

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: **Lafarge Mid-Atlantic LLC**  
**Permit Number 6659**  
**Permit To Operate A Portable Batch Concrete Plant at 888 New Jersey Avenue SE**

DATE: February 12, 2013

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***BACKGROUND INFORMATION***

A permit application to install and operate a portable batch concrete plant with associated 2.8 MMBTU/hr No. 2 fuel oil fired hot water heater at 888 New Jersey Avenue, SE was received by the Air Quality Division on October 18, 2012. The Permittee is Lafarge Mid-Atlantic LLC.

This permit will be published in the DC Register for notice of permit action on February 15, 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 batch concrete 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 [8 hours] a day, five days a week for a 250 day duration. Thus a Chapter 2



## CHAPTER 2 TECHNICAL MEMORANDUM

**Lafrage Mid-Atlantic LLC**

**Permit #6659 to Install and Operate a Portable Batch Concrete Plant at 888 New Jersey Avenue SE**

February 12, 2013

Page 2

permit is required. It should be noted that the proposed permit has been written to expire on December 31, 2013 rather than limiting it specifically to 250 days.

### Chapter 6, Section 603: Particulate Process Emissions

The discharge of particulate matter into the atmosphere from any process shall not exceed three hundredths (0.03) grains per dry standard cubic foot of the exhaust. To meet the particulate matter emissions standard, the facility is using a baghouse with 99.9% efficiency. The manufacturer recommends that the differential pressure across the bags read between 3 and 6 inches of water. To monitor the efficiency of the baghouse a magnehelic gauge is installed to show the differential pressure across the bags and must read between 3 and 6 inches of water when operating the bag house. Per the manufacturers recommendation the facility shall keep the replacement parts (listed on the manufacturer's specification of the baghouse) for the bag house on site. These requirements are contained in Conditions III(c) and (d).

Additionally, to ensure the equipment is maintained, differential pressure monitoring, visible emissions monitoring, and records of maintenance are required in the permit.

### Chapter 6, Section 605: Particulates

The visible emissions limitations of 20 DCMR 605 are applicable to this concrete mix equipment. Reasonable precautions shall be taken to minimize the emissions of any fugitive dust into the outdoor atmosphere. The reasonable precautions shall include, but not be limited to, in the case of demolition of buildings or structures, use, to the extent possible, of water; in the case of removal of removal of demolition debris which is dusty or likely to become dusty, use of water to thoroughly wet the material before moving or removing the material and keeping it wet or otherwise in a dust-free condition until eventual disposal. These requirements are found in Conditions II(a) and (b) of this permit. The operational requirements are found in Condition III(f). The facility must monitor the site for compliance per Condition IV(e) and maintain records of deviations per Condition V(i).

### Chapter 6, Section 606: Visible Emissions

The visible emissions limitations of 20 DCMR 606.1 are applicable to this concrete mix plant. Visible emissions shall not be emitted into the outdoor atmosphere from the operation of the concrete mix 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). Records of deviation must be kept pursuant to Condition V(g).

## **CHAPTER 2 TECHNICAL MEMORANDUM**

**Lafrage Mid-Atlantic LLC**

**Permit #6659 to Install and Operate a Portable Batch Concrete Plant at 888 New Jersey Avenue SE**

February 12, 2013

Page 3

### **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. Monitoring for compliance is required pursuant to Condition IV(d). Records of deviations must be kept pursuant to Condition V(h).

### ***RECOMMENDATIONS***

The application to install and operate a portable batch concrete plant and the attached permit comply with all applicable federal and District air pollution control laws and regulations. Public comments for the permit action will be solicited from February 15, 2013 through March 18, 2013. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permit (#6659) be issued in accordance with 20 DCMR 200.1 and 200.2 effective immediately and remain effective until December 31, 2013. At that time, the permit can be renewed if necessary.

SSO:ATH