

DEM Planned Actions to Monitor/Inspect Coventry Asphalt Plants in 2013

The DEM has received numerous complaints since July 2011 involving the asphalt plants. The complaints fall into the following categories:

- Odors
- Emissions
- Water Pollution
- Solid Waste Disposal
- Hazardous Waste Disposal
- Truck Traffic
- Noise
- Hours of Operation

The DEM has regulatory authority over the complaints involving odors, emissions, water pollution, solid waste, and hazardous waste. The DEM does not have regulatory authority over the complaints involving truck traffic, noise and hours of operation. These are local issues that must be addressed by the town.

DEM intends to take the following actions to monitor/inspect the asphalt plants in 2013.

Air (Odor, Emissions)

Action Item	Action
1 done	Inspect the plants after DEM becomes aware of their opening for the purpose of ensuring that visolite tests have been conducted on the baghouses and that any bags found leaking have been replaced
2a done	Discuss with plant owners voluntary use of potential additives (i.e. "Ecosorb" manufactured by OMI Industries) to control odorous emissions and simple enclosures (i.e. enclosed chutes) that could minimize exposure of the manufactured product with ambient air
2b done	Discuss with plant owners proactive dust control measures (raw material stockpiles, handling and roadway debris).
2c done	Discuss with plant owners minimization of truck idling to reduce diesel exhausts from vehicles awaiting loads

3 done	Educate local officials and residents of DEM's authority as it pertains to odors <ul style="list-style-type: none"> • No authority to regulate diesel exhaust from non-idling trucks • No authority to regulate odors relating to the material being transported in trucks
4 done	Request that the Federal Environmental Protection Agency (EPA) conduct full compliance inspections of the plants, and if DEM's request is not granted, DEM will conduct full compliance inspections of the plants in April to determine compliance with all applicable Federal and State air pollution regulations
5a done	Conduct odor monitoring 3 days per week for the first 2 weeks after DEM becomes aware of the plants opening. The monitoring will occur during normal working hours (8am to 4 pm) and an inspector will be present all day
5b	Conduct odor monitoring early morning and early evening hours during the week, including Saturdays. The length and duration of the monitoring will be based on an assessment of the complaint calls received by DEM. For example, if the complaints are primarily in the early morning hours, the monitoring will target that time.
6 done (declined)	Request that the Federal Occupational Safety & Health Administration conduct full inspections of the plants
7 ongoing	Inspect the other businesses located around the plants to determine if these businesses could be a source of odors or emissions
8	Conduct off-site air testing for volatile organic compounds (VOCs) if the inspections or the findings from the study being completed by the town of Coventry (COVENTRY STUDY) reveal concerns that require testing
9	Take appropriate enforcement action as necessary
10 ongoing	Provide the local officials and residents with DEM's findings as soon as the records are deemed public

Water Pollution & Freshwater Wetlands

Action Item	Action
1 done	Inspect the plants after DEM becomes aware of their opening for the purpose of determining compliance with all applicable surface water, groundwater and freshwater wetland regulatory requirements
2	Require the plants to conduct testing of surface waters or ground waters or both if the inspections or the findings from the COVENTRY STUDY reveal concerns that require testing
3	Take appropriate enforcement action as necessary
4 ongoing	Provide the local officials and residents with DEM's findings as soon as the records are deemed public

Hazardous Waste

Action Item	Action
1 done	Follow up on the inspection conducted on December 3, 2012 to determine if the plants are in compliance with all applicable hazardous waste regulatory requirements
2	Require the plants to conduct testing of soils if the inspections or the findings from the COVENTRY STUDY reveal concerns that require testing
3	Take appropriate enforcement action as necessary
4 ongoing	Provide the local officials and residents with DEM's findings as soon as the records are deemed public

Solid Waste

Action Item	Action
1 done	Inspect the property where the sand piles are stockpiled to determine the source of the piles and if the sand is contaminated
2	Require the owner to remove the sand, if it's determined that the sand is contaminated, and require the owner to conduct testing of soils if the inspections or the findings from the COVENTRY STUDY reveal concerns that require testing
3	Take appropriate enforcement action as necessary
4 ongoing	Provide the local officials and residents with DEM's findings as soon as the records are deemed public

With regard to the request by the Coventry residents for an 'after hours' contact person, DEM has a 24 hour number. The residents can contact the Division of Law Enforcement at 222.3070. The dispatcher will immediately contact the appropriate staff within DEM if any complaints are received that are deemed an emergency.