Filed: 1/15/2019 10:40:00 AM WEQC

EXHIBIT 33

USEPA, Region 5, Dust Suppression on Wyoming's Coal Mine Haul Roads, Record Center # 238805

atml version of the file http://www.ste.lackson.gov/leyers/Dust%20Manual%20102704.pdf. automatically generates him versions of documents as we crawl the web.

To link to or bookmark this page, use the following url: http://www.google.com/search?q=cache:FCsvQJI8jCwJ:www-personal.ksu.edu/-sstevens/Dust%2520Manual%2520102704.pdf:muleski+1986+dust+suppressants&hl=en

EPA Region 6 Records Ctr.

Google is neither affiliated with the authors of this page nor responsible for its content.

These search terms have been highlighted: muleski 1986 dust suppressants

Page 1

<div style="position:abso

WITEO STATES

Dust Suppression on Wyoming's Coal Mine **Haul Roads**

Literature Review

Recommended Practices and Best Available Control Measures - BACM

Dust Suppressant Selection Guides

A Manual

prepared for:
Industries of the Future
Converse Area
New Development

October, 2004

by:

Temple Stevenson

Page 2

Cover photos: courtesy of Triton Coal - Tony Trouchon (photographer)

TABLE OF CONTENTS

Introduction

- Literature Review: Fugitive Dust and Its Control
- II. Recommended Practices and Best Available
 Control Measures
 - Table 2.1 Dust Control Operations Recommendations 2

Figure 2.1 Sample Air Event Outline

Table 2.2 Best Available Control Measures

BACM (Recommendations) For Controlling

Fugitive Dust on Mine Haul Roads

- III. Dust Suppression Selection Guides
 - Table 3.1 **Dust Suppression Products**
 - Table 3.2 Dust Suppression Applications Guide
 - Table 3.3 Dust Suppression on Mine Haul Roads

Cost Worksheet (available in excel)

Appendices

Appendix A: Dust Suppression Survey and Results

Appendix B: Dust Control Plan and

Self Inspection Checklists

Appendix C: Palliative Selection Matrix

(Thompson)

Appendix D: Palliative Selection Matrix

(Bolander and Yamada)

Appendix E: Fugitive Dust Bibliography

Introduction

Fugitive dust emissions are increasingly becoming a problem for Wyoming's surfact mines located in a windy semi-and environment where the average wind speed is 13 miles per hour and the average rainfall is a mere 14 inches with some of the highest evaporation rates in the nation. Fugitive dust emissions are a nuisance in coal mines impairs visibility, affects the health of employees, increases wear and tear of equipn and increases road maintenance and costs. Current drought conditions, elevated win speeds, compliance with air quality and clarity standards impacted by particulate emissions, a predicted increase in coal production, and increased Coal Bed Methane operations has heightened the concern.

Dust from surface coal mine operations also has the potential to negatively impact Federal Class I Air Quality Areas in the region, such as Badlands and Wind Cave National Parks and the Northern Chevenne American Indian Area. While no visibili impairment in these Class I areas is currently attributable to any Wyoming source, it

anticipated that strategies to maintain a status of minimal impact will be of notable vector to the Western Regional Air Partnership (WRAP) and the State of Wyoming in the development of its Regional Haze SIP(State Implementation Plan), due by Dec 31, 1 (Wyoming's Long Term Strategy for Visibility Protection: Review Report, 2003).

It is the intent of this report to contribute to a better understanding of fugitive **dust** a mitigation, so that efficient and effective management strategies for suppressing it c implemented. The report includes four segments: I. Literature Review; II. Recomme Practices and Best Available Control Measures -BACM; III. **Dust** Control Suppress Selection Guides; and an Appendices containing a fugitive **dust** bibliography and document examples.

I. Literature Review: Fugitive Dust and its Control

Sources and Impact of Dust Generated by Surface Coal Mines

Haul roads, over-burden piles, drilling and blasting, coal transfers and loading, and topsoil handling are all contributing factors of dust generation in a coal mine. A South African study conducted strip min contribution an arid climate similar to Wyoming's by Thompson and Visser (2002) titled "Benchmarking and Management of Fugitive Dust Emissions From Surface Mine Haul Roads," determined that 93% of the total dust emissions from a coal strip mine could be contributed to coal transport or haul roads Figure 1. illustrates their findings of the contributions of specific sources of fugitive as a percentage of the total fugitive dust generated by a surface coal mine.

Fig. 1 Percentage contribution to total dust emissions (Thompson & Visser 2002)

Assessing the source and impact of **dust** to determine the need to increase watering, decrease speed, use **dust** suppressing chemicals (also known as palliatives), or regraveling is constricted by a lack of problem solving methodology that takes into ac the complexity of various interactions. The interactions include traffic volume, weig climate, and more according to Thompson & Visser (2002). They add, "most surface mine operators agree that dust free reads are desirable, but find it difficult to trapple

into cost-effective management and mitigation." This same study found that regular watering and the application of chemical suppressants in conjunction with optimal aggregate surfaces is the only effective option for controlling fugitive dust emission haul roads.

The most harmful types of fugitive dust to the respiratory system are those that are 1 10 microns in diameter, known as PM 10's. Because they are most harmful, they

1

Page 8

most monitored. Another common measurement involves total suspended particulate TSP's. Total suspended particulates refer to the total amount of solid particulates an liquid droplets suspended in the air, regardless of particle size (Ferguson et al., 1995 Wyoming has been monitoring PM 10 emissions to meet Federal standards since before that TSP's were the only monitored emission.

