

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

**TECHNICAL SUPPORT MEMORANDUM
FOR PROPOSED SYNTHETIC MINOR PERMITTING ACTION**

Permit No. 7301-SM

TO: File

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

Olivia Achuko *Olivia Achuko* 2/13/24
Environmental Engineer

SUBJECT: Fort Myer Construction Corporation (FMCC) Plant 1 Synthetic Minor
Permit No. 7301-SM for Operations at 2001 5th Street NE, Washington DC

DATE: February 13, 2024

This Technical Support Memorandum has been prepared to document the basis for a facility-wide synthetic minor operating permit for the following:

APPLICANT AND PERMITTEE:

Fort Myer Construction Corporation (FMCC)
2237 33rd Street NE
Washington DC 20018

FACILITY LOCATION:

Fort Myer Construction Corporation Plant #1
2001 5th Street NE
Washington DC 20002

Application Signatory per 20 DCMR 200.13:

Matthew Hill, Vice President - Operations

FACILITY DESCRIPTION AND BACKGROUND INFORMATION:

Fort Myer Construction Corporation (FMCC) operates two separate asphalt plant locations in the District of Columbia (Plant #1 and Plant #2) with both of them producing asphaltic concrete for

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the paving and construction industries. The permit associated with this memorandum is for Plant #1, located at 2001 5th Street NE, Washington DC. Plant #1 is a batch mix plant that produces primarily hot mix asphalt, but also produces cold mix asphalt as a secondary product. This permitting action is taken to convert the current Title V operating permit, No. 028-R1, issued June 14, 2016, to a synthetic minor permit. The Air Quality Division (AQD) received the synthetic minor permit application, with cover letter dated November 18, 2020, on December 28, 2020. Since issuance of the prior Title V permit, one Chapter 2 permit (Permit No. 7288, dated April 20, 2021) has been issued to Fort Myer Plant #1 for a crusher/screener combination unit. This unit has taken the place of two units, a screen, and a crusher, that were previously permitted under the old Title V permit. The requirements of Permit No. 7288 are being incorporated into Permit No. 7301-SM, thus, when issued, Permit No. 7301-SM will supersede and replace Permit No. 7288.

The emission sources related to plant operation at this site consist of: a 75 MMBtu/hr Rotary Kiln with Genco Ultra II dual-fuel (natural gas and No. 2 fuel oil) burner and Genco Ultraflo baghouse and related appurtenances, McCloskey International Model i44R Crusher/Screening combo unit, powered by a diesel-fired Tier IV Interim/Stage 3B, 600 horsepower (hp) non-road engine, with associated conveyors for recycled asphalt processing, a natural gas hot oil heater (2.0 MMBtu/hr heat input), eight (8) above ground storage tanks for storage of liquid asphalt and fuel oil, and miscellaneous insignificant sources (electric metal cutting machine, acetylene torches, electric welding machine). The facility is operated for the purpose of producing asphaltic concrete for paving. The Permittee is covered under Standard Industrial Classification (SIC) Code 2951 and North American Industrial Classification System (NAICS) code 324121.

DISCUSSION OF PROPOSED SYNTHETIC MINOR LIMITATIONS

The source indicated on the application (as revised by a subsequent submission on February 6, 2024) that by limiting the facility to the following operational limits, all associated pollutants will fall below the applicable Title V pollutant thresholds:

1. The asphaltic concrete production rate shall not exceed 240,000 tons in any 12-consecutive-month period;
2. The asphaltic concrete production rate shall not exceed 120 tons per hour (daily average production rate, averaging operating hours only);
3. The crusher/screener unit shall be operated a maximum of ten (10) hours in any day; and
4. The crusher/screener unit shall not be used to process more than 150 tons per hour of recycled asphalt pavement (RAP).

As demonstrated in the emissions summary below, these limits will ensure that emissions are maintained below the District's major source threshold of 25 tons per year for oxides of nitrogen (NO_x), volatile organic compounds (VOC), and total hazardous air pollutants (HAPs), less than 100 tons per year for all other criteria pollutants, and less than 10 tons per year for any single HAP. The pollutants that would be exceeded if a limit is not taken are NO_x and CO.

