

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
Department of Energy and Environment

**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. 052**

**APPLICANT AND PERMITTEE:**

Architect of the Capitol  
House Office Buildings Jurisdiction  
House Office Buildings  
Washington, DC 20515

**FACILITY LOCATION:**

House Office Buildings  
Washington, DC 20515

**RESPONSIBLE OFFICIAL**

Ms. Michelle Kayon, Acting Superintendent

**FACILITY DESCRIPTION:**

The House Office Buildings Jurisdiction of the Architect of the Capitol provide general support for government operations (Standard Industrial Classification code (SIC) 9199, North American Industry Classification System (NAICS) code 921190)<sup>1</sup>. The facility’s emission unit inventory primarily consists of twelve (12) diesel-fueled emergency generator sets and one (1) non-auto body paint booth.

This is the first Chapter 3 (Title V) permit application for U.S. House Office Buildings Jurisdiction. The Department of Energy and Environment (the Department) received a Chapter 3 (Title V) permit application on November 15, 2017. This permitting action is to address this Title V application and subsequent supplements.

It should be noted that the House Office Buildings Jurisdiction is a jurisdiction of the larger Architect of the Capitol (AOC) agency of the Legislative Branch of the U.S. Government. Prior to acting upon this application and two others that came in for other jurisdictions near the same

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<sup>1</sup> It should be noted that, in a letter from Christopher Potter, Director of Utilities and Power, Architect of the Capitol, Capitol Power Plant, in response to questions from the U.S. Environmental Protection Agency, AOC indicated that the NAICS code for the House Office Buildings Jurisdiction’s buildings was 921120, Legislative Bodies. At the time of preparation of this Fact Sheet and Statement of Basis, AOC continues to assert that 921120 is correct, but AQD believes 921190, Other General Government Support, is more descriptive of the applicant’s operations.

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time, the Air Quality Division (AQD) performed an extensive analysis to determine whether the various jurisdictions of AOC should be aggregated into a single facility. It was determined that they should not be aggregated. See the “Major Source Determination Memorandum” signed by Stephen S. Ours, P.E., dated April 12, 2018, for a discussion of this evaluation and the reasons for this conclusion.

The Title V permit application for the House Office Buildings Jurisdiction listed four (4) non-NSPS diesel fired emergency generators, six (6) diesel fired emergency generators subject to NSPS (40 CFR 60) Subpart IIII, and one (1) non-auto body paint booth subject to 20 DCMR 700 Miscellaneous Volatile Organic Compounds (VOCs). Two (2) additional emergency generators were installed in February, 2019 that are subject to NSPS (40 CFR 60) Subpart IIII. A supplement to the Title V application was received on March 1, 2019 to incorporate these units. In addition, the facility maintains the following miscellaneous/insignificant sources:

- Eleven (11) Aboveground Storage Tanks (ASTs) for diesel;
- Three (3) Underground Storage Tanks (USTs) for diesel;
- One (1) carpentry shop dust collector;
- One (1) metal shop dust collector; and
- One (1) 600 gallon capacity underground storage tank for gasoline.

**EMISSIONS SUMMARY:**

<b>Plant-wide Emissions Summary (tons per year)****</b>	
<b>Pollutant</b>	<b>Potential Emissions</b>
Oxides of Sulfur (SO <sub>x</sub> )	0.34
Oxides of Nitrogen (NO <sub>x</sub> )	52.06
Particulate Matter (PM/PM10)*	1.28
Volatile Organic Compounds (VOCs)**	10.03
Carbon Monoxide (CO)	9.62
Total Hazardous Air Pollutants (HAPs)***	3.21

\* Includes all of the insignificant particulate units.

\*\* Includes all of the tanks with capacities less than 1,000 gallons, in addition to those units included in the original calculations provided with the Title V application.

\*\*\* The original Title V Application states Total HAP potential to emit is 9.58 tons/yr, but this includes the Total HAP assuming maximum use of all coatings, rather than maximum use of the worst case coating, which is a more accurate (but lower) worst case estimate. See the application supplement received October 12, 2018.

\*\*\*\* Includes two (2) additional emergency generators that were installed in February, 2019 that are subject to NSPS (40 CFR 60) Subpart IIII.

