

**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. 044-R1**

**APPLICANT AND PERMITTEE:**

U.S. General Services Administration  
301 7<sup>th</sup> Street SW, Room 4606  
Washington DC 20407

**FACILITY LOCATION:**

Saint Elizabeths West Campus  
2701 Martin Luther King Jr. Ave. SE  
Washington DC 20032

**RESPONSIBLE OFFICIAL**

Shauna M. Carter, Director, Potomac Service Center, Public Buildings Service, National Capital Region

**FACILITY DESCRIPTION:**

Saint Elizabeths West Campus (SEWC), located in the southeast quadrant of Washington, D.C., is a U.S. General Services Administration (GSA) federal property that is being developed to meet the operational and housing needs of the U.S. Department of Homeland Security (DHS) Headquarters. When complete, the DHS facility will accommodate the United States Coast Guard Headquarters, The DHS National Operations Center (NOC), the Federal Emergency Management Agency (FEMA) Headquarters, the Transportation Security Administration (TSA) Headquarters, the Customs and Border Protection (CPB) Headquarters, and the Immigration and Customs Enforcement (ICE) Headquarters. This master plan will consolidate 3.8 million gross square feet of office space on the West Campus and 750,000 gross square feet of office space on a portion of the East Campus.

The facility is owned and operated by GSA and consists of a 176 acre site that accommodates historic buildings, landmark features and a historic cemetery.

The SEWC facility includes installations of boilers and emergency generators at the Central Utility Plants (CUP) and the Modular Utility Plant (MUP). The utility plants provide heating, cooling and emergency power needs to support the DHS operation. The facility is covered under the North American Industry Classification System (NAICS) Code 921190. This facility includes

**Fact Sheet and Statement of Basis****Permit No. 044-R1****U.S. General Services Administration - Saint Elizabeths West Campus**

April 23, 2019

Page 2

emission units that are capable of operating twenty-four (24) hours per day, seven (7) days per week, and fifty-two (52) weeks per year.

The significant units at the facility consist of those listed in the following table.

<b>Emission Units</b>				
<b>Emission Unit ID<sup>#</sup></b>	<b>Stack ID</b>	<b>Emission Unit Name</b>	<b>Chapter 2 Permit No.</b>	<b>Description</b>
B1 (formerly CUP-B1)	B1-S	Boiler No. 1	6565 <sup>†</sup>	One 16.74/16.80 MMBTU/hr. dual fuel fired (natural gas/No. 2 fuel oil) Burnham Commercial hot water boiler. Model #: LN3PW-400-50-GO-PF
B2 (formerly CUP-B2)	B2-S	Boiler No. 2	6566 <sup>†</sup>	One 16.74/16.80 MMBTU/hr. dual fuel fired (natural gas/No. 2 fuel oil) Burnham Commercial hot water boiler. Model #: LN3PW-400-50-GO-PF
B3 (formerly MUP-B1)	B3-S	Boiler No. 3	6569 <sup>†</sup>	One 12.50/12.60 MMBTU/hr. fired (natural gas/No. 2 fuel oil) Burnham Commercial hot water boiler. Model #: LN3PW-300-50-GO-PF
B4 (formerly MUP-B2)	B4-S	Boiler No. 4	6570 <sup>†</sup>	One 12.50/12.60 MMBTU/hr. fired (natural gas/No. 2 fuel oil) Burnham Commercial hot water boiler. Model #: LN3PW-300-50-GO-PF
B5 (formerly CUP2-B1)	B5-S	Boiler No. 5	7172 <sup>‡</sup>	One 21.00 MMBTU/hr. dual fuel fired (natural gas/No. 2 fuel oil) fire tube Hurst boiler. Model #: Series 500
B6 (formerly CUP2-B2)	B6-S	Boiler No. 6	7173 <sup>‡</sup>	One 21.00 MMBTU/hr. dual fuel fired (natural gas/No. 2 fuel oil) fire tube Hurst boiler. Model #: Series 500
EG-1 (formerly CUP-EG1)	EG-1-S	CUP1 Emergency Generator	6567 <sup>†</sup>	One 2,000 kWe Caterpillar diesel-fired emergency generators, Model No. 3516C, with an engine size of 2191 kWm. (installed 2012)
EG-2 (formerly CUP-EG2)	EG-2-S	CUP1 Emergency Generator	6568 <sup>†</sup>	One 2,000 kWe Caterpillar diesel-fired emergency generators, Model No. 3516C, with an engine size of

