



Department of Community
Development

300 6th St | Rapid City, SD 57701 | 605-394-4120

Morgan Twombly, Environmental Planner
Department of Community Development
Current Planning Division

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MEMORANDUM

TO: Rapid City Area Air Quality Board
FROM: Morgan Twombly, Environmental Planner
DATE: 2024
RE: Compliance Plan Permit Annual Inspection Reports

The purpose of the annual inspection for facilities with Air Quality Compliance Plan Permits is to identify fugitive dust generating activities and assess if control measures are in use and adequate to control fugitive emissions. The annual inspection reports are attached.

Compliance Plan Holder	Address	Expiration	Conformity w/ Plan
Pennington County Highway	3601 Cambell St	3.10.25	In conformity
City of Rapid City Landfill	5555 S Hwy 79	3.9.26	In conformity
City of Rapid City Utility Maintenance Division	225 E Main St N	3.9.26	In conformity
City of Rapid City Streets Division	605 Steele Ave	3.9.26	In conformity
RCP&E Rail Road	Cambell, Main, Maple Ave	12.11.26	In conformity
Heavy Constructors, Inc	4101 N Deadwood Ave	3.9.26	In conformity
Iron Horse Excavation	2391 Commerce Rd	12.8.25	In conformity
J Scull Construction	803 Industrial Dr	3.9.26	In conformity
RCS Storage	1314 Fountain Plaza Dr	12.8.25	In conformity
Butler Machinery	3601 N Deadwood Ave	3.11.27	In conformity
Countryside South Road District	Various locations	6.9.25	In conformity
Diesel Machinery Inc	3801 N Deadwood Ave	9.9.27	In conformity
Black Hills Speedway	2467 Jolly Ln	9.9.27	In conformity
Nielsen Dirtworks	2420 E Hwy 44	3.9.27	In conformity

Recommendation: Staff recommends the Air Quality Board acknowledge the Annual Inspection Reports for the Compliance Plan Permits.



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ANNUAL INSPECTION REPORT

OCTOBER 2024

PENNINGTON COUNTY HIGHWAY DEPARTMENT CONTINUOUS OPERATIONS

GENERAL INFORMATION:

Facility Name: Pennington County Highway Department
Location: 3601 Cambell Street, Rapid City SD
Date of Inspection: October 10, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of the Pennington County Highway Department facility is to identify the fugitive dust generating activities and assess whether the control measures identified in the Compliance Plan are in use and adequate to control fugitive dust emissions. The current Compliance Plan is valid until March 10, 2025, therefore it must be renewed before the next Air Quality Board Meeting on that day.

STAFF REVIEW:

On October 10, 2024 staff along with Cole Anderson of the Air Quality Board and colleagues conducted the annual inspection of the PennCo Highway Department and its operations with Eric Radke. Staff discussed street traction and deicing operations, street cleaning and sweeper operations, material storage and street maintenance.

Street Traction and Deicing Operations

A mixture of sand and salt is applied to the roads when needed, this combination of materials is mixed on site and housed in an enclosed warehouse to minimize runoff and dust. There is a berm on the downslope of this building to catch and divert any runoff from the warehouse/mixing process. Approximately 2,500 tons of this material are stored on site.

Street Cleaning and Sweeper Operations

The department uses two sweepers and three brooms, all of which are equipped with water. In some instances, a water truck is used to wet the road surface prior to sweeping to better mitigate fugitive dust emissions. Sweepings are then left in the area and hauled to the landfill for cover, however the use of water in this process allows the piles to form a crust which prevents wind erosion.

The frequency of sweeping is determined by traffic and snow volume. All roads are swept at least once in the spring after sanding has ceased and again before striping operations begin. Curbs and gutters are swept in the fall.

Material Storage

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This area is gravel and is sprayed with water occasionally, however most of the summer traffic volume is low. At the time of graveling the surface was sprayed with magnesium chloride and is now well compacted. At the time of inspection, the detention pond was being worked on to facilitate better drainage. Material piles are occasionally watered to form a crust to prevent fugitive dust emissions. Below are the estimates of tonnage per material type:

Asphalt millings: 3,756T
Sand: 2,500T
Ballast: 70T
Base Course: 62T
Pit Run: 324T
Rip Rap: 286T
3" Ace Chips: 23T

Recycled asphalt is collected during street rehab and brought to the site, and is processed occasionally for use in patching and paving of county roads. Processing is done on site but is contracted out, and produces very little fugitive dust.

