

# EXHIBIT A



## **DUST CONTROL AND MITIGATION PLAN**

For

A1 Organics  
Monaco Street Organic Recycling Facility  
9109 Monaco Street  
Commerce City, Colorado

November 14, 2018

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## **1.0 Introduction**

A1 Organics (A1) has prepared this Dust Control and Mitigation Plan (DCP) to document dust control and mitigation practices for the Monaco Street Organic Recycling Facility (Site or Facility), in Adams County, Colorado. This DCP also demonstrates that the Facility will maintain compliance with all applicable air pollution control division requirements.

### **1.1 Site Description**

The Site is located in the eastern plains of the Front Range just west of Interstate 76 and south of 96<sup>th</sup> Street, Commerce City, Colorado at 9109 Monaco Street (Figures 1, Site location and Figure 2, Site and Vicinity Map). The vicinity of the Site is predominately commercial (Figure 2).

The Site lies predominantly in Section 20 of Township 2 North, Range 67 West 6<sup>th</sup> Principal Baseline and Meridian. The Site slopes to the west and lies at an approximate elevation of 5,060 feet above mean sea level. The Site is owned by New Dux, LLC, and is leased to Lambland, Inc., dba A1 Organics (A1). The Site has roughly 12 acres of production area (Figure 3).

### **1.2 Facility Description**

The name and physical address for the Monaco Street Organic Recycling Facility are:

A1 Organics  
Monaco Street Organic Recycling Facility  
9109 Monaco Street  
Commerce City, CO 80022

The mailing address is:

A1 Organics  
16350 WCR 76  
Eaton, CO 80615

Site maps and plans illustrating the Facility's property boundaries, location of production and storage areas, adjoining properties, and existing structures are further illustrated in the figures.

### **1.3 Operations**

The hours of operation for the recycling facility are within the normal operating hours of A1 Organics. Normal hours of operation will be from 7:00 AM to 3:30 PM, Monday-Friday. Hours of operation for the recycling facility may be adjusted to accommodate volume fluctuations of recyclable materials and production schedules.

The names and phone numbers of the people currently operating the facility are:

Kent Pendley  
Chief Operating Officer  
970-396-5295 (mobile #)  
970-454-3492 (office #)

Travis Bahnsen  
Chief Executive Officer  
970-646-3457 (mobile #)  
970-454-3492 (office #)

Bob Yost  
Chief Technical Officer  
303-710-9121 (mobile #)  
970-454-3492 (office #)

Kevan Northrup  
Facility Manager  
303-710-9123 (mobile #)  
303-710-9301 (office #)

Chris Skelton, P.G.  
Regulatory and EH&S Officer  
970-646-2431 (mobile #)  
970-454-3492 (office #)

In the event of an emergency, any of the above people may be called.

## **2.0 Dust Control Plan**

Control of dust will be a high priority during organic recycling activities. The primary mechanism for dust control will be the use of wind monitoring, applied water, road improvement, and setback distances. Proactive controls will be instituted to reduce the amount of dust generation during site activities, including enforcement of low speed limits for vehicular traffic, height limits for stockpiles, as applicable, and road and site maintenance through the use of water and/or magnesium chloride applications as necessary for control purposes. If necessary, operations may be suspended.

A1 Organics will implement a dust control training program for all Site personnel. This training program will review the potential sources for dust, weather station monitoring, individual responsibilities, and actions for controlling and/or mitigating dust as described in this DCP. The training will emphasize the importance of dust control and familiarize Site personnel with the air monitoring requirements, appropriate dust control procedures, and corrective actions in accordance with this DCP to minimize dust generation.