**Fact Sheet and Statement of Basis**

Permit No. 044-R1

U.S. General Services Administration - Saint Elizabeths West Campus

April 23, 2019

Page 3

Emission Units				
Emission Unit ID#	Stack ID	Emission Unit Name	Chapter 2 Permit No.	Description
				2191 kWm. (installed 2012)
EG-3 (formerly CUP-EG3)	EG-3-S	CUP1 Emergency Generator	6610 <sup>†</sup>	One 2,000 kW Caterpillar diesel-fired emergency generator, Model No. 3516C, with an engine size of 2,191 kWm. (installed 2012)
EG-4 (formerly MUP-EG1)	EG-4-S	MUP Emergency Generator	6571 <sup>†</sup>	One 2,500 kW Caterpillar diesel-fired emergency generator, Model No. 3516C, with an engine size of 2,711 kWm. (installed 2012)
EG-5 (formerly MUP-EG2)	EG-5-S	MUP Emergency Generator	6572 <sup>†</sup>	One 2,500 kW Caterpillar diesel-fired emergency generator, Model No. 3516C, with an engine size of 2,711 kWm. (installed 2012)
EG-6 (formerly MUP-EG3)	EG-6-S	MUP Emergency Generator	6573 <sup>†</sup>	One 2,500 kW Caterpillar diesel-fired emergency generator, Model No. 3516C, with an engine size of 2,711 kWm. (installed 2012)
EG-7 (formerly PH-EG1)	EG-7-S	Pump house Emergency Generator	6611 <sup>†</sup>	One 2,000 kW Caterpillar diesel-fired emergency generator for the pump house, with an engine size of 2180 kWm. (installed 2012)
EG-9 (formerly MESV- EG1)	EG-9-S	MESV Emergency Generator	None. Permitted directly in previous Title V No. 044.	One 600 kW Caterpillar diesel-fired emergency generator, Model No. XQ600, with an engine size of 620 kWm. (installed May 31, 2012)
EG-10 (formerly CUP2- EG1)	EG-10-S	CUP2 Emergency Generator	7174-A1 <sup>‡</sup>	One 3,500 kW Cummins diesel-fired emergency generator with add-on emission control systems, Model No. C3500 D6e, with an engine size of 3,768 kWm. (manufactured 2017)
EG-11 (formerly CUP2- EG2)	EG-11-S	CUP2 Emergency Generator	7175-A1 <sup>‡</sup>	One 3,500 kW Cummins diesel-fired emergency generator with add-on emission control systems, Model No. C3500 D6e, with an engine size of 3,768 kWm. (manufactured 2017)

**Fact Sheet and Statement of Basis**

**Permit No. 044-R1**

**U.S. General Services Administration - Saint Elizabeths West Campus**

April 23, 2019

Page 4

<b>Emission Units</b>				
<b>Emission Unit ID#</b>	<b>Stack ID</b>	<b>Emission Unit Name</b>	<b>Chapter 2 Permit No.</b>	<b>Description</b>
EG-12 (formerly CUP2- EG4)	EG-12-S	CUP2 Emergency Generator	7176-A1 <sup>‡</sup>	One 2,500 kWe Cummins diesel-fired emergency generator with add-on emission control systems, Model No. 2500DQKAN, with an engine size of 2,715 kWm. (manufactured 2017)

<sup>#</sup> CUP refers to “central utility plant”; MUP refers to “modular utility plant”.