Material hauls to and from the site are covered with tarps to prevent fugitive dust emissions.

Unpaved Roads

Most unpaved roads with the AQ Control Zone have been covered with recycled asphalt and chip sealed. Complaints about fugitive dust from the remaining roads are minimal. The County Commission's Dust Abatement Policy allows the Pennington County Highway Department to apply a dust suppressant if the resident or landowner pays for the cost of the application. The county also shapes and waters the gravel road the day before the magnesium chloride is applied, which binds the chemicals tighter and keeps the road less dusty for a longer period of time. Typically, a road that receives a magnesium chloride application won't need to be re-graded for two years. No paving of any current gravel roads is expected at this time. They hope to increase the overlay program in the future. A long-range transportation plan is currently in progress and will make recommendations for paving in the future.

Paved Street Maintenance

Paved street maintenance is done by both the Pennington County Highway Department and contractors. The county does patching, and chip sealing, and contractors usually do crack sealing and some chip sealing. The use of a fog seal retains up to 40% more rock and helps reduce fugitive dust generation from the surface.

SUMMARY:

It is staff's opinion that the Pennington County Highway Department is in conformity with the existing Compliance Plan Permit.



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ANNUAL INSPECTION REPORT

JULY 2024

CITY OF RAPID CITY CONTINUOUS OPERATIONS AT THE LANDFILL

GENERAL INFORMATION:

Facility Name: City Landfill
Location: 5555 South Highway 79
Date of Inspection: July 25, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of the City Landfill operations and facility is to identify the fugitive dust generating activities and assess whether the control measures identified in the Compliance Plan are in use and adequate to control fugitive dust emissions. The current Compliance Plan is valid until March 9, 2026

STAFF REVIEW:

On July 25, 2024 staff conducted the annual inspection of the Landfill and its operations with Buck Schiley and Dan Roth. The following potential sources of fugitive dust emissions were discussed:

- Trackout onto Highway 79
- Fugitive dust from unpaved roads and other surfaces
- Yard waste activities;
- Recycled asphalt operations;
- Active soil borrow site; and
- Concrete pit.

Trackout to Paved Surfaces

Most of the unpaved roads at the Landfill are comprised of recycled material and are repaired as needed. Buck noted that they have noticed this material generates far less dust than typical gravel roads do. The main access roads into and around the facility are swept and watered as needed, particularly those which experience high volumes of traffic.

Should trackout occur onto Highway 79 the facility will sweep the approach as needed, and the South Dakota Department of Transportation will come by periodically and sweep as well.

Fugitive Dust from Unpaved Roads and Other Surfaces

All roads are sprayed down with water as needed, all the way to the active fill site. In addition to water, the facility employs speed limits of 15 MPH or less, which significantly lowers dust reentrainment. Currently Cell 16 and 18 are active, with Cell 16 being used mainly to store fill

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from the digging out of Cell 15 and Cell 18 is used for public waste activities. Given the rate at which Cell 18 is being filled, it is expected to be full by April of next year. As such, Cell 15 is being prepped to replace Cell 18. Currently, there is an Air Quality Construction Permit on Cell 15 with DRM as they create the cell, Dan noted that cells last approximately 5 years. Despite the dry conditions and operation of equipment, minimal dust was observed.

Compost Activities

Yard waste and clean wood is deposited in the composting area where it is ground into compost material and transferred to windrows. Some dust occurs from yard waste grinding operations, but the material can be wetted down and care is taken not to grind on windy days. After grinding, the material is stockpiled in the windrows to facilitate the composting process. During the composting process there is typically enough moisture in the product to control dust. Compost occasionally washes out onto the pavement and needs to be cleaned up periodically. The windrows are turned and after the windrow process is complete the screening and stockpiling process begins. Stockpiles of 3/4-inch compost, 3/8-inch compost and wood chips are stored in the screening area. Temporary stockpiles are stored in additional areas in the landfill. The compost is used on-site to cover small nonpublic use roads to manage dust and erosion and is also available for purchase.

Recycled Asphalt Operations

The recycled asphalt area features a number of piles and is milled by a contractor for use on site.

Active Soil Borrow Area

Currently, Cell 19 is the active borrow site, the soil is used to cover the active garbage disposal area weekly. A minimum of 6" of soil is placed across the entirety of the cell. Dan noted that as a result of the volume of projects occurring in the City this summer, almost all soil is being hauled in from outside areas and there is less demand from the Landfill. As a result, less dust is being produced and the Landfill is saving money. The inactive portion of the borrow area is covered with wood chips which reduces erosion potential.

