


GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

COMMENT RECONCILIATION MEMORANDUM

TO: File

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

SUBJECT: **Comment Reconciliation Memo – Superior Concrete Materials, Inc.
Draft Permit No. 7188 to Construct and Operate a Ready Mix Concrete
Batch Plant at 1721 South Capitol Street SW**

DATE: January 26, 2018

BACKGROUND

On November 17, 2017, the Air Quality Division (“AQD”) of the Department of Energy and Environment (“DOEE” or “the Department”) issued draft Chapter 2 permit No. 7188 proposing to issue a permit to Superior Concrete Materials, Inc. to construct and operate a ready mix concrete batch plant at 1721 South Capitol Street SW.

A properly noticed public hearing was held at the Southwest Public Library, 900 Wesley Place SW, Washington DC on December 18, 2017.

The public comment period was extended through Friday, January 5, 2018.

A number of people testified at the public hearing. Additionally, a number of people submitted written comments.

This memorandum responds to these comments and explains any actions taken to address them.

In some cases, similar comments were made by multiple commenters. In these cases, comments have been combined and summarized and only one comment response is provided in the table below.

AIR QUALITY DIVISION RESPONSES TO COMMENTS

Superior Concrete Materials, Inc.

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Merrit Drucker	<p>The permit allows the emission of up to 40 pounds per hour of solids (TSP). At this allowed rate of emission there will be very large amounts of PM 10 and PM 2.5 released creating a significant and immediate threat to public health.</p> <p>The permit needs to be revised to prohibit any release of TSP to the environment. The area around the proposed facility will be quickly covered with particulate matter if the 40 pounds per hour release rate is allowed.</p>	<p>The 40 pounds per hour of total suspended particulate matter (TSP) limit referenced is a specific requirement of 20 DCMR 603.1 and 20 DCMR Chapter 6, Appendix 6-1. It is only one of many regulatory requirements requiring the minimization of TSP emissions. However, most of the other requirements are housekeeping standards rather than specific numeric limits. AQD expects that if the other requirements in the permit are met, emissions will be well below 40 pounds per hour of TSP.</p> <p>It should also be noted that the 40 pounds per hour limit is a maximum for any given hour, not an average expected emission rate.</p> <p>The materials used in the concrete-making process generally have a higher diameter than PM10 and PM2.5, therefore less than half of the emitted total particulate matter is expected to fall into the category of PM10. Far less is expected to be in the PM2.5 range.</p>
Merrit Drucker	<p>The permit needs to be revised to include requirements for the control of particulate matter that is PM 2.5 or less. There is no mention of control of PM 2.5 at any point in the Permit. As quite adverse effects of PM2.5 on human health are well known, the Permit needs to be revised to include extensive control of PM 2.5.</p>	<p>Particulate matter emissions from concrete plants are typically controlled by baghouses and housekeeping practices such as enclosures, prompt clean-up of spills, and truck cleaning. There will be no difference in control methods for TSP, PM10, or PM2.5 for this type of activity. Therefore, it is redundant to include emission limits for multiple sizes of particulate matter. In effect, the same actions that control TSP in the permit will also control PM2.5 emissions. Additionally, there are no specific regulatory standards in place for PM2.5 from this type of</p>

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Merrit Drucker	I have been advised that the ambient air near the proposed plant is already exceeding PM 2.5 limits. The proposed facility will lead to further exceedances of PM 2.5 limits.	<p>equipment.</p> <p>AQD has not monitored violations of the National Ambient Air Quality Standards for PM2.5 in the District in recent years. This includes some temporary monitoring at the nearby King Greenleaf Recreation Center.</p> <p>Mr. Drucker submitted no substantiation of this statement himself.</p> <p>Later in the hearing testimony, Dr. Shizuka Hsieh raised concerns about particulate matter levels in the community. Please see the responses to her comments later in this document.</p> <p>Based on the design of the proposed facility, AQD expects emissions from the newly proposed facility at 1721 South Capitol Street SW to be significantly reduced as compared to the existing facility at 1601 South Capitol Street SW. As such, particulate matter concentrations in the neighborhood would be expected to be reduced rather than increased.</p>
Merrit Drucker	I request that the permit require a cessation of operations at any time the ambient air exceeds PM2.5 limits.	As stated in a prior comment response, AQD has not monitored violations of the National Ambient Air Quality Standards for PM2.5 in the District in recent years. This includes some temporary monitoring at the nearby King Greenleaf Recreation Center. Due to the nature of the facility's operations, DOEE expects PM10 to be the primary pollutant emitted. Therefore, DOEE has required temporary fence-line monitoring for PM10 that will establish contingency measures should defined action

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		<p>levels be exceeded. See the response to Mr. Drucker’s comment below related to fence line monitoring for additional detail.</p>
<p>Merrit Drucker</p>	<p>The Permit allows for the use of fly ash and slag as a component of the cement. This is standard industry practice. As fly ash and slag are waste products from the burning of coal, the fly ash and slag will contain some or all of these metals:</p> <ul style="list-style-type: none"> • Lead • Cadmium • Mercury • Arsenic • Copper • Zinc <p>Given that the Permit allows not only for large hourly air emissions, and also allows for considerable spillage onto road and other surfaces, some amount of all or a set of these toxic metals will be bioavailable by means of inhalation and will be released to area waterways through the storm drain system.</p> <p>The Permit needs to include provisions for control of these metals, and also in the water, if any is discharged offsite.</p>	<p>As Mr. Drucker noted, it is standard industry practice to use these materials in the production of concrete.</p> <p>The materials proposed for use are considered non-hazardous wastes with respect to the Resource Recovery and Conservation Act (RCRA). The U.S. Environmental Protection Agency (EPA) supports their beneficial reuse in appropriate manners, such as use as an ingredient in concrete. See: https://www.epa.gov/coalash/coal-ash-reuse</p> <p>In response to this comment, AQD estimated emissions of arsenic, beryllium, cadmium, total chromium, lead, manganese, nickel, total phosphorus, and selenium from this plant, assuming maximum allowable production rates. This was done using EPA’s AP-42 compilation of emission factors, Section 11.12. The background document related to the AP-42 factors indicated that mercury was evaluated during the effort to develop the factors, but was not identified as an emission. The emissions of each of these metals, on an annual basis, based on these factors, does not exceed 0.5 pound per year for any individual metal, and is expected to be well below that for most of the assessed metals. These estimates are an indication that these potential emissions are minimal and adequately addressed by dust control measures incorporated in the permit. Note, for comparison, a major source of a metal classified as a</p>

