

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

September 13, 2019

Mr. Joshua Callan, Safety Officer
Strittmatter Metro, LLC
5630 Connecticut Avenue NW, #300
Washington DC 20015

RE: Permit Nos 7253, 7254, 7255 and 7256 to Construct and Operate Two Portable Crushers and Two Portable Screeners at the Montana Avenue Land Development Area, Located at 1801 New York Avenue NE/1920 Bladensburg Road NE

Dear Mr. Callan:

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 Strittmatter Metro, LLC (the Permittee) to construct and operate the crushers and screeners listed below, at the Montana Avenue land development area, located at 1801 New York Avenue NE/1920 Bladensburg Road NE, Washington DC (the property bounded by New York Avenue NE, Bladensburg Road NE, and Montana Avenue NE), was received by the Air Quality Division (AQD) on March 26, 2019 (application dated March 21, 2019).

Equipment ID	Equipment Type	Equipment Description	Permit No.
6520	Impact Crusher	Screen Machine Industries Model 4043T impact crusher with serial number AE2904, powered by a Caterpillar Model C9 ACERT 376 hp diesel engine	7253
6525	Jaw Crusher	Powerscreen PremierTrak R400X jaw crusher with serial number AOMH44129, powered by a Scania Model DC09 275 hp diesel engine	7254
6526	Screener	Screen Machine Industries Model Spyder 516T screener with serial number AG3094, powered by a Cummins Model QSB4.5 110 hp diesel engine	7255
6529	Screener	Powerscreen Warrior 1800 screener with serial number LDG62554, powered by a Caterpillar Model C4.4 ATAC 110 hp diesel engine	7256

Based on the submitted plans and specifications your applications to construct and operate the crushers and screeners are hereby approved subject to the following conditions:

I. General Requirements:

- a. The approvals are issued pursuant to the applicable air pollution control requirements of

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20 DCMR for the operation of the crushers and screeners.

- b. This set of permits will expire on September 10, 2024. If continued operation after this date is desired, the owner or operator shall submit application for renewal by June 10, 2024. [20 DCMR 200.4]
- c. Operation of equipment under the authority of this set of permits 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 document may be grounds for suspension or revocation. [20 DCMR 202.2]
- g. Failure to comply with the provisions of this permit may be grounds for suspension or revocation. [20 DCMR 202.2]

II. Emission Limitations:

- a. Emissions of dust shall be minimized in accordance with the requirements of 20 DCMR 605 and the "Operational Limitations" of this permit.
- b. 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]

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- c. Emissions from the engine powering each crusher/screener shall not exceed those achieved by proper operation of the equipment in accordance with manufacturer's specifications.
- d. Visible emissions shall not be emitted into the outdoor atmosphere from stationary sources; provided, that the discharges not exceeding forty percent (40%) opacity (unaveraged) shall be permitted for two (2) minutes in any sixty (60) minute period and for an aggregate of twelve (12) minutes in any twenty-four hour (24 hr.) period during start-up, cleaning, soot blowing, adjustment of combustion controls, or malfunction of the equipment. [20 DCMR 606.1]

Note that 20 DCMR 606 is subject to an EPA-issued call for a State Implementation Plan (SIP) revision (known as a "SIP call") requiring the District to revise 20 DCMR 606. See "State Implementation Plans: Response to Petition for Rulemaking; Restatement and Update of EPA's SSM Policy Applicable to SIPs; Findings of Substantial Inadequacy; and SIP Calls To Amend Provisions Applying to Excess Emissions During Periods of Startup, Shutdown and Malfunction", 80 Fed. Reg. 33840 (June 12, 2015). It is likely that this federal action will result in changes to the requirements of 20 DCMR 606. Any such changes, once finalized in the DCMR, will supersede the language of Condition II(d) as stated above.

- e. In addition to Condition II(d), emissions from grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, bagging operations, storage bins, enclosed truck or railcar loading stations shall not exceed 7% opacity. Emissions from crushers shall not exceed 12% opacity. [40 CFR 60, Subpart OOO, Table 3]
- 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. Crushing and screening operations at the site shall only occur Monday through Saturday of each week, and shall start no earlier than 7:00 AM each day and shall end no later than 3:00 PM each day. [20 DCMR 201]
- b. The Permittee is approved to operate two crushers and two screeners at the site, but shall only operate one crusher and one screener concurrently at any given time for the duration of the permits. Operation of two crushers, simultaneously, or two screeners simultaneously, is not permitted. [20 DCMR 201]

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- c. The installed wet method dust control devices (water sprays) shall be in operation whenever the equipment is in operation, unless the material being crushed or screened is already sufficiently wet to ensure compliance with Condition II(b). [20 DCMR 201]
- d. 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.
 2. 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;
 3. 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;
 4. 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;
 5. In the case of demolition of buildings or structures: Use, to the extent possible, of water;

