May 12, 2015

George O. Priftis

Senior Operations Manager

Virginia Concrete Company, Inc.

13880 Dulles Corner Lane, Suite 450

Herndon, VA 20171

**Re: Permit (#6451-R1) to Operate a Concrete Batch Plant at 2 S Street SW, Washington, D.C.**

Dear Mr. Priftis:

Pursuant to sections 200.1 and 200.2 of Title 20 of the District of Columbia Municipal Regulations (20 DCMR), a permit from the Department of the Environment (“the Department”) shall be obtained before any person can construct or operate a stationary source in the District of Columbia. The application of Virginia Concrete Company, Inc. (“the Permittee”) for a permit to operate a concrete batch plant at 2 S Street SW has been received. Permission to operate a concrete batch plant with an associated 2.8 MMBTU/hr natural gas fired hot water heater per the submitted application dated July 21, 2014, as modified by the application received March 23, 2015, is granted subject to the following conditions:

I. General Requirements:

a. The approved batch concrete plant and associated hot water heater shall be operated in accordance with all applicable air pollution control requirements of 20 DCMR.

b. This permit expires on May 11, 2020 (20 DCMR 200.4). If continued operation after this date is desired, the owner or operator shall submit an application for renewal by February 11, 2020.

c. Operation of equipment under the authority of this permit shall be considered acceptance of its terms and conditions.

d. The Permittee shall allow authorized officials of the District, upon presentation of identification, to:

1. Enter upon the Permittee’s premises where a source or emission unit is located, an emissions related activity is conducted, or where records required by this permit are kept;

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of this permit;

3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

4. Sample or monitor, at reasonable times, any substance or parameter for the purpose of assuring compliance with this permit or any applicable requirement.

e. This permit shall be kept on the premises and produced upon request.

f. Failure to comply with the provisions of this permit may be grounds for suspension or revocation. [20 DCMR 202.2]

II. Emission Limitations:

1. Emissions of dust shall be minimized in accordance with the requirements of 20 DCMR 605 and the “Operational Limitations” of this permit.
2. The emission of fugitive dust from any material handling, screening, crushing, grinding, conveying, mixing, or other industrial-type operation or process is prohibited. [20 DCMR 605.2]

c. The discharge of particulate matter into the atmosphere from any process shall not exceed three hundredths (0.03) grains per dry standard cubic foot of the exhaust. [20 DCMR 603.1]

d. The discharge of total suspended particulate matter from the concrete batch plant shall not exceed 40 pounds per hour. [20 DCMR 603.1 and Appendix 6-1]

e. Visible emissions shall not be emitted from these unit except that discharges not exceeding 40% opacity (unaveraged) shall be permitted for two (2) minutes in any sixty (60) minutes period and for an aggregate of twelve (12) minutes in any twenty-four (24) hours period during start-up, cleaning, adjustment of combustion controls, or malfunction of the equipment. (20 DCMR 606.1)

f. 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]

III. Operational Limitations:

a. The maximum production of concrete shall be 300,000 cubic yards per 12-month rolling period from the batch concrete plant. [20 DCMR 201]

b. All dust generated must be captured and vented through the fabric filter dust collector (baghouse). [20 DCMR 201]

c. The baghouse shall maintain a particulate matter control efficiency of 99.9% at all times when the batch concrete plant is operating. [20 DCMR 201]

d. The proper operation of the baghouse shall be demonstrated when the differential pressure across the bags maintained between 3 and 8 inches of water. A magnehelic pressure gauge shall be used to monitor the pressure drop. [20 DCMR 201]

e. A full set of replacement dust collector filters shall be kept on site at all times (except immediately after replacement when an order for a new set shall be placed within one week of replacement). [20 DCMR 201]

f. The Permittee shall take reasonable precautions to minimize the emission of any fugitive dust into the outdoor atmosphere. These reasonable precautions shall include, but not be limited to the following [20 DCMR 605.1]:

* + - 1. In the case of unpaved roads, unpaved roadways, and unpaved parking lots:

i. Use of clean water in sufficient quantities and at sufficient frequencies to prevent the visible emission of dust due to the movement of vehicles or of the wind (use of binders or other chemicals may only be used with prior approval of the Department); and

ii. Prompt clean-up of any dirt, earth, or other material from the vicinity of the road, roadway, or lot which has been transported from the road, roadway, or lot due to anthropogenic activity or due to natural forces.

* + - 1. In the case of paved roads, paved roadways, and paved parking lots: Maintenance of the road, roadway, lot, or paved shoulder in a reasonably clean condition through reasonably frequent use of water, sweepers, brooms, or other means through reasonably frequent removal of accumulated dirt from curbside gutters, through reasonably prompt repair of pavement, or through any other means;
      2. In the case of vehicles transporting dusty material or material which is likely to become dusty:

i. Fully covering the material in question, with a tarpaulin or other material; and

ii. Operation, maintenance, and loading of the vehicle, distribution of the loaded material on or in the vehicle, and limiting the quantity of material loaded on or in the vehicle, so that there will be no spillage of the material onto the roads;

* + - 1. In the case of vehicles which accumulate dirt on the wheels, undercarriages, and other parts of the vehicle, due to the movement of the vehicle on dusty, dirty or muddy surfaces: Water washing of all of the dirty parts of the vehicle to thoroughly remove the dirt before or immediately after the vehicle leaves the dusty, dirty, or muddy surface.

g. The batch concrete plant shall be operated and maintained in accordance with the recommendations of the equipment manufacturers. [20 DCMR 201]

h. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the concrete mix in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [20 DCMR 606.3]

i. The 2.8 MMBTU per hour boiler shall fire only natural gas. [201 DCMR 201]

IV. Monitoring and Testing Requirements:

a. The Permittee shall monitor the quantity of cubic yards of concrete produced at the concrete batch plant each day to ensure compliance with Condition III(a).

b. The Permittee shall monitor the differential pressure across the baghouse filters to ensure compliance with Condition III(d).

c. At least once per week, during operation of the unit, the Permittee shall conduct visual observations of the emissions from the unit, both from the outlet stack and from elsewhere in the plant. If no operations are occurring during a given week, this shall be so noted. If visible emissions are observed, the following procedures shall be followed to address Conditions II(b) and (d), respectively:

1. If visible emissions of fugitive dust are observed in excess of the limit specified in Condition II(b), prompt action shall be taken to correct the problem. Operations shall not continue (except as necessary for troubleshooting purposes) if such exceedances are observable, until such time as the problem has been addressed and the equipment has been returned to compliance.