Concrete Pit

Adjacent to the recycled asphalt area there is a site in which trucks may dump concrete rubble for disposal. The concrete is then feed into a grinder by a contractor for subsequent use by the Landfill as well as those who wish to purchase it. The size of the concrete varies, but water is used both on the stockpiles as well as during the grinding process to prevent fugitive dust emissions.

Garbage Disposal Area

This area was actively being operated on by heavy equipment at the time of the inspection. The area is shut down when winds reach a sustained 30 MPH. No visible emissions were observed.



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The area is watered down when needed. Yard waste is not allowed in the active pit. Once a week the area is covered with soil and compacted and sprayed with a fibrous slurry nightly. This slurry accomplishes a similar goal to the soil, but takes up far less space than the soil, extending the life of the cell.

Water used on the site to prevent dust is sourced from retention ponds around the property.

MSW Compost Operation

The co-compost operation has been shut down after approximately 20 years of operation as a result of lack of demand and cost. Dan noted that it was impossible to remove all micro plastics in the compost and as such people found it unsightly and preferred the yard waste compost despite the superior nutrients in the MSW compost. The facility is slowly being dismantled and parts being reused elsewhere and the new purpose of the facility has not been determined.

Landfill Gas

There are 88 wells around the Landfill which collect gas produced by the decomposing waste. This gas is piped to the facility, in which it is either burned off or used to heat the various buildings. Currently, very little of the gas is high enough quality to be used and is mostly burned off. Buck noted that they are hoping to enhance their system so they may utilize more of the gas, in part by upgrading their flare to a candlestick flare, such as the one used by the City Water Reclamation Facility.

SUMMARY

It is staff's opinion that the City Landfill is in conformity with the City's Fugitive Dust Compliance Plan.



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ANNUAL INSPECTION REPORT
OCTOBER 2024
CITY OF RAPID CITY CONTINUOUS OPERATIONS AT UTILITY MAINTENANCE
DIVISION

GENERAL INFORMATION:

Facility Name: City Utility Maintenance Division
Location: 225 E Main St N
Date of Inspection: October 21, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of City Utility Maintenance Division operations and facility is to identify the fugitive dust generating activities and assess whether the control measures identified in the Compliance Plan are in use and adequate to control fugitive dust emissions. The current Compliance Plan is valid until March 9, 2026.

STAFF REVIEW:

On October 21, 2024 staff conducted the annual inspection of the City Utility Maintenance Division and its operations with Jesse Rieb. The site is 4.5 acres and nearly completely paved. The following potential sources of fugitive dust emissions were reviewed:

- Material storage area;
- Dewatering pit;
- Truck fleet operations; and
- Unpaved parking, storage and equipment parking area.

Material Storage Area

The material storage area is located west of the Utility Maintenance Building. Stockpiles of excavated dirt, backfill dirt, base material, and 1" clean rock are stored on site in 15' high three-sided concrete bins sheltered from the wind. This reduces fugitive emissions from the stockpiles. The excavated dirt piles consist of material from water line repairs so the material is saturated. The stockpile and surface of this area are watered if necessary to keep the dust suppressed, however the saturated nature of the dirt prevents most dust. Concrete rubble, riprap, and sugar rock are stored on the east side of the building on the gravel-surfaced storage yard. The paved areas of the Utility Maintenance Division are swept as needed.

Dewatering Pit

A dewatering pit facilitates the drying of saturated dirt excavated from water line repairs. Approximately twice a year the material is excavated from the pit and that which is unsuitable for backfill is hauled to the landfill for fill. Some track out occurs but is swept as needed.



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Truck Fleet Operations

The Utility Maintenance Division has seven dump trucks available. Five of the dump trucks are equipped with tarps. A truck equipped with a tarp is used when hauling material that has the potential to generate fugitive dust. When hauling dirt from a water main break site, a dump truck without a tarp can be used because the material is saturated enough that fugitive emission potential is low.

Unpaved Parking, Storage and Equipment Parking Area

The storage and equipment parking area is surfaced with gravel. Fugitive emissions were not observed from the storage piles or the unpaved storage and parking area. The area is watered with a water truck when needed but experiences little traffic.