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		<p>hazardous air pollutant (HAP) is 10 tons per year of a single HAP or 25 tons per year of all HAPs in aggregate.</p> <p>Note also that the permit does not “allow for considerable spillage onto road and other surfaces”, but rather prohibits such activities.</p> <p>Any water discharges are not addressed in the air quality permitting process, but are rather addressed by other programs within DOEE.</p>
Merrit Drucker; Alisha Camacho	The Permit period should be limited to a one year period. The purpose of a one year permit is to allow for an evaluation of the facility’s compliance with the permit. Should the facility be out of compliance, or if the Permit requirements prove to be non-protective of human health and the environment, a renewal of the permit should be denied.	AQD does not believe a one-year permit term is appropriate or necessary. AQD inspectors are able to evaluate compliance and enforce compliance with permit terms and conditions at any time. AQD believes that the permit terms and conditions, as revised in response to public comments, are protective of public health and the environment. However, should it be found in the future that this is not the case, or the facility has failed to comply with the permit terms, AQD has the authority to revoke, modify, or suspend a permit for cause. See D.C. Official Code § 8-101.05f(1); 20 DCMR § 202.
Merrit Drucker	Close out of the site at 1601 South Capitol Street SW needs to include a Phase 1 environmental inspection with a detailed investigation of soil and ground water at the site. This needs to be included as a permit requirement.	Shut-down of the equipment at the old site is required as a condition of this permit, in order to ensure that this shut-down of the old facility and start-up of a new plant results in decreased air pollutant emissions as expected. However, assessment of soil and groundwater at the old site is not within the purview of an air quality permit.
Merrit Drucker;	Drucker: The applicant should be required to install and operate	AQD agrees that a fenceline air monitoring plan for particulate matter (PM10) is reasonable in this case.

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<p>Alisha Camacho</p>	<p>air monitoring equipment at the facility boundary for the specific purpose of monitoring for PM 2.5 and heavy metals. The monitoring needs to be done in real time, and the permit applicant should be required to post the results to the DOEE web site.</p> <p>Camacho: Active air monitoring for PM 10 and PM 2.5 needs to be put on site, and the data needs to be made accessible to the public. DC United has a great system in place. The same needs to be done for Superior Concrete. King Greenleaf is a start, but as Dr. Shizuka Hsieh articulated during her testimony, air monitors need to be placed on the edge where residents are living closest to the construction.</p>	<p>Monitoring for PM10 will capture the dominant particle size range emitted as fugitive dust from this type of facility. The permit has been revised to include a requirement to develop a fence line monitoring plan for PM10 within 60 days of permit issuance, to obtain approval of this plan from AQD, and to commence monitoring within 120 days of commencement of operation of the facility. This requirement additionally establishes a requirement to take action to reduce emissions (which may include ceasing operations, among other contingency actions) when action levels identified in the plan are exceeded. The permittee is also required to report monitoring data to AQD, which will be made available to the public by DOEE.</p> <p>As noted by the commenters, AQD currently operates a special purpose fine particulate matter (PM2.5) monitoring station within the Buzzard Point community. U.S. EPA approved federal reference method PM2.5 air quality monitoring is used at this location for collecting real-time continuous data. Other than an exceedance on July 4, 2017, this site has not observed NAAQS exceedances to date. July 4th fireworks occasionally cause an exceedance of the PM2.5 daily NAAQS at one or more of the PM2.5 monitors in the District.</p> <p>With respect to heavy metals, such monitoring is not specifically required by any regulations. Additionally, as discussed above, AQD does not believe heavy metals will be emitted in significant quantities and monitoring for</p>

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		those materials would therefore be an unreasonable expense and burden on the applicant. Therefore, no requirement to monitor for heavy metals has been included in the permit.
Merrit Drucker	The applicant should be required to monitor for radiation, as the materials used in the production of the cement may contain or release radon.	Radiation is regulated on a federal level. The materials the applicant proposes to use for production of concrete are allowed for this use on a federal level. The District does not have any regulatory requirements/standards for radiation and will therefore not include radiation monitoring in an air quality permit. Note that DOEE does have a radon program, however it is limited to the regulation of radon professionals and does not impose any emission standards. The program also provides information and education about indoor radon exposure.
Merrit Drucker	The applicant should be required to implement an engine idling control program. As written, the permit does not address this. Engine idling will result in very large emissions of PM2.5 and PAHs.	Engine idling is limited pursuant to 20 DCMR § 900 for the vehicles servicing the site. Enforcement can and regularly is implemented directly based on the regulation throughout the District, including Buzzard Point. However, AQD agrees that it is appropriate to add a condition to the permit to hold the applicant responsible for limiting idling on their site. This has been done in response to this comment. Note, however, that when a vehicle's engine is needed to operate power take-off equipment (including cement mixers) the vehicle is exempt from engine idling requirements.
Merrit Drucker	The facility should be required to provide a copy of their Basic Business License and Certificate of Occupancy as part of the permit application.	Basic Business Licenses and Certificates of Occupancy are issued by the District of Columbia Department of Consumer and Regulatory Affairs via a separate review

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		<p>process. This permitting action only addresses air quality permitting requirements and does not extend to a review of all relevant District requirements. As such, this comment is not relevant to the air quality permitting process.</p>
Merrit Drucker	<p>The facility's use of additives, chemicals, and other substances added to the cement to modify its properties needs to be identified and any releases of these need to be evaluated as part of the permitting process. Each SDS (Safety Data Sheet) for each additive needs to be studied and releases of the constituents need to be evaluated and controlled as part of the permitting process. One constituent of concern is nitrates. There will be others depending upon what chemicals are added.</p>	<p>AQD has requested and received SDSs for seven additives. Small quantities of inorganic or organic chemicals are found in these additives used to assist in producing concrete with specific physical characteristics or to assist in producing the concrete (for example, in cold weather). There is no specific regulatory standard applicable to these materials vis-à-vis air quality emission levels. However, these materials have little opportunity for emission into the air in any significant quantity. They are stored in closed containers with vents. Evaporative losses through the vents are expected to be low and mostly consist of water (these materials are water-based). Although this storage method is standard practice, it has been added to the permit in response to this comment.</p> <p>With regard to nitrates specifically, two of the additives contain calcium nitrate. However, calcium nitrate is a salt that is not expected to evaporate into the atmosphere, and is therefore not of concern with respect to air quality permitting.</p>
Merrit Drucker; Alisha Camacho	<p>Drucker: The facility needs to be evaluated for compliance with the Toxic Release Inventory reporting requirement. The permit should require the facility to report to the TRI (or at a minimum conduct an assessment of its TRI</p>	<p>TRI reporting requirements are not under the purview of AQD or the air quality regulations. As such, this comment is not relevant to this permitting action.</p>

