

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

CHAPTER 2 TECHNICAL MEMORANDUM

TO: File

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

FROM: Abraham T. Hagos *ATH*
Environmental Engineer

SUBJECT: **Roubin & Janeiro, Inc.**
Permit No. 7193 to Construct and Operate Portable Screener Equipment at the 4901 Shepherd Parkway SW Hot Mix Asphalt Plant

DATE: March 13, 2018

BACKGROUND INFORMATION

Two sets of permit applications to construct and operate a screener for processing of recycled asphalt pavement (RAP) at the Roubin & Janeiro hot mix asphalt plant site at 4901 Shepherd Parkway SW, Washington DC were received by the Air Quality Division (AQD) of the Department of Energy and Environment (“the Department” or “DOEE”) on December 4, 2017.

The first of these sets of applications was an application for coverage under source category permit 6886-SC. The intent of the applicant in submitting this application was to allow for immediate construction and operation of the unit while a full-term Chapter 2 permit was being processed. However, the applicant was not eligible for coverage by the source category permit. That source category permit was specifically written to cover only temporary operations and was not intended as a way to skip public review for the installation of a permanent unit. As such, on December 8, 2017 a letter was issued to Roubin & Janeiro notifying them that the source category permit application had been denied.

The second set of applications was for the full-term Chapter 2 permit required. Forms were submitted for both the screener unit and its associated engine. This technical support memorandum has been prepared to support issuance of the full-term permit.

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 screening equipment is a potential air pollution source for particulate matter and products of

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combustion. The applicant is requesting a permit to construct and 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 6, Section 605: Control of Fugitive Dust

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

20 DCMR Chapter 6, Section 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).

Note that language has been included in the permit notifying the facility that there is an outstanding call for a State Implementation Plan (SIP) revision from EPA that may result in revisions to the applicable regulation. As such, if the regulation is changed, the new regulatory requirements will supersede those expressed in the permit specifically.

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.

40 CFR 60 Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (ICE)

Depending upon the use of this screener equipment at the site (i.e., whether it is regularly moved around the site, or stays in one place for an extended period), the internal combustion engine may be considered a non-road engine (if it moves around) or a stationary source (if it remains fixed for 12 months or more at any time). This regulation is applicable to stationary sources, but its requirements are mostly similar to those for non-road engines for this type of 2011 model year non-emergency engine.

The main result of the application of this regulation is that the unit must meet Tier III non-road engine standards in 40 CFR 89.112 and 113. This is documented with the submitted EPA

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Certificate of Conformity. The requirements have been included in Condition II(a) and (f) and Condition V(h) of the permit.

Additionally, this regulation requires that the unit use ultra-low sulfur diesel fuel that contains 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. The applicant indicated in their application that this is what they intend to use, so it has been included in the permit citing authority of both this regulation and 20 DCMR 201.

RECOMMENDATIONS

The application to construct and operate the screener equipment and the attached permit comply with all applicable federal and District air pollution control laws and regulations.

Public comments for the permit actions will be solicited from March 23, 2018 through April 23, 2018. AQD will resolve any comments received before taking any final action on the application. If no comments are received, I recommend that permit No. 7193 be issued in accordance with 20 DCMR 200.1 and 200.2.

SSOVATH