SUMMARY:

It is staff's opinion that the City Utility Maintenance Division is in compliance with the City's Fugitive Dust Compliance Plan.



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ANNUAL INSPECTION REPRT
JUNE 2024
CITY OF RAPID CITY STREETS DIVISION

GENERAL INFORMATION:

Facility Name: City Street Division
Location: 605 Steele Avenue
Date of Inspection: June 24, 2024
Report By: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of the City Street Division operations and facilities is to identify the fugitive dust generating activities and assess whether the control measures identified in the City’s Compliance Plan are in use and adequate to control fugitive dust emissions. The current Compliance Plan is in effect until March 9, 2026.

STAFF REVIEW:

On June 24, 2024 staff met with Jesse Rieb, Streets Superintendent. The following potential sources of fugitive dust emissions were reviewed:

- street traction and deicing operations;
- sweeping operations;
- sandblasting operations;
- unpaved street and alley maintenance;
- paved street maintenance;
- truck fleet operations; and
- snow disposal site.

Street Traction and Deicing Operations

The primary method of street deicing on the west side of town is the use of enhanced corrosion inhibited magnesium chloride (mag water) and quarried sodium chloride (salt). Due to water quality concerns, the method used on the east side of town is a washed river sand and road salt mixed in a 6:1 ratio. The salt and traction materials are stored in two domes and a storage building to eliminate exposure to the environment, mitigating fugitive dust potential. Material is loaded into the buildings using loaders and the area is frequently swept.

Street Cleaning and Sweeper Operations

The City has an ongoing year-round (temperature permitting) sweeping program to reduce the amount of particulate matter present on the streets that may become re-entrained into the air from traffic or wind erosion. The Street Division currently has twelve sweepers including one flusher



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truck. All of the sweepers are equipped with water to prevent dust re-entrainment.

The sweepers are cleaned out across the street from the Street Division at the Sweeper Dump Facility. The material is cleaned out of the sweepers on a daily basis and stored at this facility until it is hauled to the landfill for use as daily cover. All of the sweepers use water so the dumped material is moist and not subject to wind erosion while stored at the sweeper dump facility. The paved area at this facility is swept as needed. Water dumped from the sweepers is allowed to silt out across a vegetated area and would eventually enter the creek. Mr. Rieb stated as a result of the low water volume it often evaporates long before this.

Sandblasting Operations

No sandblasting has been done this year.

Storage and Equipment Parking Surface

The areas of the Street Division are paved with asphalt. This area is mainly used for equipment storage so there is very little traffic on the surface. Small stockpiles of gravel, ballast and cold mix asphalt are stored in bins located on the west side of the salt/sand storage building. These piles are protected from the wind so fugitive emissions are not typically generated. Small piles of fines for oil spill clean-up and pure sand for chip sealing operations are also stored on the northeast side of the northernmost salt dome and are stabilized with a crust and sediment socks. There is a stockpile of winter asphalt patch mix to the east of the salt domes behind the shops. The material is sticky and will not produce fugitive dust.

Paved areas are typically swept twice a week during the spring and then on an as-needed basis. Paved areas around the facility were clean at the time of inspection.

Unpaved Street and Alley Maintenance

Public Works has taken measures to reduce the amount of dust generation potential from unpaved streets and other areas. Priorities for roadway paving are based on maintenance issues, drainage problems, complaints and requests received.

Paved Street Maintenance

Activities of paved street maintenance are handled through Engineering and administered through Public Works.

Truck Fleet Operations

The City Street Division has tarps installed on all but one of the dump trucks to prevent fugitive emissions and are used for hauling all materials except for snow.

Snow Disposal Site



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The snow disposal site consists of the property located on East Saint Charles Street behind Taco John's. It is an undeveloped piece of land with a horseshoe shaped gravel access road. The site is cleaned and bladed in the spring, and watered to develop a crust to prevent fugitive emissions. Soil from the Black Hills Stock Show and The Monument is stored here. All piles are stabilized with vegetation. Mr. Rieb noted that a property on Cambell was recently purchased and may be included in the Compliance plan depending on its use.

SUMMARY:

It is staff's opinion that the City Street Division is in conformity with the City's Fugitive Dust Compliance Plan.



