

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

COMMENT RECONCILIATION MEMORANDUM

TO: File

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

FROM: Wyatt Bohmann
Environmental Engineer

**SUBJECT: Comment Reconciliation Memo – IPR Northeast, LLC
Draft Chapter 2 Operating Permit No. 7327**

DATE: December 22, 2022

BACKGROUND

On August 1, 2022, IPR Northeast, LLC submitted an air permit application to the Air Quality Division (AQD) of the Department of Energy and Environment (DOEE) to construct and operate a truck mounted boiler at multiple locations across Soapstone Valley Park. IPR Northeast is requesting the temporary use of this boiler to assist in the Soapstone Valley Park Sewer Rehabilitation Project to repair defective sewer piping utilizing hot water Cured-in-Place-Pipe (CIPP) technology.

On September 9, 2022, DOEE published a draft permit to provide the opportunity for public comment. Subsequently, on September 14 and September 15, 2022, Rachel Samuels, a resident of Park Van Ness, submitted two comments in response to the public notice.

The public comment period ended October 11, 2022. A public hearing was also held on October 11, 2022, but no additional comments were received either in writing or at the public hearing.

DOEE prepared this comment reconciliation memorandum has to respond to the comments submitted by Rachel Samuels.

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AIR QUALITY DIVISION RESPONSES TO COMMENTS

Comment No.	Commenter	Comment	AQD Response
1	Rachel Samuels	<p>DOEE received the following comment from Ms. Samuels on September 9, 2022:</p> <p><i>“I would like to provide public comment for the proposed propane boiler.</i></p> <p><i>As a resident of Park Van Ness (4455 Connecticut Ave NW, 20008), I would like to submit my opposition to the installation of a propane boiler. We have already been subjected to near constant noise pollution beginning at 7am every day, and far more trees have been cut down than originally proposed and approved. Our backyards have turned from beautiful trees with birds to a gaping construction site, from which most birds have fled, indicating a serious ecosystem disruption.</i></p> <p><i>If a propane boiler is installed, that will further subject us to air pollution, contributing greenhouse gases to the atmosphere, as well as harmful pollutants that are known to cause respiratory diseases and cancer.</i></p> <p><i>We have received no information as to why this boiler is necessary. If it is crucial for the rehabilitation project, please use an electric generator that emits 0</i></p>	<p>DOEE has found that the potential greenhouse gas emissions from the proposed boiler are not high enough to trigger any federal or District greenhouse gas regulatory requirements.</p> <p>The boiler is required for the project as once the resin lining for the piping is placed inside the defective sewer piping, pressurized hot water is needed to expand and cure the lining to conform to the existing legacy pipes.</p> <p>IPR Northeast intends to use a boiler truck custom built and designed to be used in CIPP projects. This type of truck includes other equipment on board that specifically aids in the curing process (recirculation pumps, water storage, etc.).</p> <p>While an electric boiler may emit less pollutants, the District has no regulatory authority to require such a boiler to be used, nor is it clear that such a boiler would be practical or available for use in this manner. Furthermore, the boiler selected for use is a low-emitting boiler and DOEE has no reason</p>

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		<p><i>harmful pollutants (and runs on clean energy if possible).</i></p> <p><i>Once again, I would like to submit my strict opposition to the installation of a propane boiler.</i></p> <p><i>Thank you for your time,”</i></p>	<p>to believe that emissions from the unit would be at levels that would be harmful to the community.</p> <p>Regarding the comments relating to noise pollution and the removal of trees, these issues are not subject to air quality permitting requirements, and therefore DOEE cannot review them under our permitting authorities.</p>
2	Racheal Samuels	<p>The following comment was received from Ms. Samuels on September 15, 2022 as a follow up to her previous comment above:</p> <p><i>“Hi Stephen,</i></p> <p><i>I wanted to add an addendum about a concern I have regarding the steam method of curing the resin for lining the pipes.</i></p> <p><i>Research shows that curing the resin using the CIPP method emits an unknown quantity of carcinogenic pollutants into the air. This concern was apparently raised last year, and neither DC Water nor the contractors have responded to the worries that people have for the workers and for the neighboring community (which, again, I'm part of). I understand</i></p>	<p>This comment is raising concerns specifically about the cured in place pipe (CIPP) process. To be clear, the process supported by the boiler will be the hot water CIPP process, rather than the steam CIPP process. This permit only pertains to the boiler supporting the CIPP process and not the CIPP process itself, this comment does not address a topic that falls within this permitting action.</p>

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		<p><i>that both the government and the contractors are legally liable to make ethical decisions.</i></p> <p><i>If it is possible, I would like to recommend that they replace the pipes rather than curing resin and creating plastic in open air.</i></p> <p><i>In the very least, is it possible to request that alternatives to the CIPP process be investigated, how you plan to monitor the pollutants, a full detailed plan of when and how many hours/days the CIPP process will occur, and what the level of pollutants is versus what is a safe level of pollutant matter for the immediate area surrounding the work site?</i></p> <p><i>Thank you, Rachel”</i></p>	

RECOMMENDATIONS

Having addressed the above comments, I recommend prompt issuance of the permit to IPR Northeast, LLC.

WEB