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	<p>reporting responsibilities.) It is my understanding, based upon testimony presented at the initial public hearing that the facility failed to report to the TRI for several years. The facility's TRI reporting history needs to be determined, and failure to report to the TRI for any year needs to be grounds for denial of the permit.</p> <p>Camacho: Quoting an opinion letter from the Institute of Public Representation at Georgetown University Law Center: "Superior Concrete is required to submit a toxic release inventory to the U.S. EPA each year for potential emissions of nitrate compounds. Superior Concrete has not reported any chemical release to the environment according to EPA records from 1987 to 2015."</p>	
<p>Merrit Drucker; Rhonda Hamilton, Commissioner, ANC-6D; Alisha Camacho</p>	<p>The [1601 South Capitol Street SW] facility has apparently operated without an air permit for its existence.</p>	<p>This comment is related to the facility that is being shut down, not the facility proposed for permitting and is therefore not applicable to this proceeding. Through this permitting action, AQD is ensuring that the new facility is properly permitted.</p>
<p>Merrit Drucker</p>	<p>The comment period for this permit needs to be extended for a minimum of 90 days to allow interested parties additional time to review and comment... During the extended public comment period, no permit should be issued.</p>	<p>AQD has already provided an extended public review period of 50 days, as compared to the standard 30-day review period. The level of public comment (23 sets of written comments) and attendance at the hearing (28 attendees, excluding DOEE staff) indicates that</p>

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		<p>information about the proposed facility and draft permit were appropriately communicated to the public. AQD sees no need to extend the comment period.</p>
<p>Merrit Drucker</p>	<p>As the Permit as written is defective, and allows for emissions that are harmful to human health, this Permit should not be issued... As the draft permit does not address the inevitable air emissions resulting from the various chemical compound added to the cement, the draft permit is incomplete... I am requesting... that the permit application and the draft permit be evaluated by a certified chemical engineer with specific qualifications in cement. A complete list of all the constituents in the cement from the proposed plant must be required as part of the permit application and any permit issued by DOEE. In reality, this facility is positioned too close to residential areas. Past and future permitted emissions have had and will continue to have adverse effects on the health of adjacent residents.</p>	<p>As noted previously, trace metals can be found in some of the constituents that make up a batch of concrete, but most of those materials end up in the final product. Any emissions of those materials are controlled by the same methods that control dust and therefore do not need to be addressed separately in the air quality permit.</p> <p>Additionally, small quantities of inorganic or organic chemicals are found in these additives used to assist in producing concrete with specific physical characteristics or to assist in producing the concrete (for example, in cold weather). There is no specific regulatory standard applicable to these materials vis-à-vis air quality emission levels. However, these materials have little opportunity for emission into the air in any significant quantity. They are stored in closed containers with vents. Evaporative losses through the vents are expected to be low and mostly consist of water (these materials are water-based). Although this storage method is standard practice, it has been added to the permit in response to this comment.</p> <p>AQD regularly evaluates various chemical processes for air emissions. The program is supervised by a certified professional engineer with a B.S. in Chemical Engineering. AQD believes that this is sufficient expertise to evaluate potential emissions from a concrete batch plant.</p>

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		<p>There are no setback requirements or regulatory limits established in the air quality regulations to require that a certain distance be maintained between a concrete plant and the nearest residence. AQD has determined that emissions allowed in the permit, as revised in response to public comment, are protective of human health and welfare.</p>
Merrit Drucker	<p>Speaking at the annual American Geophysical Union meeting in New Orleans this week, a group of scientists suggested wildfires might be responsible for thousands of deaths in the United States each year due to tiny particles they put into the atmosphere. Wildfires – and I realize this is not a wildfire, fill the air with the byproducts of combustion, including dangerous small particles called PM-2.5, which can get into the lungs and bloodstream.</p> <p>A growing body of research has demonstrated that these particles degrade health and can become fatal by causing respiratory, cardiovascular, and other health problems.</p>	<p>AQD agrees that PM2.5 is a health concern. Monitoring in the District of Columbia indicates that the District is attaining the health-based National Ambient Air Quality Standards (NAAQS) for PM2.5. NAAQS are established by EPA to protect the health of sensitive populations, including asthmatics, elderly, and children.</p> <p>Due to additional dust control methods, emissions from the new plant are expected to be substantially lower than those from the old plant nearby, which is required to shut down in the near future.</p>
Rhonda Hamilton, Commissioner, ANC-6D	Submitted a series of pictures depicting “what we have experienced from this plant”.	<p>The pictures submitted were unlabeled and undated. Additionally, most of the photos appear to depict Re-Agg operations that previously existed at the 1721 South Capitol Street SW site. The activities previously performed by Re-Agg are not representative of the type of operations that are the subject of Superior Concrete’s application for a concrete plant at the site. The permit for Superior Concrete now clearly specifies that material piles must be stored in</p>

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		<p>three-sided enclosures. The dustiest aggregate they use, sand, must be stored in a three-sided enclosure with a roof.</p> <p>One photo does appear to depict a portion of the Superior Concrete facility, and certainly shows dust in the air, but the source of the dust is not apparent. The removal of the Re-Agg facility and the old Superior Concrete facility, in combination with the much-improved procedures proposed (and required) for the new Superior Concrete facility are expected to address dust issues in the area such as those depicted. Ongoing road network improvements are also expected to have a positive impact in this area.</p> <p>A second photo may include a material pile that was used jointly by Superior Concrete (for material disposal) and Re-agg (as a source of material for their operations). Because Re-Agg is no longer present, Superior Concrete waste materials (wash-out materials) will be handled differently. They must now be stored in a three-sided enclosure while awaiting removal from the site and disposal.</p>
<p>Rhonda Hamilton, Commissioner, ANC-6D;</p> <p>Debra Frazier;</p> <p>Patricia Bishop;</p>	<p>General concern about whether the emissions will be sufficiently controlled from the plant, with the terms of the permit, to ensure protection of public health and reasonable enjoyment of life and property.</p>	<p>AQD recognizes the concerns of the community that dust from the multiple operations in the vicinity, including, but not limited to, the previous operations of Re-Agg (formerly DC Rock) at the 1721 South Capitol Street SW site and the operations of Superior Concrete at their current facility at 1601 South Capitol Street SW, have created dust levels that are unacceptable to the community.</p> <p>AQD believes that the elimination of the old Re-Agg</p>