<sup>†</sup> These permits were incorporated into the previous Title V permit No. 044 for this facility, issued September 30, 2013, and are listed here only for historical purposes.

<sup>‡</sup> These permits are being incorporated into the Title V permit at the time of issuance of permit No. 044-R1 and will cease to exist as separate permits (except for historical purposes) with that incorporation.

In addition to the significant units listed above, GSA identified in their application the following insignificant units:

- Ten small natural gas-fired hot water heaters with heat input ratings less than 5 MMBTU/hr;
- Seven natural gas-fired kitchen appliances<sup>1</sup>;
- Four natural gas-fired door heaters (Gate 6);
- Three 550-gallon aboveground storage tanks for ultralow sulfur diesel fuel (ULSD);
- Two 15,000 gallon aboveground storage tanks for ULSD;
- One 17,500 gallon aboveground storage tank for ULSD;
- Three 400 gallon storage tanks for ULSD;
- One 700 gallon storage tank for ULSD;
- One 12,500 gallon storage tank for ULSD;
- One 428 gallon storage tank for ULSD;
- Three 26,629 gallon storage tanks for ULSD;
- Four 1,900 gallons per minute wet cooling towers;
- Two 1,800 gallons per minute wet cooling towers;
- Four CUP chillers associated with the cooling towers; and
- Two MUP chillers associated with the cooling towers

<sup>1</sup> One of the pieces of kitchen equipment was listed in the application as a “Wood burning Snack Stove” located at the Snack Shop. In a January 17, 2019 email from Jessica Gunter of Aegis Environmental, a consultant for GSA, it was clarified that this was a misnomer and that the unit is a natural gas-fired pizza oven that does not burn wood.

**Fact Sheet and Statement of Basis**

**Permit No. 044-R1**

**U.S. General Services Administration - Saint Elizabeths West Campus**

April 23, 2019

Page 5

**EMISSIONS SUMMARY:**

The following is an estimate of overall potential emissions from the facility:

<b>FACILITY-WIDE EMISSIONS SUMMARY</b>	
<b>Criteria Pollutants</b>	<b>Potential Emissions (tons per year)</b>
Oxides of Sulfur (SO <sub>x</sub> )	1.10
Oxides of Nitrogen (NO <sub>x</sub> )	29.54
Total Particulate Matter, including condensables (PM Total)	3.15
Volatile Organic Compounds (VOC)	5.19
Carbon Monoxide (CO)	54.70
Total Hazardous Air Pollutants (Total HAP)	0.628

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

Saint Elizabeths West Campus (SEWC), has the potential to emit 29.54 tons per year (TPY) of oxides of nitrogen (NO<sub>x</sub>). The value for this criteria pollutant exceeds the major source thresholds in the District of Columbia of 25 TPY of NO<sub>x</sub> or VOC, and/or 100 TPY of any other criteria pollutant. Because potential emissions of NO<sub>x</sub> exceed 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.

It should be noted that, at the time of issuance of the previous iteration of the Title V permit (Permit No. 044, issued September 30, 2013), it the facility was not a major source. It had taken limits to avoid Nonattainment New Source Review (NNSR), and was, at that time limited to a potential to emit of approximately 19.9 tons per year of NO<sub>x</sub>. However, because the District does not have a synthetic minor permit, they were obliged to obtain a Title V permit.

Since that time, however, with the expansion of the facility's infrastructure and various property improvements, the potential to emit for NO<sub>x</sub> has increased to the current 29.54 TPY, and is therefore fully subject to 20 DCMR Chapter 3 permitting requirements as discussed above.

**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.

## **Fact Sheet and Statement of Basis**

**Permit No. 044-R1**

**U.S. General Services Administration - Saint Elizabeths West Campus**

April 23, 2019

Page 6

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 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 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 600 - Fuel-Burning Particulate Emission.

