

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**

**District Department of the Environment**



**Air Quality Division**

**FACT SHEET AND STATEMENT OF BASIS  
FOR PROPOSED PERMITTING ACTION  
UNDER 20 DCMR 300 (TITLE V-OPERATING PERMIT PROGRAM)**

This “Fact Sheet and Statement of Basis” has been prepared pursuant to 20 DCMR 303.1(c) and 40 CFR 70.7(a)(5).

**PERMIT NO. 041**

**APPLICANT AND PERMITTEE:**

Children’s National Medical Center  
111 Michigan Avenue, NW  
Washington, D.C. 20010-2970

**FACILITY LOCATION:**

Children’s National Medical Center  
111 Michigan Avenue, NW  
Washington, D.C. 20010-2970

**FACILITY DESCRIPTION:**

Children’s National Medical Center is a hospital, whose emission sources consist of seven (7) diesel emergency generators; several above and underground storage tanks, fume hoods, wet cooling towers, x-ray/photography development equipment, and natural gas fired kitchen equipment and laboratory equipment. The maximum operating hours for each of the 1000 kW emergency generators are 500 hours per year. The maximum operating hours for each of the three (3) 1500 kW emergency generators are 300 hours which was requested by the source during chapter 2 permit process.

**EMISSIONS SUMMARY:**

<b>Plant-wide Emissions Summary (tons per year)</b>	
<b>Pollutant</b>	<b>Potential Emissions</b>
Sulfur Dioxide (SO <sub>2</sub> )	0.027
Oxides of Nitrogen (NO <sub>x</sub> )	23.772
Particulate Matter (TSP)	1.035
Volatile Organic Compounds (VOCs)	2.569
Carbon Monoxide (CO)	1.235



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**BASIS OF 20 DCMR CHAPTER 3 (TITLE V) APPLICABILITY:**

This facility has the potential to emit more than 25 tons per year of oxides of nitrogen (NO<sub>x</sub>) if each of the seven (7) emergency generators operates for 500 hours per year. The source took a limit of 300 hours for each of the three (3) 1,500 kW emergency generators to avoid New Source Review applicability for the Chapter 2 permits. With this limit of operation, the plant-wide potential to emit for NO<sub>x</sub> remained below the 25 tpy threshold. This kind of source would normally qualify as a synthetic minor, but the District of Columbia does not currently have a synthetic minor program. As such, pursuant to 20 DCMR 300.1(a), the source is subject to Chapter 3 and must obtain an operating permit in accordance with that regulation and Title V of the federal Clean Air Act.

**LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS:**

The conditions contained in the Title V operating permit are based on the underlying requirements of 20 DCMR as well as various federal regulations promulgated pursuant to the federal Clean Air Act. The regulations that are the basis of each condition are cited in the permit, except that conditions added to make another condition, with a direct underlying regulation, enforceable as a practical matter may, in some cases, not have a specific citation. These latter, un-cited conditions generally consist of monitoring, record keeping, and reporting requirements authorized under 20 DCMR 500.1.

The permit has been developed to incorporate the requirements of all applicable requirements as defined in 20 DCMR 399.1 along with additional conditions necessary to make all such requirements enforceable as a practical matter.

Any condition of the draft Title V Permit that is enforceable by the District but is not federally-enforceable is identified in the Title V permit as such with an asterisk.

**REGULATORY REVIEW:**

This facility has been found to be subject to the requirements of the following regulations:

**Federal and District Enforceable:**

- 20 DCMR Chapter 1 - General Rules
- 20 DCMR Chapter 2 - General and Non-Attainment Area Permits
- 20 DCMR Chapter 3 – Operating Permits and Acid Rain Programs
- 20 DCMR 500 - Records and reports
- 20 DCMR 502 - Sampling, tests, and measurements
- 20 DCMR 600 - Fuel burning particulate emission

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- 20 DCMR 604 - Open Burning
- 20 DCMR 605 - Control of Fugitive Dust
- 20 DCMR 606 - Visible Emissions
- 20 DCMR 800 - Control of Asbestos
- 20 DCMR 801 - Sulfur Contents of Fuel Oils
- 40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- 40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (NESHAP for RICE)
- 40 CFR 82, Subpart G - Protection of Stratospheric Ozone (Federally enforceable only except through Title V) (*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 (Federally enforceable only except through Title V) (*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 60.11 and 40 CFR 61.12 – Credible Evidence

**District Enforceable Only:**

- 20 DCMR 402 - Chemical Accident Prevention
- 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.

**Chapter 2 Permits:**

The requirements of the following permit(s) issued under the authority of 20 DCMR Chapter 2 have been incorporated into the Title V permit:

- #6432 – One (1) 1000 kW emergency generators
- #6433 – One (1) 1000 kW emergency generators
- #6434 – One (1) 1000 kW emergency generators
- #6435 – One (1) 1000 kW emergency generators
- #6303 – One (1) 1500 kW emergency generator
- #6304 – One (1) 1500 kW emergency generator
- #6305 – One (1) 1500 kW emergency generator

**Greenhouse Gas (GHG) Requirements:**

Because Chapter 3 (Title V) was triggered for other reasons, no evaluation was made to

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determine if the facility would trigger Title V applicability under the GHG Tailoring Rule. No modifications have been made to the source that would trigger PSD applicability under the GHG Tailoring Rule. Other than this requirement, there are no other applicable requirements related to GHGs at this time, therefore none were included in the permit.

**40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

The emergency generators at the facility were installed after the trigger date in the regulation, therefore the regulation is applicable and its requirements have been incorporated into the permit.

**40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines**

This regulation is applicable as the generators are new commercial emergency stationary RICE located at an area source of HAP emissions. All units are considered new units under this regulation, therefore the only requirement is to comply with the requirements of 40 CFR 60, Subpart IIII.

**COMMENT PERIOD:**

Beginning Date: February 14, 2014

Ending Date: March 17, 2014

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

Stephen S. Ours, P.E.  
Chief, Permitting Branch  
District Department of the Environment  
Air Quality Division  
1200 First Street NE, 5<sup>th</sup> Floor  
Washington, DC 20002

**PROCEDURE FOR REQUESTING PUBLIC HEARING:**

During the public comment period any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The District shall grant such a request if it is deemed appropriate. The venue, date, and time for any public hearing shall be announced in the District Register and a daily newspaper.

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**POINT OF CONTACT FOR INQUIRIES:**

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Air Quality Division  
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**REVIEWS:**

Prepared by:



Olivia Achuko  
Environmental Engineer

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Approved by:



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