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<p>Dolores Wilt; Vanessa Ruffin-Colbert; Carrie Pecover, MA, President, Seeds of Tomorrow Inc.</p>		<p>operations and the currently existing Superior Concrete operations in the vicinity and their replacement with a well-paved and maintained site with state-of-the art new concrete batching equipment at the 1721 South Capitol Street SW site will go a long way toward addressing the dust concerns in the area.</p> <p>Additionally, AQD has performed monitoring in the community and has not identified exceedances of the NAAQS. On this basis, health-based standards, established by EPA to protect sensitive populations, are already being met. The changes are expected to reduce emissions further.</p>
<p>Rhonda Hamilton, Commissioner, ANC-6D</p>	<p>For years we [the community] have been told that the D.C. plan for our neighborhood called for replacing industrial facilities with more upscale commercial establishments, thus creating a mixed-use walkable neighborhood.</p> <p>As part of the plan, Buzzard Point community health and safety study, it said that the concrete plant would be relocated out of Buzzard Point after 2018. Before then, the report said it would be expected to remain in operation at its current location. Now, however, we see a permit that would allow the plant to stay in Buzzard Point until 2022, although not at its current – quite current location.</p> <p>How is this consistent with the more general plans for our neighborhood? And who decided to authorize something that certainly appears so inconsistent with</p>	<p>Neighborhood planning is outside of the scope of this air quality permitting action. This permitting action addresses whether or not the application is consistent with the District’s air quality laws and regulations only.</p>

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Rhonda Hamilton, Commissioner, ANC-6D	<p>it?</p> <p>The draft permit will limit particulate matter emissions from the plant..., but what is the reason to believe that these limits will be met? The permit does not contain any mechanisms for monitoring compliance with these limits from day to day. It does allow the DC Government to conduct a one-time stack test of compliance, but that will likely never happen, and there is no substitute for real-time air monitoring.</p>	<p>AQD agrees that the best assurance that emissions are being properly controlled day-to-day in this case is to perform ambient monitoring. As such, in addition to retaining the option to require specific emission testing, AQD has added a requirement to perform fenceline monitoring for a period of at least six months (following approval of a monitoring plan) to evaluate this issue.</p> <p>The monitoring plan is to be designed to determine if the new facility is causing or significantly contributing to downwind PM10 NAAQS exceedances. If it is found that it is doing so, actions must be taken to stop such exceedances from occurring before monitoring can be stopped. If necessary, AQD will act to reopen, revoke, or suspend the permit, should that be appropriate and necessary to halt any identified recurring exceedances caused or significantly contributed to by the facility.</p>
Rhonda Hamilton, Commissioner, ANC-6D	<p>Air quality around the plant has been monitored for several years. The results suggest that the current plant is violating air quality standards, yet neither the draft permit nor the technical support document evaluates the information or explains whether or why the new location will be any different.</p>	<p>AQD monitoring, using EPA-approved equipment and methods, in the District (including PM2.5 monitoring at the nearby King Greenleaf Recreation Center) has not indicated non-attainment of any particulate matter NAAQS. The plant in question has not yet been constructed, but given the equipment design and dust control techniques proposed and incorporated into the permit, emissions from the new plant are expected to be substantially lower than those from the existing plant slated for closure.</p> <p>AQD recognizes that several of the specific characteristics</p>

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		<p>of this proposed plant that are expected to reduce emissions were not specifically included in the draft permit. In response to this comment, AQD has added to the permit, requirements specifying these beneficial characteristics of the plant and site.</p> <p>These include:</p> <ol style="list-style-type: none"> 1. Clarification that the plant being permitted is a central mix technology (as opposed to a truck mix technology); 2. Requiring that the primary mixing facility be enclosed; 3. Requiring that all trucks leaving the site must be washed with a pressure was system (except when temperatures are at or below freezing (32 °F); 4. Requiring all conveyors to be covered by wind shield covers; 5. Requiring that all aggregates for use at the site and waste concrete materials must be stored in three-sided bins, maintained at levels low enough to avoid bin overflow; 6. Requiring that, in addition to the above, the sand bin must have a roof; 7. Requiring that the facility install a seven foot high chain link fence with privacy screening around the site (this is expected to reduce wind shear across the site); and 8. All mobile equipment maintenance must be performed in an indoor garage.

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Rhonda Hamilton, Commissioner, ANC-6D	The dust control plan for the source expects that so much dust will fall on the streets directly around the plant that they will have to be swept every two to four hours. But what about the streets far away? What about the dust falling on people's yards, on cars, or blowing in their windows?	The frequency of the sweeping is not a measure of the amount of dust expected. Sweeping roads near the plant is a precautionary measure to ensure that any dust that escapes other controls does not have the opportunity to travel further from the plant. Additionally, keeping the roads clean will reduce re-entrainment of any dust by passing vehicles.
Rhonda Hamilton, Commissioner, ANC-6D	<p>What permit is the plant currently operating under and is that permit valid and/or up to date? If not, why is this the case?</p> <p>What is a portable plant and how is it different from a fixed plant if it looks and operates the same?</p> <p>We believe that the D.C. Government will need to provide some answers to these questions and hold a new hearing before it can make a finalized decision, because the community has suffered a great deal from all the dust and the fumes and the diesel fumes that the residents have inhaled.</p>	<p>The previous plant is shutting down and is not the subject of this permitting action.</p> <p>Although the equipment is portable, because it is stationary when it is operating, it is considered a stationary source and is subject to the same regulatory requirements as a permanent installation would be.</p> <p>The proposed facility is a central mix-type plant which results in lower dust emissions than the old plant (a truck-mix plant) due to how the cement, cement supplement, and aggregate are loaded and mixed. The proposed facility also has other control technologies that are improvements over the existing facility, including a paved lot that is easier to clean, buildings around the equipment to reduce wind effects, covers on conveyors, privacy fencing, and covered aggregate piles.</p> <p>Sufficient opportunity for public comment has been provided, including the extension of the public comment period well beyond the original closing date, therefore DOEE has decided not to hold a second public hearing</p>

