

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

January 2, 2019

Joe Roubin, Vice President
Roubin & Janeiro, Inc.
15441 Farm Creek Drive
Woodbridge, VA 22191

Re: Permit No. 7193 to Operate a Screener at Roubin & Janeiro Hot Mix Asphalt Plant Facility, 4901 Shepherd Parkway SW

Dear Mr. Roubin:

Pursuant to sections 200.1 and 200.2 of the 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 and operate a new stationary source in the District of Columbia. The application of Roubin & Janeiro, Inc. (“the Permittee”) to construct and operate a McCloskey R155 High Energy Screener, with up to three integral conveyors, powered by a 129 hp Caterpillar C4.4 diesel-fired engine at 4901 Shepherd Parkway SW, Washington, DC 20032, per the submitted plans, performance data, and specifications, received December 04, 2017, with additional information received on December 6, 2017 and February 14, 2018, is hereby approved by the Department subject to the following conditions:

I. General Requirements:

- a. The approved screener equipment shall be constructed and operated in accordance with all applicable air pollution control requirements of 20 DCMR.
- b. This permit expires on January 1, 2024 (20 DCMR 200.4). If continued operation after this date is desired, the owner or operator shall submit a renewal application by October 1, 2023.
- 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;

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- 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 submitted at the time of issuance of this permit, the Permittee shall submit, within 12 months of the issuance date of this permit, a complete Title V application modification request for Roubin & Janeiro to include the requirements of this permit into the existing Title V permit for the facility (No. 048). [20 DCMR 301.1(a)(2)]

II. Emission Limitations:

- a. Emissions from the engine shall not exceed those found in the following table, as measured according to the procedures set forth in 40 CFR 89, Subpart E for NMHC, NOx, and CO and 40 CFR 89.112(c) for PM. [40 CFR 60.4204(b), 40 CFR 60.4201(a), and 40 CFR 89.112(a)-(c)]

Pollutant Emission Limits (g/kW-hr)		
NMHC+NOx	CO	PM
4.0	5.0	0.30

- b. Emissions of dust shall be minimized in accordance with the requirements of 20 DCMR 605 and the "Operational Limitations" of this permit.
- c. 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]
- d. Emissions from the screener and associated engine powering the screener shall not exceed those achieved by proper operation of the equipment in accordance with manufacturer's specifications.
- e. 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(e) as stated above.

- f. In addition to Condition II(e), exhaust opacity from the engine, measured and calculated as set forth in 40 CFR 86, Subpart I, shall not exceed [40 CFR 89.113]:
 1. 20 percent during the acceleration mode;
 2. 15 percent during the lugging mode;
 3. 40 percent during the peaks in either the acceleration or lugging modes. *Note that this condition is streamlined with the requirements of 20 DCMR 606.1.*
- g. 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 crusher shall be operated for a maximum of one thousand seven hundred twenty eight (1,728) hours per year.
- b. 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

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- 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;
 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.
- c. In order to comply with Condition III(b), 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.

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4. Restrict operation at the site to processing only concrete and related demolition materials from the demolished building.
- d. The Permittee shall process only recycled asphalt pavement (RAP) in the unit and shall process no more than 550 tons in any given hour. [20 DCMR 201]
- e. The screener 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 15 volume percent. [20 DCMR 201 and 40 CFR 60.4207(b)]
- f. The screener and associated engine shall be operated and maintained in accordance with the recommendations of the equipment manufacturers.
- g. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the screener 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. In order to ensure compliance with Condition III(a), the Permittee shall monitor the total hours of operation each month, either with the use of a properly functioning, non-resettable hour metering device or by tracking the sum of the duration of each instance of operation each month.
- b. The Permittee shall, during all work operations at the site, monitor to ensure that the operational requirements of Conditions III(b) through III(g) of this permit are met.
- c. If visible emissions of fugitive dust or smoke are observed in excess of the limits specified in Conditions II(b), (e), or (f), 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.
- d. 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:

- a. The information specified in Condition V shall be maintained by the Permittee at the facility for a period not less than five (5) years from when it was originated and shall be made available to the Department upon written or verbal request. Such records shall meet

the following standards: [20 DCMR 302.1(c)(2)(B), 20 DCMR 500.8, and 40 CFR 63.11509(f)]

1. The records shall provide sufficient data and calculations to demonstrate clearly that the emission limitations or control requirements are met; and
 2. Data or information required to determine compliance with an applicable limitation shall be recorded and maintained in a time frame consistent with the averaging period of the standard.
- b. The Permittee shall keep a record of the dates of operation and the hours of operation of the screener at the site. This shall be kept by recording the date of each day of operation and then either recording the initial starting hours shown on the non-resettable hour meter on the unit each day, or by keeping a log, updated daily, of each start and stop time of the unit with a sum of the total hours of operation that day.
 - c. The Permittee shall keep a record of the weight (in tons) of RAP crushed each day so as to show compliance with Condition III(d).
 - d. The Permittee shall keep a record of all substantial exceedances of the standards/limits set forth in this permit and the actions taken to correct the identified problems.
 - e. The Permittee shall maintain a record of all maintenance performed on the unit to document compliance with Condition III(f).
 - f. The Permittee shall maintain a copy of the crusher's manufacturer's maintenance and operating recommendations and make such available to Department inspectors.
 - g. 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(e).
 - h. The Permittee shall maintain a copy of the EPA Certificate of Conformity for the engine at the facility at all times.

VI. Reporting Requirements:

- a. Within 30 days following completion of any testing required under Condition IV(d), the Permittee shall submit the results, along with copies of all raw data collected, to the following address:

Chief, Compliance and Enforcement Branch
Air Quality Division
Department of Energy and Environment

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1200 First Street NE, 5th Floor
Washington DC 20002

- b. The Permittee shall comply with the reporting requirements contained Condition I(d) of Title V Permit No. 048, issued to the Permittee on June 30, 2016, for the equipment covered by this permit No. 7193.

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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