April 26, 2016

Randolph S. Moore, P.E.

Environmental Manager

Verizon Washington DC Inc.

3011 Hungary Spring Road, 2nd Fl.

Richmond, VA 23228

**RE: Permit Nos. 6499-R1, 6500-R1, and 6501 to Operate Emergency Generator Sets at 1200 H Street NW**

Dear Mr. Moore:

Pursuant to sections 200.1 and 200.2 of Title 20 of the District of Columbia Municipal Regulations (20 DCMR), a permit from the Department of Energy and Environment (“the Department”) shall be obtained before any person can construct and operate a new stationary source in the District of Columbia. The application of Verizon Washington DC Inc., (“the Permittee”) to operate three (3) 1,500 kWe emergency generator sets with associated 2,200 hp diesel-fired engines at the property located at 1200 H Street NW, Washington DC, per the submitted plans and specifications, received on December 29, 2015, is hereby approved, subject to the following conditions:

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| --- | --- | --- | --- |
| **Permit Number** | **Generator/Engine Size** | **Fuel Type** | **ID #** |
| **6499-R1** | 1,500 kWe/2,200 hp | Diesel | Engine #1 |
| **6500-R1** | 1,500 kWe/2,200 hp | Diesel | Engine #2 |
| **6501-R1** | 1,500 kWe/2,200 hp | Diesel | Engine #3 |

I. General Requirements:

a. The emergency generator sets shall be operated in accordance with the air pollution control requirements of 20 DCMR.

b. These permits expire on April 25, 2021 [20 DCMR 200.4]. If continued operation after this date is desired, the Permittee shall submit a renewal application by January 25, 2021.

c. Operation of equipment under the authority of these permits shall be considered acceptance of their terms and conditions.

d. The Permittee shall allow authorized officials of the District, upon presentation of identification, to:

1. Enter upon the Permittee’s premises where a source or emission unit is located, an emissions related activity is conducted, or where records required by this permit are kept;

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of this permit;

3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

4. Sample or monitor, at reasonable times, any substance or parameter for the purpose of assuring compliance with this permit or any applicable requirement.

e. This set of permits shall be kept on the premises and produced upon request.

1. Failure to comply with the provisions of these permits may be grounds for suspension or revocation. [20 DCMR 202.2]

II. Emission Limitations:

a. Visible emissions shall not be emitted into the outdoor atmosphere from these generators, except that discharges not exceeding forty percent (40%) opacity (unaveraged) shall be permitted for two (2) minutes in any sixty (60) minute period and for an aggregate of twelve (12) minutes in any twenty-four hour (24 hr.) period during start-up, cleaning, adjustment of combustion controls, or malfunction of the equipment [20 DCMR 606.1].

b. An emission into the atmosphere of odorous or other air pollutants from any source in any quantity and of any characteristic, and duration which is, or is likely to be injurious to the public health or welfare, or which interferes with the reasonable enjoyment of life or property is prohibited. [20 DCMR 903.1]

III. Operational Limitations:

a. Each emergency generator shall not be operated in excess of 500 hours in any given 12 month period. If operation beyond 500 hours is desired, the Permittee shall submit an application to amend these permits to comply with the conditions of 20 DCMR 805 and shall obtain the Department’s approval of such application prior to initiating such operation.

b. With the exceptions specified in Condition III(c), the emergency generators shall be operated only during emergencies as follows:

1. An electrical power outage due to: a failure of the electrical grid; on-site disaster; local equipment failure; or public service emergencies such as flood, fire, natural disaster, or severe weather conditions (e.g. hurricane, tornado, blizzard, etc.);

1. For a period of up to 15 hours per calendar year when there is a substantial deviation of voltage or frequency from the electrical provider to the premises such that the equipment being supported cannot be safely or effectively operated; or

