



Maricopa County
Air Quality Department

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Title: **Trackout Control Devices and Rule 310**

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Approved by:

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Purpose

To provide the department’s interpretation of Rule 310 to resolve an apparent conflict between sections 305.1 and 306.1 concerning the use of a trackout control device. The result is to affirm that the criteria of section 306.1(a) apply in all instances in which a trackout control device is required. Although installation of a trackout control device may not be required below the thresholds listed it is encouraged at all sites hauling bulk materials off-site. The requirement to cleanup trackout when trackout extends 25 cumulative feet or more applies whether or not a trackout control device is required.

Discussion

Rule 310, section 305.1(c) provides:

305.1 Off-Site Hauling onto Areas Accessible to the Public: *The owner and/or operator of a dust-generating operation that involves off-site hauling shall implement the following control measures:*

c. When off-site hauling, install, maintain, and use a suitable trackout control device that controls and prevents trackout and/or removes particulate matter from tires and the exterior surfaces of haul trucks and/or motor vehicles that traverse the site.

This rule establishes no lower acreage limit nor a limit based on the amount of material hauled to have a trackout control device in place at a dust-generating operation when hauling material off-site onto an area accessible to the public. In section 306.1(a) criteria are established to determine when a trackout control device is required.

306.1 Trackout Control Device:

- a. Criterion for Trackout Control Device: Install, maintain and use a suitable trackout control device that prevents and controls trackout and/or removes particulate matter from tires and the exterior surfaces of haul trucks and/or motor vehicles that traverse the site at all exits onto areas accessible to the public from both of the following:*
 - (1) All work sites with a disturbed surface area of two acres or larger, and*
 - (2) All work sites where 100 cubic yards of bulk materials are hauled on-site and/or off-site per day.*

For dust-generating operations at sites smaller than 2 acres where less than 100 cubic yards of bulk materials are hauled on-site and/or off-site in any single day, different conclusions can be reached concerning the need for a trackout control device under sections 305.1 and 306.1.

This apparent conflict in the rule requires clarification.

Statement of Policy

In Rule 310, the intent of the department was to establish a limit beneath which the use of a trackout control device is not required on a site where dust-generating activity takes place. This limit was established through identifying three scenarios, any one of which would trigger the need for a trackout control device. These three scenarios are:

1. If the disturbed area of a property where dust-generating activity is taking place is two or more acres in size.
2. On any sized parcel where dust-generating activity is underway and 100 cubic yards or more of bulk material is hauled from the site on any single day.
3. On any sized parcel where dust-generating activity is underway and 100 cubic yards or more of bulk material is hauled onto the site on any single day.

Any one of the above three scenarios will trigger the need for a trackout control device to be in place.

Rule 310, section 305.1(c) was not intended to eliminate the thresholds related to the area of disturbed acreage as well as those for on and off-site hauling in section 306.1(a)(2). The department will consider the threshold established in section 306.1(a) as being the definitive criteria to determine when a trackout control device is required at a dust-generating operation.