According to EPA officials, exceedences of the 24 hour standard for particulate matter in southern Campbell County escalated substantially over the last 15 years; from 0 incidents during 1990-2000 to 19 incidents from 2001-03.

Dust Suppression Planning

When a coal mine is in the process of implementing a dust suppression plan, cost ar plays a large role in product selection. When looking at a product, an overall cost an should be taken into account. According to Bolander and Yamada (1999) in a report the US Forest Service entitled "Dust Palliative Selection and Application Guide," a successful dust control program should not only reduce total dust emissions, but it also reduce maintenance costs. Some dust control products have proven that they calcium significantly reduce overall road maintenance costs and thus achieve an overall savi. At the same time additional preparation and a change in maintenance practices must accounted for. A booklet published by Environment Australia, a branch of Australia Department of the Environment and Heritage, Dust Control Best Practice Environm. Management in Mining (1998), explains the benefit of a dust control plan as "a long view of dust control has proven consistently cost effective. Mine planning has a particularly important role to play in dust control. Applying controls after the proble

arise is often difficult, impractical or costly."

Haul Roads/Unpaved Roads

Fugitive dust is derived from a variety of sources; nonpoint sources such as un-vege soils, and specific sources such as haul roads (Environment Australia 1998). Dust generation can be defined as the process by which particulate matter becomes airbor The amount of dust that becomes airborne is a function of various factors; including susceptibility of the surface material to wind and water erosion, and the erosive action of haul trucks (Thompson & Visser 2002). If this latter human activity coincides with unfavorable weather conditions, the result can be greatly increased dust emissions (Ferguson et al., 1999).

Haul roads generate significant amounts of dust emissions (EPA Fugitive L 1992; Thompson and Visser, 2002).

There have been several studies completed to estimate the emission rates of PM unpaved roads. According to Bolander and Yamada (1999) in the US Forest Sevice Report, *Dust Palliative Selection and Application Guide*, the followin dust generation factors should be considered when designing a dust control plan:

2

Page 9

Dust Generation Factors:

- Vehicle Speed
- · Number of Wheels Per Vehicle
- Traffic Volume
- Particle Size Distribution of the Aggregate
- · Compaction of the Surface Material
- Surface Moisture
- Climate

Researchers from the Desert Research Institute at the University of Nevada determine that a vehicle traveling on a untreated unpaved road at a speed of approximately 25

generates between 0.59 to 2.00 to 8 of rM = 10 emissions per venicle fines travele (Gillies et al. 1999). When that vehicle's speed was increased to 35 mph the emissic rates increased to 1.85 to 3.04 lbs. PM = 10 VMT with an uncertainty of 0.23 lbs. VMT. Other studies have found similar emission results. Flocchini et al.(1994) suggethat reducing vehicle travel speeds on unpaved roads from 40km/hr to 24 km/hr reducing vehicles travel speeds.

The Environmental Protection Agency, reporting in Compilation of Air Pollutants Emission Factors Volume 1 Ch 13: AP-42 (1998), found that emission of fugitive di haul roads is highly correlated with vehicle weight and silt content of the surface material. The study reported that a silt content mean of 8.4% of fines on a haul road a mean of 24% was found on a freshly graded haul road. This indicates a significant increase in fines after a road has been graded.

In addition to these factors the EPA also suggests that other traffic characteristics she considered: such as the cornering of trucks, the road's bearing strength, and grad (EPA, 1998, AP-42). They also suggest a complete examination into climate conditilike freeze/thaw cycles and monthly average wind speeds.

Effective dust control on haul roads in the Powder River Basin is complicated by the that stretches of road, constructed of less than optimal aggregates, are subject to high traffic volume by heavy haul trucks, which requires continuous grading and the frequired addition of new surface material. Wearing of surface material is related to a number factors including wind speed at the road surface, traffic volume and tonnage, type of aggregate, compaction of the road, amount of spillage, and climate (Thompson & V 2002).

In addition to haul roads and related travel areas such as truck parking lots, stockpile/reclaim areas also contribute to total dust emissions, but are usually much difficult to control. (EPA Fugitive Dust. 1992). The EPA has devised numerous equations to estimate emissions both from unpaved roads and from storage piles. Th equations can be found in "Fugitive Dust Background Document and Technical Information Document for Best Available Control Measures," published by the EPA September of 1992.

In a report by the U.S Army Construction Engineering Research Laboratories Gebhi al.(1999) noted that chemical **suppressants** should be considered as a *secondary soi* in controlling **dust**. "A properly maintained road with adequate drainage to create a road surface should be the first step and must be implemented to the greatest extent possible. The best way to avoid a **dust** problem is to properly maintain the surface, a that is achieved by grading and shaping for cross sectional crowning which prevents generation caused by excessive road surface wear." It should be noted that this study to contend with heavy vehicles with tracks, such as tanks, which reduced the efficient and cost effectiveness of any **dust** suppressant.

