



State of Utah

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## GUIDELINES

**TO:** Permitting Branch

**FROM:** Regg Olsen, Permitting Branch Manager *RDO 1/12/15*

**DATE:** January 12, 2015

**SUBJECT:** Emission Factors for Paved and Unpaved Haul Roads

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1. The question of how to deal with the emission factors for paved and unpaved haul roads has risen when using AP-42 emission factors. Using current AP-42 emission factors shows higher emission rates for paved roads than unpaved roads. This does not seem practical; we also want to encourage sources to pave roads when appropriate, not remove paved haul roads to get lower calculated emissions!

2. With these problems, sources have taken the task upon themselves to search out the best solution which at times has developed additional problems as they try to document and we try to validate their approach. We have also been concerned with consistency across industry. This memo is intended to provide some assistance on the issue for permit engineers and sources alike. Every Approval Order is a case-by-case determination and site specific with conditions unique to the site; implementation of this document will be likewise.

3. Beginning with the original guideline date (March 10, 2008), permit engineers should allow applicants to use the recommended equation found in AP-42 13.2.2 for Unpaved Haul Roads and add the appropriate control efficiencies outlined below to that equation. Due to the flexibility this approach provides, the UDAQ will strictly adhere to the outlined control efficiencies.

A source can still choose to use the AP-42 equation for Paved Haul Roads found in AP-42, 13.2.1 if they choose, but the approach outlined in this memo can serve as an alternative.