CHAPTER 2 TECHNICAL MEMORANDUM

TO: File

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

FROM: Abraham T. Hagos  
Environmental Engineer

SUBJECT: Celtic Demolition, Inc. 
Permit Numbers 6840 
Permit to Construct and Operate a Portable Concrete Crusher at McMillan Sand Filtration Plant located at 1st and Channing Streets, NW

DATE: January 28, 2014

BACKGROUND INFORMATION

A permit application to construct and operate a portable concrete crushing plant at McMillan Sand Filtration Plant located at 1st and Channing Streets, NW Washington, DC was received by the Air Quality Division on January 15, 2014. The applicant is Celtic Demolition, Inc.

The permit action will be published in the DC Register on January 31, 2014. Public comments for the permit action will be solicited through March 3, 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 an average of one shift a day [8 hours], 5 days per week and 45 days per year. The proposed permit is instead allowing up to 12 hours per day and 7 days per week of work to allow for more operations on an individual day or week.
CHAPTER 2 TECHNICAL MEMORANDUM
Celtic Demolition, Inc.
Permit Nos. 6840 to Construct and Operate a Portable Concrete Crusher at McMillan Sand Filtration Plant located at 1st and Channing Streets, NW
January 28, 2014
Page 2

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(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 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.

RECOMMENDATIONS
The application to 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 January 31, 2014 through March 3, 2014. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permit (#6840) be issued in accordance with 20 DCMR 200.1 and 200.2.

ATH