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

This facility has the potential to emit 52.06 tons per year of oxides of nitrogen (NO<sub>x</sub>). The value for this criteria pollutant exceeds the major source threshold in the District of Columbia of 25 TPY of NO<sub>x</sub>. Because potential emissions of NO<sub>x</sub> exceeds the relevant major source threshold, 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.

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

The conditions contained in the Title V operating permit are based on 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 draft Title V 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 well as Chapter 3. When the permit is issued for public review, the public notice will reflect this fact.

**REGULATORY REVIEW:**

This facility has been found to be subject to the requirements of the following regulations, except as noted in the discussion 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 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 704 - Stage I Vapor Recovery
- 20 DCMR 774 - Architectural and Industrial Maintenance Coatings
- 20 DCMR 800 - Control of Asbestos.
- 20 DCMR 801 - Sulfur Contents of Fuel Oils
- 40 CFR 51.212, 52.12, 52.30, 60.11, and 61.12 - Credible Evidence
- 40 CFR 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CIICE)
- 40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for

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- Reciprocating Internal Combustion Engines (NESHAP for RICE)
- 40 CFR 63, Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities
- 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)*

**District Enforceable Only:**

- 20 DCMR 402 - Chemical Accident Prevention *(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.)*
- 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

**20 DCMR Chapter 2 – General and Non-Attainment Area Permits:**

All stationary engines are subject to Chapter 2 permitting requirements, regardless of size, as well as paint booths. As such, all of the significant units at the facility are subject to Chapter 2 permitting requirements.

AQD is using Chapter 2 authority to update and establish other permit requirements where applicable. As such, this draft Title V permit will be issued for public notice pursuant to both Chapter 2 and Chapter 3 public notice requirements. The requirements of the following permits issued under the authority of 20 DCMR Chapter 2 (approval numbers are listed where the unit is covered by a source category permit; the source category permit number is the first six characters of the approval number) have been incorporated into the draft Title V permit and updated where appropriate.

<b>Emission Unit ID</b>	<b>Emission Unit Identification</b>	<b>Chapter 2 Permit or Approval No.</b>	<b>Approval Date</b>
Cannon House Office Building - Emergency Generator 1	MTU Model No. 16V4000 G43 generator set located at Cannon House Office Building	7125	11/30/2016
Ford House Office Building - Emergency Generator 1	Caterpillar Model No. 3508-DI generator set located at Ford House Office Building	7115-SC-0064	6/6/2018
Ford House Office Building - Emergency Generator 2	Caterpillar Model No. 3508-DITA generator set located at Ford House Office Building	7115-SC-0063	6/6/2018

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<b>Emission Unit ID</b>	<b>Emission Unit Identification</b>	<b>Chapter 2 Permit or Approval No.</b>	<b>Approval Date</b>
Ford House Office Building - Emergency Generator 3	Caterpillar Model No. 3054C generator set located at Ford House Office Building	7048-SC-0091	6/6/2018
Longworth House Office Building - Emergency Generator 1	MTU Model No. 16V2000 G85 R163-8A36 generator set located at Longworth House Office Building	6255-R2	1/12/2016
Longworth House Office Building - Emergency Generator 2	MTU Model No. 16V2000 G85 R163-8A36 generator set located at Longworth House Office Building	6256-R2	1/12/2016
O'Neill House Office Building - Emergency Generator 1	Cummins Model No. QSK23-G7 NR2 generator set located at O'Neill House Office Building	7048-SC-0032	4/14/2017
O'Neill House Office Building - Emergency Generator 2	Cummins Model No. QSX15-G9 generator set located at O'Neill House Office Building	7048-SC-0054	12/12/2017
Rayburn House Office Building - Emergency Generator A	Cummins Model No. VT12 generator set located at Rayburn House Office Building	7115-SC-0066	9/7/2018
Rayburn House Office Building - Emergency Generator B	Detroit Model No. G81R0837K36 generator set located at Rayburn House Office Building	7115-SC-0067	9/7/2018
Rayburn House Office Building - Emergency Generator C	MTU Model No. 16V4000 DS2000 generator set located at West House Underground Garage	7048-SC-0117	11/29/2018
Rayburn House Office Building - Emergency Generator D	MTU Model No. 16V4000 DS2000 generator set located at West House Underground Garage	7048-SC-0118	11/29/2018
PB	Non-Auto Body Paint Booth located at West House Underground Garage	5958-R2	4/6/2016

**20 DCMR Chapter 3 – Operating Permits and Acid Rain Programs:**

Please see the discussion above in the section entitled “Basis of 20 DCMR Chapter 3 (Title V) Applicability” for a discussion of the applicability of Chapter 3 to the facility. The acid rain portions of this chapter are not applicable to the facility.

