are taken to control fugitive dust from the site including the haul roads, traffic areas, storage piles, exposed surfaces and any site operations such as drilling, blasting, crushing and processing of materials. Accordingly, the Agency will also request that a permit condition be included in the Act 250 permit to inform and require the Permittee to take reasonable precautions to control dust from the quarry operations.

The two conditions the Agency will request to be included in the Act 250 permit are as follows:

1. The Permittee shall take reasonable precautions at all times to prevent and control fugitive particulate matter (dust) emissions from the Facility and its operations. Reasonable precautions to be taken shall include, but may not be limited to, the following measures or other equally effective measures:
 1. The unpaved traffic and parking areas at the Facility shall be periodically maintained by the application of water and/or generally accepted chemical treatments, such as calcium chloride unless otherwise restricted, which are applied at a rate and frequency to effectively limit visible dust emissions;
 2. The paved traffic and parking areas at the Facility shall be periodically maintained as necessary to prevent buildup of material that may generate fugitive dust emissions.



- Sweeping shall be performed in a manner to minimize fugitive dust air emissions, and may include lightly wetting the paved surface immediately before sweeping, or preferably by the use of a vacuum, regenerative, or high-efficiency sweeper;
3. All trucks owned, operated or under the control of the Permittee shall be securely covered when operated on public roadways and when loaded with materials that may generate fugitive dust;
 4. All rock drills operated at the Facility shall be equipped and operated with either an effective wet or dry dust control system;
 5. All unenclosed crushing and dry screening operations shall be equipped with a wet dust control (suppression) system with nozzles at appropriate locations and shall be operated as necessary;
 6. Active storage piles shall be periodically maintained by application of water and/or generally accepted chemical treatments, such as calcium chloride unless otherwise restricted, which are applied at a rate and frequency to effectively limit visible dust emissions. Inactive storage piles and exposed surfaces shall be re-vegetated as soon as reasonably practicable.

The Permittee shall ensure that any dust control measures taken in accordance with this condition are also in compliance with all other state and federal requirements.

2. The permittee shall not allow the operation of a gravel or stone crushing plant on the premises with a maximum rated capacity (based on the crusher's largest possible setting and maximum throughput, not actual operating rate) of greater than 150 tons per hour, unless said crushing plant has approval to operate from the Vermont Air Pollution Control Division.

Please keep in mind if the operations at the quarry change, C.A. Denison Lumber Company shall contact the Agency for a new permit determination. If you have any questions regarding this letter, please feel free to contact me at 272-3006.

Sincerely,



Jay S. Hollingsworth
Engineering Services Section
Air Quality & Climate Division

JH:jh
A1: Halifax

September 19, 2013

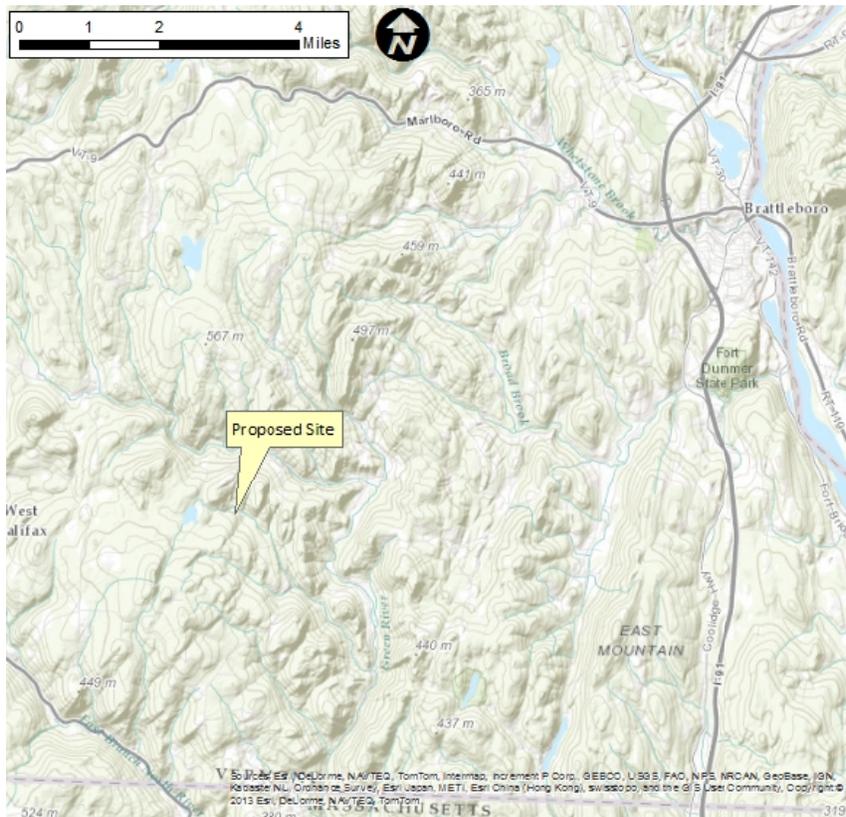
Mr. Douglas Elliott
Vermont Air Quality & Climate Division
Davis Building - 2nd Floor
One National Life Drive
Montpelier, VT 05620-3802

Subject: C.A. Denison Lumber Company Permit Determination Request

Dear Mr. Elliott:

RSG has been retained by the C.A. Denison Lumber Company (“C.A. Denison”) to assist with Act 250 permitting of a dimension stone quarry in Halifax, VT (“Halifax Quarry”). C.A. Denison is based nearby in Colrain, MA. Figure 1 shows the site is located in southern Vermont, approximately eight miles southwest of Brattleboro. The purpose of this letter is to inform the Vermont Air Quality & Climate Division (“Air Division”) about the project and request a formal determination regarding air permit applicability.

Figure 1: Site Location Map





PROJECT OVERVIEW

A 20 acre quarry will be constructed on land C.A. Denison owns in Halifax. The quarry will be operated by Ashfield Stone, LLC based in Shelburne Falls, MA. In short, the plan for this quarry is to extract large boulders and haul them away on flatbed trucks to Ashfield Stone's facility in Shelburne Falls. The operation will require excavating, drilling, and hauling to remove boulders. No blasting or processing of material (crushing, screening, etc.) will be conducted.

The project expects to generate up to ten one-way truck trips (five trucks) per week which will access the site via an access road that links into the town highway south of the quarry site. The town highway intersects with Jacksonville Stage Road. The nearest residence to the project is approximately 1,100 feet east of the access road and 1 mile southeast of the extraction area.

Equipment having the potential to produce air emissions includes a rock drill, excavator, loader, flatbed truck, and diesel generator (the site does not have power). Rock drills will be equipped with dust control shrouds. C.A. Denison is proposing to use a 49 HP Atlas Copco generator (or equivalent) which meets EPA NESHAPs/NSPS standards. The size of the generator is below the state permitting threshold of 450 HP. No other equipment exceeds Vermont permit applicability thresholds.

Supporting information is attached. Please contact me if additional information is needed.

Sincerely,

Resource Systems Group, Inc.

A handwritten signature in black ink that reads 'John Hinckley'.

John Hinckley, QEP, Senior Consultant

john.hinckley@rsginc.com