


GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

COMMENT RECONCILIATION MEMORANDUM

TO: File

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

SUBJECT: **Renewal of Source Category Permits to Construct and Operate Stationary
Emergency Engines Subject to NSPS Subparts IIII and JJJJ**

DATE: September 27, 2019

BACKGROUND

On August 23, 2019, the Air Quality Division (AQD) issued two draft source category permit renewals for public review as follows:

1. Permit 7043-SC-R1 - Source Category Permit to Construct and Operate Stationary Natural Gas-Fired Emergency Engines Subject to NSPS Subpart JJJJ; and
2. Permit 7048-SC-R1 - Source Category Permit to Construct and Operate Stationary Diesel-Fired Emergency Engines Subject to NSPS Subpart IIII.

These permits are intended to update and renew similar source category permits issued in 2015 that are scheduled to expire in 2020. These permits also addressed the partial vacatur of applicable federal New Source Performance Standard (NSPS) regulations by the courts.

Comments were solicited through September 23, 2019. One comment letter was received from American Tower Corporation related to Permit 7048-SC-R1. No other comments were received.

The following table addresses the received comment.

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Permits 7043-SC-R1 and 7048-SC-R1

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AIR QUALITY DIVISION RESPONSES TO COMMENTS

Commenter	Comment Summary	AQD Response
Jacob A. Lopes, Government Affairs Attorney, on behalf of American Tower Corporation	The commenter requested that the Condition VI requirement in draft permit 7048-SC-R1 be revised to allow for electronic record keeping in lieu of maintaining a physical onsite log at the facility. This would allow for remote monitoring.	AQD agrees with this comment and has made relevant changes to permit 7048-SC-R1, throughout Section VI. Additionally, while the commenter did not mention permit 7043-SC-R1, published for public comment at the same time, AQD has made a series of similar changes to that permit.

RECOMMENDATIONS

Having made the changes requested by the commenter, AQD will proceed to issue source category permits 7043-SC-R1 and 7048-SC-R1.

SSO