13.2.2 Unpaved Roads

13.2.2.1 General

When a vehicle travels an unpaved road, the force of the wheels on the road surface causes pulverization of surface material. Particles are lifted and dropped from the rolling wheels, and the road surface is exposed to strong air currents in turbulent shear with the surface. The turbulent wake behind the vehicle continues to act on the road surface after the vehicle has passed.

13.2.2.2 Emissions Calculation And Correction Parameters[1-6]

The quantity of dust emissions from a given segment of unpaved road varies linearly with the volume of traffic. Field investigations also have shown that emissions depend on source parameters that characterize the condition of a particular road and the associated vehicle traffic. Characterization of these source parameters allow for "correction" of emission estimates to specific road and traffic conditions.

Dust emissions from unpaved roads have been found to vary directly with the fraction of silt (particles smaller than 75 micrometers [µm] in diameter) in the road surface materials.[1] The silt fraction is determined by measuring the proportion of loose dry surface dust that passes a 200-mesh screen, using the ASTM-C-136 method. A summary of this method is contained in Appendix C of AP-42. Table 13.2.2-1 summarizes measured silt values for industrial and public unpaved roads. It should be noted that the ranges of silt content vary over two orders of magnitude. Therefore, the use of data from this table can potentially introduce considerable error. Use of this data is strongly discouraged when it is feasible to obtain locally gathered data.

Since the silt content of a rural dirt road will vary with geographic location, it should be measured for use in projecting emissions. As a conservative approximation, the silt content of the parent soil in the area can be used. Tests, however, show that road silt content is normally lower than in the surrounding parent soil, because the fines are continually removed by the vehicle traffic, leaving a higher percentage of coarse particles.

The PM-10 and TSP emission factors presented below are the outcomes from stepwise linear regressions of field emission test results of vehicles traveling over unpaved surfaces. The results from 180 PM-10 and 92 TSP field tests were used to develop the predictive emission factor expressions. Due to a limited amount of information available for PM-2.5, the expression for that size range has been scaled against the result for PM-10. Consequently, the quality rating for the PM-2.5 factor is lower than that for the PM-10 expression. The background document for AP-42 Section 13.2.2 (Reference 6) fully describes the process used to develop and validate the emission factor expressions.

Table 13.2.2-1. TYPICAL SILT CONTENT VALUES OF SURFACE MATERIAL ON INDUSTRIAL AND RURAL UNPAVED ROADS[a]

Industry	Road Use Or Surface Material	Plant Sites	No. Of Samples	Silt Content (%)	
				Range	Mean
Copper smelting	Plant road	1	3	16 - 19	17
Iron and steel production	Plant road	19	135	0.2 - 19	6.0
Sand and gravel processing	Plant road	1	3	4.1 - 6.0	4.8
	Material storage area	1	1	-	7.1
Stone quarrying and processing	Plant road	2	10	2.4 - 16	10
	Haul road to/from pit	4	20	5.0-15	8.3
Taconite mining and processing	Service road	1	8	2.4 - 7.1	4.3
	Haul road to/from pit	1	12	3.9 - 9.7	5.8
Western surface coal mining	Haul road to/from pit	3	21	2.8 - 18	8.4
	Plant road	2	2	4.9 - 5.3	5.1
	Scraper route	3	10	7.2 - 25	17
	Haul road (freshly graded)	2	5	18 - 29	24
Construction sites	Scraper routes	7	20	0.56-23	8.5
Lumber sawmills	Log yards	2	2	4.8-12	8.4
Municipal solid waste landfills	Disposal routes	4	20	2.2 - 21	6.4
Publicly accessible roads	Gravel/crushed limestone	9	46	0.1-15	6.4
	Dirt (i.e., local material compacted, bladed, and crowned)	8	24	0.83-68	11

[a]References 1,5-16.

The following empirical expression may be used to estimate the quantity in pounds (lb) of size-specific particulate emissions from an unpaved road, per vehicle mile traveled (VMT):

$$E = \frac{k\ (s/12)^{a}\ (W/3)^{b}}{(M/0.2)^{c}} \tag{1}$$

where k, a, b and c are empirical constants (Reference 6) given below and

E = size-specific emission factor (lb/VMT)
s = surface material silt content (%)
W = mean vehicle weight (tons)
M = surface material moisture content (%)

The source characteristics s, W and M are referred to as correction parameters for adjusting the emission estimates to local conditions. The metric conversion from lb/VMT to grams (g) per vehicle kilometer traveled (VKT) is as follows:

1 lb/VMT = 281.9 g/VKT

The constants for Equation 1 based on the stated aerodynamic particle sizes are shown in Table 13.2.2-2.

Table 13.2.2-2. CONSTANTS FOR EQUATION 1

Constant	PM-2.5	PM-10	PM-30[a]
k (lb/VMT)	0.38	2.6	10
a	0.8	0.8	0.8
b	0.4	0.4	0.5
c	0.3	0.3	0.4
Quality rating	C	B	B

[a]Assumed equivalent to total suspended particulate (TSP).