Effectiveness of Dust Suppressant Measures on Unpaved Roads

When analyzing dust control effectiveness it is hard to determine a product's direct impact due to the large number of compounding variables (traffic volume, truck weight and speed, road type, etc.). This is further compounded by the fact that there is not a uniform standard for determining dust suppressant effectiveness (North Carolina Department of Environment and Natural Resources Division of Air Quality (2003). Most assessments available are based on qualitative data not quantitative data (Sanders & Addo, 1993). "Without any quantitative dust measurement, it is difficult if not impossible to assess the economics and lasting value of dust palliation methods," (Sanders & Addo, p.11, 1993). There are generally two areas of study concerning measuring or analyzing dust. The first is atmospheric modeling and

Chemical du generally pro control effici 80% when ag intervals of t month (EPA, The effective suppressant: depends on the the application between appl amount, weig traffic, metec conditions, a characteristic

prediction, and the second is field measurements and quantifications (Sanders & Ad 1993). Field studies are generally more helpful in determining actual effectiveness; however there are numerous factors that need to be considered. Because of the diver of site characteristics, it is difficult to recommend a suppressant that will work well situations.

In many instances the only gauge of the effectiveness of a product is either the resul from manufacturer's testing or testimonials from previous users (Engle, 2004). Ever it is hard to determine if the product is going to work in a particular area with possit different aggregate type.

Page 11

The following is a summary of some of the significant studies that have been conduct regarding the relative effectiveness of dust control measures.

Thomas Sanders, et al.(1997) conducted a study at Colorado State University on unproad sections in Larimer County, Colorado to try to determine the relative effectiver of the three commercially available dust suppressants. These researchers evaluated effectiveness of lignosulfonate (lignin'), calcium chloride (CaCl and magnichloride (MgCl against a section left untreated. They based their evaluation on the fundamental measurements: traffic volume, fugitive dust emissions, and total aggre loss and used these measurements to calculate a cost analysis.

After taking 15 dust samples over a test period of 4.5 months they found that all threated sections outperformed the untreated section. Total aggregate loss was significantly higher for the untreated section, in fact it was 3 times more than the M₁ 2.7 times the lignin', and 2 times the CaCl 2. Relative fugitive dust emissions voluments on the untreated section. Based on cost to replace aggregate lost, traffic voluments of maintenance, and cost of suppressants they concluded that lignin' and MgC an identical cost per mile per year of \$21 vehicle, while CaCl 2 was at \$26 ar untreated was up to \$36. They produced the following chart to highlight the cost and (ADT is the average daily traffic).

Based on these results, the group concluded that under high temperature and low rel humidity lignosulfonate appears to lessen the amount of **dust** produced. They also for that lignosulfonate and MgCl 2 had the least total aggregate loss at 1.0 t/mi/yr/ve study found a 28-42% reduction in annual maintenance cost for the treated sections compared to the untreated sections.

However, during a personal interview with this author on March 30, 2004, I Sanders stated that he felt the MgCl 2 was the superior product based or long term effectiveness (Sanders, 2004).

5

Page 12

In a laboratory study, Epps and Ehsan (2002) compared aggregates from Wyoming, Texas, and Arizona to determine the effectiveness of water, CaCl 2 and MgC controlling dust. They used a crushed gravel stone from Wyoming in one segment c study. This gravel contained approximately 9.9% fines, less than both the Texas and Arizona samples. They prepped the aggregates by allowing them to cure for 2 days; 32C and 35% relative humidity. They then sprayed the samples with water at a rate 1.8 L/m² to reduce the surface tension and increase the rate of penetration, and nex applied magnesium chloride to one sample, calcium chloride to another, and water c to another sample. They found that applying chemical palliatives (MgCl 2; the Wyoming aggregate had a statistically significantly effect on reducing erosion c by wind. This, they determined was related to the fact that the chemicals kept the su wet even in windy conditions. The authors found no real difference between the Mg and CaCl 2, but noted that both lose their effectiveness over time.

Next they evaluated the effectiveness of the chemicals in a simulated traffic experin They found that a 38% solution of CaCl 2 and a 30% solution of MgCl 2 app

Wyoming aggregate significantly reduced erosion caused by traffic compared to an aggregate sample that was only treated with water. They concluded that the applicat of CaCl₂ or MgCl₂ greatly enhanced dust control on unpaved roads in comparison water or no treatment and that there is not a significant difference between the two chemicals.

Gillies et al. (1999) from the Desert Research Institute at the University of Nevada at the San Joaquin Valley Unified Air Pollution Control District evaluated the effective of four dust suppressants over a 14 month study. The suppressants that were teste included a biocatalyst stabilizer (EMC 2), a polymer emulsion (Soil Sement), a penulsion with polymer (Choerex PM), and a nonhazardous crude-oil-containing mathematically identified an equation to calculate suppressant control efficiency, which the define as "the percent reduction in emissions between the treated and untreated sections are the suppressant control efficiency.

Efficiency= 1-(treated emission factor/untreated emission factor)

This study determined that estimating suppressant efficiency can be done using som simple methods in place of expensive monitoring. The authors determined that a measurement of the bulk silt loading and the surface strength can provide an effectivenessive assessment of a suppressants effectiveness to reduce PM in emissippressant treated surface that can achieve bulk silt content less that 20 g/m2 is considered to be 90% effective at suppressing PM in emissions. Further, if that maintain flexibility (measured by a penetrometer) and can resist brittle failure then the suppressant is predicted to maintain effectiveness longer (Gillies, et al. 1999).

