December 24, 2013

Josep Maset

VP/GM

Super Concrete Corporation

6401 Golden Triangle Drive #400

Greenbelt, MD 20770

**Re: Permit (#5585-C2) to Construct An Additional Emissions Control Unit for An Existing Ready Mix Concrete Batch Plant at 5001 Ft. Totten Drive NE, Washington, DC**

Dear Mr. Maset:

Pursuant to the requirements of Title 20 of the District of Columbia Municipal Regulations (20 DCMR), Section 200.1 and 200.2, permission for Super Concrete Corporation, (“the permittee”) to construct an additional emissions control unit, C & W Manufacturing and Sales Company Model CP-3040 Pulse Jet Central Dust Collector System, to an existing Ready Mix Concrete Batch plant at Aggregate Industries located at 5001 Fort Totten Drive, NE Washington, D.C. (“the site”), per the submitted plans, performance data, and specifications, is granted by the District Department of the Environment (“the Department”) subject to the following conditions:

I. General Requirements:

a. The approved emission control unit shall be constructed in accordance with all applicable air pollution control requirements of 20 DCMR.

b. This permit expires on December 23, 2016 [20 DCMR 200.4]. If construction is to continue after this date, the owner or operator shall submit an application for renewal by August 23, 2016.

c. Construction of equipment under the authority of this permit shall be considered acceptance of its terms and conditions.

d. The permittee shall allow authorized officials of the District, upon presentation of identification, to:

1. Enter upon the Permittee’s premises where a source or emission unit is located, an emissions related activity is conducted, or where records required by this permit are kept;

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of this permit;

3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

4. Sample or monitor, at reasonable times, any substance or parameter for the purpose of assuring compliance with this permit or any applicable requirement.

e. This permit shall be kept on the premises and produced upon request.

1. Failure to comply with the provisions of this permit may be grounds for suspension or revocation. [20 DCMR 202.2]

g. The permittee shall, upon completion of the construction, request that the Department grant approval to operate.

1. A separate application to operate pursuant to 20 DCMR Chapter 2 does not need to be submitted to the Department for the equipment or process covered by this construction permit. Upon a satisfactory demonstration by an on-site inspection that the equipment or process complies with all of the terms and conditions of this permit, and any other applicable requirements the Department will issue a Chapter 2 Operating Permit for this equipment or process.

2. The applicant shall notify the Department sufficiently in advance of the demonstration and shall obtain the Department’s prior concurrence of the operating factors, time period, and other pertinent details relating to the demonstration.

3. The provisions of 20 DCMR 200.2 shall not apply to the operation of equipment or processes for the purposes of initially demonstrating satisfactory performance to the Department following construction, installation, modification, or alteration of the equipment or processes.

h. If modifications to the equipment design as submitted in the permit application, or any revision thereof, are required, an amendment to this construction permit shall be obtained before making these design changes, unless the Department determines that no such amendment is required.

i. Upon completion of construction and the satisfactory demonstration of the equipment pursuant to Condition I(g), the requirements of this permit shall be administratively amended into permit #5585-R2-A1 pursuant to 20 DCMR Chapter 200.2.

II. Emission Limitations:

1. Emissions of dust shall be minimized in accordance with the requirements of 20 DCMR 605 and the “Operational Limitations” of this permit.
2. The emission of fugitive dust from any material handling, screening, crushing, grinding, conveying, mixing, or other industrial-type operation or process is prohibited. [20 DCMR 605.2]

c. 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. [20 DCMR 603.1]

d. Visible emissions shall not be emitted from these unit except that discharges not exceeding 40% opacity (unaveraged) shall be permitted for two (2) minutes in any sixty (60) minutes period and for an aggregate of twelve (12) minutes in any twenty-four (24) hours period during start-up, cleaning, adjustment of combustion controls, or malfunction of the equipment. (20 DCMR 606.1)

e. 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]

III. Operational Limitations:

* 1. The concrete mix batch plant shall be operated for no more than three shifts per day, seven days per week and 360 days per year for the duration of this permit.

b. All dust generated must be captured and vented through one of the dust collector, fabric filter baghouse units.

c. The older fabric filter baghouse unit shall maintain a 99.9% efficiency when concrete mixing is occurring and dust is being vented to that baghouse.

 The new C&W Manufacturing and Sales Co. fabric filter baghouse unit shall maintain a 99.99% efficiency when concrete mixing is occurring and dust is being vented to that baghouse.

d. The proper operation of the older dust collector, fabric filter baghouse unit shall be demonstrated when the differential pressure across the bags maintained between 2 and 6 inches of water. Magnehelic pressure gauge shall be used to monitor the pressure drop. The exception to this requirement is that the differential pressure may be operated at less than 2 inches of water for up to 8 hours of operation after installation of new bags.

