

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment



CHAPTER 2 TECHNICAL MEMORANDUM

TO: File

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

FROM: Abraham T. Hagos *ATH*
Environmental Engineer

**SUBJECT: Celtic Demolition, Inc.
Permit Number 6712
Permit To Construct and Operate a Portable Concrete Crusher at the
1400 Block of New York Avenue NE**

DATE: March 18, 2013

BACKGROUND INFORMATION

A permit application to construct and operate a portable concrete crushing plant at the 1400 block of New York Avenue NE, Washington, DC 20011 was received by the Air Quality Division on January 24, 2013. The applicant is Celtic Demolition, Inc.

The permit action will be published in the DC Register and posted on DDOE's website on March 22, 2013. Public comments on the permit action will be solicited through April 22, 2013.

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

REGULATORY REVIEW

Chapter 2, Section 200: General Permit Requirements:

The portable concrete crushing equipment is a potential air pollution source for particulate matter and other pollutants. The applicant is requesting a permit to operate the equipment for one shift a day [8 hours], five days a week and 60 days, total. Thus a Chapter 2 permit is required. Note that they confirmed by phone with they only need the



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permit for 60 days, so AQD is not limiting operations to 5 days per week in the draft permit, but is limiting the length of the permit to 60 calendar days.

Chapter 6, Section 605: Control of Fugitive Dust

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

Chapter 6, Section 606: Visible Emissions

The visible emissions limitations of 20 DCMR 606.1 are applicable to this portable concrete crusher plant. Visible emissions shall not be emitted into the outdoor atmosphere from the operation of the portable concrete crusher plant; 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).

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 80.510: Standards for Non-Road Diesel Fuel

The requirements of 40 CFR 80.510(b) have been included in Condition III(e) of the permit for the non-road engine powering the crusher.

RECOMMENDATIONS

The application to operate a portable concrete crusher 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 22, 2013 through April 22, 2013. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permit (#6712) be issued in accordance with 20 DCMR 200.1 and 200.2.

SSO:ATH

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