**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: 020-R2**

**APPLICANT AND PERMITTEE:**
The George Washington University
2025 F Street NW, Suite 200
Washington, DC 20052

**FACILITY LOCATION:**
The George Washington University
2025 F Street NW, Suite 215
Washington, DC 20052

**FACILITY DESCRIPTION:**
The George Washington University (GWU) is a provider of educational services facility covered by Standard Industrial Classification (SIC) code 8221 and North American Industrial Classification System (NAICS) code 611310. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. The previous Title V permit (issued on September 27, 2004) listed four hundred twenty-nine (429) emissions units; the 2009 Title V permit application listed four hundred forty (440) pieces of fuel burning equipment. However, this draft Title V permit consists of three hundred ninety-eight (398) fuel burning units and a total of six hundred forty-five (645) emissions units, including miscellaneous units. The facility consists of the following sources of air emissions at the university (including identified miscellaneous/insignificant sources):

- Twenty-one (21) large boilers (greater than 5 MMBTU/hr): including five (5) dual fuel boilers permitted to fire natural gas and No. 2 fuel oil, nine (9) dual fuel boilers classified as "gas-fired" and burning No. 2 fuel oil in the event of gas service interruptions; and seven (7) natural gas fired only;

- Eighty-one (81) natural gas small boilers (less than 5 MMBTU/hr): including five (5) dual fuel boilers operating as "gas-fired" and burning No. 2 fuel oil in the event of gas interruptions. The other small boilers burn only natural gas;
- Seventy-seven (77) natural gas hot water heaters;
- Forty-five (45) emergency generators, including forty (40) diesel and five (5) natural gas generators;
- Three (3) natural gas fired air handler units;
- Three (3) natural gas fired humidifiers;
- Two (2) steamed humidifiers;
- One (1) diesel fired pump engine;
- One-hundred five (105) above ground storage tanks;
- Twelve (12) underground storage tanks;
- One-hundred twenty-eight (128) laboratory fume hoods;
- Two (2) solvent storage areas;
- Six (6) space heater/furnaces;
- Four (4) natural gas kilns;
- One-hundred twenty-three (123) natural gas dryers;
- Thirty-two (32) packaged heating ventilation and cooling units;
- Natural gas kitchen equipment; and
- Several other insignificant units listed in Section IV of the permit.

It should be noted that the current Title V Application (2009) lists thirty-seven (37) units that were removed from service. These units were noted in correspondence between DDOE and GWU and were not included in the draft Title V permit or emissions estimates. In addition, eighty-three (83) new units were put into operation through the issuance of forty-four (44) DDOE Chapter 2 permits since the initial 2004 Title V permit, with three (3) units not yet put into operation. One Chapter 2 permit to construct (6618-C) was issued for the two units associated with the cogeneration facility; those units are anticipated to become operational in May, 2015 and have therefore also been included in the permit. One Chapter 2 permit (6966) has been issued for the construction and operation of a 600 kW diesel fired emergency generator; this unit has not yet been installed, but is expected to become operational before the end of 2015. It should also be noted that not all of the Chapter 2 permits issued since 2004 were renewed.

The newly-added significant emission units included in the draft Title V permit are listed below in this Fact Sheet and Statement of Basis.

## EMISSIONS SUMMARY:

The facility reported the following emissions in the draft Title V permit application and subsequent emissions data from 2013:

| PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR] | |
|---|---|
| **Pollutants** | **Potential Emissions** |
| Sulfur Oxides of Sulfur* ($SO_x$) | 746 |
| Nitrogen Oxides ($NO_x$) | 473 |
| Total Particulate Matter, including condensables (PM Total) | 46.9 |
| Volatile Organic Compounds (VOC) | 23.6 |
| Carbon Monoxide (CO) | 233 |

* Plantwide emissions are reported primarily in terms of sulfur dioxide ($SO_2$) with the exception of dual fuel boilers which are reported as $SO_2$ and sulfur trioxide ($SO_3$).

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

The George Washington University has the potential to emit (PTE) approximately 473 tons per year (TPY) of nitrogen oxides ($NO_x$), 746 TPY of oxides of sulfur ($SO_x$), and 233 TPY of carbon monoxide (CO). The values for these criteria pollutants exceed the major source threshold in the District of Columbia of 25 TPY of $NO_x$ or VOC, and/or 100 TPY of any other criteria pollutant. Because potential emissions of $NO_x$, $SO_x$, and CO exceed the relevant major source thresholds, 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 draft 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 those 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 draft Title V permit as such with an asterisk.