Table 13.2.2-2 also contains the quality ratings for the various size-specific versions of Equation 1. The equation retains the assigned quality rating, if applied within the ranges of source conditions, shown in Table 13.2.2-3, that were tested in developing the equation:

Table 13.2.2-3. RANGE OF SOURCE CONDITIONS USED IN DEVELOPING EQUATION 1

Surface Silt Content, %	Mean Vehicle Weight		Mean Vehicle Speed		Mean No. of Wheels	Surface Moisture Content, %
	Mg	ton	km/hr	mph		
1.2-35	1.4-260	1.5-290	8-88[a]	5-55[a]	4-7[a]	0.03-20

[a] See discussion in text.

As noted earlier, Equation 1 was developed from tests of traffic on unpaved surfaces, either uncontrolled or watered. Unpaved roads have a hard, generally nonporous surface that usually dries quickly after a rainfall or watering, because of traffic-enhanced natural evaporation. (Factors influencing how fast a road dries are discussed in Section 13.2.2.3, below.) The quality ratings given above pertain to the mid-range of the measured source conditions for the equation. A higher mean vehicle weight and a higher than normal traffic rate may be justified when performing a worst-case analysis of emissions from unpaved roads.

It is important to note that the vehicle-related source conditions refer to the average weight, speed, and number of wheels for all vehicles traveling the road. For example, if 98 percent of traffic on the road are 2-ton cars and trucks while the remaining 2 percent consists of 20-ton trucks, then the mean weight is 2.4 tons. More specifically, Equation 1 is *not* intended to be used to calculate a separate emission factor for each vehicle class within a mix of traffic on a given unpaved road. That is, in the example, one should *not* determine one factor for the 2-ton vehicles and a second factor for the 20-ton trucks. Instead, only one emission factor should be calculated that represents the "fleet" average of 2.4 tons for all vehicles traveling the road.

Furthermore, although mean vehicle speed and the mean number of wheels do not explicitly appear in the predictive equation, these variables should be considered when determining quality ratings. During the validation of Equation 1, it was found that the predictive equation tends to overpredict emissions for very slow mean vehicle speeds.

The background document (Reference 6) discusses this tendency for very slow vehicles speeds. The background document further notes that no bias is evident for mean vehicle speeds of at least 15 mph.

<u>In the case of a mean vehicle speed less than 15 mph</u>, Equation 1 could be used to conservatively estimate the amount of emissions due to traffic over the unpaved surface. Should one wish to account for the tendency for Equation 1 to overestimate at low speeds, it is recommended that Equation 1 be multiplied by (S/15), where S is the average vehicle speed (mph) and $S \leq 15$ mph. Again, note that <u>this applies only to situations in which the average vehicle speed is less than 15 mph.</u> Furthermore, if Equation 1 is multiplied by (S/15), then the quality rating of the emission estimate should be downgraded by at least one letter.

Moreover, to retain the quality ratings when addressing a group of unpaved roads, it is necessary that reliable correction parameter values be determined for the road in question. The field and laboratory procedures for determining road surface silt and moisture contents are given in AP-42 Appendices C.1 and C.2. Vehicle-related parameters should be developed by recording visual observations of traffic. In some cases, vehicle parameters for industrial unpaved roads can be determined by reviewing maintenance records or other information sources at the facility.

In the event that site-specific values for correction parameters cannot be obtained, then default values may be used. A default value of 2.2 tons is recommended for the mean vehicle weight on publicly accessible unpaved roads. (It is assumed that readers addressing industrial roads have access to the information needed to develop average vehicle information for their facility.) In the absence of site-specific silt content information, an appropriate mean value from Table 13.2.2-1 may be used as a default value, but the quality rating of the equation is reduced by two letters. Because of significant differences found between different types of road surfaces and between different areas of the country, use of the default moisture content value of 0.2 percent for dry conditions is discouraged. The quality rating should be downgraded two letters when the default moisture content value is used.

The effect of routine watering to control emissions from unpaved roads is discussed below in Section 13.2.2.3, “Controls”. However, all roads are subject to some natural mitigation because of rainfall and other precipitation. Equation 1 can be extrapolated to annual average uncontrolled conditions (but including natural mitigation) under the simplifying assumption that annual average emissions are inversely proportional to the number of days with measurable (more than 0.254 mm [0.01 inch]) precipitation:

$$E_{ext} = \frac{k\ (s/12)^{a}(W/3)^{b})}{(M_{dry}/0.2)^{c}}\ [(365\ -\ p)/365] \tag{2}$$

where s, W, k, a, b and c are as given earlier and

E_{ext} = annual size-specific emission factor extrapolated for natural mitigation, lb/VMT
M_{dry} = surface material moisture content under dry, uncontrolled conditions, %
p = number of days with at least 0.254 mm (0.01 in) of precipitation per year (see below)

Figure 13.2.2-1 gives the geographical distribution for the mean annual number of "wet" days for the United States. Although the use of information from this table is reasonable for estimating an average emission factor, it would not be reasonable to use this information to estimate an actual emission factor for a specific year. Reported meteorological information should be used for estimating actual emission factors.