3. When a sudden, unexpected event occurs that, if not immediately attended to, presents a safety or public health hazard, is necessary to protect equipment from damage, or is necessary to avoid imposing an unreasonable financial burden. An emergency includes operations necessitated by non-routine failures of equipment, but it does not include voluntary demand reductions covered by Condition III (f).

c. Each emergency generator may be operated for the purpose of maintenance checks and readiness testing for a period not to exceed one hundred (100) hours per calendar year. Any such operation shall be considered as part of the 500 hours allowed under Condition III(a) above. [20 DCMR 201]

d. The emergency generators shall fire only diesel fuel with a maximum sulfur content of 0.05% by weight (500 ppm). [20 DCMR 201 and 20 DCMR 801]

e. The emergency generators shall be operated and maintained in accordance with the recommendations of the equipment manufacturers or to industry standards for similar models if manufacturer specifications are unavailable. [20 DCMR 201]

f. The emergency generators shall not be operated in conjunction with a voluntary demand-reduction program or any other interruptible power supply arrangement with a utility, other market participant, or system operator. [20 DCMR 201]

g. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the units in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [20 DCMR 201]

IV. Monitoring and Testing Requirements:

a. The Permittee shall monitor the date, time, duration, and reason for each emergency generator startup to ensure compliance with Conditions III(a), (b), (c), and (f).

b. In order to ensure compliance with Condition III(a), the Permittee shall monitor the total hours of operation of each generator each month, either with the use of a properly functioning, non-resettable hour metering device or by tracking the sum of the duration of each instance of operation each month.

c. The Permittee shall test fuel oil as necessary to show compliance with Conditions III(d) and V(c) in accordance with appropriate ASTM methods. [20 DCMR 502.3 and 502.6]

d. The Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]

V. Record Keeping Requirements:

a. The following information shall be recorded, initialed, and maintained in a log at the facility for a period not less than three (3) years [20 DCMR 500.8]:

1. The date, time, duration, and reason for each start-up of each emergency generator; (*Note that if the unit is operated due to a deviation in voltage or frequency from the utility pursuant to Condition III(b)(2), this shall be specifically noted.*)

2. The total hours of operation for each month and the cumulative 12-month rolling period shall be calculated and recorded within 15 days of the end of each calendar month for the previous month and the 12-month period ending at the end of that month;

3. The total hours of operation for maintenance checks and readiness testing pursuant to Condition III(c) each month, and totaled for each calendar year by January 15 of each year for the previous calendar year;

4. The total hours of operation due to a deviation in voltage from the utility pursuant to Condition III(b)(2) each calendar year, totaled by January 15 of each calendar year for the previous calendar year;

5. Records of the maintenance performed on the unit;

6. Records of the results of any visible emissions monitoring performed;

7. Records of the occurrence and duration of each malfunction of operation; and

8. Records 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.

b. The Permittee shall maintain a copy of the emergency generators’ manufacturers’ maintenance and operating recommendations at the facility. If such documentation is unavailable, the Permittee shall maintain documentation of the industry standards to which each unit is being maintained.

c. For each delivery of diesel fuel, the Permittee shall maintain one of the following:

1. A fuel delivery receipt containing the date, fuel type, and amount of the delivery and certification from the fuel supplier that the fuel delivered was tested in accordance with an appropriate ASTM method (specified in the certification) and met the requirements of Condition III(d); or

2. A fuel delivery receipt and documentation of sampling and analysis containing the following information:

i. The fuel oil type and the ASTM method used to determine the type (see the definition of distillate oil in 40 CFR 60.41c for appropriate ASTM methods);

ii. The weight percent sulfur of the fuel as determined using ASTM test method D-4294 or D-5453 or other methods approved in advance by the Department;

iii. The date and time the sample was taken;

iv. The name, address, and telephone number of the laboratory that analyzed the sample; and

v. The test method used to determine the sulfur content.

If you have any questions, please call me at (202) 535-1747 or Olivia Achuko at (202) 535-2997.

Sincerely,

Stephen S. Ours, P.E.

Chief, Permitting Branch

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