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With the establishment of the operational limits in Conditions III(a)(2)(A) and III(b)(2)(A) of the permit, along with associated monitoring and record keeping requirements, and a requirement to report exceedances of these operational limits found in Condition I(c)(3)(B), the operational limits are enforceable as a practical matter, and pursuant to 20 DCMR 200.6 and 200.7, this facility qualifies for synthetic minor status.

EMISSIONS SUMMARY:

The following is an estimate of overall potential emissions from the facility:

FACILITY-WIDE EMISSIONS SUMMARY [TONS PER YEAR]		
Pollutants	Potential Emissions without 20 DCMR 200.6 and 200.7 Limits[†]	Potential Emissions with 20 DCMR 200.6 and 200.7 Limits[‡]
Sulfur Dioxide (SO ₂)	47.13	11.29
Oxides of Nitrogen (NO _x)	32.13	10.51
Total Particulate Matter (PM) [€]	25.86	10.67
Volatile Organic Compounds (VOCs)	13.48	3.21
Carbon Monoxide (CO)	212.96	49.55
Total Hazardous Air Pollutants HAPs)	4.18	1.41

[†] Assumes 1,051,200 tons of annual throughput of asphalt.

[‡] Assumes 240,000 tons of annual throughput of asphalt, consistent with limits established pursuant to 20 DCMR 200.6 and 200.7.

[€] Total particulate matter values include both filterable and condensable fractions of particulate matter. The values in this table have been calculated incorporating the emission limit being established in the permit for emissions from the dryer/mixer process as discussed in the discussion of 20 DCMR Chapter 2 applicability below.

REGULATORY REVIEW:

This facility has been found to be subject to the requirements of the following regulations, except as noted in the discussion below:

Federal and District Enforceable:

20 DCMR Chapter 1 - General Rules
20 DCMR Chapter 2 - General and Non-Attainment Area Permits
20 DCMR 500 - Records and reports
20 DCMR 502 - Sampling, tests, and measurements.
20 DCMR 600 - Fuel burning particulate emission.
20 DCMR 604 - Open Burning
20 DCMR 605 - Control of Fugitive Dust
20 DCMR 606 - Visible Emissions
20 DCMR 800 - Control of Asbestos

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- 20 DCMR 801 - Sulfur Contents of Fuel Oils
- 20 DCMR 803 - Sulfur Process Emissions
- 20 DCMR 805 - Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen
- 40 CFR 60, Subpart I - Standards of Performance for Hot Mix Asphalt Facilities
- 40 CFR 60, Subpart OOO - NSPS for Nonmetallic Mineral Processing Plant
- 40 CFR 61.12 - Credible Evidence
- 40 CFR 64 - Compliance Assurance Monitoring (CAM)
- 40 CFR 82, Subpart G - Protection of Stratospheric Ozone (*Note: AQD did not make a positive determination that this regulation was applicable to the facility, but included it as a standard requirement in the permit.*)
- 40 CFR 82, Subpart H - Halon Emissions Reduction (*Note: AQD did not make a positive determination that this regulation was applicable to the facility, but included it as a standard requirement in the permit.*)

District Enforceable Only:

- 20 DCMR 402 - Chemical Accident Prevention (*Note: AQD did not make a positive determination that this regulation was applicable to the facility but included it as a standard requirement in the permit.*)
- 20 DCMR 900 - Engine idling
- 20 DCMR 901 - Vehicular exhaust emissions
- 20 DCMR 902 - Lead Content of Gasoline
- 20 DCMR 903 - Odorous or other nuisance air pollutants

20 DCMR Chapter 2: General and Non-attainment Area Permits:

Both the batch mix asphalt plant and the crusher/screener are stationary sources subject to the requirement to obtain a permit to operate under 20 DCMR 200.2 and were previously subject to the requirement to obtain permits to construct under 20 DCMR 200.1. The batch mix asphalt plant was previous subject to combined Chapter 2 and Chapter 3 permit No.028-R1, issued June 14, 2016. The crusher/screener permit was subject to Chapter 2 permit 7288, issued April 20, 2021.

In addition, to address odor issues at the facility, FMCC has proposed to install a blue smoke condenser on each of the vents of the 20,000-gallon and 10,000-gallon liquid asphalt tanks. These are considered to be air pollution control devices subject to permitting under 20 DCMR 200.1, and are proposed to be permitted via this permitting action.

