CHAPTER 2 TECHNICAL MEMORANDUM

TO: File
FROM: Stephen S. Ours, P.E.
      Chief, Permitting Branch
      Abraham T. Hagos
      Environmental Engineer

SUBJECT: Celtic Demolition, Inc.
         Permit Numbers 6788-T and 6788
         Permit to Construct and Operate a Portable Concrete Crusher at 1301 New
         Jersey Avenue, NW

DATE: October 3, 2013

BACKGROUND INFORMATION

A permit application to construct and operate a portable concrete crushing plant at 1301 New
Jersey Avenue, NW, Washington, DC 20001 was received by the Air Quality Division on
September 9, 2013. The applicant is Celtic Demolition, Inc.

The permit action will be published in the DC Register on October 4, 2013. Public comments
for the permit action will be solicited through November 4, 2013.

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

It should be noted that, due to deadlines related to the project, AQD plans to issue a temporary
30-day permit to allow the project to begin prior to the end of the public notice period. This
temporary permit will be designated permit 6788-T.

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 per day [8 hours], 5 days per week and 60
days. However, since this is an average, AQD will allow operations for up to twelve (12) hours per day, seven (7) days per week in the permit.

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 October 4, 2013 through November 4, 2013. AQD will resolve any comments received before issuing the standard permit, and if no comments are received, I recommend that permit (#6785) be issued in accordance with 20 DCMR 200.1 and 200.2.

In the meantime, as discussed above, a temporary permit will be issued to allow the project to begin in order to meet required deadlines.

ATH/SSO