It is emphasized that the moisture content to be used in Equation 2 -- M_{dry} -- must reference dry, worst-case conditions. In the absence of the appropriate site-specific information, the default value of 0.2 percent should be used in Equation 2.

Equation 2 provides an estimate that accounts for precipitation on an annual average basis for the purpose of inventorying emissions. It should be noted that Equation 2 does not account for differences in the temporal distributions of the rain events, the quantity of rain during any event, or the potential for the rain to evaporate from the road surface. In the event that a finer temporal and spatial resolution is desired for inventories of public unpaved roads, estimates can be based on a more complex set of assumptions. These assumptions include:

1. The moisture content of the road surface material is increased in proportion to the quantity of water added;
2. The moisture content of the road surface material is reduced in proportion to the Class A pan evaporation rate;
3. The moisture content of the road surface material is reduced in proportion to the traffic volume; and
4. The moisture content of the road surface material varies between the extremes observed in the area. The CHIEF Web site (http://www.epa.gov/ttn/chief/ap42back.html) has a file which contains a spreadsheet program for calculating emission factors which are temporally and spatially resolved. Information required for use of the spreadsheet program includes monthly Class A pan evaporation values, hourly meteorological data for precipitation, humidity and snow cover, vehicle traffic information, and road surface material information.

It is emphasized that the simple assumption underlying Equation 2 and the more complex set of assumptions underlying the use of the procedure which produces a finer temporal and spatial resolution have not been verified in any rigorous manner. For this reason, the quality ratings for either approach should be downgraded one letter from the rating that would be applied to Equation 1.

13.2.2.3 Controls[18-22]

A wide variety of options exist to control emissions from unpaved roads. Options fall into the following three groupings:

1. Vehicle restrictions that limit the speed, weight or number of vehicles on the road;
2. Surface improvement, by measures such as (a) paving or (b) adding gravel or slag to a dirt road; and
3. Surface treatment, such as watering or treatment with chemical dust suppressants.

Available control options span broad ranges in terms of cost, efficiency, and applicability. For example, traffic controls provide moderate emission reductions (often at little cost) but are difficult to enforce. Although paving is highly effective, its high initial cost is often prohibitive. Furthermore, paving is not feasible for industrial roads subject to very heavy vehicles and/or spillage of material in transport. Watering and chemical suppressants, on the other hand, are potentially applicable to most industrial roads at moderate to low costs. However, these require frequent reapplication to maintain an acceptable level of control. Chemical suppressants are generally more cost-effective than water but not in cases of temporary roads (which are common at mines, landfills, and construction sites). In summary, then, one needs to consider not only the type and volume of traffic on the road but also how long the road will be in service when developing control plans.

Vehicle restrictions. These measures seek to limit the amount and type of traffic present on the road or to lower the mean vehicle speed. For example, many industrial plants have restricted employees from driving on plant property and have instead instituted bussing programs. This eliminates emissions due to employees traveling to/from their worksites. Although the heavier average vehicle weight of the busses increases the base emission factor, the decrease in vehicle-miles-traveled results in a lower overall emission rate.

Although vehicle speed does not appear as a correction parameter, it is obvious to anyone who has driven on an unpaved road that (visible) emissions increase with vehicle speed. Accordingly, speed reduction is a clearly viable control measure. However, as with the source parameters that do appear in Equation 1, the control measure must effectively reduce the fleet average speed. In order to substantially reduce the speed of all vehicles, this control option is most applicable to rural public roads. However, effective enforcement of the new speed limit may prove problematic.

Currently available short-term tests suggest that the control efficiency afforded by speed reduction should be considered as linear. Thus, if the average speed is effectively reduced by 30 percent (e.g., from 50 to 35 mph), then a control efficiency of 30 percent should be applied to the emission factor. The background document discusses how past testing programs used “captive” traffic to tightly control vehicular characteristics. These tests involve very short periods (1 to 2 hr) of increased or reduced travel speeds. Under these conditions, it was found that emissions depend upon speed raised to a power between 1 and 2. However, exploratory analysis of the data supporting the equation in this section indicated that emissions were poorly correlated with speed raised to the power of approximately 0.3. As a result, it is believed that if the long-term, average speed is reduced on an unpaved road, the road surface silt content can be expected to change. In other words, the silt content will reach a new equilibrium condition as the grinding of material is balanced by the emission process. It is strongly recommended that any prospective emission reduction credit based upon speed reduction be based upon the ratio of speeds raised to the 0.3 power. After 6 months operation at the slower speed a new road surface sample should be collected