## **3.0 Potential Fugitive Dust Sources**

There are no contaminants of concerns with regards to the fugitive dust emissions at the Site. The following Site areas/tasks have been identified as potential sources of fugitive dust emissions. At a minimum, dust control practices will be implemented in:

- Areas of heavy equipment and vehicular traffic
- Wood grinding
- Product screening

- Mulch coloring
- Soil amendment mixing
- Loading and unloading operations

#### **4.0 Dust Control and Mitigation Procedures**

The following management practices will be used to preclude conditions conducive to dust generation and suppress dust should it occur.

- Paved entry roads will be maintained free of tracked soil or compost
- Traffic speed will be reduced to an appropriate speed
- Use of water and/or magnesium chloride on Site roads
- Application of water on stockpiled materials
- Stockpiled material will be placed as a dust migration barrier on the east side of the screening operations.
- Grinding and screening operations will be located at the southwest/west side of the Site, at least 500 feet away from neighboring residents.
- Grinding operations will include a water spray system to mitigate dust and reduce opacity.
- All outgoing loads shall be covered.

#### **5.0 Weather Monitoring and Corrective Actions**

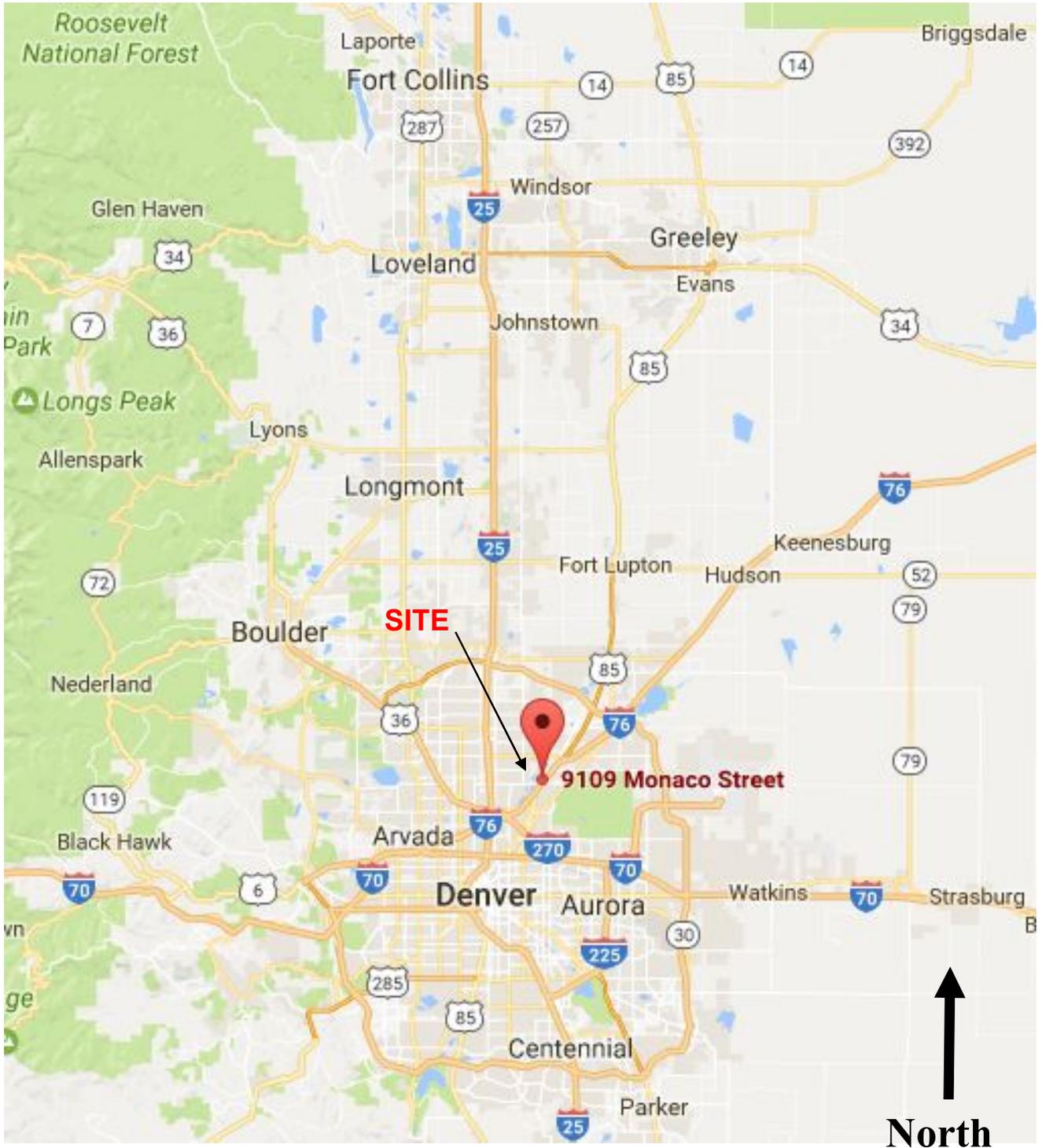
A weather station that measures and logs wind direction and velocity is in operation at the Site. The weather station shall be programmed to alarm when wind conditions are greater than 15 miles per hour or otherwise unfavorable to Site operations. Daily visual monitoring for dust will be logged and recorded. Should conditions exist where dust could be a problem, the Site foreman will be notified immediately. Corrective actions may consist of any the following:

- Suspend grinding and/or screening operations
- Additional water application
- Magnesium chloride dust suppression
- Tarping of stockpiles.

#### **6.0 Limitations**

A1 has prepared this DCP based on available information consistent with the standards of care and skill ordinarily exercised by members of the profession practicing under similar conditions in the geographic vicinity and at the time the services were performed. No warranty or guarantee, expressed or implied, is a part of this DCP. This DCP is for the exclusive use of A1 Organics. Use or reliance by others is prohibited without the express authorization of A1 Organics. Unauthorized use or reliance is at third party's sole risk.

# FIGURES



Approximate Scale 1 inch = 11 miles

	<p>16350 WCR 76, Eaton, CO 80615 (O) 970-454-3492 (F) 970-454-3232</p>	<p align="center"><b>Site Location Map</b></p> <p align="center">Monaco Street Organic Recycling Facility 9109 Monaco Street Commerce City, Colorado</p>	<p align="center"><b>FIGURE</b></p> <p align="center"><b>1</b></p>
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Approximate Scale 1 inch = 725 feet



16350 WCR 76,  
 Eaton, CO 80615  
 (O) 970-454-3492  
 (F) 970-454-3232

**Site and Vicinity Map**

Monaco Street Organic Recycling Facility  
 9109 Monaco Street  
 Commerce City, Colorado

**FIGURE**

**2**



Approximate Scale 1 inch = 265 feet

 - Site Boundary



16350 WCR 76,  
Eaton, CO 80615  
(O) 970-454-3492  
(F) 970-454-3232

**SITE PLAN**

Monaco Street Organic Recycling Facility  
9109 Monaco Street  
Commerce City, Colorado

**FIGURE**

**3**



Google Map View of A1 Organics and Surrounding Uses  
Asphalt Milling Overlay



Existing Temporary Office



Aerial of AI site - Commerce City



East Side of Property Line



East Side of Property Line 2



East Side of Property Line 3



East Side of Property Line 4



East Side of Property Line 5



Dust Collection on Stationary Object East of Property Line.



Northeast Side of Property Line 1



Northeast Side of Property Line 2



South-side of Property - Brown Brother's Materials - Low to No Dust



South-side of Property - Snowplows - Sitting for over 2 years  
Within 50 feet of Grinding Operations.



South-side of Property - Brown Brother's Materials - Low to No Dust



Designated Grinding and Screening Area - Minimum 500ft from East Property Line.  
Containment Barrier East of Screening Operations



Aerial of Site - East view of South Property Line.



Containment Barrier East of Screening Operations  
Minimum 500ft from East Property Line.