20 DCMR 604 - Open Burning

20 DCMR 605 - Control of Fugitive Dust

20 DCMR 606 - Visible Emissions

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 51.212, 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

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

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

40 CFR 82 - 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.*)

## **Fact Sheet and Statement of Basis**

**Permit No. 044-R1**

**U.S. General Services Administration - Saint Elizabeths West Campus**

April 23, 2019

Page 7

### **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 - Onroad Engine Idling and Nonroad Diesel 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:**

The pollutant-emitting equipment at the facility (except some insignificant activities listed in Condition IV of the permit) has been subject to permitting requirements under 20 DCMR 200. Equipment included in the permit was either included in the previous Title V permit (issued September 30, 2013) or has since been subject to Chapter 2 permitting requirements. The table of emission units above lists the units at the site and their associated Chapter 2 permits. The footnotes indicate which ones were previously incorporated into the Title V permit and which ones are being incorporated via this permitting action. Note that this action is a combined Chapter 2 and Chapter 3 permitting action and updates requirements for equipment under the authority of 20 DCMR 201.

Insignificant fuel burning equipment that is not subject to permitting because it burns natural gas or distillate fuel and is external combustion type equipment with a heat input capacity of 5 MMBtu/hr or fewer (see 20 DCMR 200.12) has not been issued permits under Chapter 2, although there are requirements in Condition IV the Title V permit requiring that fuel usage be reported as well as various other requirements.

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

The boilers and generators are subject to Chapter 3 provisions of 20 DCMR. This permitting action is to issue a permit renewal under the authority of this regulation. All identified applicable requirements have been included in the permit. The facility is not subject to the acid rain provisions of Chapter 3.

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

Numerous monitoring and testing requirements have been placed in the permit to ensure that it is enforceable as a practical matter. Many of these conditions have been placed in the permit pursuant to Sections 500 and 502 authority.

### **20 DCMR Chapter 6 – Particulates**

Several sections of Chapter 6 are applicable to this facility. Section 600 is applicable to the boilers and water heaters at the facility and appropriate conditions have been included in the permit. Sections 604 (Open Burning) and 605 (Control of Fugitive Dust) are standard requirements included in all Title V permits.

## **Fact Sheet and Statement of Basis**

**Permit No. 044-R1**

**U.S. General Services Administration - Saint Elizabeths West Campus**

April 23, 2019

Page 8

Section 606.1, establishing visible emission limits, is applicable to emission units. It has been noted in the permit that Section 606 is subject to a SIP Call from EPA and may be changed as a result. If this happens, it is noted that the new version of the regulation will supersede the older version.

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

NO<sub>x</sub> RACT is applicable to this facility pursuant to 20 DCMR 805.1(a) because it is a major source of NO<sub>x</sub>. Boilers B5 and B6 are subject to 20 DCMR 805.1(a)(1) and the related requirements of 20 DCMR 805.5(a) and 805.8. Boilers B1 through B4 are subject because they are part of a major stationary source and are therefore covered by 20 DCMR 805.1(a)(4). No specific RACT level is defined in the regulation for this type of equipment, but AQD has previously considered annual combustion tuning pursuant to 20 DCMR 805.8 to meet the requirements of this regulation for similar units. The relevant requirements have been included in the permit.

### **20 DCMR Chapter 9 – Engine Idling, Odor and Nuisance Pollutants**

The provisions of the relevant parts of this chapter have been included in the permit to address engine idling, odor, and nuisance pollutants at the facility.

### **40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units:**

Under 40 CFR 60.40c, Boilers B1 through B6 are all subject to Subpart Dc as they have heat input ratings in excess of 10 MMBTU/hr, but less than 100 MMBTU/hr and were all constructed after June 9, 1989. The only requirements applicable to these units, however, are the visible emissions standards in 40 CFR 60.43c(c). These have been incorporated in Condition III(a)(1)(D). Related testing requirements have been incorporated in Conditions III(a)(3)(A) and (D).