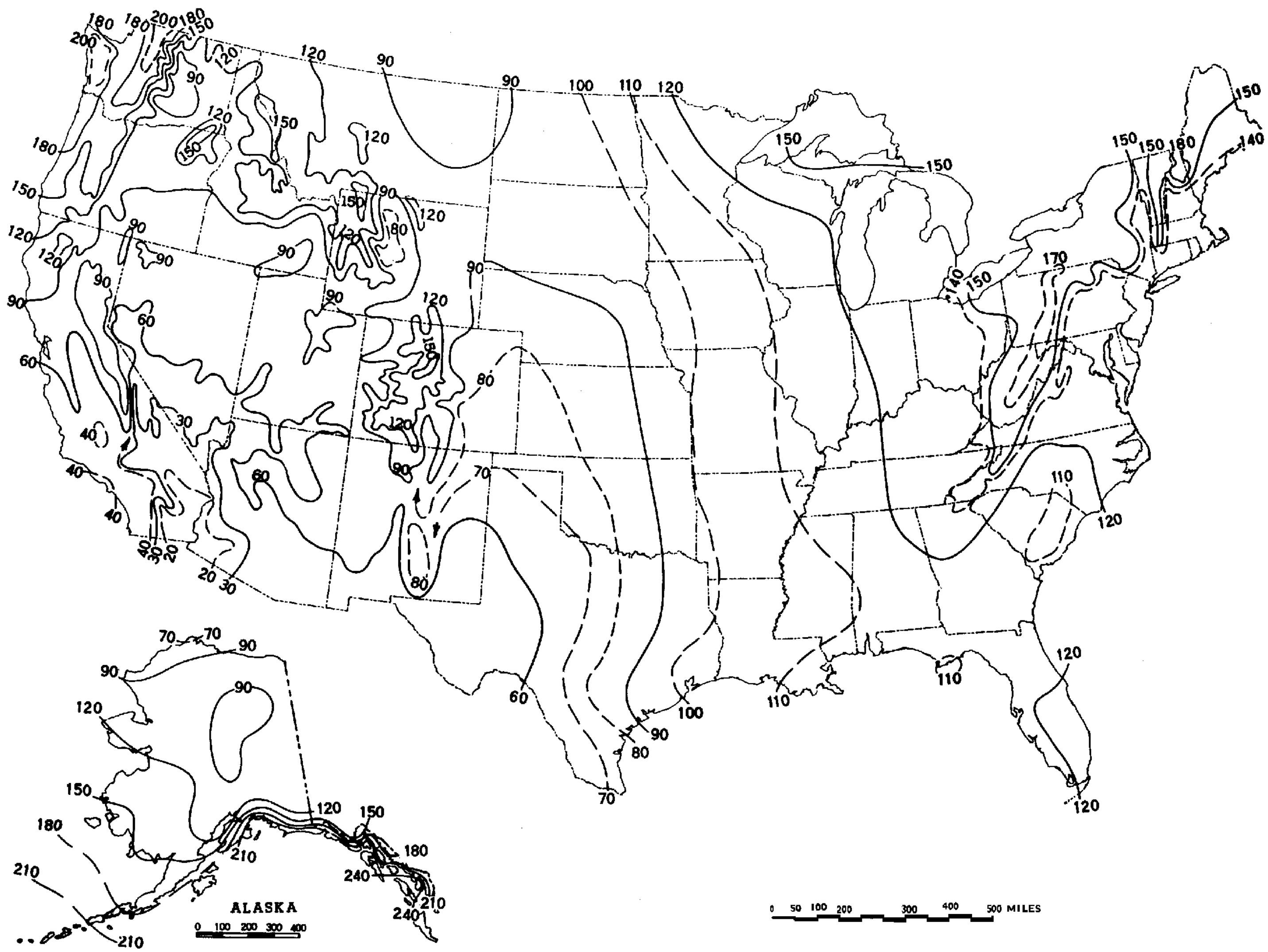

Figure 13.2.2-1. Mean number of days with 0.01 inch or more of precipitation in United States.

and analyzed (in the manner described in Appendices C.1 and C.2). The new surface silt content should then be used in Equation 1 for calculation of a new uncontrolled emission factor, without further adjustment for speed.

Surface improvements. Control options in this category alter the road surface. As opposed to the "surface treatments" discussed below, improvements are relatively "permanent" and do not require periodic retreatment.

The most obvious surface improvement is paving an unpaved road. This option is quite expensive and is probably most applicable to relatively short stretches of unpaved road with at least several hundred vehicle passes per day. Furthermore, if the newly paved road is located near unpaved areas or is used to transport material, it is essential that the control plan address routine cleaning of the newly paved road surface.

The control efficiencies achievable by paving can be estimated by comparing emission factors for unpaved and paved road conditions. The predictive emission factor equation for paved roads, given in Section 13.2.1, requires estimation of the silt loading on the traveled portion of the paved surface, which in turn depends on whether the pavement is periodically cleaned. Unless curbing is to be installed, the effects of vehicle excursion onto unpaved shoulders (berms) also must be taken into account in estimating the control efficiency of paving.

