November 20, 2018

David Brown

Environmental Protection Specialist

Department of Homeland Security

245 Murry Drive, Building 410

Washington, DC 20223

**Re: Permit No. 6717-R1 to Operate Indoor Firing Range Facility at 1200 Pennsylvania Avenue NW**

Dear Mr. Brown:

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 Energy and Environment (the Department) shall be obtained before any person may construct and operate a stationary source in the District of Columbia. The application of the Department of Homeland Security (DHS) (the Permittee) to operate an indoor firing range facility located at 1200 Pennsylvania Avenue NW, Washington, DC, per the submitted plans and specifications, received August 24, 2018, is hereby approved, subject to the following conditions:

I. General Requirements:

a. The approved indoor firing range facility shall be operated in accordance with all applicable air pollution control requirements of 20 DCMR.

b. This permit expires on November 19, 2023 [20 DCMR 200.4]. If continued operation after this date is desired, the owner or operator shall submit a renewal application by August 19, 2023.

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 “Operational Limitations” of this permit.

1. The emission of fugitive dust from the indoor firing range facility is prohibited. [20 DCMR 605.2]

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

d. Visible emissions shall not be emitted into the outdoor atmosphere from the firing range. [20 DCMR 201 and 20 DCMR 606.1]

e. 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:

* 1. All air vented from the firing range shall be vented through either the primary exhaust system or the continuous exhaust system. Both systems shall be fitted with a MERV 8 initial filter (or filter bank), MERV 13 secondary filter (or filter bank), and a final High Efficiency Particulate Air (HEPA) filter (or filter bank).
	2. The MERV 13 filters shall be rated to maintain an 85% dust control efficiency. The HEPA filters shall be rated to maintain a 99.97% control efficiency.
	3. The proper operation of the filters shall be demonstrated when the differential pressures across the across the filters are maintained in the following ranges:

|  |  |  |
| --- | --- | --- |
| Filter | Minimum Differential Pressure (inches of water) | Maximum Differential Pressure (inches of water) |
| MERV 8 | 0.15 | 0.8 |
| MERV 13 | 0.25 | 1.0 |
| HEPA | 1.65 | 2.0 |

Differential pressure gauges shall be used to monitor the pressure drop both locally and as part of information displayed at an automation system terminal.

* 1. A set of replacement of MERV 8, MERV 13, and HEPA filters shall be kept on site at all times.
	2. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the indoor firing range 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 continually monitor the differential pressure across the MERV 8, MERV 13, and HEPA filters to ensure compliance with Condition III(c). If any differential pressure reading is noted outside of the specified ranges, firing range operations shall be halted and the the filter shall be replaced or other appropriate maintenance shall be performed to correct the deviation prior to restart of firing range operations.

b. If visible emissions of fugitive dust or smoke are observed in excess of the limits specified in Conditions II(b) or II(d), prompt action shall be taken to correct the problem. Operations shall not continue if such exceedances are observable, until such time as the problem has been addressed to the satisfaction of the Department.

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

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

V. Record Keeping and Reporting Requirements:

a. The Permittee shall record in a log the differential pressure readings from the pressure gauges at least once each day, during operation to ensure compliance with the operational requirements of Condition III(a), (b), and (c) of this permit. As an alternative, the Permittee may maintain verifiable electronic records recorded on at least this frequency.

b. The Permittee shall keep a record of all identified exceedances of the standards and limits set forth in this permit and the actions taken to correct the identified problems.

c. The Permittee shall maintain a record of all maintenance performed on the indoor firing range ventilation systems to document compliance with Condition III(e).

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

e. The Permittee shall maintain a copy of the indoor firing rage’s filter manufacturer’s maintenance and operating recommendations and make such available to Department inspectors.

f. By March 1 of each calendar year, the Permittee shall submit to the Department a report covering the previous calendar year containing the following information:

1. Identification of the facility and permit number;

2. A list of any differential pressure deviations that could not be corrected within 24 hours of discovery and the action(s) taken to correct the deviation; and

3. A list of any instances of visible emissions being observed and the timeline and action(s) taken to resolve the issue.

If no instances of the deviations described in Condition V(f)(1) and (2) occurred during the reporting period, this shall be so stated on the report.

g. Reports required pursuant to Condition V(f) shall be submitted to the following address:

Chief, Compliance and Enforcement Branch

Department of Energy and Environment

Air Quality Division

1200 First Street NE, 5th Floor

Washington DC 20002

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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