

"Clearing the Air" Workshop #6

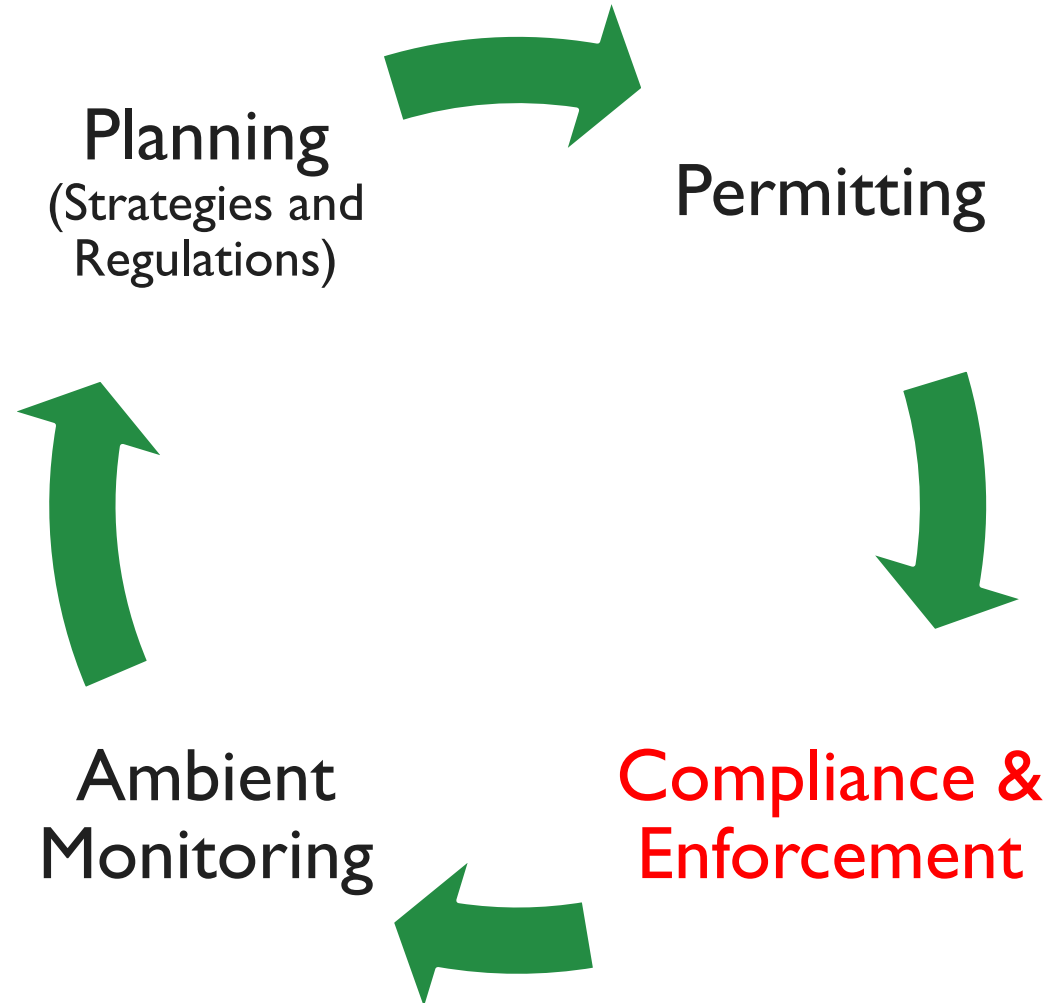
How the District Inspects Air Pollution Sources
and how you can, too

★ ★ ★ DEPARTMENT
OF ENERGY &
ENVIRONMENT



GOVERNMENT OF THE
DISTRICT OF COLUMBIA
MURIEL BOWSER, MAYOR

Air Quality Program



Compliance & Enforcement: **What we Do**

- Regulate Permitted Facilities/Equipment
 - **Major Source** - larger emitting facilities, federally regulated Title V program
 - **Minor Source** - smaller sources of emissions regulated by the District
- Investigate Resident Complaints
 - Odor, visible emissions, fugitive dust, engine idling, and asbestos
- Regulate work involving asbestos

What do we permit?

- Emergency generators
- Boilers
- Crushers/Screeners
- Bag houses
- Paint Booths, Screen Printing
- Cement Mixers
- Dry Cleaners using Tetrachloroethylene (“Perchloroethylene”)
- Other equipment/operations that meet the permitting threshold, determined by potential to emit

If it emits, it likely needs a permit.