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ANNUAL INSPECTION REPORT
OCTOBER 2024
RCP&E RAILROAD CONTINUOUS OPERATION

GENERAL INFORMATION:

Facility Name: Rapid City, Pierre, and Eastern (RCP&E) Railroad
Location: Main Yard - 2230 Cambell Street
Roundhouse - 500 Main Street
Storage Yard - Maple Avenue
Rail lines within the Control Zone
Date of Inspection: October 11, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of the Rapid City, Pierre & Eastern (formerly Genesee & Wyoming) Railroad facilities is to identify the fugitive dust generating activities and assess whether the control measures identified in the Compliance Plan are in use and adequate to control fugitive dust emissions. The Compliance Plan is effective until December 13, 2026.

STAFF REVIEW:

On October 11, 2024 staff met with John Sabo to inspect the facilities. Staff discussed potential sources of fugitive dust from gravel lots and roads, transportation of material in railcars, track out from the facility onto City roads, ballast placement along the rail and stock piles.

Main Yard – Cambell Street Facility

The Cambell Street Facility is located at 2720 Cambell Street and has a paved entrance off of Saint Patrick Street. The first building on the site has a paved parking area, this area and the road leading into the facility were relatively free of track out. John noted that the facility has a skid steer with a power broom that they use to sweep the paved surfaces as needed.

The remainder of the facility is gravel, with posted speed limits of 25 mph. John noted that they are infrequently travelled on and thus produce very little dust. Within the graveled yard are a number of storage piles. The first is approximately 80 tons of bentonite-fouled ballast, which is thoroughly vegetated and has a crust on it. This material is effectively used like cat litter to clean up any spills and fill soft spots along the rail. There are various 2-5 ton piles of 2” sugar rock for use in and around the yard. This rock is cleaned and therefore produces little to no dust.



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Almost all rail cars are covered to prevent fugitive dust emissions, and only large material that is not associated with dust is allowed to be transported in cars which are not covered.

Roundhouse – Main Street Facility

This facility runs along E. Main Street, beginning at the intersection with Steele Ave. The area is graveled and some track out was observed onto E Main, this has since been addressed. Mag water is used when needed. Both entrances to the facility are paved. There was a pile of approximately 20 tons of clean rock at the Steele Ave entrance but John noted this was a temporary holding locations.

A vacuum truck from WL Plastics was on the site, collecting material from covered rail cars. This process is done meticulously so as to avoid waste and produces no fugitive dust. John noted that this is a unique practices as the Rapid City location is not a transfer station.

White Eagle - Maple Avenue Facility

The Maple Avenue facility consists of a storage area for maintenance operations and a gravel road next to the railroad tracks. This area is surfaced with gravel but is no longer in use. Riprap has been removed from this location. No track out was observed. The unposted speed limit in the area is 15 mph.

Ballast placement

Track maintenance was not observed at the time of inspection. The ballast is added as needed for track maintenance which mostly occurs during summer months. Ballast is watered when it is loaded to be brought to the site.

SUMMARY:

It is staff's opinion that the RCP&E Railroad is in conformity with the existing Compliance Plan Permit.



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ANNUAL INSPECTION REPORT
NOVEMBER 2024
RCS STORAGE CONTINUOUS OPERATIONS

GENERAL INFORMATION:

Facility Name: Heavy Constructors, Inc.
Location: 4101 Deadwood Ave N
Date of Inspection: November 19, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of the Heavy Constructors facility is to identify the fugitive dust generating activities and assess whether the control measures identified in the Compliance Plan are in use and adequate to control fugitive dust emissions. The current Compliance Plan is in effect until April 5, 2026.

STAFF REVIEW:

On November 19, 2024 staff inspected the Heavy Constructors facility on Deadwood Ave and reviewed operations of the facility with David Ulrich. The facility consists of an office, several storage and repair buildings, an employee parking lot, and equipment and material storage.

Equipment Storage Area

The equipment storage area is located on Lot 2 of Tract A and is surfaced with recycled asphalt. The equipment/building material storage area mainly located on Lot 1 is surfaced with gravel and dirt. The main travel lanes of the facility are recycled asphalt. The posted speed limit is 10 mph. The area experienced low traffic volume and is watered as needed.

Material Storage Area

The northern material storage yard includes stockpiles of asphalt rubble, millings and fill which is stabilized with heavy vegetation. The road leading into this area is surfaced with recycled asphalt. The travel lands are gravel, which are watered as needed to control dust and the posted speed limit is 10 mph. This area gets little traffic, and is only traveled on when trucks are hauling in and out. The rock construction entrance is in good condition. An onsite water truck is used as needed for the storage areas and stockpiles.