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		prior to permit issuance.
Debra Frazier	Request for establishment of health-based air pollution standards, a neighborhood monitoring system to evaluate whether the standards are met, a person to monitor pollution levels and implement actions such as shutting down the plant, if health levels are exceeded.	<p>Health-based air pollution standards have already been established by EPA. These National Ambient Air Quality Standards (NAAQS) can be found at: https://www.epa.gov/criteria-air-pollutants/naaqs-table.</p> <p>AQD continually monitors to determine attainment status with respect to these standards at a number of monitoring stations in the District. In addition, AQD has been maintaining a temporary special purpose air monitoring site at King Greenleaf Recreation Center, in the neighborhood near the proposed construction site. With the exception of July 4th, this site meets EPA equipment and location requirements and, except for July 4, 2017, has not observed NAAQS exceedances to date. July 4th festivities and fireworks occasionally cause an exceedance of the PM2.5 daily NAAQS at one or more of the PM2.5 monitors in the District.</p> <p>AQD has added a requirement to the permit to perform fenceline air monitoring for a period of at least six months (following approval of a monitoring plan) to evaluate this issue. This permit language includes a requirement to establish and implement contingency measures to reduce emissions should any action level contained in the plan be exceeded.</p>
Debra Frazier	If this plant were proposed for another location in the District, such as Ward 1, would it go forward? Would the monitoring standards be more stringent and	Other DC programs and agencies, such as the Office of Zoning and the Zoning Commission establish standards for where facilities may locate. AQD evaluates applications to

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	intense?	<p>construct and operate in relation to District and federal air quality regulations only. These regulations are the same throughout the District.</p> <p>With regard to air pollution standards, the aforementioned NAAQS are nationwide standards and do not vary from location to location within the United States.</p>
<p>Dr. Shizuka “Zukes” Hsieh, Trinity Washington University</p>	<p>My [Dr. Hsieh] colleagues and I have been monitoring PM at a residence on the corner of Half Street and P Street SW since July 26, 2016. We are using the same type of instrument that DOEE and Haley & Aldrich have used to monitor PM-10 at the construction site for D.C. United stadium.</p> <p>The location of our monitor is important because PM levels are highly dependent upon how close you are to the source of the dust. For example, according to a 2016 study, moving just 100 meters closer to a construction site will more than double the PM that that individual experiences due to that construction.</p> <p>So our PM monitor on Half Street is about 200 meters from the existing concrete plant and over 700 meters closer to the plant than the DOEE PM-2.5 monitor at King Greenleaf Recreation Center is. So, in other words, we have one that is really in the neighborhood and close by.</p> <p>So, what have we measured? Over the past 17 months,</p>	<p>AQD has not been involved in Dr. Hsieh’s monitoring program and has not been provided the opportunity to evaluate monitor location, methodology, or frequency. Dr. Hsieh did not submit such relevant information during the comment period to support her team’s conclusions.</p> <p>Based on the limited information provided in Dr. Hsieh’s testimony, no PM10 NAAQS exceedance is being experienced at the location, even assuming that AQD ultimately agrees with the sampling methodology. 70 exceedances of a 0.1 milligram per meter cubed (100 micrograms per meter cubed) level, ranging in duration from 1 minute to 30 minutes, is highly unlikely to exceed the NAAQS standard of 150 micrograms per meter cubed, on a 24 hour average basis, more than once per year, on average over three years.</p> <p>Dr. Hsieh’s team’s PM2.5 evaluation may warrant further investigation. As noted previously, AQD has been maintaining a special purpose air monitoring site at King Greenleaf Recreation Center within the nearby community. With the exception of a July 4th exceedance, this site has</p>

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	<p>our monitor at Half Street has recorded over 70 incidents where PM-10 reached a level high enough to be considered an action level at the D.C. United construction site.</p> <p>So, at the D.C. United construction site, reaching the action level requires implementing mitigation measures such as spraying down trucks and – but when the PM levels become high at our Half Street monitor at a residence, not a construction site, there do not appear to be any mitigation measures or actions to lower the levels that residents are experiencing during those times.</p> <p>So, these incidents are rolling averages, PM-10 rolling averages, above 0.1 milligrams per meter cubed and they last anywhere from a minute to half an hour.</p> <p>Monitoring in the community is important because the high PM experienced by Buzzard Point residents is due to cumulative exposure from multiple sources. About one out of four times that the action level was reached at the D.C. United site, DOEE or Haley & Aldrich indicated or determined that the incident was due to outside sources, not D.C. United construction.</p> <p>And similarly, our monitor’s hourly PM-2.5 would show spikes at different times than the ones at King Greenleaf, and that means that presumably the two</p>	<p>not observed NAAQS exceedances to date. July 4th fireworks occasionally cause an exceedance of the PM2.5 daily NAAQS at one or more PM2.5 monitoring sites in the District. AQD may be able to evaluate the team’s methodology if the relevant information is submitted for review.</p> <p>However, it should be noted that continuous changes in the area, including closure of the Re-Agg facility and the future closure of the current Superior Concrete site and its replacement with an upgraded facility at the former Re-Agg site are likely to reduce any levels measured historically.</p> <p>AQD intends to continue to monitor for particulate matter at the King Greenleaf special purpose air monitoring site through the end of September 2018. AQD will continue to perform inspections in the area and enforce air quality regulations and permits as appropriate.</p>

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	<p>locations, 800 meters apart, experience dust sources differently due to their proximity.</p> <p>So, in closing, the cumulative PM experienced by residents in this neighborhood is already high. Our monitoring on Half Street reads an annual average of 18 micrograms per meter cubed PM-2.5, which exceeds the EPA limit of 12 micrograms per meter cubed.</p> <p>And so, through monitoring, planning, and enforcement, DOEE owes it to Buzzard Point residents to ensure that multiple projects in industry, the bridge project, surrounding construction, concrete plants, do not end up contributing simultaneously to generate dangerously high cumulative levels of PM.</p>	
<p>Meg Maguire and Dale Ostrander;</p> <p>Melissa Merritt;</p> <p>Alisha Camacho</p>	<p>Maguire and Ostrander: Air quality monitoring by Dr. Shizuka Hsieh at Trinity College confirmed what residents have experienced: fugitive dust from the existing plant. Yet the city has not properly monitored the air quality at the site and is proceeding without adequate knowledge to grant a permit to this large corporation. Before any further action is taken, the city should place air monitors on the site and the results should be made public.</p> <p>Merritt: Continued construction is a direct threat to public health. Particulate matter PM10 and PM2.5 is known to</p>	<p>AQD has performed monitoring for PM2.5, using EPA approved equipment and methods, in the area, specifically at King Greenleaf Recreation Center.</p> <p>Regarding Dr. Hsieh’s findings, please see the discussion in response to her comments above.</p> <p>In response to comments received during the public comment period, AQD is adding a requirement for temporary fenceline air monitoring for particulate matter to ensure that the new facility is not causing excess particulate matter emissions.</p>