It should also be noted that this permit is being issued pursuant to the District's authority under 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 specified 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 774 - Architectural and Industrial Maintenance Coatings
20 DCMR 800 - Control of Asbestos
20 DCMR 801 - Sulfur Contents of Fuel Oils
20 DCMR 805 - Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen
40 CFR 51.12, 52.12, 52.30, 60.11, and 61.12 - Credible Evidence
40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR 60, Subpart IIII- Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CIICE)
40 CFR 60, Subpart JJJJ- Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SIICE)
40 CFR 60, Subpart KKKK- Standards of Performance for Stationary Combustion Turbines
40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (NESHAP for RICE)
40 CFR 63, Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources
40 CFR 82, Subpart G - Protection of Stratospheric Ozone (Federally enforceable only except through Title V) *(Note: Air Quality Division [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

New Source Performance Standards (NSPS) [40 CFR 60]:
New Source Performance Standards apply to this facility as the following NSPS analyses and applicability determination indicate:

1. 40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

   Pursuant to 40 CFR 60, NSPS Subpart IIII applies to stationary compression ignition internal combustion engines: 1) with model year of 2007 or later, 2) that commenced construction after July 11, 2005 and were manufactured after April 1, 2006, or 3) that were modified or reconstructed after July 11, 2005. There are a total of seventeen (17) diesel emergency generators at GWU that are subject to NSPS Subpart IIII.

*Emergency Generators*
DDOE confirmed that the seventeen (17) diesel new compression ignition internal combustion engines (CIICE) are subject to 40 CFR 60, Subpart IIII. The engines identified are as follows:

| **Equipment Location** | **Emission Unit Description** | **Equipment Serial Number** |
|---|---|---|
| Dakota | One (1) 40 kW Cummins Diesel Generator | 46628677 |
| Monroe Hall | One (1) 250 kW Cummins Diesel Generator | 46700534 |
| Thurston Hall | One (1) 200 kW Cummins Diesel Generator | 21758315 |
| Aston | One (1) 150 kW John Deere Diesel Generator | 0G0516 |
| South Hall | One (1) 750 kW Detroit Diesel Generator | 5352006203 |
| Support Building | One (1) 600 kW Caterpillar Diesel Generator | EST00821 |
| FS Key Hall | One (1) 100 kW John Deere Diesel Generator | PE4045L066958 |
| Smith Center | One (1) 150 kW John Deere Diesel Generator | PE6068L084190 |
| Lafayette Hall | One (1) 125 kW Caterpillar Diesel Generator | CAT00C66LN6D02223 |
| Guthridge Hall | One (1) 200 kW Onan Diesel Generator | 73251096 |
| Law Learning Center | One (1) 200 kW Cummins Diesel Generator | 73428402 |
| Ross Hall | Three (3) 1,000 kW Cummins Diesel Generators | 37256910 |

| Equipment Location | Emission Unit Description | Equipment Serial Number |
|---|---|---|
| | | 37256926<br>37256940 |
| Milken Institute School of Public Health & Health Services | One (1) 1,000 kW Cummins Diesel Generator | 37257962 |
| Science and Engineering Hall | Two (2) 1,500 kW Detroit Diesel Generators | 5262011946<br>5262011949 |

2. 40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

   Select natural gas burning emergency generators are subject to Subpart JJJJ for stationary spark ignition internal combustion engines (SIICE). The identified emission units are two (2) natural gas burning emergency generators. The applicability triggers for the NSPS for natural gas burning emergency generators is based on the construction or modified/reconstruction date of June 12, 2006, or the manufacture date of July 1, 2008. The engines identified are as follows:

| Equipment Location | Emission Unit Description | Equipment Serial Number |
|---|---|---|
| Gelman Library | One (1) 180 kW Doosan Natural Gas Emergency Generator | Unknown |
| Museum | One (1) 355 kW Power Solutions International Natural Gas Emergency Generator | EESOD300293 |

