



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center - 1600 John F Kennedy Blvd
Philadelphia, Pennsylvania 19103-2852

Report Title: Clean Air Act Inspection of DC Materials, Inc.
Inspection Date(s): 09/06/2023
Regulatory Program(s): SIP, NSPS

Company Name: DC Materials, Inc.
Facility Name: DC Materials
Facility Location: 3334 Kenilworth Ave, Ste B
Hyattsville, MD 20781
Latitude: 38.930286 **Longitude:** -76.931798
County/Parish: Prince Georges

AFS/ICIS-Air Number:
Permit Number: MD00000002403300666
NAICS Code: 327123 **SIC:** 5032
Unique Project #: 3E23CA106A

Facility Representatives:	Point of Contact
Blaks Esherick, Environmental Consultant	☒
Phone: 202-365-8815 Email: besherick@strittmattercompanies.com	
Joseph Tompkins, Safety	☒
Phone: 571-238-0899 Email: jtompkins@strittmattercompanies.com	
Joshua Callan, Safety	☐
Phone: 571-762-3161 Email: scallan@strittmattercompanies.com	

EPA Inspectors:
Stafford Stewart, Environmental Engineer, 3ED21
Phone: 215-814-5352 Email: stewart.stafford@epa.gov
Carly Joseph, Environmental Scientist, 3ED21
Phone: 215-814-2127 Email: joseph.carly@epa.gov

EPA Lead Inspector

Signature

Stafford Stewart

Date

1600 John F Kennedy Blvd
Philadelphia, PA 19103-2852

Supervisor

Signature

Kristen Hall

Date

Table of Contents

I. Introduction.....	3
A. Summary of the Facility	3
B. Inspection Opening Conference.....	3
II. Site Activity/Process Description.....	4
III. Observations.....	5
IV. Records Review	6
V. Closing Conference	6
VI. List of Attachments.....	8

I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Clean Air Act (CAA) inspection at DC Materials, Inc. (DC Materials or Facility) to verify compliance with applicable State and Federal regulations. The Maryland Department of The Environment (MDE) was notified of the inspection on August 21, 2023, via email. On September 1, 2023, EPA notified the Facility of the planned inspection via phone and email. EPA emailed a list of records for review to Joseph Tompkins, prior to the inspection (see Attachment 1). These records are listed in the Records Review section of the report.

The inspection included an evaluation of the Facility's processes and its compliance with the CAA. All information included in this report is the result of statements by the Facility representatives, materials shown to the inspectors by the Facility representatives, and/or documents provided by the Facility representatives to the inspectors at the time of, or subsequent to, the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in Section A. Summary of the Facility.

A. Summary of the Facility

The Facility is located at 3334 Kenilworth Avenue, Suite B, Hyattsville, MD 20781. DC Materials is a Crushing and screening plant. The company is engaged in concrete recycling, sand, gravel, topsoil, and landscaping supplies. They are permitted to operate a 250 tons per hour (tph) Lippman electric powered crushing and screening (CSP) plant equipped with wet suppression system to control fugitive dust. There is also a secondary Metso crusher which is used to process materials that exit the primary Lippman crusher. The Facility's equipment summary list has the Metso crusher rated at 250 tph however the Facility's minor operating permit states that this crusher is rated at 100 tph.

The Facility received a Minor CAA Permit (#033-0666-6-0159) from MDE issued on November 10, 2021.

The Facility is subject to, or potentially subject to the following federal regulations:

- 40 CFR Part 60 Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants

B. Inspection Opening Conference

At 9:00 am on September 6, 2023, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. DC Materials was represented by Blaks Esherick, Environmental Consultant, Joseph Tompkins, Safety Consultant, Joshua Callan, Safety Consultant, Jesse Scisciani, Dispatch Manager and Ronald Bennett, Air Quality Engineer from Compliance Plus Services. EPA inspectors, Stafford Stewart, and Carly Joseph presented their

credentials and explained the purpose of the visit was to conduct a CAA inspection to determine compliance with their permit and any applicable regulations. Additionally, EPA informed the facility representatives of their right to claim any confidential business information (CBI). At that time, DC Materials did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

DC Materials was acquired by Strittmatter, LLC (Strittmatter) on February 4, 2023, however the company's trade name and business operations, which involves the crushing and screening of recycled concrete to produce stone, has remained unchanged. Strittmatter is engaged in earth work, including excavation and trucking, they currently operate in the State of Maryland (MD), Virginia (VA) and the District of Columbia (DC).

