

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

CHAPTER 2 TECHNICAL SUPPORT MEMORANDUM

TO: File

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

FROM: Afewerki Birhane
Environmental Engineer, Permitting Branch, Air Quality Division

SUBJECT: Department of Homeland Security (DHS)
Permit No. 6717-R2
Permit To Operate an Indoor Firing Range at 1200 Pennsylvania Avenue NW

DATE: May 28, 2024

BACKGROUND INFORMATION

A permit application to renew a prior permit (Permit 6717-R1, issued November 28, 2018) to operate an indoor firing range facility at 1200 Pennsylvania Avenue NE, Washington, DC was received by the Air Quality Division (“AQD”) of the Department of Energy and Environment (“the Department”) via email on August 9, 2023. The associated application fee payment was received on September 5, 2023. The applicant is the U.S. Department of Homeland Security.

The permit action will be published in the DC Register on June 7, 2024. Public comments for the permit action will be solicited through July 8, 2024.

The applicant has not requested that any of the information submitted to the Department be held confidential pursuant to 20 DCMR 101.

TECHNICAL INFORMATION

The facility to be permitted is an indoor firing range facility located at 1200 Pennsylvania Avenue NW, Washington, DC.

The applicant was unable to quantify the criteria pollutants emissions from the indoor firing range facility but specified that the filters used in the process are more than 99.97% efficient. It is expected that emissions will be extremely low, considering the type of operation and the control equipment used.

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REGULATORY REVIEW

In developing this permit, the following regulations were evaluated for applicability.

Chapter 2, Section 200: General Permit Requirements:

The indoor firing range facility is a potential air pollution source for particulate matter and lead. The applicant is requesting a permit renewal to continue to operate the facility but did not specify operating schedule, quantity and type of input materials and air pollution emissions to the outdoor atmosphere other than particulate matter. The applicant has specified the use of a three bank filter system consisting of a lower efficiency MERV 8 filter, an 85% efficient MERV 13 filter, and a high efficiency particulate air (HEPA) filter that is rated at 99.97% efficiency for controlling dust. Thus, a Chapter 2 permit is required.

Chapter 6, Section 605: Control of Fugitive Dust

The fugitive dust control requirements of 20 DCMR 605 are applicable to this indoor firing range facility. The requirements of this regulation are found in Conditions II(a) and (b) of this permit. In order to achieve compliance, operational procedures are set forth in Conditions III(a), (b), and (c). The facility must monitor control equipment per Condition IV(a). Relevant records must be kept pursuant to Conditions V(a), (b), and (d). Significant deviations must be reported pursuant to Conditions V(h) and (i).

Chapter 6, Section 606: Visible Emissions

This regulation was recently updated (August 11, 2023), thus significant changes to the requirements in this permit, compared to the prior permit for this equipment, are reflected in the draft permit. The zero percent opacity visible emissions limitations of 20 DCMR 606.1 are applicable to this indoor firing range facility and have been incorporated into Condition II(d) of the permit. However, pursuant to authority granted under 20 DCMR 201, AQD did not include the exceptions contained in Section 606.2 in the permit as any visible emissions are a sign of a serious failure of the control devices and lead dust is more hazardous than most dusts covered by this regulation.

In addition, the maintenance, operational, and training requirements of 20 DCMR 606.4 have been included in Condition III(e) of the permit.

Monitoring for compliance is required pursuant to Conditions IV(b) and (d). Records of deviations must be kept pursuant to Condition V(b). maintenance records and procedures must be kept per Conditions V(c), (d), and (e). Records of training must be kept per Condition V(f). Reporting of deviations is required under Conditions V(h) and (i).

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

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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. Monitoring is required pursuant to Condition IV(c) of the permit. Records of deviations must be kept pursuant to Condition V(g).

In addition, due to recent changes to this rule (promulgated August 4, 2024), the affirmative defense provisions of 20 DCMR 903.13(b) have been included in Condition II(e). The odor control plan requirements of the regulation do not apply to this facility.

RECOMMENDATIONS

Based on its review, AQD believes that the application to operate the indoor firing range facility 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 June 7, 2024 through July 8, 2024. AQD will address any comments received before making a final determination on the permit application. If no comments are received, I recommend that permit No. 6717-R2 be promptly issued in accordance with 20 DCMR 200.2, as proposed, following the close of the comment period.

SSO/AB