3. 40 CFR 60, Subart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

   Combustion units operating as dual fuel boilers are subject to NSPS Subpart Dc. NSPS applicability for boilers is based on unit size and age. The boilers must have heat input ratings greater than 10 MMBTU/hr, and must have been installed after June 9, 1989. Both criteria for age and size must be met for applicability of 40 CFR 60.40c – Subpart Dc to be triggered. The facility has five (5) dual fuel fired boilers in operation: EUN-27, EUN-28, EUN-39, EUN-34, and EUN-35:

   - EUN-29 has a heat input capacity of 6.12 MMBTU/hr which is less than the 10 MMBTU/hr size limit, therefore Subpart Dc does not apply to this unit.
   - EUN-34 and EUN-35 have heat input capacities of 48.7 MMBTU/hr, however, they were installed in 1974, and do not meet the age limitation. Therefore Subpart Dc does not apply to these units.

- EUN-27 and EUN-28 have heat input capacities of 10.2 MMBTU/hr and were installed in 1999. The two units meet both the size and age limitations. Therefore, Subpart Dc is applicable to these units. The requirements of Subpart Dc have been incorporated in the permit as applicable.
- The heat recovery steam generator and duct burner are regulated under 40 CFR 60 Subpart KKKK and are exempt from the requirements of Subpart Dc. The combustion turbines are not considered boilers and are not regulated by the subpart.

4. 40 CFR 60, Subpart KKKK – Standards of Performance for Stationary Combustion Turbines

   Combustion units operating as part of cogeneration operations, including the combined gas turbine and heat recovery steam generator (HRSG) with duct burner integrated system, are subject to NSPS for stationary combustion turbines Subpart KKKK. The cogeneration facility includes a combustion gas turbine and associated HRSG/duct burner that have heat inputs greater than 10 MMBTU/hr and were constructed after February 18, 2005. Subpart KKKK establishes nitrogen oxides and sulfur dioxide emissions limits for combustion turbines that commenced construction after February 18, 2005 and have a heat input at peak load equal to or greater than 10 MMBTU/hr. This subpart also applies to emissions from the associated HRSG unit and duct burner listed below:

   - Combustion gas turbine with a heat input capacity of 52.9 MMBTU/hr.
   - HRSG equipped with supplemental firing by cogeneration duct burner with a heat input capacity of 16.8 MMBtu/hr.

   Per 40 CFR 60.4305(b), stationary combustion turbines regulated under 40 CFR Subpart KKKK are exempt from the requirements of Subpart GG. Because the combustion turbine was installed as part of the cogeneration facility and is subject to NSPS Subpart KKKK, it is not subject to NSPS Subpart GG.

<u>National Emission Standards for Hazardous Air Pollutants [40 CFR 63]:</u>

1. 40 CFR 63, Subpart YYYY – National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines

   Because GWU is an area source of HAPs it is not subject to NESHAP Subpart YYYY, which establishes formaldehyde emission limits for combustion turbines at major sources of HAPs that commenced construction or reconstruction after January 14, 2003.

2. 40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (NESHAP for RICE)

   Subpart ZZZZ of 40 CFR 63 applies to stationary reciprocating internal combustion engines

(RICE) at 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 consider 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 spark ignition (SI) and compression ignition (CI) engines at this facility, where "new" is defined as those engines that are manufactured or reconstructed after June 12, 2006. Note that for new engines, Subpart ZZZZ defers their regulations to the NSPS, 40 CFR Part 60 Subpart IIII and Subpart JJJJ. Seventeen (17) new diesel fired engines and two (2) new natural gas fired engines for emergency generators at GWU fall into this category (as listed within the table under Subpart IIII and Subpart JJJJ). The draft Title V permit has been drafted to include the applicable requirements of the NSPSs for these units.

Additionally, Subpart ZZZZ covers existing engines at the facility. These consist of twenty-three (23) diesel generator engines, one (1) diesel fire pump engine, and three (3) natural gas fired generator engines. The facility considered requesting a limitation on the use of these generators in low voltage or frequency situations to qualify for an exemption as existing stationary institutional engines. However, they decided that they did not want to accept this limitation. As such, the requirements of Subpart ZZZZ have been added to the relevant sections of the permit.