Types of Air Quality Community Complaints

- Engine Idling
- Nuisance Odor
- Visible Emissions
- Dust
- Asbestos*

Anyone can submit an air quality complaint via 311.

*separate "Clearing the Air"



WHAT IS ENGINE IDLING?

Engine Idling is the **excessive** idling (running) of a vehicle engine while the vehicle is:

1. Parked
2. Stopped
3. Standing



WHY IS ENGINE IDLING A CONCERN FOR DC?

PROTECT OUR AIR

- Vehicle exhaust is the single largest source of air pollution in the District.
- Engine idling pollutes the atmosphere, which affects the health of people and the environment.
- Pollutants from vehicles contribute to acid rain, ozone formation, and global climate change.



WHAT IS THE **LAW** FOR ENGINE IDLING IN THE DISTRICT?

20 DCMR § 900.1

Prohibits the idling of on-road gasoline or diesel-powered motor vehicles on public or private space for more than **three (3) minutes** while the vehicle is parked, stopped, or standing, including for the purposes of operating air conditioning or heating equipment.

20 DCMR § 900.2

Prohibits the idling of non-road diesel-powered engines for more than three (3) minutes.

Fines start at \$500

LEARN THE LAW; KNOW THE EXCEPTIONS

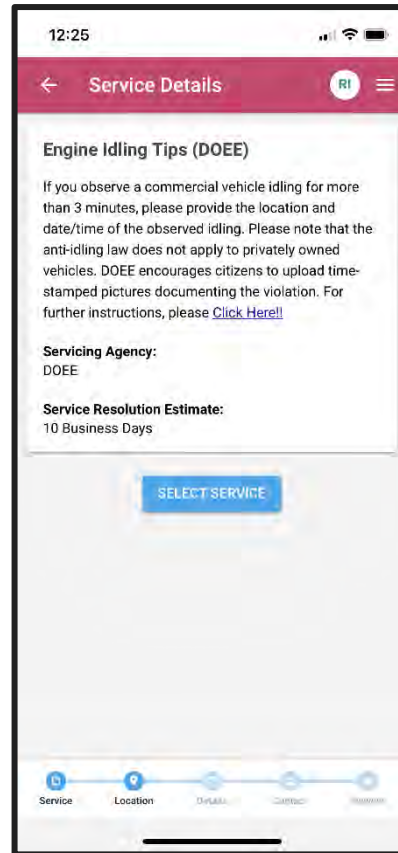
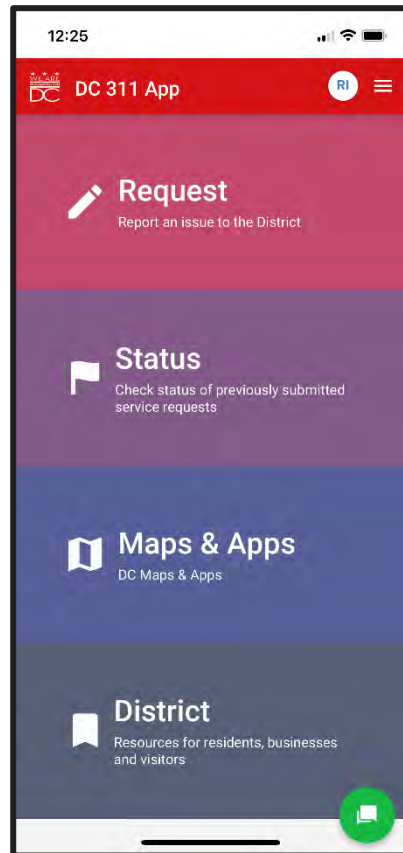
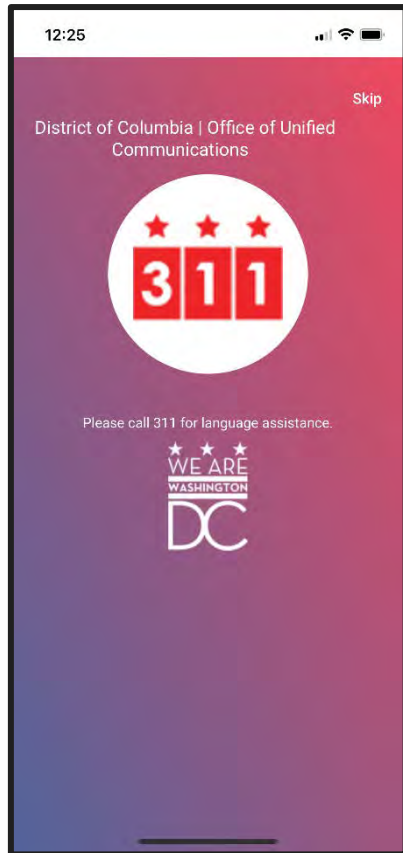
YOU ARE ALLOWED TO:

- Idle non-commercial private passenger vehicles (*personal vehicles*). It is still best not to do so any more than necessary.
- Idle to operate **power take-off equipment**, such as dumping beds, cement mixers, refrigeration systems, content delivery, winches, or shedders.
- Idle for up to **five (5) minutes** when the temperature is **at or below freezing (32 degrees F)**.
- Idling **nonroad engines** for up to fifteen (15) minutes when **queuing** (i.e., intermittently moving forward to perform work).
- Idle **nonroad equipment** for safety, servicing, inspection or emergency purposes.

Community Enforcement through 311

- DOEE encourages taking **time-stamped photographs** to document engine idling violations and **submit through DC 311**
- Guidelines for taking photos:
 - There must be at least **two (2) photographs** taken
 - Typically must be taken at least five (5) minutes apart.
 - If the temperature is below 32 F, must be taken at least six (6) minutes apart
 - There must be a photograph of the license plate of the truck or bus
 - There must be at least one photograph that shows any company identifying information or logo, and when on the vehicle, there should be a photograph of the U.S. Department of Transportation (DOT) number on the vehicle.

Citizen Enforcement through 311



- DC 311 is a free app and a webpage:
<https://311.dc.gov/citizen/home>
- Select “Engine Idling Tips (DOEE)” for your service request type

Citizen Enforcement on 311 continued...

12:26

← Engine Idling Tips (DO... RI

Add File

Service Information

* Did the vehicle idle for more than 3 minutes?

* What is the vehicle type?

NOTE: Some commercial vehicles (e.g., cement truck mixing concrete) are exempt from the anti-idling law.

* Is this a recurring issue?

* Provide the date and time of the idling incident.

* Location Type

Additional Information (e.g. company name, USDOT number, license plate number, time of day for recurring idling, etc.)

Service Location Details Contact Review

12:28

← Engine Idling Tips (DO... RI

Add File

Service Information

* Did the vehicle idle for more than 3 minutes?
Yes

* What is the vehicle type?
Commuter Bus

NOTE: Some commercial vehicles (e.g., cement truck mixing concrete) are exempt from the anti-idling law.

* Is this a recurring issue?
No

* Provide the date and time of the idling incident.
November 29, 2021 5:26 PM

* Location Type

Choose File Source

Gallery

Camera

Cancel

12:30

← Request Submitted RI

Thank you!
Your request has been submitted

Your case number is
21-00536734

[You can view your request status here](#)

Expected Resolution Date:
December 13, 2021

Service Notice:
No service notice provided.

[Return Home](#)

- Enter details in prompts:
 - vehicle type,
 - rate of occurrence,
 - time/date,
 - location type, and
 - other identifying details
- Upload photographs in the “Add File” feature
- Review entries
- Submit

What is considered a **Nuisance Odor**?

20 DCMR 903 states “An emission into the atmosphere of **odorous** or **other air pollutants** from any source in any quantity and of any characteristic, and duration which is, or is likely to be injurious to the public health or welfare, or which interferes with the reasonable enjoyment of life and property is prohibited.”

Fines start at \$500

@doee_dc





The "Nasal Ranger" device

How does DOEE conduct an **odor inspection**?



- Most odor inspections are initiated by complaints/tips in **DC 311** or by **phone to 202-535-2600**
- Inspector visits **site of complaint**, prioritizing the **odor identified in complaint**
- Inspector uses the “nasal ranger” to quantify odor intensity when an odor of concern is identified.
- When inspector identifies an odor of **2 dilutions/threshold** or greater, they determine source and initiate compliance/enforcement

What are **visible emissions**?



- Any **readily-perceptible** exhaust into the atmosphere originating from **any vehicle exhaust** pipe, or any commercial/industrial **chimney, smokestack, or other exhaust outlet.**
- Typically comprised of particulate material (**smoke**)
- DOEE does **not** recognize steam as a concern

Fines start at \$1,000

Smoke vs. Steam

Smoke **may vary in color** and have indistinct/hazy edges.



Steam may have gap from outlet, **always white**, tends to have defined edges



Fugitive Dust

- 20 DCMR 199.1 defines **fugitive dust** as “solid, airborne particulate matter emitted from any source other than through a stack or originating from any activity or process, or both.”