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6. In the case of removal of demolition debris which is dusty or likely to become dusty: Use of water to thoroughly wet the material before moving or removing the material and keeping it wet or otherwise in a dust-free condition until eventual disposal;
 7. In the case of stockpiles of dusty material: Thorough wetting of the material before loading onto the stockpile and keeping the stockpile wetted, covered, or otherwise in a non-dusty condition.
- e. In order to comply with Condition IV(c) and (d), the Permittee shall:
1. Provide clean water (free from salt, oil, etc.) for use at the site;
 2. Provide water spraying equipment that can access the entire work area;
 3. Apply water sprays without creating a nuisance or ponding and preventing movement of spray beyond site boundary.
 4. Restrict operation at the site to processing only concrete and related demolition materials from the demolished building(s).
- f. The importation of off-site materials for processing is authorized, provided that the materials and their handling meet the requirements of the Soil Erosion & Sedimentation Act of 1977, as amended. [20 DCMR 201]
- g. The crusher and screener engines shall be fired only on diesel fuel with a maximum sulfur content of 15 ppm (0.0015% by weight) and either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. [20 DCMR 201]
- h. The crushers and screeners shall be operated and maintained in accordance with the recommendations of the equipment manufacturers. [20 DCMR 201]
- i. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the equipment 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 and 40 CFR 60.11(d)]

IV. Monitoring and Testing Requirements:

- a. The Permittee shall monitor the operating hours of each crusher and screener with the use of a non-resettable hour meter installed on the unit.

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- b. The Permittee shall monitor the time of first start-up of any of the four units, as well as the last shutdown of any of the four units, each day to ensure compliance with Condition III(a).
- c. The Permittee shall monitor which crushers and screeners are operating each day and ensure that operations of two crushers or two screeners does not overlap, to ensure compliance with Condition III(b).
- d. The Permittee shall, during all work operations at the site, monitor to ensure that the operational requirements of Conditions III(c) through III(i) of this set of permits are met.
- e. If visible emissions of fugitive dust or smoke are observed in excess of the limits specified in Conditions II(b), (d), or (e), 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.
- f. The Permittee shall perform monthly periodic inspections to check that water is flowing to the discharge spray nozzles in the wet dust suppression systems. The Permittee must initiate corrective action within 24 hours and complete corrective action as expediently as practical if the Permittee finds that water is not flowing properly during an inspection of the water spray nozzles. [40 CFR 60.674(b)] If the water spray system is found to not be operating properly, operation of the affected crusher or screener shall be ceased until the water flow has been re-established. [20 DCMR 201]
- g. Within 60 calendar days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 calendar days after initial start-up of such facility, the Permittee shall perform a visible emissions test, on each unit, using the procedures set forth in 40 CFR 60, Appendix A-4, Method 9 to determine compliance with Conditions II(b), (d), and (e). This test program shall be consistent with the requirements of 40 CFR 60.11 and 40 CFR 60.675 including the following [See 40 CFR 60.675 for more details on allowable procedures]:
 1. The minimum distance between the observer and the emission source shall be 15 feet;
 2. The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g. road dust). The required observer position relative to the sun (40 CFR 60, Appendix A-4, Method 9, Section 2.1) must be followed;
 3. For affected facilities using wet suppression for particulate matter control (as required in this permit), a visible mist is sometimes generated by the spray. The water mist must not be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is present, the observation of

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emissions is to be made at a point in the plume where the mist is no longer visible;
and

4. The duration of the Method 9 observations must be 30 minutes (five 6-minute averages). Compliance with the applicable fugitive emission limits in Condition II(e) must be based on the average of the five 6-minute averages.
- h. For visible emissions testing required pursuant to Condition IV(g), the Permittee shall submit the proposed testing plan to the following address at least 14 calendar days before the testing is to be performed:

Chief, Compliance and Enforcement Branch
Air Quality Division
Department of Energy and Environment
1200 First Street NE, 5th Floor
Washington DC 20002

V. Record Keeping Requirements:

The Permittee shall maintain the following records for a period of three years and shall make them available to the Department or the U.S. EPA upon request. [20 DCMR 500.8] All records shall be maintained in such a manner that authorized representatives can certify their accuracy under penalty of D.C. Official Code § 8-101.05e pertaining to false statements, and have either done so in the records, or will do so at the time they are made available to the Department or the U.S. EPA.

- a. The Permittee shall keep a log of the crushing and screening operations at the site as follows:
 1. The time of start-up of the first crusher or screener to be operated each day shall be recorded;
 2. The time of shut-down of the last crusher or screener to be operated each day shall be recorded; and
 3. A record of which units were used each day. If more than one crusher or more than one screener was used in a day, the hours of operation of each unit shall be maintained in such a manner as to document compliance with Condition III(b);
- b. The Permittee shall keep a record of the quantity and type of any materials imported from offsite sufficient to show compliance with Condition III(f).

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- c. The Permittee shall keep a record of all identified exceedances of the standards/limits set forth in this permit and the actions taken to correct the identified problems.
- d. The Permittee shall maintain a record of all maintenance performed on the unit to document compliance with Conditions III(h) and (i).
- e. The Permittee shall maintain a copy of the manufacturer's maintenance and operating recommendations for each unit and make such available to Department inspectors upon request.
- f. For each delivery of diesel fuel, the Permittee shall maintain records of the date, fuel type, and amount of the delivery, as well as sufficient documentation to show that the fuel met the standards set forth in Condition III(g).
- g. The Permittee shall record each inspection of the water spray nozzles, including the date of each inspection and any corrective actions taken, in a logbook (written or electronic) at the facility. [40 CFR 60.674(b) and 40 CFR 60.676(b)(1)]
- h. The Permittee shall maintain the records of the results of all testing required pursuant to Condition IV(g).

VI. Reporting Requirements:

Within 30 days following completion of the testing required under Condition IV(g), the Permittee shall submit the results, along with copies of all raw data collected, 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 contact 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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