Effectiveness results The bio-catalyst (EMC) was only 39% effective after the initial application and 0% effective after 11 months. The acrylic compolymer was 95% effective after one week and approximately 85% after 11 months. The bitumen product was 95% effective after one week, 75% after months, and 53% after 11 months.

6

Page 13

The EPA has created an equation to determine the PM emission factor for t roads. This accuracy of this equation, however, is still under some question, particul related to vehicle speed (Muleski/MRL 2002). Also this equation is designed around

average traffic weight, and does not account for heavier trucks (e.g. haul trucks).

E=2.6 (Silt/12)^0.8 (Weight/3)^0.4 / (Moisture/0.2)^0.3)

E =	PM 10 unpaved road dust emission factor for a	Ill vehicle
Silt =	silt content, material less than 75 μ m in the sur	face mater
Weight =	average weight of the vehicle fleet (tons)	
Moisture =	surface moisture content (%)	(EPA, AP

The addition of moisture into the equation is fairly recent (Countess, 2001). It was a based on the recognition that climate and moisture play a large part in overall emiss from unpaved roads. An older version of this equation included variables for the nur of wheels and speed, but re-analysis proved the variable not to be statistically signif (Countess, 2001). However, when using this model in an industrial setting it may be important to account for total wheels, traffic volume, and speed as variables. In additional some feel that the type of aggregate should be included as it can often account for the long term amount of fines in the road surface.

Dust Suppressants

Road dust suppressants have evolved notably. Second and third generation product now solving not only the dust problem but also cost efficiency, environmental, and issues (Engle, 2004). Positive results are now coming from even the toughest desert drought environments where past products have failed (Engle, 2004). While EPA (A 42, 1998) testing has shown that chemical dust suppressants can be effective (80% reduction when applied at regular intervals) there is not a single, cure-all solution. S products work better in certain climates, various road surfaces, and under different t volumes, and each product comes with various advantages and limitations.

Dust suppressants are effective based on the fact that they agglomerate the fine par in a road surface, binding the surface particles together, and increasing the density o haul road surface material (Bolander & Yamada, 1999). If fines are lost as dust on a unpaved road it leads to the coarse material coming loose and can then be thrown or washed away. This can result in a road full of corrugations and potholes that require expensive maintenance (Sanders & Addo, 1993). "The main goal of a dust control i stabilize the road surface; reducing the rate of aggregate loss and money spent annual replacement," (Sanders & Addo, 1993).

Dust control additives are beneficial not only at reducing dust emissions, but they a improve the compaction and stability of the road. According to Epps and Ehsan (20) there are numerous factors related to the effectiveness of a dust palliative including application rate, method of application, moisture content of the surface material dura application, palliative concentrations fines content, mineralogy of the aggregate, and environmental conditions.

Surface treatments to control dust emissions fall under two categories, wet suppress and chemical stabilization (EPA, AP-42, 1998). Wet suppression includes watering the application of surfactants that keep the road surface wet. Chemical stabilization involves an attempt to change the physical characteristic of the road. Unlike waterin chemical suppressants require less reapplication and many act to form a hardened t surface (EPA, AP-42, 1998).

The addition of a wetting agent or larger sized particles reduces erodibility only at the interface of the surface and the impact vehicles (Thompson & Visser 2002). Dust on measures lose effectiveness on a scale ranging from immediately to weeks. The palliative effects of water decays from 100% to 0% in a matter of hours while chem applied to control dust may decay over several days or weeks so it is important to understand the expected effectiveness of the product that you are working with (Thompson & Visser 2002).

A report issued by the U.S. Department of Transportation and the South Dakota Loc Transportation Assistance Program states that in areas of high traffic volume, the co dust control can more than pay for itself. This is based on the fact that a good dust a agent can not only reduce material lost from the road, but also reduce the need for b maintenance (Skoreth & Selim 2000). The same study determined that when a dust suppressant is not working well aggregate fines are lost, leaving only gravel size pai on the road, which leads to the formation of a washboard surface, reduced skid resis and potholes. The addition of agents (water or chemical) to reduce erodibility is base the principle of increasing binding of the fines and gravel. (Thompson & Visser 200

According to "Surface Mine Dust Control" by John Organiscak, et al. (2003), the be dust control plan should be dependent on the type of aggregate you have on your ha road. Selecting a dust suppressant, according to Sanders (1993) should depend not con its performance characteristics, but also on the type of traffic and volume, roadw conditions, and the costs involved to achieve the desired level of control.

In the following selection and application guide, Bolander and Yamada (1999) sugg that selecting suppressants involves determining not only cost but cost effectivenes

they have devised the following fist of benefiting factors that should be considered selecting a **dust** palliative.

Palliative Factors

- Coherence of the Dust Particles (to themselves or larger parti
- Resistance to Traffic Wear
- Aggregate Retention
- Long-term Effectiveness

(Bolander & Yamada, 19

8

Page 15

Water

Water assists in maintaining the compaction and strength of the road aggres and reduces the potential loss of road material (Thompson & Visser 2002). is attractive because it is seen as a cost effective alternative, however the co soon escalates with the addition of expensive equipment and operating costs

Data from the EPA's Compilation of Air Pollution Emission Factors Volume Ch 13, AP-42 (1998) shown here in Figure 1.1 suggests that small increases moisture content (1 to 2 moisture level) initially results in large increases in control efficiency (from 0% to 75%) but beyond which additional efficiency grows slowly with increased watering (requires 2.5x more water to increase effectiveness to 95%) significantly reducing cost effectiveness at the upper

Figure 1.1 Dust Control Efficiency of Water

Similarly, a study by Rosbury and Zimmer (1983) found that watering once hour has an efficiency of 40% in controlling dust, but when that rate is dou the efficiency increases only by 15% to 55%.