There are currently 18 full time employees at DC Materials and the hours of operation are Monday to Friday 6 am to 4 pm and Saturday 6 am to 12 pm. Recycled concrete is purchased from about 100 customers ranging from small family businesses to large corporations, DC Materials did not provide the names or any other details of any of their suppliers. The raw materials purchased are trucked in, stockpiled, and placed by front end loaders into the feed hopper of the Lippman jaw crusher for primary processing then conveyed to the secondary Metso crush for further processing. The finished product consists of three types of crushed stone, rated as RC 57, typically between $\frac{3}{8}$ and 1-inch in diameter; RC 2 (typically 1.5 to 2.5 inches in diameter); and RC 6 typically no more than 1.75 inches in diameter. The recycled concrete is introduced into a primary 250 tph Lippman crusher first then into a secondary Metso crusher where the finished goods are conveyed to a simplicity screen for sifting. The Metso crusher is rated at 250 tph in the Facility's equipment summary list however the current operating permit list the crusher as 100 tph. The stone processed to specification is stockpiled while the larger particles, referred to as "bottoms" are recycled and re-introduced into the feed hopper of the primary crusher. DC Materials stated that solvents are not used in the process.

Finished goods are shipped out via truck to customers in the DC, MD and VA areas. DC Materials does not maintain a fleet of trucks for receiving or shipping out materials, all trucks used for receiving raw materials and shipping out finished goods are owned by the suppliers and customers. DC Material sells products to more than 100 customers, however, there are no predominant customer since no company purchases more than 10% of the products sold.

There are no air pollution controls on site besides portable water misters that are water turbines with large hose sprays used to control fugitive dusts and particulate matter. The primary crusher and SIMPLICITY screens are also equipped with spray bars to control particulate matter.

There are no functioning emergency engines on site. Joseph Tompkins stated that the emergency engine on site was never used and that it was inherited when they purchased the facility, they will dismantle it once all relevant permits to do so are obtained. There is a 4000-gallon above

ground diesel storage tank (AST), the fuel from this tank is used for the company's heavy-duty equipment, including loaders and excavators used on site.

The opening conference concluded at 9:35 am.

III. Observations

EPA inspectors were led on a walkthrough of the Facility at 9:37 am by Joshua Callan, Joseph Tompkins and Jesse Scisciani of DC Materials and Ronald Bennett of Compliance Plus Services was also present for the walkthrough. EPA inspectors noted photos would be taken by Carly Joseph during the Facility walkthrough (Attachment 2).

The plant walkthrough began with a tour of the supplies area for smaller trucks. Joseph Tompkins stated that this area is dedicated to raw materials received from the smaller trucks, and that there is another area where the heavier trucks off load the recycled concrete being that is used as raw material. The practice of providing different areas for offloading is done to avoid any possibility of accidents between the larger and smaller trucks when unloading raw materials on site. Inspectors were able to observe a mister spray controlling fugitive dust when inspecting this area. The next area inspected is where raw materials from the larger trucks are stockpiled, this was followed by an inspection of the 4,000 gallons above ground storage tank adjacent to the maintenance shop. The facility tour continued to the maintenance shop where a parts washer was observed, this maintenance shop is no longer in use, it is separated from the new warehouse by a roadway.

The inspection team then observed the operations that involved raw materials being delivered by front end loaders to the primary Lippman jaw crusher for processing. The crushed materials are then conveyed to the Metso secondary crusher for further processing. After the materials exit the secondary crusher a series of conveyor belts, shakers, magnetic set, and screens work to separate out the finished materials. There is magnetic separation of metallic (ferrous) residues, which is then conveyed to a storage bin to await shipment off site for further recycling. The non-metallic residue or fluff is also separated out and dropped into dedicated hoppers. Raw materials were not being crushed during the Facility tour.