In addition to general permitting requirements, FMCC has requested limits on their operations to avoid applicability of 20 DCMR Chapter 3 (Title V) pursuant to 20 DCMR 200.6. These same operational limits are also, effectively, a limit pursuant to 20 DCMR 200.7 to avoid applicability of 40 CFR 64, Compliance Assurance Monitoring, as discussed in the review of that regulation below. Specifically, the Permittee has requested throughput limitations on their equipment of 120 tons per hour (daily average production rate, averaging operating hours only) and 240,000 tons

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of total production in any 12-consecutive-month period. These limits have been incorporated into the permit as Condition III(a)(2)(A)(i) and (ii), respectively.

Pursuant to 20 DCMR 201, in order to be protective of public health and the environment, the Department does not allow emissions to exceed those achieved with properly maintained and operated equipment. As a result, AQD is establishing a more stringent total suspended particulate matter (TSP) standard of 3.5 lbs/hr from the dryer/mixer process, based on review of extensive stack test results over several years. This limit is based on a review of what the facility has achieved in past stack tests. To develop this factor, AQD reviewed six recent sets of stack test results performed between 2019 and 2023. Of these results, two were discounted as they showed extremely high results that were subsequently found to be the result of maintenance issues within the baghouse (the September 1, 2020 and June 15, 2022 tests). A third result, the test performed on August 1, 2023, was also excluded from consideration as its results were approximately three times higher than the results of the highest of the remaining three tests, and appeared to not be representative of what the facility was capable of performing when properly maintained and operating under normal conditions. AQD developed the standard in the draft permit based on an analysis of the three remaining test results, adjusted to the asserted 120 ton per hour maximum throughput of the facility, and adding two standard deviations to the mean of those tests. When sufficient emissions test data is available, this has been used in the past to establish a reasonable emissions limit that is reflective of proper operation and maintenance of the equipment.

In addition, AQD is establishing a total particulate matter standard, to include both filterable and condensable particulate matter, from the dryer/mixer process. Because there was no historical emissions testing data available for condensable particulate matter at this site, AQD established this standard of 5.9 lb/hr based on a review of AP-42 factors and applying the percentage of total particulate matter attributed to condensable particulate matter (40%) to the TSP standard developed based on stack testing as discussed above.

Both of these particulate matter standards are incorporated into Condition III(a)(1)(A) of the permit.

AQD is also establishing a mass-based NO_x emissions limit of 6.40 lb/hr from the dryer/mixer process. This limit is found in Condition III(a)(1)(C)(ii) of the permit. This is based on what the facility has represented is the maximum potential to emit NO_x (1.3 times the highest of the six recent stack tests performed between 2019 and 2023).

Note also that 20 DCMR 205, New Source Performance Standards, adopts, by reference, certain federal New Source Performance Standards (NSPSs) from 40 CFR 60, including Subpart I, Hot Mix Asphalt Facilities, and Subpart OOO, Nonmetallic Mineral Processing Plants. These federal regulations apply, as discussed below, therefore 20 DCMR 205 also applies. However, 20 DCMR 205 does not impose any additional compliance requirements beyond those specified in the referenced federal rules.

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All associated Chapter 2 requirements have been incorporated into the synthetic minor permit.

20 DCMR Chapter 3: Operating Permits and Acid Rain Programs

This regulation was previously applicable to this facility as it was found to have had the potential to emit greater than the District's major source thresholds of NO_x, VOC, SO₂, and CO. See the [Fact Sheet and Statement of Basis](#), dated April 11, 2016, related to issuance of the facility's prior Title V permit. However, with updates to regulatory requirements, such as reduced sulfur-in-fuel standards and with the operational restrictions taken pursuant to 20 DCMR 200.6 and 200.7, discussed previously, the facility will no longer have the potential to emit above the major source threshold of any pollutant. Therefore, this regulation is no longer applicable to the facility.

