

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment



CHAPTER 2 TECHNICAL MEMORANDUM

TO: File

THROUGH: Stephen S. Ours, P.E. *ATH for SSO*
Chief, Permitting Branch

FROM: Olivia Achuko *OA*
Environmental Engineer

**SUBJECT: Fort Myer Construction Corporation (FMCC)
Permit Number 6757 and 6758
Permits To Construct and Operate a Crusher and a Screener at
Rhode Island Avenue, NE, Lot 5, Square 3605**

DATE: November 24, 2013

BACKGROUND INFORMATION

A set of permit applications to construct and operate both a crusher and a screener with associated conveying for the processing of recycled asphalt pavement (RAP) near Rhode Island Avenue, NE, lot 5, Square 3605, Washington, DC was received by the Air Quality Division on July 18, 2013. The RAP processed at this facility is used in the manufacture of asphalt pavement at FMCC's other facilities.

During a routine inspection and during a meeting between the Department and the permittee, the crusher and the screener was found in a property belonging to FMCC off Rhode Island Avenue near FMCC plant #1. After thorough investigation, it was found that no Chapter 2 permits exist for the units. These permits are construction and operating permits for existing units.

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



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REGULATORY REVIEW

Chapter 2, Section 200: General Permit Requirements:

Both the crushing and screening equipment are potential air pollution sources for particulate matter and other pollutants. The applicant is requesting permits to operate the equipment and its associated engines on a routine basis for the duration of the permit. Thus a chapter 2 permit is required.

Chapter 6, Section 605: Control of Fugitive Dust

The fugitive dust control requirements of 20 DCMR 605 are applicable to the crusher and screener and associated conveying. The requirements of this regulation are found in Conditions II(b) and (c) of the permits. The operational requirements are found in Conditions III(b) and (c). 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 these equipment. Visible emissions shall not be emitted into the outdoor atmosphere from the operation of the equipment; 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.

Other Regulations:

40 CFR 60 subpart IIII, Standard of Performance for Stationary Compression Ignition Reciprocating Internal Combustion Engines (RICE) for owners and operators of new stationary source applies to these engines because both of them were installed after June 2006.

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This regulation requires the emission units to use ultra-low sulfur diesel fuel that contains a maximum sulfur content of 15 ppm (0.0015% by weight) and either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.

RECOMMENDATIONS

The applications to operate these two related pieces of equipment and the attached operating permits comply with all applicable federal and District air pollution control laws and regulations.

Public comments for the permit actions will be solicited from November 29, 2013 through December 30, 2013. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permits #6757 and #6758) be issued in accordance with 20 DCMR 200.1 and 200.2.

SSO:OA