2. If visible emissions of fugitive dust or smoke are observed, the Permittee shall either discontinue operations until the problem is corrected or shall make arrangements for prompt visible emissions testing by a person certified in accordance with EPA Reference Method 9 (40 CFR 60, Appendix A). Such a test shall consist of a minimum of 30 minutes of opacity observations and shall be performed while operating in a similar manner as was occurring when the visible emissions were observed. If an exceedance of the requirements of Condition II(d) are observed, operations shall be discontinued until the problem is corrected.

d. The Permittee shall monitor any odor emitted from the facility and take any actions necessary to ensure compliance with Condition II(f).

e. The Permittee shall monitor the conditions at the site and take any actions necessary to ensure compliance with the fugitive dust requirements of Condition III(f).

f. The Department reserves the right to require that the Permittee conduct performance tests and/or stack tests to determine compliance with Conditions II(c) and (d). In the case that a performance test or stack test is required by the District, the Permittee shall furnish the District with a written report of the results of such performance tests in accordance with the following procedures. [20 DCMR 502.1]

1. The stack tests shall be performed in accordance with 40 CFR 60, Appendix A, Methods 1 through 5. The performance test shall consist of three separate one-hour runs using this test method.
2. One (1) original and one (1) copy of the test protocol shall be submitted a minimum of thirty (30) days in advance of the proposed test date. The test shall be conducted in accordance with Federal and District requirements.
3. The test protocol shall be approved by the Department prior to initiating any testing. Upon approval of the test protocol, the Company shall finalize the test date with the assigned inspector in the Compliance and Enforcement Branch. The Department must have the opportunity to observe the test for the results to be considered for acceptance.
4. The final results of the testing shall be submitted to the Department within sixty (60) days of the test completion. One (1) original and one (1) copy of the test report shall be submitted to the address in Condition IV(f)(7).
5. The final report of the results shall include the emissions test report (including raw data from the test) as well as a summary of the test results and a statement of compliance or non-compliance with permit conditions to be considered valid. The summary of results and statement of compliance or non-compliance shall contain the following information:
   1. A statement that the owner or operator has reviewed the report from the emissions testing firm and agrees with the findings.
   2. Permit number(s) and condition(s) which are the basis for the compliance evaluation.
   3. Summary of results with respect to each permit condition.
   4. Statement of compliance or non-compliance with each permit condition.
6. The results must demonstrate to the Department’s satisfaction that the emission unit is operating in compliance with the applicable regulations and conditions of this permit; if the final report of the test results shows non-compliance the owner or operator shall propose corrective action(s). Failure to demonstrate compliance through the test may result in enforcement action.
7. The following address shall be used for correspondence with the Department for this performance testing:

Chief, Compliance and Enforcement Branch

Air Quality Division

1200 First Street NE

5th Floor

Washington, DC 20002

g. In addition to the testing required above, the Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]

V. Record Keeping Requirements:

The following information shall be recorded, and maintained in a log at the facility and made available when requested for a period of not less than three years (unless a longer record retention requirement is specified below). [20 DCMR 500.8]

a. The Permittee shall record in a log the differential pressure reading of the magnehelic pressure gauge at least once each day, during operation of the equipment to ensure compliance with the operational requirements of Conditions III(b), (c), and (d) of this permit.

b. The Permittee shall keep a record of the total cubic yards of concrete produced at the ready mix concrete batch plant site each day. This shall be kept by keeping a log, updated daily. Additionally, the Permittee shall keep a record of the total cubic yards of concrete produced in a 12-month rolling sum format, updated monthly for the previous 12 calendar months to ensure compliance with the operational requirements of Condition III(a) of this permit.

c. The Permittee shall keep a record of all deviations from the pressure drop requirements of Condition III(d) and the actions taken to correct each identified deviation.

d. The Permittee shall maintain a record of all maintenance performed on the unit to document compliance with Condition III(g).

e. The Permittee shall maintain a copy of the concrete mix plant and the fabric filter baghouse manufacturers’ maintenance and operating recommendations and make such available to Department inspectors.

f. The Permittee shall maintain a copy of the specifications for the bags used in the baghouse to document compliance with Condition III(c).

g. The Permittee shall keep a record of the results of all visible emissions monitoring performed pursuant to Condition IV(c).

h. The Permittee shall keep records of all odors identified pursuant to Condition IV(d) and the actions taken to correct them.

i. The Permittee shall keep records of any fugitive dust exceedances identified pursuant to Condition IV(e) and the actions taken to correct them.

j. The Permittee shall keep records of the operating conditions, raw data, and results of any testing performed pursuant to Conditions IV(f) and (g) for the duration of the operations of the plant at the 2155 Queens Chapel Road NE site.

If you have any questions, please call me at (202) 535-1747 or Abraham T. Hagos at (202) 535-1354.

Sincerely,

Stephen S. Ours, P.E.

Chief, Permitting Branch

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