3. 40 CFR 63, Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants (HAP) for Industrial, Commercial, and Institutional Boilers Area Sources

   This subpart applies because the facility is an area source of HAPs and it has institutional boilers that burn fuel oil above the trigger threshold of the regulation. A major source is defined as any source with the potential to emit greater than 10 TPY of any single HAP or greater than 25 TPY of all HAPs. The facility does not have the potential to emit greater than 10 TPY of a single HAP or 25 TPY of all HAPs therefore it is an area source. The subpart has compliance requirements for all dual fuel burning boilers that have a heat input capacity of 1.6 MMBTU/hr or larger.

   Five (5) of the existing boilers have been permitted to operate using No. 2 fuel oil at will (in addition to the primary fuel source of natural gas): EUN-27, EUN-28, EUN-34, EUN-35, and EUN-29. All of these boilers have heat input capacities above 1.6 MMBTU/hr. Therefore, all of these boilers are covered by this NESHAP.

All of these units have heat input ratings greater than 5 MMBTU/hr, and as such, the facility is required to submit an initial notification of applicability to the EPA and perform biennial boiler tune-ups (the requirement for which was changed to annual tune-ups in the permit due to a similar requirement in 20 DCMR 805, but which requires annual tune-ups).

Additionally, four (4) of the units have heat input capacities greater than 10 MMBTU/hr, and are therefore required to have performed a one-time energy assessment. All of these requirements have been included in the draft Title V permit. It is noteworthy that 20 DCMR 805 tune-up requirements and the Subpart JJJJJJ tune-up requirements have a common emissions reduction goal. However, the approaches for achieving this goal differ modestly. Whereas the federal regulations requires that a subsequent tune-up after the initial tune-up must occur no later than 25 months, the DCMR reasonably available control technology (RACT) regulation of 20 DCMR 805, specify that combustion adjustments be performed annually.

Note that the Permittee has asserted that they have submitted the initial notifications and notifications of compliance status to the EPA and have performed initial tune-ups and energy assessments as required prior to the deadlines in the rule (and the permit).

In order to accommodate both rules in this permit, a streamlined approach was used in which Condition III (a)(2)(D) (and equivalent conditions for the other boilers) specifies a compromise frequency of 13 months (i.e., 25 less 12 equals 13). Hence the Permittee must conduct subsequent tune-ups no more than 13 months after the previous tune-up.

The energy assessment is not required for the dual fuel boiler EUN-29 which is a smaller boiler with a heat input capacity of less than 10 MMBTU/hr (6.1 MMBTU/hr); however because the boiler has a heat input capacity greater than 5 MMBTU/hr, tune-ups are required annually.

The subpart does not apply to the nine (9) large (>5 MMBTU/hr) dual fuel boilers classified as gas-fired boilers under Subpart JJJJJJ. Gas-fired boilers, or boilers that primarily burn gas are considered gas-fired boilers even if they also burn oil or other liquid fuel during periods of gas curtailment, gas supply interruption, startups, or for periodic testing for a time not to exceed 48 hours during any calendar year, and are not subject to Subpart JJJJJJ requirements.

The remaining seven (7) larger boilers (greater than 5 MMBTU/hr) are gas-fired, and are therefore not subject to the requirements of Subpart JJJJJJ. Appropriate conditions have been placed in the draft Title V permit, pursuant to 40 CFR 63.111195 to ensure that liquid oil is only utilized in the affected boilers in compliance with 40 CFR 63.11237. In addition, this rule does not cover the small fuel burning equipment in the miscellaneous insignificant activities section of the permit as those units burn natural gas exclusively.

Compliance Assurance Monitoring (CAM) [40 CFR 64]:
A Compliance Assurance Monitoring Plan (CAM) does not apply to the emission units at GWU that are covered by the draft Title V permit. The emissions units covered in the permit include primarily boilers, engines, heaters, and emergency generators. These combustion units do not use a control device other than the inherent design of the unit and the proper operation and maintenance. Emissions from these units are products of the combustion of fuel burned and are controlled by proper operation, good combustion and maintenance practices. 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 (which has been overturned by the U.S. Supreme Court in any case). Other than this requirement, there are no other applicable requirements related to GHGs at this time, therefore none were included in the permit.

