

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Department of Energy and Environment

**CHAPTER 2 TECHNICAL MEMORANDUM**

TO: File

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

FROM: Olivia Achuko *SSO FOA*  
Environmental Engineer

SUBJECT: **Fort Myer Construction Corporation (FMCC) Plant #1  
Permit No. 7288  
Permit to Construct and Operate a Crusher/Screeners at 2001 5<sup>th</sup> Street NE**

DATE: March 12, 2021

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***BACKGROUND INFORMATION***

A permit application to construct and operate a new No. 2 fuel oil-fired McCloskey International Model i44R Crusher/Screeners combination unit at 2001 5<sup>th</sup> Street NE, Washington DC (Fort Myer Plant #1) was received on or about August 17, 2020. The crusher/screeners unit will replace the previously existing separate crusher and screeners units at this location. The applicant indicated that, based on emission inventory of the unit, no regulated pollutant from the unit exceeds 5 tons/year thereby, exempting the unit from minor new source review. The information on the application form indicated that the engine is a Tier III unit but follow-up information from the applicant identified that it is actually a Tier IV Interim/Stage 3B engine. After consultation with the U.S. Environmental Protection Agency, the Air Quality Division (AQD) determined that the engine is properly classified as a non-road engine, and is therefore not subject to air quality permitting. However, the crusher itself is a stationary source subject to air quality permitting.

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

***REGULATORY REVIEW***

20 DCMR Chapter 2, Section 200: General Permit Requirements:

The crushing/screening equipment is a potential air pollution source for particulate matter and other pollutants. The applicant is requesting a permit to operate the equipment and its associated engine on a routine basis for the duration of the permit. Thus, a chapter 2 permit is required.

20 DCMR Chapter 3: Operating Permits and Acid Rain Programs

Fort Myer Construction Corporation Plant #1 is a major source subject to Chapter 3. As such, eventually this unit must be incorporated into the Title V permit for the facility. Due to the

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timing of the permit renewal application deadline, the facility has already requested that this new equipment be included in the Title V permit upon renewal. As such the Chapter 2 permit does not establish a deadline to do so, as would otherwise be required. The record keeping duration requirement in 20 DCMR 302.1(c)(2)(B) has been incorporated into Condition V.

20 DCMR Chapter 6, Section 605: Control of Fugitive Dust

The fugitive dust control requirements of 20 DCMR 605 are applicable to the crusher/screeners unit. The requirements of this regulation are found in Condition II(b) of the permit. The operational requirements are found in Conditions III(c) and (d). The facility must monitor the site for compliance per Conditions IV(c) and (d).

20 DCMR Chapter 6, Section 606: Visible Emissions

The visible emissions limitations of 20 DCMR 606.1 are applicable to the 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(c). Monitoring for compliance is required pursuant to Condition IV(d), while testing is required pursuant to Condition IV(f).

A note has been added to Condition II(c) that 20 DCMR 606 may be revised pursuant to a "SIP call" issued by EPA; if the regulation is revised, the new regulation's requirements will automatically supersede the current permit language.

20 DCMR Chapter 9, Section 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(e) of the permit.

Other Regulations:

40 CFR 60 Subpart IIII, Standard of Performance for Stationary Compression Ignition Reciprocating Internal Combustion Engines (RICE) for owners and operators of new stationary source does not apply to the engine because the engine meets the definition of a non-road engine (40 CFR 1068.30) and is therefore not a stationary engine. Only stationary engines are subject to this rule. specifically, the unit is self-propelled under (1)(i) of that definition and is not exempted under (2)(i) or (ii) of that definition. The exemption in (2)(iii) of the definition only applies to units meeting (1)(iii) of the definition.

40 CFR 60, Subpart LL, the New Source Performance Standard (NSPS) for Metallic Mineral Processing Plants will not be applicable to this equipment because the source will not be allowed to process metallic minerals in the equipment. The equipment is limited to processing RAP per Condition III(a)(2).

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40 CFR 60, Subpart OOO, the NSPS for Nonmetallic Mineral Processing Plants is applicable to this source pursuant to 40 CFR 60.670(a)(1). As a result of the applicability of this regulation, additional visible emissions requirements were placed in Condition II(d) with corresponding testing requirements in Condition IV(f) and (g) and record keeping and reporting requirements in Conditions V(g) and (h) and VI(a), respectively. Additionally, inspections of the water sprays have been required in Condition IV(e) with associated record keeping required in Condition V(g).

***RECOMMENDATIONS***

The application to operate crusher/screeners combo unit and the attached operating permit comply with all applicable federal and District air pollution control laws and regulations.

Public comments for the permit action will be solicited from March 19, 2021 through April 19, 2021. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permit No. 7288 be issued in accordance with 20 DCMR 200.1 and 200.2.

SSO:OA