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**20 DCMR Chapter 5 – Source Monitoring and Testing:**

Throughout the permit, appropriate monitoring, testing, and record keeping requirements have been established to ensure that all emission and operational limits in the permit are enforceable as a practical matter. These requirements are established under the authority of Chapter 5.

**20 DCMR 603 – Particulate Process Emissions:**

The requirements of 20 DCMR 603 are not included in the permit for the carpentry shop dust collector or the metal shop dust collector because the units vent indoors. However, the permit establishes that all captured dust emissions shall be controlled by an exhaust system attached to a baghouse unit which collects the particulates into a barrel and vents within the building. Additionally, the baghouse unit shall be maintained in accordance with the recommendations of the manufacturer.

**20 DCMR 700 – Miscellaneous Volatile Organic Compounds (VOCs):**

The requirements of 20 DCMR 700 were included in the permit for the paint booth. Because the facility will not be performing activities regulated by other sections of Chapter 7, such as mobile equipment repair and refinishing, most activities occurring in this unit will be regulated under this section. Many of the monitoring and record keeping requirements in the permit are designed to document compliance with this section.

**20 DCMR 701 – Storage of Petroleum Products:**

The requirements of 20 DCMR 701 do not apply to the source because all of the storage vessels located at the source have a capacity less than 40,000 gallons.

**20 DCMR 704 – Stage I Vapor Recovery:**

AQD determined that the 600 gallon underground storage tank for gasoline should have been equipped with Stage I vapor recovery equipment. AOC notified AQD during this permitting process that they had identified that the unit did not meet these requirements, but that they had already ceased using the unit (though some gasoline, an estimated 30 gallons, remained in the tank), and intended to permanently close and remove the tank in the next couple of years. They reported that they were beginning the process of closing the tank (in cooperation with the Department's Underground Storage Tank Branch). See James Styers' email to Thomas Olmstead and Stephen Ours, dated April 15, 2019. Because Stage I vapor recovery requirement apply only when filling a tank, they agreed to take a permit limit to not fill the tank at any time in the future and to pursue temporary closure of the tank, followed by removal of the tank. This agreement is reflected in Condition IV(d)(5) of the permit. This will ensure future compliance with 20 DCMR 704.

**20 DCMR 705 – Stage II Vapor Recovery:**

This regulation is not applicable to any of the storage tanks. This regulation does not cover diesel fuel and, for gasoline, only covers storage tanks with >10,000 gallons per month throughput, which is not a characteristic of the 600 gallon gasoline storage tank at the facility.

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**20 DCMR 714 – Control Techniques Guidelines (CTGs):**

20 DCMR 714 is not applicable to these units since the source does not operate any of the source categories (Miscellaneous Metal Product and Plastic Parts Surface Coatings, Large Appliance Coatings, Metal Furniture Coatings) specified in 20 DCMR 714. The paint booth is used primarily for painting wooden pieces such as shelving, TV stands, picture frames and doors. The facility is not a manufacturing facility.

**20 DCMR 715 – Major Source and Case-By-Case Reasonably Available Control Technology (RACT):**

The requirements of 20 DCMR 715 do not apply to the source because the VOC PTE of the source is less than 25 tons per year.

**20 DCMR 801 – Sulfur Content of Fuel Oils:**

This regulation limits fuel oil sulfur content to 1% by weight in all circumstances. There are more stringent requirements for commercial fuel oil, but the only portion of 20 DCMR 801 applicable to the emergency engines is the 1% sulfur content limit. This requirement is streamlined with the more stringent requirements found in 40 CFR 63.6604(b) for the non-NSPS engines and 40 CFR 60.4207(b) for the NSPS engines.