Chapter 2 Permits:
AQD is using Chapter 2 authority to update 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 new permits issued under the authority of 20 DCMR Chapter 2 have been incorporated into the draft Title V permit and updated where appropriate. The following table summarizes the Chapter 2 permits issued since the 2009 permit application:

| Permit Number | Equipment Type | Date Issued |
|---|---|---|
| 6927 | One 180 kW natural gas fired emergency generator set at Gelman Library (IEPN-39) | 9/26/14 |
| 6353-R1 | One existing 100 kW diesel fired emergency generator set at JBKO Hall (IEPN-39) | 3/25/14 |
| 6790, 6791 | Two (2) 7 MMBTU/hr dual fuel boilers, classified as gas fired boilers (EUN-321, EUN-322) | 1/24/14 |
| 6789 | 355 kW natural gas fired emergency generator (IEPN-39) | 1/24/14 |
| 6352-R1 | 125 kW diesel fired emergency generator (IEPN-39) | 11/19/13 |
| 6744 | 1,000 kW diesel fired emergency generator (IEPN-39) | 9/26/13 |
| 6741, 6742 | Two (2) 1,500 kW diesel fired emergency generator (IEPN-39) | 9/26/13 |
| 6696, 6697, 6698 | Three (3) 6 MMBTU/hr natural gas fired boilers (EUN-626, EUN-627, EUN-628) | 5/15/13 |
| 6688, 6689 | Two (2) 9.73 MMBTU/hr dual fuel boilers, classified as gas fired boilers (EUN-610, EUN-611) | 5/15/13 |

| Permit Number | Equipment Type | Date Issued |
|---|---|---|
| 6685 | 150 kW diesel fired emergency generator (IEPN-39) | 4/9/13 |
| 6686 | 125 kW diesel fired emergency generator (IEPN-39) | 4/9/13 |
| 6687 | 400 kW diesel fired emergency generator (IEPN-39) | 4/9/13 |
| 5713-R1 | 400 kW diesel fired emergency generator (IEPN-39) | 4/9/13 |
| 6691 | 160 kW diesel fired emergency generator (IEPN-39) | 4/9/13 |
| 6692 | 150 kW diesel fired emergency generator (IEPN-39) | 4/9/13 |
| 6690 | 68 kW diesel fired fire pump engine (IEPN-39) | 3/19/13 |
| 5778-R1-A1 | 800 kW diesel fired emergency generator (IEPN-39) | 3/14/13 |
| 6693-A1 | 40 kW diesel fired emergency generator (IEPN-39) | 3/14/13 |
| 6713-A1 | 300 kW diesel fired emergency generator (IEPN-39) | 3/14/13 |
| 6694-A1 | 250 kW diesel fired emergency generator (IEPN-39) | 3/14/13 |
| 5986-R1-A1 | 200 kW diesel fired emergency generator (IEPN-39) | 3/14/13 |
| 6695-A1 | 150 kW diesel fired emergency generator (IEPN-39) | 3/14/13 |
| 6190-R1-A1 | 750 kW diesel fired emergency generator (IEPN-39) | 3/14/13 |
| 6237-R1-A1 | 100 kW diesel fired emergency generator (IEPN-39) | 3/14/13 |
| 6247-R1-A1 | 150 kW diesel fired emergency generator (IEPN-39) | 3/14/13 |
| 6257-R1-A1 | 200 kW diesel fired emergency generator (IEPN-39) | 3/14/13 |
| 6703, 6704, 6705 | 200 kW diesel fired emergency generator (IEPN-39) | 3/5/13 |
| 6618-C | Cogeneration facility | 12/27/12 |
| 6594 | 200 kW diesel fired emergency generator (IEPN-39) | 7/16/12 |
| 6548 | 200 kW diesel fired emergency generator (IEPN-39) | 2/21/12 |

Note that the requirements of permit 6618-C have been revised to reflect a lower capacity duct burner actually installed by the facility that is different from the equipment identified in permit 6618-C.

Also note that permit 6966, issued on January 30, 2015, has not been incorporated into the Title V permit. This is because the unit has not yet been constructed and construction is not expected to be complete before issuance of the final Title V permit.

## COMPLIANCE HISTORY:

The Permitee has been subject to no enforcement actions by AQD in the past three years. No air quality violations are identified in the EPA Enforcement and Compliance History Online (ECHO) database over the last three years, as of the time of this writing.

## COMMENT PERIOD:

Beginning Date: May 15, 2015
Ending Date: June 15, 2015

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, 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 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:**

John C. Nwoke
Environmental Engineer
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Air Quality Division
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(202) 724-7778

**REVIEWS:**

Prepared by:

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SSO:JCN