Re-application is required at frequent intervals dependent on environmental conditions. Water retention in the Powder River Basin is generally poor due high temperatures and wind speeds as well as low relative humidity. Increas

9

Page 16

water scarcity and cost adds to the scenario making water a temporary and typically un-economical solution.

Thompson and Visser (2002), based on the context of the arid South Africa mines, determined the degree of dust control achieved by watering is a function amount of water applied, time between applications, traffic volumes, we conditions, wearing-course material, and the extent of water nenetration into

wearing course. They determined that on an average degree of dustiness, a : reapplication is required at three hour intervals in the winter and every hour half in the summer. These intervals decrease with the addition of weight per vehicle, number of wheels, traffic volume, and climate conditions.

Thompson and Visser (2002) also found that traffic volume negatively cornwith total dustiness; which they explained based on observation, that higher volumes led to more compaction of the wearing course and the removal of I loose material on the sides of the road as well as spillage from the vehicle. I also determined that vehicles lower to the ground with many wheels tend to an increase in dust based on the increase in wind shear.

Precipitation can greatly reduce **dust** emissions. Normally a rainfall resultir least 0.1 inch is assumed to suppress all emissions. However during a hot, d summer's day a rain of that same amount may only reduce emissions for he opposed to days (Countess, 2001).

Chlorides

Chlorides are salts that act as water attracters and absorbers; as hygroscopic compounds, they draw moisture out of the air to keep the road surface dampalthough there is no physical binding (Skoreth & Selim 2000).

Chlorides are the most commonly used products for haul road dust control. A study by Rosbury and Zimmer (1983) showed that the highest control efficiency measured for a chemical dust suppressant (at that time), 82%, was for CaCl 2 two weeks after a then decreased over time. The average during the initial two weeks was approximately 50%. After five weeks, the control efficiency declined to less than 20%.

The most common salts used to control dust are calcium chloride (CaCl magnesium chloride (MgCl 2). When determining which is most effectiv ability to produce a brine under adverse conditions such as high wind speed hurnidity, or high traffic volumes is the best indicator (Sanders, 1993).

CaCl 2

Calcium Chloride (CaCl ₂)has been used as a **dust** control and rc stabilizing agent for the last century (Epps & Ehsan, 2002). CaCl deliquescent and hygroscopic properties causing the chemical to ha

high affinity to water; increasing the tension of water molecules be soil particles. When applied the chemical increases the adhesive bo between particles resulting in retention of particles. According to E al.(2002) CaCl $_2$ has a wider range of effectiveness in regards to temperature than magnesium chloride and loses its hygroscopic pro at a temperature of 25C if the relative humidity drops below 32%.

Calcium Chloride comes in three forms: flake at 77-80% purity, pe 97% purity, and a clear liquid at 35-38% purity (Bolander & Yama 1999). Calcium Chloride is favored over Magnesium Chloride in at seasons of higher humidity, but it is not as effective in long dry spe (Bolander & Yamada, 1999). This chemical can significantly lower freezing point of a water solution. In fact at 30% solution can have freezing point of -60F (Larkin Laboratory, 1986). Because of this property several coal mines choose to use CaCl 2 during the w

MgCl:

Magnesium chloride is a by-product of potash production and is on available in the liquid form (Ferguson et al., 1999). When determin CaCl₂ or MgCl₂ is more effective there are contradictory finding statements. It seems the more recent studies are coming to the conc the MgCl₂ is outperforming CaCl₂. According to Epps and Esl MgCl₂ is more effective than CaCl₂ in increasing the surface to water molecules. Bolander and Yamada (1999) found that MgCl considered to be the best water absorbing product for drier climates because the chemical starts to absorb water from the air at 32% relahumidity regardless of the temperature. The product also increases aggregate surface tension, creating a very hard road when the surfa dry, more so than CaCl₂

Both CaCl 2 and MgCl 2 are known to be corrosive to metals, because the moisture to the surface and thus prolong the period of erosion (Bolander & Yamada, 1999). A positive attribute of both of these chemicals is that each allows a maintenance crew to re-grade and re-compact with little concern for surface moisture loss.

Ocument of an (1999) state that these sans provide the most saustactory bein application ease, cost, and dust control for semi-arid, semi-humid climates.

Organic/Non-Bituminous Chemicals

Compounds under this category include lignosulfonate, sulphite liquors, tal pitch, pine tar, and vegetable oils. These products generally perform well in environments but are not very effective when applied to aggregate surface material with few fines (Gebhart, et al., 1999). These dust control agents ca

11

Page 18

very sticky and may harbor an unappealing odor. They often fail after heavy due to their water soluble, organic nature (Gebhart, et al., 1999). These procurrently appear expensive, but the cost benefit equation continually change a rule, they tend to be environmentally friendly. One compound with some supporting literature is lignosulfonate (lignin').