**20 DCMR 805 – Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen:**

The requirements of 20 DCMR 805 do not apply to the source. Pursuant to 20 DCMR 805.1(c)(2), the requirements of 20 DCMR 805 do not apply to “emergency standby engines operated less than five hundred (500) hours during any consecutive twelve (12) month period.” The emergency generators all have operation limits of less than 500 hours listed in Conditions III(a)(2)(A) and III(b)(2)(A) of the permit.

**40 CFR 60, Subpart EE – New Source Performance Standard for Surface Coating of Metal Furniture:**

This subpart does not apply to this facility because the source uses less than 3,842 liters of coating (as applied) per year (see 40 CFR 60.310(c)) and keeps purchase or inventory records or other data necessary to substantiate annual coating usage shall be exempt from all other provisions of this subpart. See Condition III(c)(2)(J) of the permit for this limitation. These records shall be maintained at the source for a period of at least 2 years per the regulation, but the five year retention requirement of 20 DCMR 302.1(c)(2)(B) contained in the permit supersedes this requirement as it is more stringent.

**40 CFR 60, Subparts K, Ka, and Kb – Standards for Storage Vessels for Petroleum Liquids or Volatile Organic Liquids:**

The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids or Volatile Organic Liquids (40 CFR 60, Subparts K, Ka, and Kb) do not apply to this facility for all of the storage vessels located at the source because for the purposes of Subparts K, Ka, and Kb all of the storage vessels at the source have a capacity less than 151,412 liters



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(40,000 gallons) for petroleum liquids or a capacity less than or equal to 75 cubic meters (m<sup>3</sup>) for volatile organic liquids as specified in 40 CFR 60, Subparts K, Ka, and Kb.

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

**Internal Combustion Engines:**

The engines of eight diesel emergency generator sets at the facility are subject to 40 CFR 60, Subpart IIII. 40 CFR 60, Subpart IIII applies to stationary compression ignition internal combustion engines (CI-ICE) that: 1) commenced construction after July 11, 2005 and were manufactured after April 1, 2006, or 2) were modified or reconstructed after July 11, 2005.

The eight (8) diesel CI-ICE identified below are subject to 40 CFR 60, Subpart IIII:

<b>Emission Unit ID</b>	<b>Stack ID</b>	<b>Emission Unit Identification</b>	<b>Description</b>
Cannon House Office Building - Emergency Generator 1	CAN1	MTU Model No. 16V4000 G43 generator set located at Cannon House Office Building	2,000 kWe generator set powered by a 3,058 hp diesel engine, installation date: 2015 (NSPS)
Ford House Office Building -Emergency Generator 3	FORD3	Caterpillar Model No. 3054C generator set located at Ford House Office Building	60 kWe generator set powered by a 94.5 hp diesel engine, installation date: 2007 (NSPS)
Longworth House Office Building - Emergency Generator 1	LONG1	MTU Model No. 16V2000 G85 R163-8A36 generator set located at Longworth House Office Building	1,000 kWe generator set powered by a 1,495 hp diesel engine, installation date: 2007 (NSPS)
Longworth House Office Building - Emergency Generator 2	LONG2	MTU Model No. 16V2000 G85 R163-8A36 generator set located at Longworth House Office Building	1,000 kWe generator set powered by a 1,495 hp diesel engine, installation date: 2007 (NSPS)
O'Neill House Office Building - Emergency Generator 1	ON1	Cummins Model No. QSK23-G7 NR2 generator set located at O'Neill House Office Building	750 kWe generator set powered by a 1,220 hp diesel engine, installation date: 2012 (NSPS)
O'Neill House Office Building - Emergency Generator 2	ON2	Cummins Model No. QSK15-G9 generator set located at O'Neill House Office Building	400 kWe generator set powered by a 755 hp diesel engine, installation date: 2012 (NSPS)
Rayburn House Office Building - Emergency Generator C	RAYC	MTU Model No. 16V4000 DS2000 generator set located at West House Underground Garage	2,000 kWe generator set powered by a 3,058 hp diesel engine, installation date: 2019 (NSPS)



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<b>Emission Unit ID</b>	<b>Stack ID</b>	<b>Emission Unit Identification</b>	<b>Description</b>
Rayburn House Office Building - Emergency Generator D	RAYD	MTU Model No. 16V4000 DS2000 generator set located at West House Underground Garage	2,000 kWe generator set powered by a 3,058 hp diesel engine, installation date: 2019 (NSPS)

The requirements of this regulation are incorporated throughout Condition III(b) of the permit for these units.