20 DCMR Chapter 6, Section 600: Fuel Burning Particulate Emission

This section applies to the 2.0 MMBTU/hr natural gas-fired hot oil heater covered by the Miscellaneous Activities section of the permit. It establishes a total suspended particulate matter (TSP) emission limit for the unit (see Condition IV(d)(4)). Note that the regulation refers to "particulate matter" rather than TSP, but the regulation was written at a time when these terms were generally used interchangeably, as such, the permit has been written to provide more specificity and clarity by referencing TSP.

This section does not apply to the main plant burner as the burner heats material using direct heat transfer, and is therefore not considered "fuel burning equipment" as defined by 20 DCMR 199.

20 DCMR Chapter 6, Section 603: Particulate Process Emissions

This section establishes TSP emissions from the main process (which includes combined emissions from the burner and the operation of the drum dryer). This process is controlled by a baghouse. This section also references Appendix 6-1 of the regulation. While Appendix 6-1 allows up to 40 lbs/hr of TSP emissions, AQD has determined, based on review of extensive stack test data, that emissions at that level are not indicative of proper operation/maintenance of the equipment. As such, and given the environmental justice concerns in the neighborhood, a more stringent limit of 3.5 lb/hr has been placed in the draft permit, based on the Department's authority under 20 DCMR 201. The development of this standard has been discussed above in the review of Chapter 2 applicability.

The requirements of this regulation, adjusted as discussed above, are found in Condition III(a)(1)(A) of the permit. Testing for compliance is required pursuant to Condition III(a)(3)(L) of the permit.

It should be noted that the cover letter for the permit application requested a broader range of allowable differential pressure across the baghouse filters from the previously authorized range of 2-4 inches of water, but minimal justification was provided for such a change. In a call with David Love of the facility on December 13, 2023, AQD inquired about the basis for this request and Mr. Love indicated that there was no need to make that change as the facility is able to comply readily with the existing range. As a result, this requested change will not be

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incorporated into the updated permit. However, in order to address expected lower differential pressure ranges after replacement of bags, while a filter cake is developed, the language of the condition has been revised to exempt from the range, a one-day period following replacement of at least 20% of the bags in the baghouse.

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

The requirements of this section are generally applicable to the overall operations of the plant, and are therefore included in Condition II(c) of the permit. In general, this section requires that the facility take “reasonable precautions” to minimize emissions of fugitive dust from the facility.

Also, the permit establishes, as requirements, certain activities that the Department considers to be reasonable precautions, and which FMCC has proposed to implement to minimize fugitive dust emissions. Condition III(a)(2)(K) requires that a wet sweeper broom truck be dedicated to the two FMCC plants in the District, and that they be used regularly at Plant #1, at least twice daily, and as necessary to minimize fugitive dust from the facility. Additionally, Condition III(a)(2)(L) requires that water sprinklers be used throughout the plant to keep dust down. The requirements of 20 DCMR 605 apply both to the main plant operations and the RAP crusher and associated yard.

20 DCMR Chapter 6, Section 606: Visible Emissions

20 DCMR 606 was updated via a final rulemaking that went into effect on August 11, 2023. This regulation applies generally throughout the facility, and its requirements are therefore found in Condition II(b) as facility-wide permit requirements. This section also establishes both direct visible emissions standards, such as the emission limits found in Conditions III(a)(1)(E) and III(b)(1)(C)(i) for the main plant and the RAP crusher/screener combo unit, respectively. It also establishes general duty requirements to maintain and operate equipment “in a manner consistent with good air pollution control practices for minimizing emissions”, more specific maintenance requirements, and requirements that personnel using the equipment be trained in its use to ensure compliance with the other requirements of the regulation. These requirements are found throughout the permit, as applicable.

20 DCMR Chapter 8, Section 801: Sulfur Content of Fuel Oils

This section is applicable to the main burner. FMCC committed to using natural gas as the primary fuel for the burner and No. 2 fuel oil as a back-up that would only be burned during natural gas interruptions and any testing required by the permit to use fuel oil. This is specified in Condition III(a)(2)(D) of the permit. When burning No. 2 fuel oil, it must meet the sulfur content requirements of Condition II(f) the permit. In effect, this means that, except for oil remaining in tanks purchased prior to July 1, 2018, only fuel oil with a sulfur content of 15 parts per million by weight is allowed to be burned in the equipment. Waste oil cannot be burned in the equipment.