The raw asphalt is ground by a contractor and produces minimal dust. The millings are large enough in size to not become airborne and produce fugitive emissions. Similarly, the red dirt contains a high clay content and does not pose much risk of fugitive emissions.



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SUMMARY:

It is staff's opinion that Heavy Constructors is in conformity with the existing Compliance Plan.



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ANNUAL INSPECTION REPORT
AUGUST 2024
IRON HORSE EXCAVATING CONTINUOUS OPERATIONS

GENERAL INFORMATION:

Facility Name: Iron Horse Excavating
Location: 2391 Commerce Road
Date of Inspection: August 16, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of the Iron Horse Excavating facility is to identify the fugitive dust generating activities and assess whether the control measures identified in the Compliance Plan are in effect until December 8, 2025.

STAFF REVIEW:

On August 16, 2024 staff inspected the Iron Horse Excavating facility on Commerce Road with Ashley Ankele and reviewed operations of the facility.

Material Storage Area

The material storage area is located on the south side of Commerce Road behind the office. The yard holds stockpiles of dirt, sand, gravel of various sizes, asphalt and construction rubble. All unpaved drive aisles are gravel. Water is used as needed for dust control, a water truck is kept on site for this purpose. Asphalt piles are often recycled, and a contractor will come and grind the substrate. Gravel is most often sourced from Pete Lien while many of the other materials come from jobsites; all truck loads are covered with tarps during transport. A sweeper is run along Commerce road should any track out occur, but they are cognizant of wet conditions and avoid leaving the yard during muddy conditions to minimize track out.

SUMMARY:

It is staff's opinion that Iron Horse Excavating is in conformity with the existing Compliance Plan.



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ANNUAL INSPECTION REPORT
NOVEMBER 2024
J. SCULL CONSTRUCTION CONTINUOUS OPERATIONS

GENERAL INFORMATION:

Facility Name: J. Scull Construction
Location: 803 Industrial Avenue
Date of Inspection: November 6, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of J Scull Construction is to identify the fugitive dust generating activities and assess whether the control measures identified in the Compliance Plan are in use and adequate to control fugitive dust emissions. The Compliance Plan permit is scheduled for renewal by March 9, 2026.

STAFF REVIEW:

On November 6, 2024 staff inspected the J Scull Construction facility on Industrial Avenue with Justin Oswald and reviewed operations of the facility.

Material Storage Area (west of office)

In previous years, asphalt millings and rubble were stockpiled on site. The area is roughly 2 acres and is graveled. There is no longer material storage at this location. The area experiences almost no traffic. The condition of the unpaved surface is fair.

Equipment Storage Area (642 Industrial)

The lot across the street was previously unpaved but is now entirely paved and houses no material or equipment storage. There are no potential sources of fugitive dust at this site.

SUMMARY:

It is staff's opinion that J Scull Construction is in conformity with the existing Compliance Plan. It is also staff's opinion that this property no longer requires a Compliance Plan and can be transitioned to a Parking/Storage permit in the future.



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ANNUAL INSPECTION REPORT
NOVEMBER 2024
RCS STORAGE CONTINUOUS OPERATIONS

GENERAL INFORMATION:

Facility Name: RCS Storage
Location: 1314 Fountain Plaza Drive (Office)
2400 Commerce Road
1325 Fountain Plaza Drive
Date of Inspection: November 15, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of the RCS Storage facility is to identify the fugitive dust generating activities and assess whether the control measures identified in the Compliance Plan are in use and adequate to control fugitive dust emissions. The current Compliance Plan is in effect until December 8, 2025.

STAFF REVIEW:

On November 15, 2024 staff inspected the RCS Storage facility on Fountain Plaza Drive and reviewed operations of the facility.

Equipment Storage Area

The equipment storage area located on the east and south side of Fountain Plaza Drive behind the office is used for equipment storage. Asphalt millings have been placed around the building's unpaved areas and throughout the drive aisles in the storage yard to reduce the potential for fugitive dust and track out. Vehicle speed limit is 5-10 mph to reduce dust. The millings are well compacted but are watered occasionally when needed. The area experiences very little traffic and therefore has little potential for fugitive dust emissions. If tracking occurs, Fountain Plaza Drive is swept.

SUMMARY:

It is staff's opinion that RCS Construction is in conformity with the existing Compliance Plan. It is also staff's opinion that this property no longer requires a Compliance Plan and can be transitioned to a Parking/Storage permit in the future.



