CHAPTER 2 TECHNICAL MEMORANDUM

TO:          File
THROUGH:     Stephen S. Ours, P.E.  
             Chief, Permitting Branch
FROM:        Abraham T. Hagos  
             Environmental Engineer
SUBJECT:     The Anderson Company, LLC. 
             Permit Numbers 6945 
             Permit to Construct and Operate a Portable Concrete Crusher at 7th Street 
             and Main Avenue, SW
DATE:        August 19, 2014

BACKGROUND INFORMATION

A permit application to construct and operate a portable concrete crushing plant at 7th Street and 
Main Avenue SW, Washington, DC was received by the Air Quality Division on August 13, 
2014. The applicant is The Anderson Company, LLC.

The permit action will be published in the DC Register on August 22, 2014. Public comments 
for the permit action will be solicited through September 22, 2014.

The Company has not requested that any of the materials submitted with this application be held 
confidential.

REGULATORY REVIEW

Chapter 2, Section 200: General Permit Requirements:  
The portable concrete crushing equipment is a potential air pollution source for particulate matter 
and other pollutants. Thus a chapter 2 permit is required. The applicant is requesting a permit to 
operate the equipment for one shift a day [8 hours], 6 days per week and 300 days per year.

Chapter 6, Section 605: Control of Fugitive Dust 
The fugitive dust control requirements of 20 DCMR 605 are applicable to this portable
concrete crusher equipment. The requirements of this regulation are found in Conditions II(a) and (b) of this permit. The operational requirements are found in Conditions III(c) and (d). The facility must monitor the site for compliance per Conditions IV(b) and (c).

Chapter 6, Section 606: Visible Emissions
The visible emissions limitations of 20 DCMR 606.1 are applicable to this portable concrete crusher plant. Visible emissions shall not be emitted into the outdoor atmosphere from the operation of the portable concrete crusher plant; provided, that discharges not exceeding forty percent (40%) opacity (unaveraged) shall be permitted for two minutes in any sixty (60) minute period and for an aggregate of twelve (12) minutes in any twenty-four hour (24 hr.) period during start-up, or malfunction of equipment. This requirement is contained in Condition II(d). Monitoring for compliance is required pursuant to Condition IV(c).

Chapter 9, Section 903: Odorous or Other Nuisance Air Pollutants
"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 or property is prohibited [20 DCMR 903.1]" is applicable to all sources. This requirement is contained in Condition II(e) of the permit.

40 CFR 60, Subpart OOO, the New Source Performance Standard (NSPS) for Nonmetallic Mineral Processing Plants
This regulation is applicable to this source. As a result of the applicability of this regulation, additional visible emissions requirements were placed in Condition II(e) with corresponding testing requirements in Condition IV(e) and (f) and record keeping and reporting requirements in Conditions V(h) and VI(a), respectively. Additionally, inspections of the water sprays have been required in Condition IV(d) with associated record keeping required in Condition V(g).

RECOMMENDATIONS

The application to construct and operate a portable concrete crusher and the requirements of the attached operating permit comply with all applicable federal and District air pollution control laws and regulations.

Public comments for the permit action will be solicited from August 22, 2014 through September 22, 2014. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permit (#6945) be issued in accordance with 20 DCMR 200.1 and 200.2.

ATH