### **40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI-ICE)**

NSPS Subpart IIII applicability for the generators was considered for this facility. Based on the date of applicability (July 11, 2005), Subpart IIII is applicable to all 11 compression ignition internal combustion engines (CIICE) because they were manufactured after April 1, 2006. The units were constructed in 2012 which is after July 11, 2005, thus NSPS Subpart IIII is applicable. The requirements of this subpart have been incorporated into Condition III(b) of the permit.

### **40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984**

This subpart applies to volatile organic liquid (VOL) storage tanks constructed, reconstructed, or modified after July 23, 1984, with a capacity equal to or greater than 75 m<sup>3</sup> (about 19, 813 gallons). However, tanks greater than 151 m<sup>3</sup> which store liquid with a true vapor pressure less

**Fact Sheet and Statement of Basis**

**Permit No. 044-R1**

**U.S. General Services Administration - Saint Elizabeths West Campus**

April 23, 2019

Page 9

than 3.5 kPa and tanks greater than 75 m<sup>3</sup> but less than 151 m<sup>3</sup> that store liquid with a true vapor pressure less than 15 kPa, are exempted under 40 CFR 60.110b(b). The 15 above ground diesel/No. 2 fuel oil storage tanks at Saint Elizabeths West Campus were constructed after July 23, 1984. All but three of them have storage volumes under 75 m<sup>3</sup>. The remaining three, T-FOT-01 through T-FOT-03, have storage capacities of 26,629 gallons. However, they are used to store ultralow sulfur diesel fuel which, according to Table 7.1-2 of AP-42, has a true vapor pressure at 100° F of 0.022 psi (0.15 kPa). As such, none of the storage tanks are subject to Subpart Kb.

**40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (NESHAP for RICE) located in an Area Source of HAPS**

Subpart ZZZZ of 40 CFR 63 regulates hazardous air pollutants (HAPs) such as acetaldehyde, acrolein, benzene, toluene, xylene, cadmium, chromium, lead, etc, through surrogate compounds such as formaldehyde, carbon monoxide (CO) and/or volatile organic compounds (VOC).

A facility that emits or has the potential to emit 10 tons/year of any single HAP or 25 tons/year 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 tons/year of a single HAP or an aggregate of more than 25 tons of total HAPs, it is not a major source. It is rather an area source. Therefore the area source MACT for Reciprocating Internal Combustion Engines (RICE) is applicable to the two emergency engines at the facility as discussed below.

Subpart ZZZZ is applicable to existing, new or reconstructed SI and CI engines. The part of Subpart ZZZZ that is applicable depends on the date of commencement of construction of the particular engine. Based on 40 CFR 63.6590(a)(2)(iii), engines whose construction or reconstruction commenced after June 12, 2006 are considered new stationary internal combustion engines. For these engines, pursuant to 40 CFR 63.6590(c), no requirements other than those imposed by 40 CFR 60, Subpart IIII or Subpart JJJJ are imposed by Subpart ZZZZ. Subpart IIII applies to the all 11 CI-ICE-powered emergency generator sets addressed in Condition III(b) of the permit as discussed earlier. Condition III(b) therefore only includes the requirements of 40 CFR 60, Subpart IIII and related references, as this is all that is required under Subpart ZZZZ.

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

Because the facility is an area source of HAPs, as discussed above, applicability of 40 CFR 63, Subpart JJJJJ was evaluated as it relates to the facility's boilers and hot water heaters. Saint Elizabeths West Campus operates under the NAICS code 921190 to which this rule applies. Certain boilers are exempted from the requirements of subpart JJJJJ pursuant to 40 CFR 63.11195 and the related definitions at 40 CFR 63.11237. All of the boilers and hot water heaters at the facility are exempt under at least one of the criteria.