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	<p>cause a variety of health concerns, ranging from respiratory diseases to cancer. A TSI Dusttrak was installed at Syphax Gardens in July 2016. It is the only air monitor in SW that runs 24 hours while tracking dust levels for particulate matter PM2.5 and PM10. The data collected has confirmed that there is fugitive dust in the air. DOEE needs to investigate further before issuing any permits that could contribute to the pre-existing air pollution.</p>	
<p>Meg Maguire and Dale Ostrander; Alisha Camacho</p>	<p>Maguire and Ostrander: We ask you to immediately withdraw any consideration of issuing the air quality permit and to perform the appropriate air quality analysis and undertake the land use planning to find an appropriate site for this facility.</p> <p>Camacho: A different location needs to be considered, with a preference given to a healthier community that can withstand the construction.</p>	<p>AQD has performed appropriate analysis of expected emissions from the facility and has established all appropriate regulatory requirements in the permit to ensure that emissions are minimized and appropriately protective of public health and the environment.</p> <p>AQD does not perform land use planning functions, nor does it have the authority to perform such functions. AQD's authority extends only to reviewing and either approving or denying air quality permit applications based on the merits of the individual application. AQD evaluates applications to determine their compliance with District and federal air quality requirements only and does not have authority to determine where a particular source is located.</p>
<p>Akosua Dosu Sylvia Carroll; Francenia McClain;</p>	<p>Dosu: Commenter indicated concern about enforcement once a permit is issued. "I am in objection to this permit because once the permit is given, it is so hard to get any type of inspection, to get anybody to come down once there is dust, because you cannot prove that one</p>	<p>With regard to the portion of the comment that relates to regulations and accountability, issuance of a high-quality permit establishes clear responsibilities of the company and clear standards/control techniques to which the company must adhere. AQD believes that the permit, as revised in response to comments, achieves this goal.</p>

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<p>Geraldine McClain;</p> <p>Hosea McClain, Jr.;</p> <p>Alisha Camacho;</p> <p>Kari Fulton et al.¹</p>	<p>company is creating the dust. When the... inspectors finally do come down, there may be a wash-down beforehand. And so, in objection to this permit, it's because once the permit is created, there are no regulations, there are no stipulations, there is no accountability for these... companies and their dust pollution."</p> <p>Carroll, F. McClain, G. McClain, and H. McClain, Jr.: If a permit is granted to Superior, what incentives does DOEE have to protect this vulnerable neighborhood?</p> <p>Camacho: How will any air permit provided moving forward be enforced? The community needs to hear from DOEE about exactly how the air permit will be enforced moving forward. At a prior public meeting, Richard Jackson explained: "I know there's a lot of angst over the concrete plants and the amount of dust that they generate... We have sat and met with the concrete companies. We have addressed the issues; we've increased the number of inspections... Unless we have someone stationed there in a hut 24/7 we're not going to catch everything..." If residents can organize and volunteer to monitor PM data, then I'm confused why DOEE is unable to.</p> <p>Kari Fulton et al.: The District Department of Energy and Environment</p>	<p>With respect to the responsiveness of the Department to complaints, AQD inspectors are always deployed in response to complaints and also regularly perform proactive inspections of the area. While it is true that responses are not always immediate, they often come within a couple of hours and almost always within one business day. AQD is committed to strict oversight of the new facility as well as others in the area, and will continue with these efforts.</p> <p>The decrease in the number of facilities, improved equipment/facilities to be operated by Superior Concrete, and improved road network in the area, are expected to reduce air quality emissions and improve enforcement efforts by making violations easier to identify and document.</p> <p>As noted previously, AQD is monitoring PM data at King Greenleaf Recreation Center, in the nearby community, and is requiring, through issuance of this permit, fenceline monitoring at the facility.</p>

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	(DOEE) has taken Superior concrete to court for failing to minimize fugitive dust on several occasions. I am not confident that Superior Concrete will follow regulations in its new proposed location.	
Akosua Dosu	Commenter expressed concern that a community health impact assessment has not been performed and that members of the community who are more vulnerable to particulate matter are not appropriately considered.	<p>The District of Columbia Department of Health (DOH) did, in fact, perform a “Buzzard Point Community Health & Safety Study” (CHASS), completed in August 2016. It can be found at: https://doh.dc.gov/sites/default/files/dc/sites/doh/page_content/attachments/Buzzard%20Point%20Community%20Health%20and%20Safety%20Study%20%28CHASS%29%20August%202016.pdf</p> <p>Additionally, AQD has performed air quality monitoring for PM2.5 in the community, as previously discussed. AQD compares monitored data to National Ambient Air Quality Standards (NAAQS). These NAAQS are set by EPA to be protective of vulnerable populations, including children, asthmatics, and the elderly. See https://www.epa.gov/criteria-air-pollutants/naaqs-table.</p> <p>AQD has not identified any NAAQS exceedances as a result of this monitoring, except a July 4, 2017 exceedance that has been attributed to fireworks occurring at that time.</p>
Akosua Dosu; Alisha Camacho	Dosu: Also, I wanted to know about the mitigation tactics that you have for the health impacts. I know that you mentioned air filters for the air conditioning units. I don’t know how many there are, how many you gave	The air quality permit is focused on dust (and other pollutant) reduction and control from the source itself. Any neighborhood programs such as air conditioning unit filter distribution is beyond the scope of this permitting action.

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	<p>out, who you gave them out to, how you chose that radius. I think that should be information that is disclosed.</p> <p>Camacho: Superior Concrete Inc highlighted their community involvement during the meeting, including air filter donations. Rhonda Hamilton and Kari Fulton have been incredibly proactive about having community partners donate air filters, and this was news to all of us. Who did the air purifiers go to? And if it wasn't to the local residents, then DOEE should request that Superior provide air monitors and other respiratory relief tools.</p>	
<p>Alisha Camacho</p>	<p>Ms. Camacho submitted photographs of the area. At least one is of operations of the now closed Re-Agg facility. One is next to a roadway showing heavy dust on the ground, but not indicating a location. Another shows dust on an unidentified surface at an unidentified location. One of the photos shows substantial dust under a conveyor at the 1601 South Capitol Street SW Superior Concrete site. All of the photographs are undated, but a statement in Ms. Camacho's testimony indicates that they were taken over two years.</p>	<p>The Re-Agg site operations have closed and the site will be paved as part of the project. This photograph is therefore not indicative of site usage going forward. The two photographs with unidentified locations do show dust in the area, but are relevant to previous operations in the area, not future operations as proposed. The photograph showing significant dust build-up under a conveyor is, again, related to the old Superior Concrete site, but AQD agrees that, at a new site, better site maintenance is required. As such, the permit has been revised to specifically note in the permit that areas under conveyors must be kept clean.</p>
<p>Alisha Camacho; Kari Fulton et</p>	<p>Camacho: "The fugitive dust and fine particulates released by Superior Concrete... have exacerbated respiratory health problems in the community..." - Opinion letter</p>	<p>The CHASS states: "Overall, the review of health outcomes data show that in general, the population within the CHS Assessment Area (20024 zip code) has a health status, as measured by health outcomes that are similar to</p>

