August 11, 2015

John Michael Bixler

Deputy Director of Facilities Management

Smithsonian Institution - National Zoological Park

1000 Jefferson Dr. SW

Washington, DC 20004

**Re: Permit #6979 to Construct and Operate a Sawdust Collector for Woodworking Operations at the Smithsonian Institution’s National Zoological Park**

Dear Mr. Bixler:

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 shall be obtained before any person can construct or operate a stationary source in the District of Columbia. The application of the Smithsonian Institution (“the Permittee”) for a permit to operate a sawdust collector to control dust from woodworking operations at the National Zoological Park, 3001 Connecticut Avenue NW, Washington, DC has been received. Permission to operate the woodworking operations and sawdust collector per the submitted application received January 29, 2015 is granted subject to the following conditions:

I. General Requirements:

a. The approved woodworking operations and sawdust collector shall be operated in accordance with all applicable air pollution control requirements of 20 DCMR.

b. This permit expires on August 10, 2020 [20 DCMR 200.4]. If continued operation after this date is desired, the owner or operator shall submit an application for renewal by May 10, 2020.

c. Construction or 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]

g. If not already completed, upon issuance of this permit, the Permittee shall promptly supplement their pending Title V operating permit application as appropriate to update it to include the requirements of this permit [20 DCMR 301.2] This supplement shall be submitted within 30 days of the date of issuance of this permit.

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 total suspended 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 outlet of the sawdust collector shall not exceed 0.24 pounds per hour. [20 DCMR 603.1 and Appendix 6-1]

e. Visible emissions shall not be emitted from the outlet of the sawdust collector. (20 DCMR 201 and 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. All dust captured by the dust control system shall be vented through the fabric filter. [20 DCMR 201]

b. The fabric filter shall maintain a particulate matter control efficiency of at least 99.5% at all times when the sawdust collector is operating. [20 DCMR 201] *Note that compliance with this requirement will be assumed if the manufacture’s specifications for the filters being used document that they will meet this standard and all maintenance and operational requirements of the manufacturer’s specifications and this permit are being met, unless other credible evidence of a violation is identified.*

c. The proper operation of the fabric filter shall be demonstrated when the differential pressure across the bags is maintained between 0.6 and 6 inches of water. A magnehelic pressure gauge shall be used to monitor the pressure drop. [20 DCMR 201]

d. A set of replacement filters and any spare parts for the dust collector recommended by the manufacturer shall be kept on site at all times. [20 DCMR 201]

e. The Permittee shall take reasonable precautions to minimize the emission of any fugitive dust into the outdoor atmosphere. [20 DCMR 605.1]

f. The sawdust collector shall be operated and maintained in accordance with the recommendations of the equipment manufacturer. [20 DCMR 201]

g. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the sawdust collector 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]

IV. Monitoring and Testing Requirements:

a. The Permittee shall monitor the differential pressure across the fabric filters to ensure compliance with Condition III(c).

b. At least once per quarter, during operation of the unit, the Permittee shall conduct visual observations of the emissions from the outlet of the sawdust filter. If no operations occur during a given quarter, this shall be so noted. If visible emissions are observed, 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.

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

d. 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(e).

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

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 five years: [20 DCMR 302.1(c)(2)(B) and 20 DCMR 500.8]

a. During each day of operation of the equipment, 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 (f) of this permit.

b. The Permittee shall keep a record of the time of operation of the sawdust collector each day. This shall be kept by keeping a log, updated daily, of each start and stop time of the unit.

c. The Permittee shall keep a record of all deviations from the pressure drop requirements of Condition III(c) 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(f).

e. The Permittee shall maintain a copy of the sawdust collector manufacturers’ maintenance and operating recommendations at the facility and make such available to the Department upon request.

f. The Permittee shall maintain a copy of the specifications for the filters used in the sawdust collector to document compliance with Condition III(b).

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

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

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

If you have any questions, please call me at (202) 535-1747 or Gaurav Bansal at (202) 535-2273.

Sincerely,

Stephen S. Ours, P.E.

Chief, Permitting Branch

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