Other improvement methods cover the road surface with another material that has a lower silt content. Examples include placing gravel or slag on a dirt road. Control efficiency can be estimated by comparing the emission factors obtained using the silt contents before and after improvement. The silt content of the road surface should be determined after 3 to 6 months rather than immediately following placement. Control plans should address regular maintenance practices, such as grading, to retain larger aggregate on the traveled portion of the road.

Surface treatments refer to control options which require periodic reapplication. Treatments fall into the two main categories of (a) "wet suppression" (i. e., watering, possibly with surfactants or other additives), which keeps the road surface wet to control emissions and (b) "chemical stabilization/ treatment", which attempts to change the physical characteristics of the surface. The necessary reapplication frequency varies from several minutes for plain water under summertime conditions to several weeks or months for chemical dust suppressants.

Watering increases the moisture content, which conglomerates particles and reduces their likelihood to become suspended when vehicles pass over the surface. The control efficiency depends on how fast the road dries after water is added. This in turn depends on (a) the amount (per unit road surface area) of water added during each application; (b) the period of time between applications; (c) the weight, speed and number of vehicles traveling over the watered road during the period between applications; and (d) meteorological conditions (temperature, wind speed, cloud cover, etc.) that affect evaporation during the period.

Given the complicated nature of how the road dries, characterization of emissions from watered roadways is best done by collecting material samples at various times between water truck passes. (Appendices C.1 and C.2 present the sampling and analysis procedures.) The time-averaged moisture content is then substituted into Equation 1. Samples that reflect average conditions during the watering cycle can take the form of either a series of samples between water applications or a single sample at the midpoint. It is essential that samples be collected during periods with active traffic on the road. Finally, because of different evaporation rates, it is recommended that samples be collected at various times during the year. If only one set of samples is to be collected, these must be collected during hot, summertime conditions.

When developing watering control plans for roads that do not yet exist, it is strongly recommended that the moisture cycle be established by sampling similar roads in the same geographic area. If the moisture cycle cannot be established by similar roads using established watering control plans, the more complex methodology used to estimate the mitigation of rainfall and other precipitation can be used to estimate the control provided by routine watering. An estimate of the maximum daytime Class A pan evaporation (based upon daily evaporation data published in the monthly Climatological Data for the state by the National Climatic Data Center) should be used to insure that adequate watering capability is available during periods of highest evaporation. The hourly precipitation values in the spreadsheet should be replaced with the equivalent inches of precipitation (where the equivalent of 1 inch of precipitation is provided by an application of 5.6 gallons of water per square yard of road). Information on the long term average annual evaporation and on the percentage that occurs between May and October was published in the Climatic Atlas (Reference 16). Figure 13.2.2-2 presents the geographical distribution for "Class A pan evaporation" throughout the United States. Figure 13.2.2-3 presents the geographical distribution of the percentage of this evaporation that occurs between May and October. The U. S. Weather Bureau Class A evaporation pan is a cylindrical metal container with a depth of 10 inches and a diameter of 48 inches. Periodic measurements are made of the changes of the water level.

The above methodology should be used <u>only for prospective analyses</u> and for designing watering programs for existing roadways. The quality rating of an emission factor for a watered road that is based on this methodology should be downgraded two letters. Periodic road surface samples should be collected and analyzed to verify the efficiency of the watering program.

As opposed to watering, chemical dust suppressants have much less frequent reapplication requirements. These materials suppress emissions by changing the physical characteristics of the existing road surface material. Many chemical unpaved road dust suppressants form a hardened surface that binds particles together. After several applications, a treated road often resembles a paved road except that the surface is not uniformly flat. Because the improved surface results in more grinding of small particles, the silt content of loose material on a highly controlled surface may be substantially higher than when the surface was uncontrolled. For this reason, Equation 1 cannot be used to estimate emissions from chemically stabilized roads. Should the road be allowed to return to an uncontrolled state with no visible signs of large-scale cementing of material, Equation 1 could then be used to obtain conservatively high emission estimates.

The control effectiveness of chemical dust suppressants appears to depend on (a) the dilution rate used in the mixture; (b) the application rate (volume of solution per unit road surface area); (c) the time between applications; (d) the size, speed and amount of traffic during the period between applications; and (e) meteorological conditions (rainfall, freeze/thaw cycles, etc.) during the period. Other factors that affect the performance of dust suppressants include other traffic characteristics (e. g., cornering, track-on from unpaved areas) and road characteristics (e. g., bearing strength, grade). The variabilities in the above factors and differences between individual dust control products make the control efficiencies of chemical dust suppressants difficult to estimate. Past field testing of emissions from controlled unpaved roads has shown that chemical dust suppressants provide a PM-10 control efficiency of about 80 percent when applied at regular intervals of 2 weeks to 1 month.

