

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. 025-R2**

**APPLICANT AND PERMITTEE:**

Marriott Wardman Park Hotel  
2660 Woodley Road NW  
Washington, DC 20008

**FACILITY LOCATION:**

Marriott Wardman Park Hotel  
2660 Woodley Road NW  
Washington, DC 20008

**FACILITY DESCRIPTION:**

The Marriott Wardman Park Hotel is a hotel service facility covered by standard Industrial Classification (SIC) 7011. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, and fifty-two (52) weeks per year. The facility units consist of three industrial boilers, three emergency generators, one diesel fire pump, a carpentry shop paint booth, and several miscellaneous/insignificant activities.

**EMISSIONS SUMMARY:**

<b>PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR] AS REPORTED</b>		
<b>CRITERIA POLLUTANTS</b>	<b>POTENTIAL EMISSIONS (TPY)</b>	<b>2009 ACTUAL EMISSIONS (TPY)</b>
Sulfur Dioxide (SO <sub>2</sub> )	406.719	1.841
Nitrogen Oxides (NO <sub>x</sub> )	75.676	2.900



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<b>PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR] AS REPORTED</b>		
<b>CRITERIA POLLUTANTS</b>	<b>POTENTIAL EMISSIONS (TPY)</b>	<b>2009 ACTUAL EMISSIONS (TPY)</b>
Particulate Matter (PM & PM <sub>10</sub> )	23.457	1.226
Volatile Organic Compounds (VOC)	5.467	1.943
Carbon Monoxide (CO)	44.870	3.630

**TITLE V PROGRAM APPLICABILITY BASIS:**

This facility has the potential to emit 75.676 tons per year (TPY) of nitrogen oxides, 406.719 TPY of sulfur dioxide (SO<sub>2</sub>), 23.457 TPY of particulate matter (PM), 5.467 TPY of volatile organic compounds (VOC), and 44.870 TPY of carbon monoxide. Due to this facility's potential to emit over 25 TPY of NO<sub>x</sub>, and greater than 100 TPY of SO<sub>2</sub>, Marriott Wardman Park Hotel is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 20 DCMR 300.

**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.

It should also be noted that this permit will be issued to include updated requirements established pursuant to 20 DCMR Chapter 2. As such, it will be issued for public notice as a merged permit under the authority of both Chapters 2 and 3.

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**REGULATORY REVIEW:**

This facility has been found to be subject to the requirements of the following regulations (except where the conditions of the requirement are included in all District Title V permits, or as discussed below):

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 501 - Monitoring devices.

20 DCMR 600 - Fuel-burning Particulate Emission

20 DCMR 604 - Open Burning

20 DCMR 605 - Control of Fugitive Dust

20 DCMR 606 - Visible Emissions

20 DCMR 700 – Miscellaneous Volatile Organic Compounds (VOCs)

20 DCMR 743-749 – Adhesives and Sealants

20 DCMR 800 - Control of Asbestos

20 DCMR 801 - Sulfur Content of Fuel Oils

20 DCMR 803 - Sulfur Process Emissions

20 DCMR 805 - Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen

40 CFR 82, Subpart G - Protection of Stratospheric Ozone (Federally enforceable only except through Title V)

40 CFR 82, Subpart H - Halon Emissions Reduction (Federally enforceable only except through Title V)

40 CFR 61.12 - Credible Evidence

40 CFR 63, Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers

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:

No new Chapter 2 permits have been requested since the issuance of the previous Title V permit. However, Chapter 2 authority is being used to update some requirements in the Chapter 3 permit,

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therefore the permit will be advertised as a combined Chapter 2 and Chapter 3 permit for public comment purposes.

### **Compliance Assurance Monitoring (CAM) [40 CFR 64]**

Compliance Assurance Monitoring (CAM) requirements do not apply to this facility's units because none of the units at this facility rely on control devices for compliance with any applicable emission limitation or standard. By combusting natural gas or No. 4 fuel oil, PM emission is significantly reduced. Low NO<sub>x</sub> burners used by Marriott do not qualify as control devices under CAM. Stack test data as required in the Marriott Title V permit is used to ensure compliance with the PM limitations. There is no requirement for this facility to install control devices as defined by 40 CFR 64. Therefore, CAM is not applicable.

