



PROJECT MEMORANDUM

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To: SCDES

Cc:

From: Heather Ponce *Heather Ponce*

Andrea Kehn, Senior Peer Review *Andrea Kehn*

Subject: Justification of Inherent Control Device

JUSTIFICATION OF WASH PLANT AS INHERENT CONTROL DEVICE

The wash plant is an integral component of Heidelberg's aggregate processing operation. Its primary function is to clean raw gravel by removing impurities such as silt, dust, clay, and organic matter, which can compromise the quality and consistency of the final product. This cleaning process is not an add-on or optional step—it is essential to producing a marketable material that meets specification standards.

Importantly, the use of water in the wash plant inherently reduces particulate emissions. By saturating the material and suppressing dust at the source, the wash plant minimizes airborne particulates to negligible levels. This emission reduction is not achieved through a separate pollution control device, but rather as a direct result of the operational process itself. Therefore, the wash plant functions as an **inherent control device**, as defined by regulatory frameworks, because it is both necessary for product quality and intrinsically effective at controlling emissions.