Lignin'

Lignin' or lignosulfonate is a by-product of the paper making proce is regarded to be generally safe environmentally because of the fact is an organic product. This product performs very well under arid conditions. It binds particles together to increase the strength of the and remains effective during long dry spells with low humidity (Bc & Yamada, 1999). One of lignin's weaknesses is that it is highly so in water, and its surface binding properties can be destroyed by hea It also has a tendency to stick to passing vehicles and is difficult to from painted surfaces (Frazer, 2003). Lignin is most effective and so the greatest longevity when the road has been scarified and the probeen mixed into the aggregate (Sanders & Addo, 1997). However, this same scarification process that reduces the current use of lignin some haul roads, as the perceived costs of the down-time due to scarification and curing appears prohibitive.

A study using lignin' on Pikes Peak's unpaved roads conducted by

Sanders and Addo (1998) revealed that the lignin was 2.7 more effect suppressing dust than water. After spring snowmelt, 8 months all application, there were indications that the Lignin' was still function a good proportion of the test sections.

Petroleum Products

Petroleum products include asphalt emulsions (modified and not), dust oils fluids, and petroleum resin emulsions. These products may be effective in a variety of climates; however, because they are by-products of petroleum anwaste oils, they may contain toxic materials with significant environmental effects, and are not considered safe unless they have been processed to remitoxins (Gebhart, et al., 1999). These products are usually very expensive an the organic products, are very sticky and have a foul smell.

Petroleum products are film forming and dust binding. They coat the dust particles and form a cohesive membrane that attaches each to adjacent parti. This results in a chained bond of large agglomerates that are too heavy to be dislodged by wind (James Informational Media, Inc., 2000).

12

Page 19

Emulsified Asphalts

Emulsified Asphalts work to control dust, but their use is very limithe product must be applied with specialized equipment (Skorseth a Selim 2000). The soil type and density of the road surface can great affect the rate at which a petroleum product penetrates the road. Rothat have been scanfied to loosen the aggregate achieve the greates amount of soil penetration. If the road has not been scarified the usproducts with low viscosities will be ineffective (Bolander, Yamad 1999).

Polymers

Polymers such as polyvinyl acrylics and acetates work by binding the surfar particles together to form a semi-rigid film on the surface. Polymers are considered suitable for use under a wide range of climate and soil condition are most effective in environments that receive 8 to 40 inches of precipitatic year. Generally, a light compaction of the road after application of a polymer recommended unless the product is mixed into the road surface (Bolander, Yamada 1999). Polymers are considered to be most effective on *lightly traf areas*. These types of palliatives are usually non-toxic and environmentally friendly (Gebhart, et al., 1999).

Electro-Chemical Stabilizers

Electro-Chemical stabilizers include sulphonated petroleum, ionic stabilizer and bentonite. They are not likely to leach out and are stated to be very effe at reducing dust emissions in clay or sandy aggregate types. These product well under a variety of climate conditions; however, many of these product not been tested using standard laboratory tests under field conditions. Small trials should be performed to determine site specific efficiency prior to large scale usage (Gebhart, et al., 1999).

Surfactants

Essentially surfactants are additives that make water wetter, reduce surface tension a allow better penetration of the palliative. At least one product (Haul Road **Dust** Con claims a cumulative effect, whereby each new application boosts the effectiveness o previous levels.

Several manufacturers of surfactants recommend prewetting of the roadbed, for thei products to perform optimally. Similarly, Epps and Ehsan (2002) used prewetting in their laboratory study of aggregates and erosion.

There is a slight trend within mine operations in the Powder River Basin to use high diluted applications of MgCl 2 and CaCl 2 in all water applications, instead of a :

There are environmental concerns associated with the use of certain surfactants. (ref page 17 of this document for a discussion of these impacts)

Other Commercial Products

A list of commercial products is posted by The New Mexico Environment/ Departm of Air Quality Bureau, which can be accessed on the web at http://www.inmenv.state.nm.us/aqb/dust_control.html_and in Table 3.1 of this report. There are some products listed here that are not included in this literature review. Classification of every product is not possible in part due to lack of a literature histo and to the proprietary nature of the commercial formulas.

Mechanical Stabilization

Mechanical or road stabilization is the mixing of two or more substrate materials to a road surface that has the correct fine gradient and plasticity. This method does not involve the application of chemicals although they can be used in addition to the stabilization. One of the most effective substrate mixtures involves the addition of c to a gravel and sand aggregate. The clay binds to the fine particles, and improves the roads stability and longevity. "When a gravel road resists lateral displacement durin traffic, it is said to be mechanically stable, notes Gebhart, et al. (1999). This resistan provided by the natural forces of coheston and internal friction that exist in the soil."

Importance of Appropriate Dust Suppressant Application

Appropriate application of a selected product is key to the overall effectiveness of a control plan. "It can translate either into success or costly wastefulness, failure, and difficult maintenance down the line." according to David Engle (2004), author of "I Maintenance Techniques and Products Have Made Great Strides." Engle also emphasizes timing as a critical component to successful application. He suggests an initial application during the narrow window between the spring rains and the start c summer drought; "Keeping an eye on the weather forecast is critical; many expensive applications have been ruined by ruinfall."