 The proper operation of the new C&W Manufacturing and Sales Co. dust collector, fabric filter baghouse unit shall be demonstrated when the differential pressure across the bags maintained between 2 and 8 inches of water. Magnehelic pressure gauge shall be used to monitor the pressure drop. The exception to this requirement is that the differential pressure may be operated at less than 2 inches of water for up to 8 hours of operation after installation of new bags.

e. Per the baghouse manufacturers’ recommendations, a set of replacement parts for the dust collectors shall be kept on site at all times.

f. The permittee shall take reasonable precautions to minimize the emission of any fugitive dust into the outdoor atmosphere. These reasonable precautions shall include, but not be limited to the following [20 DCMR 605.1]:

* + - 1. In the case of unpaved roads, unpaved roadways, and unpaved parking lots:

i. Use of clean water in sufficient quantities and at sufficient frequencies to prevent the visible emission of dust due to the movement of vehicles or of the wind (use of binders or other chemicals may only be used with prior approval of the Department); and

ii. Prompt clean-up of any dirt, earth, or other material from the vicinity of the road, roadway, or lot which has been transported from the road, roadway, or lot due to anthropogenic activity or due to natural forces.

* + - 1. In the case of paved roads, paved roadways, and paved parking lots: Maintenance of the road, roadway, lot, or paved shoulder in a reasonably clean condition through reasonably frequent use of water, sweepers, brooms, or other means through reasonably frequent removal of accumulated dirt from curbside gutters, through reasonably prompt repair of pavement, or through any other means;
			2. In the case of vehicles transporting dusty material or material which is likely to become dusty:

i. Fully covering the material in question, with a tarpaulin or other material; and

ii. Operation, maintenance, and loading of the vehicle, distribution of the loaded material on or in the vehicle, and limiting the quantity of material loaded on or in the vehicle, so that there will be no spillage of the material onto the roads;

* + - 1. In the case of vehicles which accumulate dirt on the wheels, undercarriages, and other parts of the vehicle, due to the movement of the vehicle on dusty, dirty or muddy surfaces: Water washing of all of the dirty parts of the vehicle to thoroughly remove the dirt before or immediately after the vehicle leaves the dusty, dirty, or muddy surface.

g. The concrete mix plant shall be operated and maintained in accordance with the recommendations of the equipment manufacturers.

h. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the concrete mix plant in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [20 DCMR 606.3]

IV. Monitoring and Testing Requirements:

a. The permittee shall monitor the operating hours of the concrete mix plant each day to ensure compliance with Condition III(a).

b. The permittee shall monitor the differential pressure across the baghouse filters to ensure compliance with Condition III(d).

c. At least once per week, during operation of the concrete mix plant, the Permittee shall conduct visual observations of the emissions from the plant. If visible emissions of fugitive dust or smoke are observed in excess of the limits specified in Conditions II(b), II(c) or II(d), prompt action shall be taken to correct the problem. Operations shall not continue if such exceedances are observable, until such time as the problem has been addressed and the equipment has been returned to compliance. Operations of the plant may continue if the exceedance is discontinued by switching to operation using the other dust collector, until such time as the problem is corrected.

d. The permittee shall monitor any odor emitted from the facility and take any actions necessary to ensure compliance with Condition II(e).

e. The permittee shall monitor the conditions at the site and take any actions necessary to ensure compliance with the fugitive dust requirements of Condition III(f).

f. Whenever the concrete mix plant is in operation, the permittee shall monitor which dust collector is in use at any given time to assist in ensuring compliance with Condition III(d).

V. Record Keeping Requirements:

 The following information shall be recorded, and maintained in a log at the facility and made

 available when requested for a period of not less than three years. [20 DCMR 500.8]

a. The permittee shall record in a log the differential pressure reading of the magnehelic pressure gauge at least once each day for each dust collector operated that day, during operation of the equipment to ensure compliance with the operational requirements of Conditions III(b), (c), and (d) of this permit.

b. The permittee shall keep a record of the hours of operation of the ready mix concrete batch plant at the site each day. This shall be kept by keeping a log, updated daily, of each start and stop time of the unit with a sum of the total hours of operation that day. This record shall also note which dust collector was in operation that day and note the time when the dust collector in use changed during operations that day, whenever applicable.

c. The permittee shall keep a record of all deviations from the pressure drop requirements of Condition III(d) and the actions taken to correct each identified deviation.

d. The permittee shall maintain a record of all maintenance performed on the unit to document compliance with Condition III(g).

e. The permittee shall maintain a copy of the concrete mix plant and the fabric filter baghouse manufacturers’ maintenance and operating recommendations and make such available to Department inspectors.

f. The permittee shall maintain a copy of the specifications for the bags used in each baghouse to document compliance with Condition III(c).

g. The permittee shall keep a record of the results of all visible emissions monitoring performed pursuant to Condition III(c).

h. The permittee shall keep records of all odors identified pursuant to Condition IV(d) and the actions taken to correct them.

i. The permittee shall keep records of any fugitive dust exceedances identified pursuant to Condition IV(e) and the actions taken to correct them.

If you have any questions, please call me at (202) 535-1747 or Abraham T. Hagos at (202) 535-1354.

Sincerely,

Stephen S. Ours, Chief

Permitting and Enforcement Branch

SSO:ATH