### **New Source Performance Standards (NSPS) (40 CFR 60):**

#### **Boilers**

New Source Performance Standards (NSPS) do not apply to this facility's boilers as the following NSPS analysis and applicability evaluation determines.

NSPS applicability for boilers is generally based on unit size and age of installation. Both of these criteria have to be met for NSPS (40 CFR 60), Subpart Dc to be applicable to the boilers:

#### **Test 1 Size**

The three installed boilers burn both gas and #4 oil and all have input rates of 29.29 MMBTU per hour each. The unit capacity passes the test because the sizes are greater than 10 MMBTU per hour. Per this test, the units could potentially be covered by 40 CFR Part 60, Subpart Dc, New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units.

#### **Test 2 Age limitation**

The three installed units were constructed in 1974, which is prior to the applicability date of 40 CFR 60, Subpart Dc of June 9, 1989. Because the units were neither modified nor constructed after the applicability date, the units do not meet the applicability criteria related to the age of the units.

#### **Conclusion**

NSPS Subpart Dc does not apply to the boilers since the construction dates do not fall within the applicability range of the regulation.

#### **Generators**

40 CFR 60, Subpart IIII covers generator sets of the types covered by this permit, however, the equipment was installed well before the applicability date of this regulation, thus this NSPS is not applicable to the equipment.

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**Greenhouse Gas (CHG) Programs**

The boilers at the Marriott facility emitted 101,896 metric tons/year of carbon dioxide (CO<sub>2</sub>) equivalent in the year 2009.

As such, based on the GHG reporting rule applicability found in 40 CFR 98, Subpart A and Subpart C, the facility appears to be subject to the reporting rule. However, because the GHG reporting rule is not an “applicable requirement” under Title V these requirements have not been included in the draft permit.

20 DCMR, Chapter 3 (Title V) applicability was triggered by other pollutants, thus a Chapter 3 permit is required whether or not emissions of GHGs meet Title V applicability thresholds. 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.

**Area Source Maximum Achievable Control Technology (MACT) Standards for Reciprocating Internal Combustion Engine (RICE)**

The 40 CFR 63 Subpart ZZZZ regulates Hazardous Air Pollutants (HAPs) from RICE units at area sources of HAPs. The Marriott facility is an area source of HAPs. The generators at the facility qualify as “existing” units because, per the permit application, they were installed in 1974 and have not been modified since that date. They are used purely for emergency purposes. Subpart ZZZZ is not, however, applicable, because the equipment qualifies as a “commercial emergency stationary RICE”, which is exempt from complying with Subpart ZZZZ pursuant to 40 CFR 63.6590. As such, the requirements of this regulation have not been included in the Title V permit.

**40 CFR 63, Subpart JJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Source**

The facility has three existing dual fuel (natural gas and #4 fuel oil) fired boilers at the facility. Pursuant to this regulation, the Permittee must submit an initial notification to EPA. Marriott Wardman Park must also perform biennial tune-ups of the boiler, submit biennial reports, have a one-time energy assessment performed, and keep various records. The requirements of this regulation, as updated on February 1, 2013, have been added into this permit.

**40 CFR Part 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

This regulation covers three types of painting operations: 1) paint stripping operations that use methylene chloride, 2) autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, and 3) spray application of coatings

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containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). The facility has confirmed that they do not perform any of these activities. Therefore, the permit has been written to prohibit these activities, and the regulation is therefore not applicable.

**COMMENT PERIOD:**

Beginning Date: March 22, 2013

Ending Date: April 22, 2013

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

Stephen S. Ours, P.E.  
Chief, Permitting Branch  
Air Quality Division  
District Department of the Environment  
1200 First Street NE, 5th 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 deemed appropriate. The venue, date, and time for any public hearing shall be announced in the District Register and a daily newspaper.

**POINT OF CONTACT FOR INQUIRIES:**

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  
202-535-1747

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**REVIEWS**

This permit and memo was prepared in part by Olaniyan Tajudeen, but finalized by Stephen Ours after Mr. Tajudeen was no longer employed by the Department.

Finalized and Approved by:



Stephen S. Ours, P.E.

Chief, Permitting Branch

SSO/OT