CHAPTER 2 TECHNICAL MEMORANDUM

TO: File

THROUGH: Stephen S. Ours, P.E.
Chief, Permitting Branch

FROM: Abraham T. Hagos
Environmental Engineer

SUBJECT: Roubin & Janeiro Hot Mix Asphalt Plant
Permit Nos. 7044 and 7045
Permits to Construct and Operate a Crusher and a Conveyor at the
Roubin & Janeiro Asphalt Plant at 4901 Shepherd Parkway SW

DATE: December 29, 2015

BACKGROUND INFORMATION

A permit application package to construct and operate both a crusher and a conveyor for
the processing of recycled asphalt pavement (RAP) at the Roubin & Janeiro Hot Mix
Asphalt Plant located at 4901 Shepherd Parkway SW, Washington, DC was received by
the Air Quality Division on June 23, 2015. The applicant is Roubin & Janeiro Inc.

The permit action will be published in the DC Register on January 8, 2016. Public
comments for the permit action will be solicited through February 8, 2016.

The Company has not requested that any of the materials submitted with this application
be held confidential.

REGULATORY REVIEW

20 DCMR 200: General Permit Requirements:
Both the crusher and conveyor equipment are potential air pollution source for particulate
matter and other pollutants. The applicant is requesting a permit to operate the equipment
and its associated engines on a routine basis for the duration of the permit. Thus a chapter
2 permit is required.

20 DCMR 605: Control of Fugitive Dust
The fugitive dust control requirements of 20 DCMR 605 are applicable to the crusher and
conveyor. The requirements of this regulation are found in Conditions II(b) and (c) of the
permits. The operational requirements are found in Conditions III(b) and (c). The
facility must monitor the site for compliance per Condition IV(b).

20 DCMR 606: Visible Emissions
The visible emissions limitations of 20 DCMR 606.1 are applicable to this equipment. Visible emissions shall not be emitted into the outdoor atmosphere from the operation of the equipment; provided, that discharges not exceeding forty percent (40%) opacity (unaveraged) shall be permitted for two 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, or malfunction of equipment. This requirement is contained in Condition II(d). Monitoring for compliance is required pursuant to Condition IV(c).

20 DCMR 903: Odorous or Other Nuisance Air Pollutants
"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]" is applicable to all sources. This requirement is contained in Condition II(g) of the permits.

Other Regulations:
The engines associated with these units are non-road engines, therefore 40 CFR 60 Subpart III, Standard of Performance for Stationary Compression Ignition Reciprocating Internal Combustion Engines (RICE) does not apply.

However, non-road engine rules do apply, so the requirements of 20 DCMR 89.112 and 113 were included in the permit.

RECOMMENDATIONS

The applications to operate these two related units and the attached operating permits comply with all applicable federal and District air pollution control laws and regulations. Public comments for the permit action will be solicited from January 8, 2016 through February 8, 2016. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permit Nos. 7044 and 7045 be issued in accordance with 20 DCMR 200.1 and 200.2.

SSO: ATH