## **Fact Sheet and Statement of Basis**

### **Permit No. 044-R1**

**U.S. General Services Administration - Saint Elizabeths West Campus**

April 23, 2019

Page 10

Specifically, the six largest boilers, though dual fuel-fired boilers that would otherwise be subject to the rule, have taken the limit found in Condition III(a)(2)(D) to require that they only operate on No. 2 fuel oil/diesel during periods of gas supply emergencies, periods of gas curtailment, or periods of testing on liquid fuel not to exceed a combined total of 48 hours per boiler during any calendar year. With these limits, the units meet the definition of a “Gas-fired boiler” per 40 CFR 63.11237 as exempted at 40 CFR 63.11195(e).

The smaller units identified in the permit application as hot water heaters all have heat input ratings less than 1.6 MMBTU/hr and, as such, meet the definition of a “Hot water heater” per 40 CFR 63.11237 as exempted at 40 CFR 63.11195(f). It should be noted that all of these units have tank capacities in excess of the 120 gallon threshold specified in the definition of “Hot water heater”, but that same definition provides the 1.6 MMBTU/hr threshold for hot water boilers included in the definition and indicates that this threshold should be evaluated independently. It should be noted that this interpretation (that the 120 gallon and 1.6 MMBTU/hr triggers are independent and should each be evaluated independently) was confirmed in a conference call between Air Quality Division and EPA staff on May 15, 2013.

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

Compliance Assurance Monitoring Plan (CAM) requirements do not apply to this facility. None of the equipment relies on emission control devices to comply with emission limitations or standards except the three CUP2 emergency generator sets (EG-10, EG-11, and EG-12). These three units were originally permitted with operating hour limitations to ensure that the CUP2 project did not trigger NNSR. However, at a later date, the facility determined that they were not comfortable with retaining the operating hour limitations. As such, in a subsequent permitting action (Chapter 2 permits 7174-A1 through 7176-A1, issued September 20, 2018), the operating hour limitations were removed and replaced with the standard 500 hours per year that is the standard basis for establishing potential to emit of an emergency generator set, but installation and operation of selective catalytic reduction (SCR) systems were required to reduce emission to offset that increase in operating hours. The SCR project reduced the potential to emit of the three units, combined, from 10.05 tons per year of NO<sub>x</sub> to 4.36 tons per year of NO<sub>x</sub>. Without controls, and assessed at 500 hours per year operation, each of the two larger generator sets could emit approximately 12.3 tons per year of NO<sub>x</sub>, while the smaller unit could emit approximately 8.8 tons per year of NO<sub>x</sub>. Because no individual “pollutant specific emission unit” can emit more than 25 tons per year of NO<sub>x</sub> before controls, CAM is not applicable to these units.

#### **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 ordinarily 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.

**Fact Sheet and Statement of Basis**

**Permit No. 044-R1**

**U.S. General Services Administration - Saint Elizabeths West Campus**

April 23, 2019

Page 11

**ENFORCEMENT HISTORY:**

According to EPA's Enforcement and Compliance History Online (ECHO) database and the associated Integrated Compliance Information System (ICIS), there have not been any enforcement actions taken against U.S. General Services Administration - Saint Elizabeths West Campus in the last five years for air quality violations.

**COMMENT PERIOD:**

Beginning Date: May 3, 2019

Ending Date: June 3, 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, D.C. 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 is deemed appropriate. The venue, date, and time for any public hearing shall be announced in the D.C. Register and on the Department's website.

**POINT OF CONTACT FOR INQUIRIES:**

John C. Nwoke  
Environmental Engineer  
Department of Energy and Environment  
Air Quality Division  
1200 First Street NE, 5th Floor  
Washington, DC 20002  
(202) 724-7778

**Fact Sheet and Statement of Basis**

**Permit No. 044-R1**

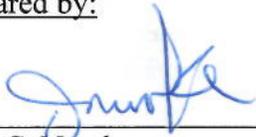
**U.S. General Services Administration - Saint Elizabeths West Campus**

April 23, 2019

Page 12

**REVIEWS:**

Prepared by:



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John C. Nwoke  
Environmental Engineer

Approved by:



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

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