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ANNUAL INSPECTION REPORT
NOVEMBER 2024
BLACK HILLS SPEEDWAY CONTINUOUS OPERATIONS

GENERAL INFORMATION:

Facility Name: Butler Machinery Company
Location: 3601 Deadwood Avenue N
Date of Inspection: November 18, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of the Butler Machinery Company facility is to identify the fugitive dust generating activities and assess whether the control measures identified in the Compliance Plan are in use and adequate to control fugitive dust emissions. The current Compliance Plan is in effect until March 9, 2027.

STAFF REVIEW:

On November 18, 2024 staff inspected the Butler Machinery facility at 3601 Deadwood Ave N. Potential sources of fugitive dust material storage area, unpaved storage area, traffic on unpaved surfaces and a gravel turn-around adjacent to the entrance. Speed limit on paved areas are 25 mph and 5 mph on unpaved areas within the yard.

Material Storage Area

This area features a 1200-ton compacted dirt pile which is used to test repaired equipment and allow customers to demo machinery. The stockpile is treated with mag water for dust control and a portion of the pile is stabilized with vegetative cover.

Unpaved Storage Area

This area is surfaced with gravel. Track out onto paved surfaces was minimal, and vacuum sweeping is performed when track out occurs. The area is watered as needed and sweeping occurs approximately twice a month. The area has portions which have been revegetated, the rest is mostly recycled asphalt which poses little risk of fugitive dust emissions.

Equipment Storage Areas

The used equipment and rental equipment display areas are surfaced with heavy gravel.

Traffic on Unpaved Surfaces



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Mag water is used as a dust suppressant on unpaved areas, however customer traffic is limited to paved areas to minimize dust.

Gravel Turn Around

This area is in good condition with minimal track out onto the adjacent paved surface.

SUMMARY:

It is staff's opinion that Butler Machinery is in conformity with the existing Compliance Plan.



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ANNUAL INSPECTION REPORT
NOVEMBER 2024
COUNTRYSIDE SOUTH ROAD DISTRICT

GENERAL INFORMATION:

Facility Name: Countryside South Road District
Location: Countryside South Subdivision, Sheridan Lake Road
Date of Inspection: November 25, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of the Countryside South Road District is to identify the fugitive dust generating activities and assess whether the control measures are in use and adequate to control fugitive dust emissions. The current Compliance Plan is valid until March 9, 2026.

Countryside South Road District is located in the Countryside South subdivision. The streets are paved, and traction materials are applied to the steep streets during the winter months. The Compliance Plan indicates that the roads will be swept two to four times per year.

STAFF REVIEW:

On November 25, 2024 staff inspected the streets located in the Countryside South Road District. The following road conditions were noted:

- Alfalfa Court – clean, no loose material.
- Double Tree Road – clean, no gravel.
- Sandlily Court – clean
- Coneflower Court – clean
- Conifer Lane – clean
- Blue Stem Court – clean, no chips.
- Bitter Root Court – clean.
- Limelight Lane – clean, no material at intersection.
- Conifer Lane – clean.
- Scrub Oak Circle – clean, no buildup around drainage.
- Sweet Clover – clean.
- Rockcress Court – clean.
- Currant Court – clean.
- Daisy Lane – clean, some chips collected in low area near turnaround.
- Barberry Court – clean, no longer a gravel pit at the end.



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- Snowberry Lane – clean.
- Snowberry Court – clean.
- Columbine Court – clean.

SUMMARY:

It is staff's opinion that Countryside South Road district is in conformity with the Compliance Plan.



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ANNUAL INSPECTION REPORT
NOVEMBER 2024
DIESEL MACHINERY CONSTRUCTION CONTINUOUS OPERATIONS

GENERAL INFORMATION:

Facility Name: Diesel Machinery, Inc
Location: 3801 Deadwood Avenue North
Date of Inspection: November 8, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of Diesel Machinery is to identify the fugitive dust generating activities and assess whether the control measures identified in the Compliance Plan are in use and adequate to control fugitive dust emissions. The Compliance Plan permit is scheduled for renewal by September 9, 2027.

STAFF REVIEW:

On November 8, 2024 staff inspected Diesel Machinery Inc. (DMI).