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al.;	<p>from the Institute for Public Representation at Georgetown University Law Center</p> <p>The CHASS also concluded that the residents living within the 20024 zip code have on average higher rates of respiratory illness when compared to the rest of the District. As a result, community partners Dr. El Gloria Harrison and Dr. Janet Phoenix are volunteering their time to run a community health assessment at the census tract level, CT064, to better document which neighborhood is raising that average.</p> <p>Fulton et al.:</p> <p>In 2016 the District Department of Health released the Buzzard Point Community Health and Safety Study (CHASS). The CHASS states that the neighborhoods surrounding the current and proposed locations of the Superior Concrete plant have higher asthma, cancer and respiratory illness rates than the rest of Washington, DC. There is also a larger population of elderly residents who are more vulnerable to air pollution.</p>	<p>that of the District of Columbia, when compared for several indicators. However, by some measures, there were slight differences. Although the top five causes of death for the District in general and those for the Buzzard Point area were similar, the data show higher death rates for diseases of the heart and cancer in Buzzard Point than across the District.</p> <p>These differences are based, however, on very small numbers or case counts, which in many instances consisted of less than a total of 20 cases over five years. Therefore, while the data and analysis based on these rates might suggest some cancer incidence and mortality trends, as well as lower-respiratory disease rates that appear to run counter to District trends, we conclude that there are no statistically-significant elevations of cancer or other health conditions within the Buzzard Point Community Health Status (CHS) Assessment Area compared to the rest of the District of Columbia.” [CHASS, Page 5]</p> <p>While the CHASS does, in fact, recommend further monitoring of health outcomes related to asthma, acute respiratory diseases, heart disease and stroke, AQD has not been presented with data that would preclude construction of the new facility, especially in light of the fact that long-term emissions are expected to be reduced substantially as compared to previous activities in the area and that past monitoring in the area by AQD has not identified exceedances of the health-based NAAQS for particulate</p>

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Alisha Camacho	DC United has documented that a quarter to a third of the times action levels were exceeded on the DC united premises, the high dust levels were determined to be from outside sources.	matter. Any issues found in the past cannot be attributed to the proposed facility, which has not yet been constructed. AQD believes that replacement of the old facility with a new state-of-the art facility will reduce particulate matter concentrations in the area.
Alisha Camacho	In the community health assessment put together by the department of health, it was concluded that the measureable vulnerabilities found, indicate the “potential absence of protective factors essential to community resilience, in the face of extended physical and social disruption generated by perpetual construction... In order to mitigate against the potential and/or cumulative impact of less tangible- but real-social determinant of health stressors that might be faced by especially vulnerable residents, the District must redouble its efforts to minimize impacts, in order to assure their community health and safety.” – CHASS	As noted previously, based on the review of the application, installation of a new state-of-the-art facility, operated under the conditions of the permit, as revised in response to public comments, taking the place of the previous nearby facility will significantly reduce emissions, thereby reducing any stressors on community health.
Alisha Camacho	From the CHASS we know that: <ul style="list-style-type: none"> • 96% of the residents living near the site (CT064) are not white. • The average income of the residents living near the site (CT064) make \$32,70/yr [sic]. • Census tract 64 and 105 have minority populations great [sic] than the DC average, and high percentage of low-income residents than DC. 	AQD believes that it has provided for meaningful involvement of the neighborhood in the air quality permitting process. In addition to the standard procedures of issuing a public notice on the DOEE website and in the D.C. Register, DOEE notified local leaders of the permitting process directly. A public hearing was held at a location convenient to the neighborhood in the evening to accommodate as many people as possible. AQD also extended the public comment period in response to public requests.

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	<ul style="list-style-type: none"> • The US EPA Office of Environmental Justice defines environmental justice as “The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic group should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local and tribal programs and policies” • “Based on the guidelines described above, both of these census tracts qualify as potential environmental justice communities of concern because they have minority and low income populations greater than the statistical reference area.” 	<p>As is evidenced in this document, received comments were evaluated and resulted in meaningful changes to the permit, from the draft version, to better control and monitor for dust from the proposed facility.</p>
<p>Alisha Camacho (and others)</p>	<p>Superior Concrete has been “fined for violations of air quality regulations on several occasions. They persist, however, in dispersing concrete dust well beyond the borders of their operations.” – Opinion letter from the Institute for Public Representation at Georgetown University Law Center</p> <p>There have been past compliance problems related to the existing Superior Concrete facility at 1601 South Capitol Street SW. Why is DOEE entertaining an application for a new facility?</p>	<p>AQD has evaluated the application from Superior Concrete and has concluded that better equipment and better proposed site maintenance procedures, all documented in an enforceable permit, will ensure appropriate protection of public health and the environment from operations at the facility, as well as facilitate AQD enforcement. AQD is fully committed to enforcing the requirements of the site permit.</p>
<p>Alisha Camacho</p>	<p>During their testimony, Superior Concrete advertised their site’s upgrades. This is a first great step, but they</p>	<p>Several of the differences between the old plant and the proposed new plant are common sense solutions (though</p>

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	<p>need to provide public documentation on the upgrades and access to studies proving how they reduce air pollution. This is a serious matter given the vulnerable population and heavy industry. No risks can be afforded. If they are unable to provide this information, or if there are no studies available, then they should not remain in Buzzard Point.</p>	<p>sometimes costly) to problems identified from previous experience in the industry in general or at the old facility specifically. For example, a paved lot is much easier to clean than a dirt lot. Similarly, an enclosure around the mixer portion of the plant will act as a settling chamber for any dust that escapes the mixing equipment, hence greatly reducing the possibility that it will escape to the open atmosphere. A chain link fence with privacy screen will reduce the amount of wind blowing across the ground, picking up any dust found there. A truck wash, when used consistently, will substantially reduce any track-out of materials by trucks onto the road network.</p> <p>Other improvements are, perhaps, less obvious, but known in the industry to create less dust. For example, Superior Concrete’s old plant is a “truck mix” facility; the propose plant is a “central mix” facility. Due to the way materials are transferred, emission potential is substantially lower. This is backed up by EPA-developed emission factors found in AP-42, Section 11.12, “Concrete Batching” (See https://www3.epa.gov/ttn/chief/ap42/ch11/final/c11s12.pdf, especially tables 11.12-1 and 11.12-2). The methodology for developing these factors can be found in the background document at https://www3.epa.gov/ttn/chief/ap42/ch11/bgdocs/b11s12.pdf.</p> <p>AQD has evaluated the proposed control techniques and found that the proposed plant is reasonably expected to be</p>