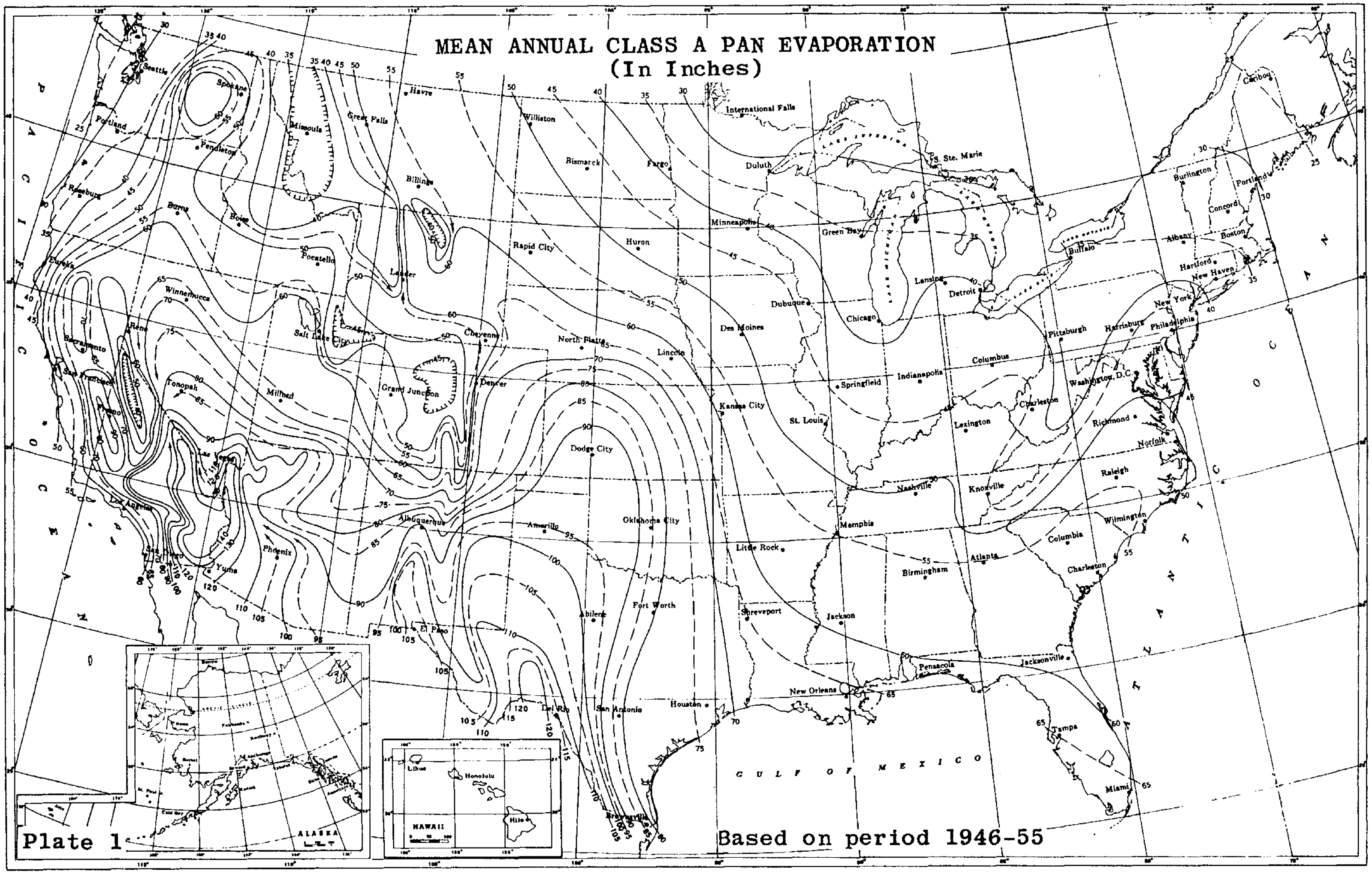

Figure 13.2.2-2. Annual evaporation data.