Loadout Zone & Equipment Storage Area

The loadout zone and equipment storage area where construction equipment is loaded and unloaded for sale, rent, or repair is located on the south side of the property. The surface is dirt/gravel, and is being transitioned fully to gravel. The entrance, parking at the building, and area to the north of the building and around Dakota RV on the same parcel is asphalt. A water truck is available for use when necessary, and the asphalt is swept as needed with their skid steer sweeper attachment.

Repair Shop

The repair shop is accessed on the south and west sides of the building and that area is surfaced with gravel. Less than 10 CY of native soil is stockpiled in this area for customers to use to demo equipment. The soil surface is watered as necessary, and the unposted speed limit is 10 mph.

Dakota RV & RV Storage Area

Dakota RV is on the north side of the property and is paved with asphalt. To the west of this area on the north side of the parcel is an RV storage area, which is surfaced with larger clean rock. Watering is used when necessary to mitigate fugitive dust.



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SUMMARY:

DMI is in conformance with the Compliance Plan at this time. Given the nature of the site, staff recommends that this permit be transitioned to a parking/storage permit in the future.



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ANNUAL INSPECTION REPORT
NOVEMBER 2024
BLACK HILLS SPEEDWAY CONTINUOUS OPERATIONS

GENERAL INFORMATION:

Facility Name: Black Hills Speedway
Location: 2467 Jolly Lane
Date of Inspection: November 14, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of the Black Hills Speedway facility is to identify the fugitive dust generating activities and assess whether the control measures identified in the Compliance Plan are in use and adequate to control fugitive dust emissions. The current Compliance Plan is in effect until September 9, 2027.

STAFF REVIEW:

On November 14, 2024 staff inspected the Black Hills Speedway facility at 2467 Jolly Lane.

Race Track

Black Hills Speedway encompasses 34.07 acres on the northeast corner of Highway 44 and Jolly Lane. The facility is contained within a chain link fence. Spectator parking encompasses approximately 4 acres of gravel along the western portion of the site. The gypsum/dirt racing and interior pit area is approximately 12.7 acres. The remainder of the parcel is primarily dirt or concrete grandstand seating and concessions.

The track is watered at least weekly during the race season (May through September). The area is unused during the off season and is therefore undisturbed during this time. Three water trucks are on site and the water source is a pond to the north of the track. This year, the lack of rain resulted in the pond going almost entirely dry, however the facility has access to city water. Site grading occurs as needed during the race season, and a water truck is simultaneously used to mitigate dust.

There is an area just outside the track which contains piles of fill for the track, these are watered to allow a crust to form, thus preventing fugitive dust.

SUMMARY:

It is staff's opinion that Black Hills Speedway is in conformity with the existing Compliance Plan.



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ANNUAL INSPECTION REPORT
NOVEMBER 2024
NIELSEN DIRTWORKS CONTINUOUS OPERATIONS

GENERAL INFORMATION:

Facility Name: Nielsen Dirtworks
Location: 2420 E Hwy 44
Date of Inspection: November 20, 2024
Report by: Morgan Twombly, Environmental Planner

GENERAL COMMENTS:

The purpose of the annual inspection of the Nielsen Dirtworks facility is to identify the fugitive dust generating activities and assess whether the control measures identified in the Compliance Plan are adequate in controlling fugitive dust emissions. The current Compliance Plan is in effect until March 9, 2027.

STAFF REVIEW:

On November 20, 2024 staff inspected the Nielsen Dirtworks facility at 2420 E Hwy 44 with Shawn Nielsen. Activities on the site consist of hauling topsoil in to be screened and resold as well as hauling in river rock, clean rock, compost and base course for resale.

Material Storage Area

The material storage area consists of approximately 4 acres of unpaved gravel and soil. The posted speed limit within the yard is 5 mph and experiences about 30 vehicle trips per day. The material is constantly in use but stockpiles consist of topsoil, compost and rock. Volumes are 2000 cy, 500 cy, and 100 tons respectively. These piles are regularly watered to form a crust, particularly in the winter when operations slow.

Topsoil is screened every day during the busy season, unless conditions are windy. Particular attention is paid to wind direction, absolutely no screening is down when south winds are present to avoid fugitive emissions migrating towards the homes to the north of the property.

A water truck and sweeper are present on site. Entrance to the site is concrete and is swept as needed. Drive aisles are millings and pea gravel to minimize dust.

SUMMARY:

It is staff's opinion that Nielsen Dirtworks is in conformity with the existing Compliance Plan.