The engines listed below of the four diesel emergency generator sets at the facility are not subject to 40 CFR 60, Subpart IIII because 40 CFR 60, Subpart IIII applies to stationary compression ignition internal combustion engines (CI-ICE) that: 1) commenced construction after July 11, 2005 and were manufactured after April 1, 2006, or 2) were modified or reconstructed after July 11, 2005. The engines listed below were manufactured before April 1, 2006.

<b>Emission Unit ID</b>	<b>Stack ID</b>	<b>Emission Unit Identification</b>	<b>Description</b>
Ford House Office Building - Emergency Generator 1	FORD1	Caterpillar Model No. 3508-DI generator set located at Ford House Office Building	650 kWe generator set powered by a 927 hp diesel engine, installation date: 1985 (non-NSPS)
Ford House Office Building - Emergency Generator 2	FORD2	Caterpillar Model No. 3508-DITA generator set located at Ford House Office Building	900 kWe generator set powered by a 1,220 hp diesel engine, installation date: 1992 (non-NSPS)
Rayburn House Office Building - Emergency Generator A	RAYA	Cummins Model No. VT12 generator set located at Rayburn House Office Building	300 kWe generator set powered by a 480 hp diesel engine, installation date: 1962 (non-NSPS)
Rayburn House Office Building - Emergency Generator B	RAYB	Detroit Model No. G81R0837K36 generator set located at Rayburn House Office Building	505 kWe generator set powered by a 765 hp diesel engine, installation date: 2002 (non-NSPS)

**40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Engines:**

This subpart does not apply to this facility because this facility only includes compression ignition (diesel) engines.

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**40 CFR 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products:**

This subpart does not apply to this facility because the source is not a major source of HAPs.

**40 CFR 63, Subpart PPPP – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products:**

This subpart does not apply to this facility because the source is not a major source of HAPs.

**40 CFR 63, Subpart QQQQ – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Wood Building Products:**

This subpart does not apply to this facility because the source is not a major source of HAPs.

**40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (NESHAP for RICE):**

40 CFR 63, Subpart ZZZZ applies to stationary reciprocating internal combustion engines (RICE) at major or area sources of HAP emissions to regulate/monitor HAPs such as acetaldehyde, acrolein, benzene, toluene, xylene, cadmium, chromium, lead, etc., through surrogate compounds such as formaldehyde, CO and/or VOC.

A facility that emits or has the potential to emit 10 TPY of any single HAP or 25 TPY of any combination of HAPs, is considered a major source. Any source that is not a major source is an area source. Because this facility does not have the potential to emit more than 10 TPY of a single HAP or an aggregate of more than 25 TPY of total HAPs, it is an area source. Therefore the area source NESHAP requirements of Subpart ZZZZ are applicable to this facility.

Subpart ZZZZ is applicable to new or reconstructed diesel compression ignition (CI) engines at this facility, where “new” is defined as those engines that are manufactured or reconstructed after June 12, 2006. However, the only requirements for these units are to comply with 40 CFR 60, Subpart IIII, as applicable. This situation affects the eight generator sets (CAN1, FORD3, LONG1, LONG2, ON1, ON2, RAYC, and RAYD) previously discussed as covered by 40 CFR 60, Subpart IIII. Only the NSPS requirements have been cited in the permit for these units because Subpart ZZZZ does not add any additional compliance requirements.

“Existing” CI engines are also covered by this regulation. Four diesel engines associated with generator sets at the facility fall into this category as shown in the following table:

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<b>Emission Unit ID</b>	<b>Stack ID</b>	<b>Emission Unit Identification</b>	<b>Description</b>
Ford House Office Building - Emergency Generator 1	FORD1	Caterpillar Model No. 3508-DI generator set located at Ford House Office Building	650 kWe generator set powered by a 927 hp diesel engine, installation date: 1985 (non-NSPS)
Ford House Office Building - Emergency Generator 2	FORD2	Caterpillar Model No. 3508-DITA generator set located at Ford House Office Building	900 kWe generator set powered by a 1,220 hp diesel engine, installation date: 1992 (non-NSPS)
Rayburn House Office Building - Emergency Generator A	RAYA	Cummins Model No. VT12 generator set located at Rayburn House Office Building	300 kWe generator set powered by a 480 hp diesel engine, installation date: 1962 (non-NSPS)
Rayburn House Office Building - Emergency Generator B	RAYB	Detroit Model No. G81R0837K36 generator set located at Rayburn House Office Building	505 kWe generator set powered by a 765 hp diesel engine, installation date: 2002 (non-NSPS)

The requirements of this regulation are incorporated throughout Condition III(a) of the permit for these units.