Not only is the timing of the application crucial, but the manner in which the produc applied is just as important - if not more so. Sanders and Addo (1993) describe two in which suppressants are most typically applied; mixed-in-place and spray method. The mixed in place method involves mixing the suppressants with the road aggregation when this application procedure is used it not only suppresses dust but it also proving an improved road surface resulting in reduced maintenance costs. Spraying involves high pressure application of the material to the road surface. Topical spraying is affective for short parades of time, though, resulting in the need for gapplications.

throughout the season (Sanders & Addo, 1997). It is usually wise to try a test section determine how well the product is going to work on a specific gravel, and what type application works best (Skorseth & Selim, 2000).

Almost all suppressants have a greater longevity and effectiveness when applied to a road that has been properly prepared, scarified, and the suppressant is mixed in with the aggregate and then compacted to a 6-inch thick wearing course (Sanders & Addo, 1997).

14

Page 21

Another key application principle was identified by Bolander and Yamada (1999). I suggest that adequate penetration of the **dust** suppressant into the surface material is imperative. This penetration should be 3/8 to 3/4 of an inch in depth. Proper penetra will reduce the loss of palliative from surface wear and allow the surface to resist leaching. The process imparts cohesion, and resists aging.

Bolander and Yamada (1999) in the *USFS*Dust Palliative Selection and Application provide the following suggestions for applying dust suppressants:

Application Tips

- Repair unstable surface, grade (to a adequate depth) immediately to application
- Apply suppressants (especially salts) immediately after the wet s
- Apply after a rain, or spray the road before application, to ensure materials are more moist and thus more workable
- Adhere to manufactures recommendations on minimum application rate, compaction and curing time
- Use a pressure distributor to evenly distribute the suppressant
- · Water frequently and lightly, not infrequently and heavily

Scarifying

Sanders et al. (1997) include scarification of the road surface in their list of important techniques to be considered when applying dust suppressants ar particularly specify the technique when using lignin. Organiscak et al. (200) suggest that when using chlorides it is beneficial to loosen 1-2 inches of the aggregate uniformly to allow the chemical to penetrate evenly. And like Bo

and Yamada (1999), the group stresses proper road preparation as a key to t effectiveness of a dust palliative, especially creating a good crown and drai when using a chloride. They also state that when using a chloride the roadw should not be compacted before applying the chemicals and the road shoulc kept at optimum moisture before application, this allows the product to be absorbed quickly and evenly:

For some suppressants it is recommended to keep traffic off the road surface for tw three hours after application to allow the product to absorb and cure (Skorseth & Se 2000). This characteristic is expected to be considered a limitation by mine engineer who would have difficulty justifying the necessary down time involved on mine hat roads (see survey results. Appendix A). Grading after application also partially destitute effect of many dust suppressants (Ferguson et al., 1999). Because of this, gradi should be postponed after heavy application of suppressant for as long as possible.

The EPA has recommended that a diluted reapplication be applied periodically (2 w to a month) to control loose surface material. They also state that weather related

15

Page 22

application schedules should be considered prior to implementing a dust control pro (EPA Fugitive Dust, 1992).

The type of road aggregate is one factor that determines the type of dust control that most effective. Organiscak et al. (2003) recommend effective applications for various road types in their article "Surface Mine Dust Control." In road surfaces with poor gradation, water is the only effective solution because chemical suppressants (most which are water soluble) cannot compact the surface or form a new surface because will leach. In sand they recommend bitumens because of the fact that they are not w soluble. On a road with good gradation all chemical suppressants can be used, and road with too much silt the road should just be rebuilt, as no dust control will be eff (Organiscak, et al., 2003). If a haul road is left untreated by a dust suppressant aggn replacement will become necessary over shorter periods of time and maintenance w required more frequently (Epps & Ehsan, 2002).

Education and Training

In addition to using prescribed application procedures, John Watson and Jui Chow (2000) from the Desert Research Institute suggest that the success of control problem depends on outreach and education programs for contractor public works agencies. In a coal mine, education should be extended to maintenance personnel.

Environmental Impacts

The major environmental concern when using dust suppressants is contamination of ground and surface water. Thomas Piechota, an assistant engineering professor at University of Nevada Las Vegas was quoted in Lance Frazer's "Down with Road Di (Innovations)" as saying it doesn't matter what suppressant is used, there will alway some level of water quality impact (Frazer, 2003). Peichota noted that petroleum compounds were more harmful than suppressants such as magnesium chloride. An area of impact he mentioned is the fact that the suppressants are creating a somewh impenetrable road surface, which will increase runoff, which has its own hydrologic impacts.

There is some potential for off-site plant damage during periods of heavy rainfall (Ferguson et al., 1999). All necessary precautions should be followed to unsure that chemicals are kept away from water sources.

16

Page 23

Sodium Chloride (rock salt) and sand may be impacting ponderosa and other pines (Anon' CoDOT, 2004).

While no Wyoming coal mines use Sodium Chloride to treat dust on haul roads that know of, the expected negative publicity from this environmental impact (near Boul may carryover into other road salts such as MgCl 2 and CaCl 2 which are heav There is no scientific evidence yet of the actual cause of the tree damage, but the die appears to be confined to an area within 50 of the roadway for 20 plus miles, strong suggesting road runoff and/or exhaust furnes as contributing factors. Conversely, fee Wyoming coal mine haul roads traverse timbered acreage, limiting this specific imp

Surfactants, on the other hand, may pose some environmental concerns, M. Warhun (1995) in a report to Friends of the Earth, England, outlines toxicity concerns with alkylphenol ethoxylate (APEO) surfactants, and calls for a more widespread ban on use (The surfactant is currently banned in several European countries). He recomme the replacement of APEOs with linear alcohol ethoxylate surfactants, which are reach biodegradable according to Consultants in Environmental Sciences Ltd (CES, 1993)

Works Cited

Anonymous Colorado Department of Transportation Official. Personal Interview wi Author, June, 2004. Boulder, CO.