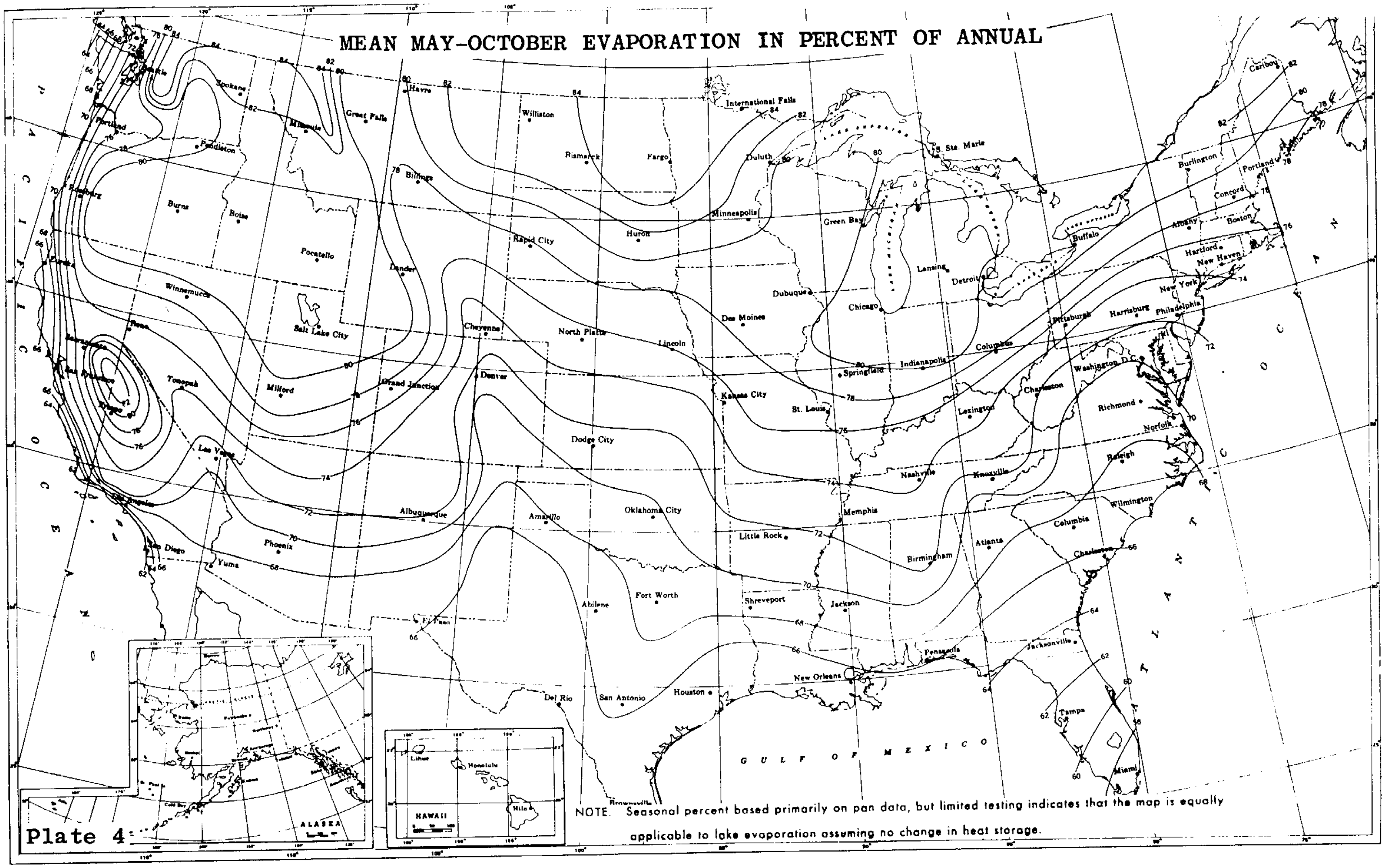

Figure 13.2.2-3. Geographical distribution of the percentage of evaporation occurring between May and October.

Petroleum resin products historically have been the dust suppressants (besides water) most widely used on industrial unpaved roads. Figure 13.2.2-4 presents a method to estimate average control efficiencies associated with petroleum resins applied to unpaved roads.[20] Several items should be noted:

1. The term "ground inventory" represents the total volume (per unit area) of petroleum resin concentrate (*not solution*) applied since the start of the dust control season.

2. Because petroleum resin products must be periodically reapplied to unpaved roads, the use of a time-averaged control efficiency value is appropriate. Figure 13.2.2-4 presents control efficiency values averaged over two common application intervals, 2 weeks and 1 month. Other application intervals will require interpolation.

3. Note that zero efficiency is assigned until the ground inventory reaches 0.05 gallon per square yard (gal/yd^2). Requiring a minimum ground inventory ensures that one must apply a reasonable amount of chemical dust suppressant to a road before claiming credit for emission control. Recall that the ground inventory refers to the amount of petroleum resin concentrate rather than the total solution.

As an example of the application of Figure 13.2.2-4, suppose that the equation was used to estimate an emission factor of 7.1 lb/VMT for PM-10 from a particular road. Also, suppose that, starting on May 1, the road is treated with 0.221 gal/yd^2 of a solution (1 part petroleum resin to 5 parts water) on the first of each month through September. Then, the average controlled emission factors, shown in Table 13.2.2-4, are found.