**40 CFR 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities:**

Some aspects of this regulation would have been previously applicable to the 600 gallon underground storage tank for gasoline, however, the unit has no throughput and will not be allowed to be filled. Temporary closure of the unit, followed by its removal is required pursuant to Condition IV(d)(5) of the permit. The Department’s Underground Storage Tank Branch is preparing for the closure of the tank.

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

This subpart does not apply to this facility because the paint booth does not perform paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), autobody refinishing operations, or spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP. The paint booth is used primarily for painting wooden pieces such as shelving, TV stands, picture frames and doors. AQD confirmed with Mr. James Styers via an email received by Stephen Ours on February 17, 2016 that the facility does not use coatings in

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spray guns that contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). Conditions III(c)(2)(F), III(c)(3)(E), and III(c)(4)(D) of the permit have been put in place (transferred from the previous Chapter 2 permit for the unit) to ensure that no such coatings are used.

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

The CAM rule does not apply to the emission units at U.S. House Office Buildings Jurisdiction that are covered by the draft Title V permit. The emissions units covered in the permit are engines, tanks, and a paint booth. Individually, emissions from each of these units will not exceed the major source threshold for air contaminant emissions identified within 40 CFR 64; therefore none of the units meet the criteria for CAM applicability.

**Greenhouse Gas (GHG) Requirements:**

Because Chapter 3 (Title V) was triggered by other pollutants, no evaluation was made to 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.

**COMPLIANCE HISTORY:**

The applicant has not been subject to enforcement actions by AQD in the past three years. No air quality violations have been identified by the Compliance and Enforcement Branch over the last three years. No air quality violations are listed in the three year compliance status summary in EPA's Enforcement and Compliance History Online (ECHO) database.

The applicant noted in the Compliance Plan and Compliance Certification form that the following units failed to meet the visible emissions requirements in 20 DCMR 606.

<b>Emission Unit ID</b>	<b>Stack ID</b>	<b>Emission Unit Identification</b>	<b>Description</b>
Ford House Office Building - Emergency Generator 1	FORD1	Caterpillar Model No. 3508-DI generator set located at Ford House Office Building	650 kWe generator set powered by a 927 hp diesel engine, installation date: 1985 (non-NSPS)
Ford House Office Building - Emergency Generator 2	FORD2	Caterpillar Model No. 3508-DITA generator set located at Ford House Office Building	900 kWe generator set powered by a 1,220 hp diesel engine, installation date: 1992 (non-NSPS)
Rayburn House Office Building - Emergency Generator A	RAYA	Cummins Model No. VT12 generator set located at Rayburn House Office Building	300 kWe generator set powered by a 480 hp diesel engine, installation date: 1962 (non-NSPS)

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**Draft Title V Operating Permit No. 052**  
**Architect of the Capitol, House Office Buildings Jurisdiction**  
July 30, 2019  
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The applicant stated that these above units are in the process of being replaced (RAYA) or are being reevaluated by AOC for their opacity evaluation test procedures. The applicant must obtain a permit before construction, installation, or operation of any generator and/or any other pollutant-emitting equipment subject to air quality permitting regulations begins.

**COMMENT PERIOD:**

Beginning Date: August 9, 2019  
Ending Date: September 9, 2019

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

Stephen S. Ours, P.E.  
Chief, Permitting Branch  
Department of Energy and 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 Title V permit and may request a public hearing, if no public hearing has already been scheduled. A request for 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.

**POINT OF CONTACT FOR INQUIRIES:**

Thomas Olmstead  
Environmental Engineer  
Department of Energy and Environment  
Air Quality Division  
1200 First Street NE, 5<sup>th</sup> Floor  
Washington DC 20002  
(202) 535-2273

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**REVIEWS:**

Prepared by:



Thomas Olmstead  
Environmental Engineer

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Approved by:



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