

Appendix M

High Wind Policy

(AMENDED VERSION – MARCH 26, 2011)

A. STANDARD ONSITE WEATHER OBSERVATIONS

At the start of each work day during the daily Tailgate Safety Meeting, START will give a briefing of the National Weather Service forecast for the area. Briefing will include (if known) projected wind speed range for the day and possible timing if available.

Throughout the day START-3 will monitor wind gusts on-site using the on-site weather station.

B. NOTIFICATION

During periods where wind gusts on-site reach 23+ miles per hour (mph), the following procedures will be implemented.

1. Wind gusts hit 23+ mph: START-3 or OSC to immediately notify ERRS Response Manager
2. Monitor for 15 minutes (do not change or shut down operations during this stage)
3.
 - a. *If during the 15 minutes of monitoring wind gusts do not exceed 23 mph, then continue operations as usual.*
 - b. *If during the 15 minutes of monitoring wind gusts again exceed 23 mph, then move to step 4 below.*
4. Implement Water Curtain Operations

Immediately upon notification of sustained high wind conditions (exceeds 23 mph) ERRS will change operations as follows:

- a. ERRS will setup and run the water curtains around all excavation areas and all loading operations
 - *excavation areas where large excavators are being used:* no fewer than 2 water curtains and 3 Orbit brand Tripod Sprinklers surrounding the operation.
 - *excavation areas where a mini excavator is in use:* no fewer than 3 Orbit brand Tripod Sprinklers will be used.
 - *truck loading operations:* no fewer than 2 water curtains and 2 Orbit brand Tripod Sprinklers will be used.
- b. ERRS will cover all exposed piles or excavated areas that are not being used
- c. ERRS will routinely water spray all exposed excavated areas.
- d. ERRS will routinely spray excavated soil piles

Note: - If End Dumps are on-site, demurrage should not be considered as a limiting factor in changing to a water curtain operation.
-The wind policy does not apply to operations that do not involve soil disturbance. Therefore, operations such as backfilling will not change based on wind conditions.

5. Continue to "Monitoring During High Wind Events" *Section C.1.*

During periods where wind gusts on-site reach 30+ miles per hour (mph), the following procedures will be implemented.

6. Wind gusts hit 30+ mph: START-3 or OSC to immediately notify ERRS Response Manager

7. Monitor for 15 minutes (do not shut down operations during this stage)
 - a. *If during the 15 minutes of monitoring wind gusts do not exceed 30+ mph:* Continue operations as usual (Water Curtain mode or Standard operations as winds dictate).
 - b. *If during the 15 minutes of monitoring wind gusts again exceed 30+ mph:* All soil disturbance activities (i.e., excavation and loading of trucks) must be halted and all piles and open excavations must then be covered.
8. Continue to "Monitoring During High Wind Events" Section C.2.

C. MONITORING DURING HIGH WIND EVENTS

Monitoring during periods where wind gusts on-site reach 23+ miles per hour (mph):

1. When operating in Water Curtain mode (winds exceed 23 mph but less than 30 mph) START-3 shall monitor wind gusts every 15 minutes for a period of 1 hour:
 - a. *If gust readings stay above 23mph, but below 30 mph:* Continue operating using Water Curtain method. Continue with the hourly monitoring until Section C.1.b. (below).
 - b. *If gusts do not exceed the 23 mph within an hour of monitoring:* The use of Water Curtain will cease and ERRS may return to normal operational mode.

Monitoring during periods where wind gusts on-site reach 30+ miles per hour (mph):

2. When under the Temporary Shut Down Mode (after two 30+ mph wind gusts of the initial 15 minutes) START-3 will monitor wind gusts for a period of 1 hour. All soil disturbance activities (i.e., excavation and loading of trucks) will cease for an hour.
 - a. *If gust readings exceed 30 mph within the hour monitoring:* Monitoring wind gusts will continue for an additional hour. All soil disturbance activities (i.e., excavation and loading of trucks) will remain stopped for an additional hour. Continue to Section 3 below.
 - b. *If gusts do not exceed the 30 mph within an hour of monitoring:* ERRS may return to normal operational mode (Water Curtain mode or Standard operations as winds dictate).
3. After two hours of monitoring:
 - a. *If gusts do not exceed the 30 mph within the second hour of monitoring:* ERRS may return to normal operational mode (Water Curtain mode or Standard operations as winds dictate).
 - b. *If gust readings exceed 30 mph within the second hour of monitoring:* Work will be suspended for the rest of the day (backfill operations may proceed at the discretion of the OSC).
 - ERRS will securely cover the excavated/exposed soil. No excavation/loading will be done for the remainder of the day.
 - START-3 will collect all air samples, monitors, etc...

This policy will be continuously re-evaluated based on current analytical results, addition of upgraded meteorological equipment, implementation of additional emission control technologies and the evaluation of the effectiveness of all actions.

Policy reviewed and approved by:



Mike McAteer, EPA Federal On-Scene Coordinator

3/26/11

Date