Fines start at \$1,000

Do's and Don'ts - Dust

Do: Suppress dust near the source and maintain reasonably clean construction entrance



Don't: leave dust on your neighbor's property for them to clean up



Do's and Don'ts - Dust

Do: Clean entrances and vehicle tires for vehicles leaving a dusty site



Don't: Wait until dust builds up to start sweeping



Do's and Don'ts - Dust

Do: Contain your demolition



Don't: do dry demolition without containment



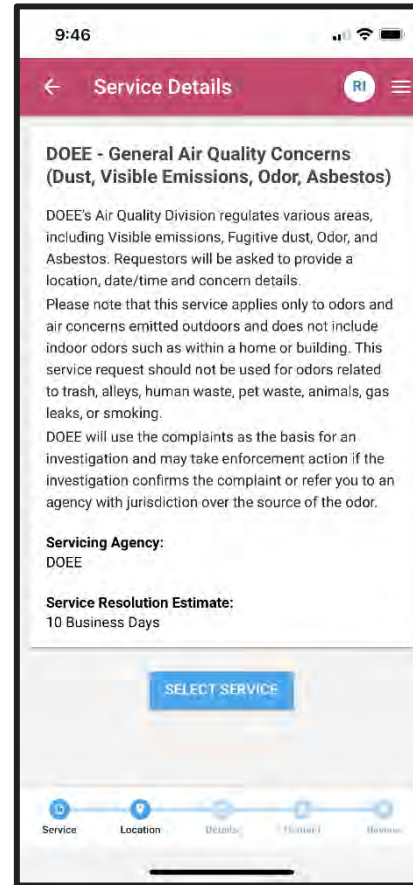
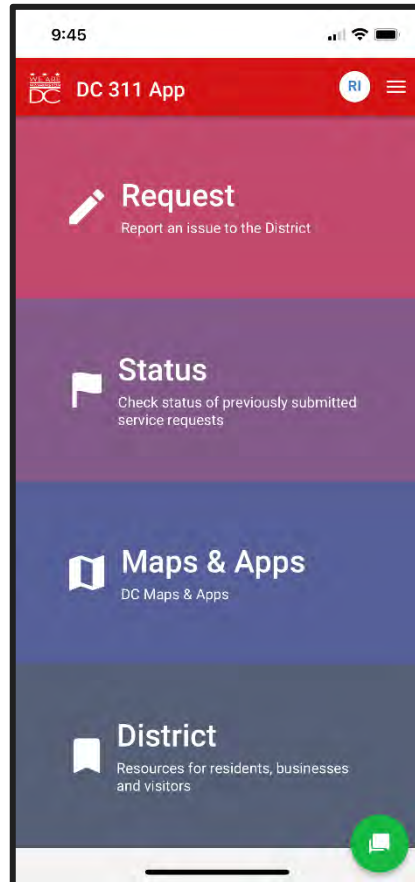
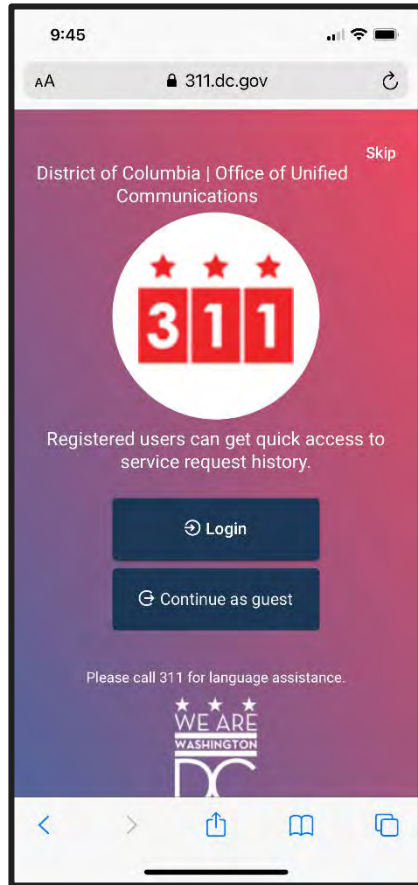
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When DOEE inspects **dust** or **visible emissions**

The inspector will...