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20 DCMR Chapter 8, Section 803: Sulfur Process Emissions

This regulation establishes a limit on oxides of sulfur (SO_x) emissions, calculated as sulfur dioxide (SO₂) of 0.05% by volume (without the addition of diluent air to the process to comply). This requirement is included in the permit as Condition III(a)(1)(B)(ii). Emissions testing is required to demonstrate compliance according to Condition III(a)(3)(L).

20 DCMR Chapter 8, Section 805: Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen

This regulation applies to all sources that are a major source of NO_x. Additionally, it applies to sources that have at any time been subject to 20 DCMR 805 per 20 DCMR 805.1(b). Therefore, even though FMCC has taken limits in this permit to limit facility-wide emissions of NO_x below the District's major source threshold of 20 tons per year, this regulation remains applicable. Conditions III(a)(1)(C) and (D) contain NO_x and CO emissions limits established in 20 DCMR 805.6(a). Annual emissions tests are required pursuant to Conditions III(a)(3)(L) and (M). Record keeping requirements related to these test results are included in Condition III(a)(4)(B)(viii).

20 DCMR Chapter 9, Section 900: Onroad Engine Idling and Nonroad Diesel Engine Idling

The requirements of this regulation are found in Condition II(g) of the permit. Additionally, because engine idling has been identified as a concern at the plant in the past, and in response to proposals from the applicant, Condition III(a)(2)(I) contains additional requirements better ensure compliance. This condition requires installation and maintenance of bilingual (English and Spanish) signage to notify drivers of the requirements of this regulation, training requirements for FMCC-employed drivers, and a requirement to conduct outreach to other trucking companies that operate at the site, to advise them of the requirements of this regulation.

20 DCMR Chapter 9, Section 903: Odorous or Other Nuisance Air Pollutants

This regulation is a District-enforceable only regulation. The regulation applies to all sources unless otherwise prohibited by federal supremacy. In the case of asphalt plants, such as FMCC Plant #1, this regulation fully applies.

20 DCMR 903.1, which states: "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 and property is prohibited" applies to all sources, except where the regulation does not apply as discussed above. Therefore, it applies to this facility.

Additionally, on August 4, 2023, a revision to the regulation was promulgated to establish requirements for certain sources to submit an Odor Control Plan (OCP) for their facilities. Any stationary source that falls within the "asphalt processing plants" category was required to submit an OCP by November 2, 2023, as specified in 20 DCMR 903.2(d) and 903.4(a)(2)(B). Such an OCP must meet the requirements of 20 DCMR 903.5.

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FMCC submitted an OCP which was received by the Department on November 1, 2023. However, pursuant to 20 DCMR 903.6 and 903.7, the Department reviewed and, by letter dated December 29, 2023, disapproved the OCP as submitted. Pursuant to 20 DCMR 903.7(a), the letter specified a deadline of February 12, 2024 to submit a revised OCP addressing the deficiencies identified in the letter.

The draft permit being proposed includes all the requirements of 20 DCMR 903 in Condition II(j). Conditions III(a)(1)(H) and III(b)(2)(I) reference Condition II(j). Conditions III(a)(4)(B)(xiv) and III(b)(5)(C) require FMCC to maintain records of deviations from the requirements of the OCP, once approved. Conditions III(a)(5)(A) and III(b)(6)(B) require reporting of deviations from the OCP.

Under 20 DCMR 903, the OCP is a stand-alone document and does not need to be incorporated condition-by-condition into the permit. However, some specific odor mitigation strategies have been incorporated directly into the draft permit. Pursuant to an odor mitigation plan, dated June 18, 2021, and submitted by FMCC in response to an administrative order, FMCC committed to the use of odor neutralizers in the asphalt binders used at the facility in appropriate concentrations to achieve classification as no-odor binders. This requirement has been incorporated into Condition III(a)(2)(M) of the permit. Additionally, while the November 1, 2023 OCP submittal was not approved, one aspect of the proposal, installation of blue smoke condensers on the 20,000- and 10,000-gallon hot liquid asphalt tanks, to control organic vapors and odor from these tanks when being filled, has been incorporated into the permit as Condition III(a)(2)(J). This condition requires installation of these devices within 90 days of issuance of the permit.