Table 13.2-2-4. EXAMPLE OF AVERAGE CONTROLLED EMISSION FACTORS FOR SPECIFIC CONDITIONS

Period	Ground Inventory, gal/yd^2	Average Control Efficiency, %[a]	Average Controlled Emission Factor, lb/VMT
May	0.037	0	7.1
June	0.073	62	2.7
July	0.11	68	2.3
August	0.15	74	1.8
September	0.18	80	1.4

[a] From Figure 13.2.2-4, $\leq$10 µm. Zero efficiency assigned if ground inventory is less than 0.05 gal/yd^2. 1 lb/VMT = 281.9 g/VKT. 1 gal/yd^2 = 4.531 L/m^2.

Besides petroleum resins, other newer dust suppressants have also been successful in controlling emissions from unpaved roads. Specific test results for those chemicals, as well as for petroleum resins and watering, are provided in References 18 through 21.

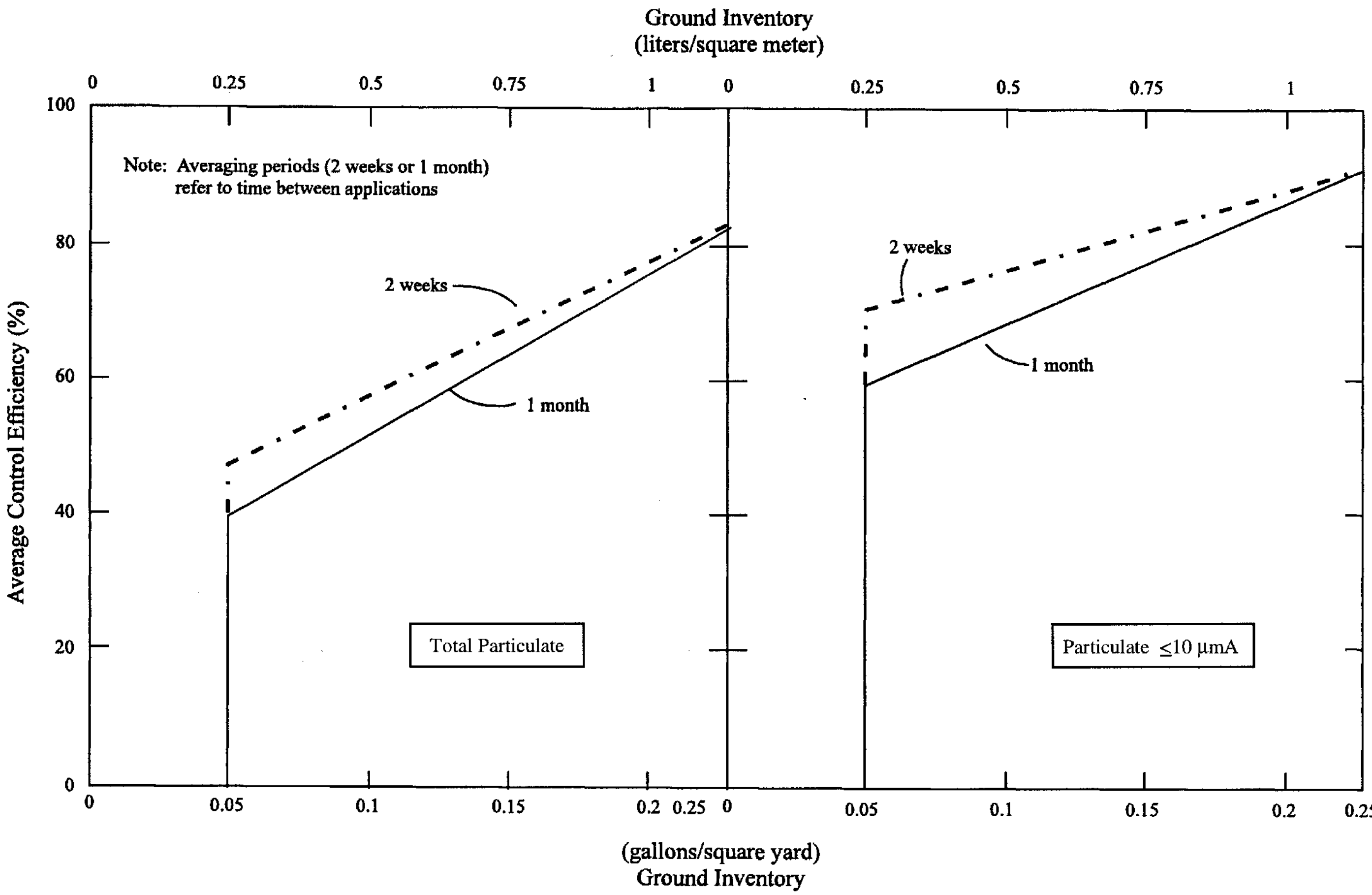

Figure 13.2.2-4. Average control efficiencies over common application intervals.

13.2.2.4 Updates Since The Fifth Edition

The Fifth Edition was released in January 1995. Revisions to this section since that date are summarized below. For further detail, consult the background report for this section (Reference 6).

October 1998 (Supplement E)--This was a major revision of this section. Significant changes to the text and the emission factor equations were made.

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