

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment



CHAPTER 2 TECHNICAL MEMORANDUM

TO: File

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

FROM: Abraham T. Hagos *ATH*
Environmental Engineer

**SUBJECT: Department of Homeland Security (DHS)
Permit Number 6717
Permit To Construct and Operate an Indoor Firing Range at 1200
Pennsylvania Avenue NW**

DATE: August 29, 2013

BACKGROUND INFORMATION

A permit application to construct and operate an indoor firing range facility at 1200 Pennsylvania Avenue, NE, Washington, DC was received by the Air Quality Division on February 4, 2013. The applicant is the U.S. Department of Homeland Security.

The permit action will be published in the DC Register on August 30, 2013. Public comments for the permit action will be solicited through September 30, 2013.

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 indoor firing range facility is a potential air pollution source for particulate matter and lead. The applicant is requesting a permit to construct and operate the facility but did not specify operating schedule, quantity and type of input materials and air pollution emissions to the outdoor atmosphere other than particulate matter. The applicant has



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specified the use of a high efficiency particulate air (HEPA) filter emission control device that is 99.97% efficiency. 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 this indoor firing range facility. The requirements of this regulation are found in Conditions II(a) and (b) of this permit. The operational requirements are found in Conditions III(b), (c), and (d). The facility must monitor the site for compliance per Conditions IV(b) and (c). Relevant records must be kept pursuant to Conditions V(b), (c), and (d). Significant deviations must be reported pursuant to Condition V(g).

Chapter 6, Section 606: Visible Emissions

The visible emissions limitations of 20 DCMR 606.1 are applicable to this indoor firing range facility. Visible emissions shall not be emitted into the outdoor atmosphere from the operation of the indoor firing range facility. Pursuant to authority granted under 20 DCMR 201, AQD did not include the exceptions contained in Section 606 in the permit as any visible emissions are a sign of a serious failure of the control devices and lead dust is more hazardous than most dusts covered by this regulation. This requirement is contained in Condition II(d). Monitoring for compliance is required pursuant to Condition IV(c). Records of deviations must be kept pursuant to Condition V(c). Reporting of deviations is required under Condition V(g).

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. Monitoring is required pursuant to Condition IV(d) of the permit. Records of deviations must be kept pursuant to Condition V(c).

RECOMMENDATIONS

The application to operate the indoor firing range facility and 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 30, 2013 through September 30, 2013. AQD will resolve any comments received before issuing the

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permit, and if no comments are received, I recommend that permit (#6717) be issued in accordance with 20 DCMR 200.1 and 200.2.

SSO:ATH