Prevention of Significant Deterioration (PSD) and Greenhouse Gas (GHG) Tailoring Rule: Neither PSD nor Title V are triggered by GHG pollutants alone. As such, and given that the facility's non-GHG emissions no longer trigger Title V (20 DCMR Chapter 3) applicability following the limitations taken pursuant to 20 DCMR 200.6 and 200.7, neither PSD nor the GHG Tailoring Rule (as currently written) are applicable to the facility for projects happening in the future, as long as the minor source status of the facility for non-GHG pollutants is maintained.

Previous to this, PSD was not triggered for any projects at the facility for GHGs, even when the facility was a major source of air pollutants. Currently, the estimated potential to emit GHG pollutants as CO_{2e} (without taking into account the synthetic minor limitations taken under 20 DCMR 200.6 and 200.7) is 29,892.29 (short) tons per year (27,118.19 metric tons per year). This is well below tailoring rule thresholds.

40 CFR 60, Subpart I – Standards of Performance for Hot Mix Asphalt Facilities

This regulation is applicable as this facility meets the definition of a hot mix asphalt facility and it commenced construction or modification after June 11, 1973. The 0.04 gr/dscf emission limit found in 40 CFR 60.92 has been streamlined with the 0.03 gr/dscf limit of 20 DCMR 603.1 and can be found in Condition III(a)(1)(A)(ii) of the permit. The 20% opacity limit can be found in

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Condition III(a)(1)(F). The Permittee requested that the Method 9 test be done while the burner fires natural gas instead of No. 2 fuel oil citing that the source seldom uses No. 2 fuel oil in actual operation. The permit has therefore been worded to allow the source to test with fuel oil only once during the term of the permit and every other year to test with whatever fuel was the primary fuel since the last required test, which is expected to be consistently natural gas. See Condition III(a)(3)(Q). Testing requirements required by this subpart and the referenced 40 CFR 60.8 can be found in Condition III(a)(3)(L).

40 CFR 60, Subpart OOO - NSPS for Nonmetallic Mineral Processing Plant:

40 CFR 60, Subpart OOO, the NSPS for Nonmetallic Mineral Processing Plants is applicable to the crusher/screener combo unit used for RAP crushing, 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 III(b)(1)(D).

40 CFR Parts 61 and 63 – National Emission Standards for Hazardous Air Pollutants (NESHAPs)

There are no Part 61 or 63 NESHAPs applicable to this facility.

40 CFR 64 – Compliance Assurance Monitoring (CAM)

The requirements of 40 CFR 64 to establish a Compliance Assurance Monitoring (CAM) Plan were previously applicable to this facility as the facility was a major source and the asphalt plant could not achieve compliance without the use of the control device (the baghouse) for compliance. However, since the facility is taking a limit under 20 DCMR 200.6 to avoid applicability of 20 DCMR Chapter 3 by becoming a synthetic minor source, this is effectively also a limit under 20 DCMR 200.7 to avoid applicability of 40 CFR 64. As such, the formal CAM plan has not been included in this permit. However, the elements of the CAM plan are typically considered to be necessary to ensure that other aspects of the permit are “enforceable as a practical matter” (see 20 DCMR 199 for the definition). As such, although not formally called out as a separate section in this permit, the requirements of the former CAM plan are substantially included in this updated permit.

COMMENT PERIOD AND PUBLIC HEARING:

During the public comment period, any interested person may submit written comments on the draft permit. The public comment period will occur as follows:

Beginning Date: February 16, 2024
Ending Date: March 18, 2024

All written comments should be addressed to the following individual and office:

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

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Department of Energy and Environment
Air Quality Division
1200 First Street NE, 5th Floor
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stephen.ours@dc.gov

In addition, AQD has scheduled a public hearing to take further comment on this draft permit. This hearing will take place in a hybrid format on Monday, March 18, 2024 at 5:30 pm. The in-person portion of the hearing will occur at the offices of the Department of Energy and Environment at 1200 First Street NE, Washington DC. In-person attendees are encouraged to arrive 10 minutes early to allow time to be directed to the meeting room.

Information on how to attend the meeting virtually will be provided in the public notice of this action.

All relevant comments received during the comment period and the public hearing will be considered before taking final action on the permit application.

POINT OF CONTACT FOR INQUIRIES:

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