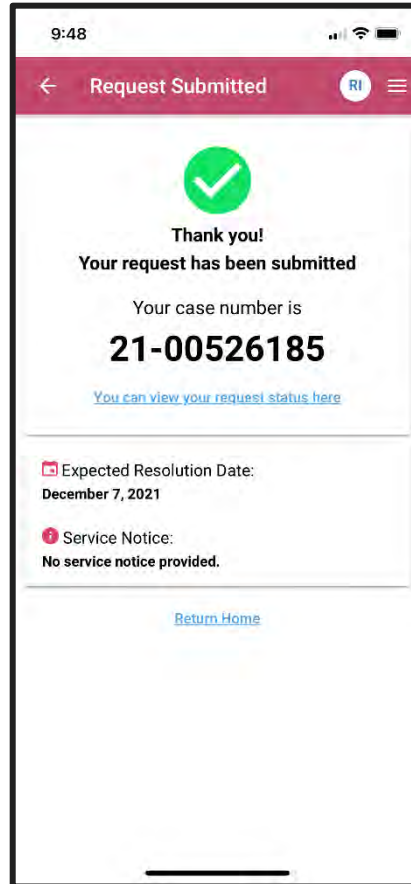
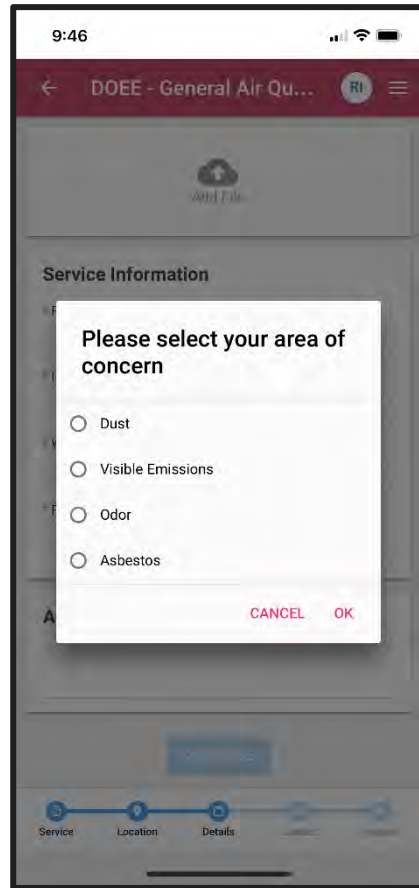
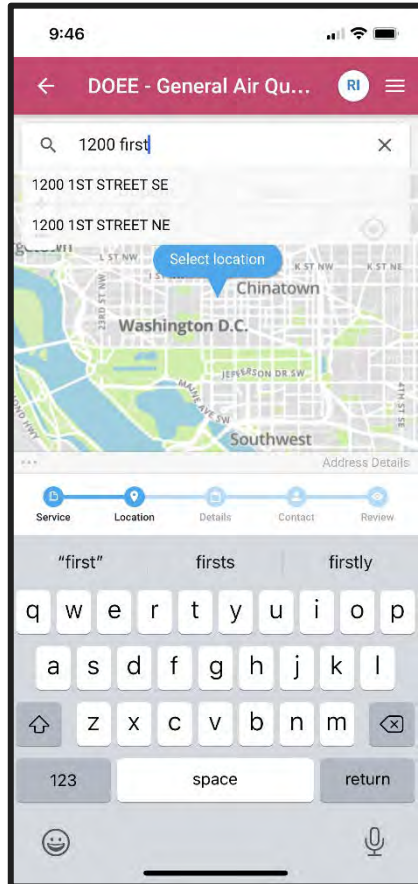
- Start at the location where issue is first identified
- Note **weather** (windspeed and direction, precipitation, etc.)
- Trace issue to source
- Identify **responsible party**
- Attempt **resolution** with responsible party
- **Document** inspection as it progresses

Service Request in DC 311



- Visit the **DC 311** app or **webpage** at <https://311.dc.gov/citizen/home>
- Request
- Select **DOEE – General Air Quality Concerns**, a catch-all Service Request for **Dust, Visible Emissions, Odor, and Asbestos**

DC 311, continued...



- Select request subtype
- Enter Location
- Add as much detail as possible for inspector (day/s, times, frequency, weather, etc)
- Upload pictures
- Review
- Submit

Submissions by **email**

- Email: air.quality@dc.gov
- Please include **address of concern** in subject line
- Detail **date/time of issue**, frequency (if recurring—typically for odors), any other details you can provide
- Attach any **photos**



Request by Phone

- Call **202-535-2600**
- If you reach an inspector's voicemail, leave a **detailed message**, including a **call-back number**



When **enforcement** moves forward using **evidence you provide...**

- If an inspector identifies an **enforceable concern** from your **photographs and supporting** details, that inspector may reach out to you with a partially populated **affidavit**.
- **Review the affidavit**, correct and/or add information, sign, date, and return when ready.
- The respondent has an opportunity to respond to DOEE's enforcement notice admitting or denying fault
- If case is not resolved, it may advance to the Office of Administrative Hearings (OAH). With your affidavit, an inspector may be able to present your evidence to OAH on your behalf. **You may need to be available for a hearing.**