

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Department of Energy and Environment

**COMMENT RECONCILIATION MEMORANDUM**

TO: File

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

**SUBJECT: Renewal of Source Category Permits to Construct and Operate Stationary  
Emergency Engines Not Subject to NSPS Subparts IIII and JJJJ, but  
Subject to NESHAP Subpart ZZZZ**

DATE: September 30, 2020

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**BACKGROUND**

On July 24, 2020, the Air Quality Division (AQD) issued two draft source category permit renewals for public review as follows:

1. Permit 7115-SC-R1 - Source Category Permit to Operate Existing Stationary Diesel-Fired Emergency Engines Exempt from NSPS Subpart IIII but Subject to NESHAP Subpart ZZZZ; and
2. Permit 7116-SC-R1 - Source Category Permit to Operate Existing Stationary Natural Gas-Fired Emergency Engines Exempt from NSPS Subpart JJJJ but Subject to NESHAP Subpart ZZZZ.

These permits are intended to update and renew similar source category permits issued in 2016 that are scheduled to expire in 2021. Minimal changes were made from the previous versions of the permit in the renewal.

Comments were solicited through August 24, 2020. One comment package was received by email submitting comments on both draft permits. The package was submitted by Sally Atkins of All4 Inc. on behalf of Howard University and was received on August 24, 2020. No other comments were received.

The following table addresses the received comments.

## **COMMENT RECONCILIATION MEMORANDUM**

### **Renewal of Source Category Permits to Construct and Operate Stationary Emergency Engines Not Subject to NSPS Subparts III and JJJJ, but Subject to NESHAP Subpart ZZZZ Permits 7043-SC-R1 and 7048-SC-R1**

September 30, 2020

Page 2 of 4

#### **AIR QUALITY DIVISION RESPONSES TO COMMENTS**

The following comments were received by email on August 24, 2020 from Sally Atkins of All4 Inc. on behalf of Howard University.

<b>Permit and Condition</b>	<b>Comment Summary</b>	<b>AQD Response</b>
7115-SC-R1 and 7115-SC-R1, Condition IV(c)(1)	Please reference allowed operation of maintenance checks and readiness testing as provided by Permittee-developed maintenance plan as per Condition IV(f).	The language of this condition comes from 40 CFR 63.6640(f)(2)(i), which does not reference Permittee-developed maintenance plans. In order to remain consistent with the federal regulation, AQD will not add the requested reference.
7115-SC-R1 and 7115-SC-R1, Condition IV(c)(2)(i)	Please change [reference] to Condition IV(c), as there is no Condition III(c).	AQD agrees with this correction and will make the requested change.
7115-SC-R1 and 7115-SC-R1, Conditions IV(c)(2)(ii) and IV(e)	Please confirm DOEE does not allow for the specific part of the 50 hour condition that allows for local balancing authority DR as part of a financial arrangement under the rule 63.6640(f)(4)(ii) for emergency RICE located at area HAP sources?	The commenter is correct that this type of operation is not permitted under the purview of this source category permit. If an applicant wishes to participate in this type of program, the applicant will need to obtain a standard Chapter 2 permit (as opposed to a source category permit coverage approval) and will be required to comply with 20 DCMR § 1200.
7115-SC-R1 and 7115-SC-R1, Conditions V(a) and VI(a)(1)	Please confirm why “time” is required to be recorded as 63.6655(f) only requires duration (i.e., how many hours are spent for emergency operation, including what classified the operation as emergency, and how many hours are spent for non-emergency operation.” Recording “time” indicates that during an emergency operation, an operator needs to record when power was lost and when it came back on, which can pose difficulty recording. Whereas duration is recorded by the non-	The time of operation is needed for compliance determination purposes. For example, should a complaint be received about an engine covered by this permit, or about a facility with such an engine, it is important for an investigating inspector to determine if the engine was operating at the time of the complaint. As such, AQD has determined that it is important for the permittee to track this information.

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September 30, 2020

Page 3 of 4

Permit and Condition	Comment Summary	AQD Response
	<p>resettable hour meter.</p> <p>“If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.”</p>	
7115-SC-R1 and 7115-SC-R1, Condition VI(a)(8)	<p>The draft condition text requires records to be kept of “the actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunction process and air pollution control and monitoring equipment to its normal or usual manner of operation”</p> <p>Comment: Installation of APCD would be required if engine was to operate as a non-emergency engine – which this permit is not for. This is the first time APCD and monitoring equipment is mentioned. If engine were to have these, then this permit does not include other MACT ZZZZ recordkeeping requirements. Suggest removing reference to APCD since there is no APCD installed or reword to state that these records are only required if APCD is installed.</p>	<p>AQD recognizes that there is a typographical error in this condition (“malfunction”, rather than “malfunctioning”). This will be corrected.</p> <p>Regarding the reference to air pollution control equipment, there are two reasons that this is incorporated in the language:</p> <ol style="list-style-type: none"><li>1) This reflects the exact language of 40 CFR 63.6655(a)(5); and</li><li>2) Some units may have air pollution control equipment built into them, whether required by the regulation specifically or not.</li></ol> <p>It is appropriate to track actions taken to restore malfunctioning equipment, whether process equipment, air pollution control equipment, or monitoring equipment, when a malfunction occurs. As such, this language is appropriate here. It is</p>

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September 30, 2020

Page 4 of 4

<b>Permit and Condition</b>	<b>Comment Summary</b>	<b>AQD Response</b>
		inherent in the language that, if there is no air pollution control equipment, that records related to the non-existent equipment would not be required.  No change will be made to this condition.

**RECOMMENDATIONS**

Having addressed the comments, AQD will proceed to issue source category permits 7115-SC-R1 and 7116-SC-R1.

SSO