Bolander, P., Yamada, A. (November 1999). "Dust Palliative Selection and Applica Guide." United Department of Agriculture, Forest Service, Technology and Develop Program. San Dimas Technology and Development Center, San Dimas, California.

Countess, R. et al. 2001. Methodology for Estimating Fugitive Windblown and Mechanically Resuspended Road Dust Emissions Applicable for Regional Air Qual Modeling. Paper in International Emission Inventory Conference, "One Atmosphere Inventory, Many Challenges." Denver, CO, April 30. (Power point presentation slid

Engle, D. (2004). "Bidding Farwell to Dusty Roads, Road Maintenance Techniques Products Have Made Great Strides," Forester Communications, Erosion Control January/February 2004. www.forester.net

Environment Australia, Department of the Environment and Heritage (1998). "Dust Control Best Practice Environment Management in Mining." Sustainable Industry/Sustainable Minerals.

Environmental Protection Agency 450/2-92-005 (1992). "Fugitive **Dust Background** Document and Technical Information Document for Best Available Control Measur Office of Air Quality, Planning and Standards, Research Triangle Park, NC.

Environmental Protection Agency (1998). "Compilation of Air Pollution Emission Factors, AP-42." Volume 1, Ch 13, Unpaved Roads. Office of Air Quality, Plannin Standards, Research Triangle Park, NC 27711.

Epps, Amy, Ehsan, M. (2002). "Laboratory Study of **Dust** Palliative Effectiveness." Journal of Materials in Civil Engineering. September/October 2002 p.427-435.

Frazer, Lance (2003). "Down with Road Dust (Innovations)," National Institute of Environmental Health Sciences. Env Health Perspectives Dec. 2003 V111 i16 pA89

Ferguson, J.H. et al. (1999). "Fugitive Dust: Nonpoint Sources." Agricultural MU C University of Missouri-Columbia. Agricultural Publication G1885.

Gebhart, D.L., Denight, M.L., Grau, R.H., (1999). "Dust Control and Technology Selection Key." U.S. Army Construction Engineering Research Laboratory, Land Management Laboratory, Resource Mitigation and Protection Division; and the U.S Army Engineer Waterways Experiment Station, Pavements Division.

James Informational Media. Inc (2000). "Better Roads, a Look at **Dust** Control and I Stabilizers." Better Roads Magazine www.betterroads.com/articles/prod500.htm

18

Page 25

Larkin Laboratory (1986). "Calcium Chloride and Magnesium Chloride for Dust Control." 1691 N. Swede Rd. Midland Michigan 48640

N. Carolina Department of Environment and Natural Resources Division of Air Qua (2003). "Economic Analysis of Particulates from Fugitive Dust Emissions Sources."

Organiscak, J.A., et al. (2003). "Chapter 5, Surface Mine <u>Dust Control</u>." In Handbo Dust Control in Mining, Center for Disease Control, IC # 9465.

Rosbury, K.D., Zimmer, R.A. (1983), "Cost-Effectiveness of **Dust Controls** Used of Unpaved Haul Roads, Volume 1: Results, Analysis, and Conclusions," PEDCo Environmental, Inc. U.S. Bureau of Mines.

Sanders, T. (2004). Personal Interview conducted by Temple Stevenson on the camp Colorado State University, March 30, 2004.

Sanders, T.G., Addo, J.Q. (2000). "Experimental Road Dust Measurement Device." Journal of Transportation Engineering, November/December 2000.

Sanders, T.G., Addo, J.Q. (1998). Pikes Peak Road Dust Project. Colorado State University.

Sanders, T., Addo, J.Q., Ariniello, A., Heiden, W.F. (1997). "Relative Effectiveness Road **Dust Suppressants**." Journal of Transportation Engineering September/Octot 1997. p 393-397.

Sanders, T.G., Addo, J.Q. (1997). "Effectiveness and Environmental Impact of Road Dust Suppressants." MC Report NO. 94-28, Mountain Plains Consortium.

Skorseth, K., Selim, A.A (2000). <u>Gravel Road Maintenance and Design Manual</u>. So Dakota Local Transportation Assistance Program. U.S. Department of Transportatic Federal Highway Administration.

Thompson R.J., Visser, A.T. (2002). "Benchmarking Management of Fugitive **Dust** Emissions From Surface-Mine Haul Roads." Transaction of the Institute of Mining Metallurgy, 111/April, pp A28-A35.

Watson, J.G., Chow, J.C. (2000). "Reconciling Urban Fugitive Dust Emissions Inversard Ambient Source Contribution Estimates: Summary of Current Knowledge and Needed Research." Desert Research Institute, Energy and Environmental Engineerin Center. DRI Document No. 6110.4F

Wyoming's Long Term Strategy for Visibility Protection-Review Report. 2003. Prepared by the Wyoming Department of Environmental Quality, Air Quality Divis