EPA inspectors tried to examine the labels on the Lippman and Metso crushers to determine if the manufacturer's specifications, including the power rating and throughput capacity of the crushers, were visible. The locations of the labels on the crushers made them difficult to inspect, however based on what EPA inspectors were able to observe, no power ratings or throughput capacity were visible on the labels. Photographs were taken of the labels and captured the model numbers of the crushers.

The Facility tour continued with an inspection of the finished products area, this included areas where the RC57 product was stockpiled, followed by the RC6 (fines) stockpile, and the RC2 stockpile. During the inspection, water trucks were observed spraying the RC6 stockpile to control fugitive dusts during truck loading operations. The inspection team then proceeded to

inspect the maintenance shop where a Generac generator, two - 275 gallons and two - 500 gallons tanks used for waste oil, and totes storing DEF (deionized water and urea) fluids were observed. A parts washer was also located in this building, Joseph Tompkins stated that no solvents besides pressurized water and Safety Kleen detergents are used in the parts washer, he also stated that the generator which was observed is powered by natural gas and that it was inherited from the previous owners, and that there are no plans to use this generator. There are plans to decommission this maintenance shop in about six months once all relevant permits to demolish the building are obtained. No visible emissions were observed during the Facility walkthrough.

The walkthrough concluded at 10:42 am.

IV. Records Review

The records review commenced after the plant walkthrough at 10:45 am. EPA inspectors reviewed documents requested in the September 1, 2023, email to Joseph Tompkins (see Attachment 1). Records were provided at the time of the inspection by Joseph Tompkins. Below are the records requested and what was provided:

1. Process flow diagram and plot plan. *This was reviewed on site.*
2. A list of all air emissions sources and corresponding dates of installation. *This was provided and will be reviewed after the inspection.*
3. Provide a list of all applicable NESHAP or NSPS regulations for your air emission source(s). *This was reviewed on site.*
4. All opacity observation test results for the past 5 years. *Visual emission inspection reports were provided for affected facilities including conveyor belts, screens and transfer points and will be reviewed after the inspection.*
5. Records of periodic inspection for the past 5 years. *This was provided and will be reviewed after the inspection.*
6. Copies of all clean air act (CAA) permit applications, notices and other relevant submissions from 2015 to the present. *This was provided and will be reviewed after the inspection.*
7. All Initial start-up date notices for equipment at the Facility sent to MDE from 2015 to the current date. *This was provided and will be reviewed after the inspection.*

V. Closing Conference

After the records review, EPA inspectors, Blaks Esherick, Joseph Tompkins, Joshua Callan, and Jesse Scissciani of DC Materials and Ronald Bennett of Compliance Plus Services had a brief closing conference to ask additional questions and discuss observations. EPA inspectors stated that a review of the information obtained on the Metso secondary crusher, including the Model number, will be done to determine the rating (tph). Ronald Bennett stated that the rating of the Metso crusher shown in the Facilities equipment list summary provided by DC Materials might be a mistake and that they will investigate it further. The Facility's equipment summary list

shows the rating of the Metso crusher as 250 tph however the Facility's Minor Operating Permit list the crusher as 100 tph. The EPA inspectors noted that the investigation is on-going, and any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that will require further investigation. EPA also noted that they would issue an inspection report within in 60 days, with a copy to the State. Simultaneously, EPA will perform a detailed review of records and may have additional questions. The inspection concluded at 11:45 am.

The following have been identified as *potential* issues during the inspection. They are issues that require either further investigation by EPA or additional information or explanation by DC Materials.

- The Facility's minor permit (#033-0666-6-0159) shows that a 100 ton per hour (tph) Hazemag crusher was replaced by a 100 ton per hour Metso crusher in 2015. However, the Metso crusher was listed as 250 tph in the DC Materials Equipment summary provided.

VI. List of Attachments

- Attachment 1: Email correspondence to Joseph Tompkins of records requested to review during inspection
- Attachment 2: Photo Log – DSC00506 to DSC00531
- Attachment 3: Inspection sign-in-sheet