October 16, 2019

Captain Jose L. Rodriguez

United States Department of the Navy

Joint Base Anacostia-Bolling

370 Brookley Avenue SW

Washington, DC 20373

**RE: Permit No. 7269 to Construct and Operate a Dust Collector at Joint Base Anacostia-Bolling, Building 399, 2743 Defense Blvd. SW, Washington DC**

Dear Mr. Rodriguez:

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 can construct or operate a stationary source in the District of Columbia. The application of the United States Department of the Navy, Joint Base Anacostia-Bolling (“JBAB” or “the Permittee”) to construct and operate an ArrestAll AR6-25 (JBAB Emissions Unit ID PM-399-2) dust collector, located at Building 399, 2743 Defense Blvd. SW, Washington DC, has been reviewed:

Based on the submitted plans and specifications as detailed in the application received August 1, 2019, your application to construct and operate is hereby approved subject to the following conditions:

I. General Requirements:

a. The dust collector shall be constructed and operated in accordance with the air pollution control requirements of 20 DCMR.

b. This permit will expire on October 15, 2024 [20 DCMR 200.4]. If continued operation after this date is desired, the Permittee shall submit an application for renewal by July 15, 2024.

c. Construction or operation of equipment under the authority of this set of permit be considered acceptance of its terms and conditions.

1. The Permittee shall allow authorized officials of the District, upon presentation of identification, to:
2. 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 set of permits 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.

1. This permit shall be kept on the premises and produced upon request.
2. Failure to comply with the provisions of this permit may be grounds for suspension or revocation. [20 DCMR 202.2]
3. Within twelve months of issuance of this permit, the Permittee shall apply to have the equipment covered herein incorporated into the JBAB’s Title V operating permit. This application is due by October 15, 2020.

II. Emission Limitations:

a. Total suspended particulate matter (TSP) emissions from the dust collector shall not exceed 0.03 gr/dscf and shall not exceed 5.3 lbs per year. [20 DCMR 201 and 20 DCMR 603]

b. Adding diluent air to the gas stream to comply with Condition II(a) is prohibited. [20 DCMR 603.3]

c. 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]

d. Visible emissions shall not be emitted into the outdoor atmosphere from this equipment.

[ 20 DCMR 201 and 20 DCMR 606.1].

III. Operational Limitations:

1. The dust collector shall be constructed, maintained, and operated such that it achieves at least 99.9% efficiency for control of dust from the woodworking operation. [20 DCMR 201]
2. The Permittee shall properly operate and maintain the dust collection system, including collection trunks and blowers so as to minimize emissions from woodworking operations. [20 DCMR 201]
3. The dust collector shall be operated and maintained in accordance with the manufacturer’s operational and maintenance procedures in order to minimize emissions from woodworking operations. [20 DCMR 201]
4. The Permittee shall establish a minimum differential pressure across the cartridge filters at the time of initial start-up with a full set of new cartridge filters. Whenever the differential pressure drops below this minimum level, the equipment shall be shut down and inspected and any worn or damaged filters shall be replaced. If a full set of new filters is not installed, the previous minimum differential pressure level shall be maintained. [20 DCMR 201]
5. The Permittee shall maintain sufficient stores of cartridge filters in a readily available location to allow for prompt replacement of any worn or damaged filters. [20 DCMR 201]

IV. Monitoring and Testing Requirements:

a. The Permittee shall monitor the physical condition of the dust collector and repair or replace any damaged components. [20 DCMR 201.1]

b. The Permittee shall periodically check the shaker system and ensure that it is properly operating. If maintenance issues are identified, the Permittee shall promptly make repairs as necessary for proper operation. [20 DCMR 201]

1. The Permittee shall use a properly installed and maintained differential pressure monitoring device to monitor the pressure drop across the cartridge filters to assure normal operating conditions. The pressure drop shall be monitored at least once per day during operations to ensure that the differential pressure remains above the minimum pressure drop established pursuant to Condition III(d) and otherwise within proper operating parameters. In lieu of manual monitoring, an electronic monitoring system may be used if appropriate alarms are installed to ensure that operations are maintained within the proper operating range and that the system records a log of readings consistent with the record keeping requirements of this permit. [20 DCMR 201]
2. The Permittee shall monitor exhaust from the dust collector to ensure compliance with Condition II(d).
3. The Permittee shall visually inspect and empty the dust collector quarterly or at a frequency that ensures proper operation of the dust collector. [20 DCMR 201]
4. The Permittee shall monitor dust disposal to minimize fugitive emissions [20 DCMR 201]
5. The Permittee shall inspect the filter media as needed and at least on an annual basis and shall replace the filters as needed to ensure continual proper operation of the dust collector. [20 DCMR 201]
6. 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 and Reporting Requirements: [20 DCMR 200.7]

1. The following information shall be recorded, initialed, and maintained in a log at the facility for a period not less than five (5) years from the date the information is obtained [20 DCMR 302.1(c)(2)(B) and 20 DCMR 500.8]:
2. The documentation of the results of all inspections pursuant to Conditions IV(b), (e), and (g);

2. Records of the date, description, and who performed the any maintenance on the equipment *[Note that these records must be sufficient to document that the Permittee is complying with the requirements of Condition III(b) and (c)]*;

3. Records of the brand, type, and filter efficiency of all filter media used in the equipment, as well as the dates such filter media were replaced. Such records will be used to document compliance with Condition III(a) except where more specific information is available, such as testing performed pursuant to Condition IV(h);

4. Records of the results of differential pressure monitoring performed upon start-up of the equipment each time a full set of cartridge filters are installed. These data shall be subsequently used as the minimum differential pressure allowable in across the filters, pursuant to Condition IV(c);

5. Records of all differential pressure monitoring performed pursuant to Condition IV(c);

6. Records of the results of any visible emissions monitoring performed;

7. Records of the occurrence and duration of each malfunction of operation; and

8. Records of the actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation; and

1. The Permittee shall maintain a copy of the dust collector manufacturer’s maintenance and operating recommendations at the facility for the life of the unit. [20 DCMR 500.1]
2. The Permittee shall maintain a copy of the results of any tests performed pursuant Condition IV(h) at the facility for the life of the unit.
3. The Permittee shall include the equipment covered by this permit document in all reports required by the Title V permits for the facility, including, but not limited to, semi-annual and annual compliance certifications and reports, wherein the Permittee shall certify compliance or non-compliance with the conditions of this permit document for the covered equipment.

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

SSO:ATH