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Vanessa Ruffin-Colbert	Aggregates/materials used to be delivered by barge, but now seem to be delivered by “massive numbers of trucks, which brings with them additional risk throughout the streets of the nation’s capital.” How will materials be delivered?	<p>much lower-emitting than the current plant.</p> <p>The air quality permit addresses truck deliveries and shipments. Trucks must be covered and loaded so as to ensure that spillage does not occur.</p> <p>In response to comments, AQD has added language to the permit to include the District’s anti-idling regulation to clarify Superior Concrete’s responsibility for ensuring that engine idling does not occur related to their operations, except as permitted by regulation.</p>
Kari Fulton et al. ¹	I am writing to oppose the proposed Air Quality Permit 7188 for Superior Concrete Material to construct and operate a ready mix portable concrete batch plant at 1721 South Capitol Street SW. The Buzzard Point community already has a higher than district average air pollution rate and Superior Concrete has contributed to unsafe air quality, diesel fumes, and unsafe working conditions in its current location at 1601 South Capitol Street SW. Granting permission for Superior Concrete to continue operation in the Buzzard Point neighborhood is contradictory to future community development plans and will exacerbate air quality issues for the surrounding neighborhoods.	<p>Please see responses above regarding the CHASS performed by the Department of Health, monitoring performed by DOEE, and AQD’s lack of authority over land use planning.</p> <p>As previously stated, AQD has not monitored exceedances of the NAAQS for PM2.5 at the nearby King Greenleaf Recreation Center monitor (except a July 4th exceedance that is typical of the results of July 4th festivities and fireworks, and therefore not associated with industrial activity). The CHASS did not identify statistically significant elevations of cancer or other health conditions in the Buzzard Point community.</p> <p>AQD expects the new plant to have substantially lower emissions than the old plant that is being shut down. As such, AQD has determined that the permit should not be rejected on this basis.</p>

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		<p>With respect to unsafe working conditions, employee working conditions at the facility are not under the authority of AQD and are not relevant to this permitting action. Any concerns about worker safety at the facility should be referred to the federal Occupational Safety and Health Administration (OSHA).</p>
<p>Kari Fulton et al.¹</p> <p>Andy Litsky, Chairperson for ANC 6D and Rhonda Hamilton, Commissioner, ANC 6D06 on behalf of ANC 6D</p>	<p>Kari Fulton et al.¹: District Department of Energy and Environment Emission guidelines state that: “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] Allowing Superior Concrete to continue operating in the Buzzard Point community is in violation of these guidelines and will contribute to health and safety concerns for the surrounding area.</p> <p>ANC6D: The D.C. government is not supposed to permit any plant no matter how small that will violate the air quality standards or otherwise cause damaging air pollution. The draft permit itself forbids any emission “injurious to public health or welfare” or which would interfere with “the reasonable enjoyment of life or property. There is no doubt that the cement plant is and will be a significant source of air pollution.</p>	<p>The commenters are correctly referencing 20 DCMR 903.1. For a violation of this regulation to occur, an emission must 1) be injurious to the public health or welfare, or 2) interfere with reasonable enjoyment of life or property.</p> <p>AQD has found that, based on the design of the proposed new facility and the standards contained in the permit, operation of the proposed new facility within these parameters will not cause a violation of either of the above standards.</p> <p>However, the commenters are correct to note that this is an applicable regulation, and hence it is contained in the permit. AQD inspectors will be evaluating the site for any violations of these standards and will take enforcement to ensure compliance should a violation be identified.</p>

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Commenter(s)	Comment or Comment Summary	AQD Response
Kari Fulton et al. ¹	<p>Superior concrete is clustered with other industrial businesses and proposed construction projects that increase air pollution in the area. Located within the five- block radius of the Superior Concrete plant are Vulcan Materials concrete, DC United soccer stadium (under construction), and the Buzzard Point and Waterfront Substations. The South Capitol Street bridge deconstruction and construction and several commercial and residential projects are also planned for the area within the next three years. The combined impact of these industrial and construction projects will cause long-term and permanent health damage to existing and future residents of the neighborhood.</p> <p>Fugitive dust from these sites piles up on the street and creates a dust storm especially during high traffic times such as rush hour and baseball games at Nationals Stadium. Traffic controllers, plant workers, pedestrians and employees at near by business are forced to breathe this air while conducting business in the area. Vehicles parked in the areas near the current and proposed sites are oftentimes covered in thick coats of fugitive dust.</p>	<p>Dust emissions are subject to regulation at each of these locations. Re-Agg’s previous facility has been closed, so related emissions have been eliminated. Emissions from Superior Concrete’s proposed plant are expected to be substantially lower than those from the currently existing facility scheduled for closure. Vulcan Materials (Virginia Concrete) is subject to a separate permit. The DC United stadium construction has performed fenceline monitoring and is nearing completion. Other development projects, whether subject to formal dust control plans or not, are subject to the District’s fugitive dust regulation at 20 DCMR 605.</p> <p>The roadway network in the area is being improved, which will allow for improved sweeping and therefore less dust will be on the roads for vehicles to stir up.</p> <p>AQD is committed to enforcing all relevant air quality regulations in the area, and responding to all citizen complaints as promptly as possible.</p> <p>In short, while cumulative effects of multiple facilities and projects are of concern, AQD believes, based on current monitoring and health data and project trends, this will not result in a situation that is not protective of public health or the environment.</p>

AIR QUALITY DIVISION RESPONSES TO COMMENTS

Superior Concrete Materials, Inc.

Draft Permit No. 7188 to Construct and Operate a Ready Mix Concrete Batch Plant at 1721 South Capitol Street SW

January 26, 2018

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RECOMMENDATIONS

AQD recommends issuance of Chapter 2 permit No. 7188, as revised according to the comment responses above.

SSO

ⁱ A series of similar comments were submitted by Kari Fulton, Andrea Serpas, Ernest Williams, Leslie Fields, Ben Alexandro, Kara Skipper, Meg Maguire, Ronda Chapman, Shanita Brown, Devi Lockwood, Ricki Goldsby, and Jeremiah Lowrey. In this table, this group will be referred to as "Kari Fulton, et. al."