December 9, 2014

G.H. Simmons, P.E., CFM

AVP Facilities Operation, Design & Construction

Georgetown University

3700 O Street NW

Washington, DC 20057

**RE: Permit #6870 to Construct and Operate a Cold-Cleaning Degreaser**

Dear Mr. Simmons:

Pursuant to sections 200.1 and 200.2 of Title 20 of the District of Columbia Municipal Regulations (20 DCMR), a permit from the District Department of the Environment (the Department) shall be obtained before any person can construct and operate a stationary source in the District of Columbia. The application of the Georgetown University (the Permittee) to construct and operate a Safety-Kleen, Model X-16/30 Cold-Cleaning Degreaser at Georgetown University, located at Southwest Quad Building, Washington, DC, per the submitted plans and specifications, received on April 4, 2014 is hereby approved, subject to the following conditions:

I. General Requirements:

a. The cold-cleaning degreaser shall be maintained and operated in accordance with the air pollution control requirements of 20 DCMR.

b. This permit expires on December 8, 2019 [20 DCMR 200.4]. If continued operation after this date is desired, the owner or operator shall submit a renewal application by September 8, 2019.

c. Construction or operation of equipment under the authority of this permit shall be considered acceptance of its 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 permit shall be kept on the premises and produced upon request.

1. Failure to comply with the provisions of this permit may be grounds for suspension or revocation. [20 DCMR 202.2]
2. If not already completed by the time of issuance of this permit, within 90 days of issuance of this permit, the Permittee shall submit a complete application or application amendment to modify the facility’s Title V operating permit pursuant to 20 DCMR Chapter 3, to incorporate the conditions of this permit.

II. Emission Limitations:

a. 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. Immersion cold cleaning machines shall have a freeboard ratio of seventy-five one hundredths (0.75) or greater, unless the machines are equipped with covers that are kept closed except when parts are being placed into or are being removed from the machine. [20 DCMR 764.2]

* 1. b. Immersion cold cleaning machines and remote reservoir cold cleaning machines shall [20 DCMR 764.3]:

1. Have a permanent, conspicuous label summarizing the operating requirements in Condition III(c); and

2. Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines that drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than six inches (6 in.) shall constitute an acceptable cover.

c. Cold cleaning machines shall be operated in accordance with the following procedures [20 DCMR 764.4]:

1. Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container;

2. Cleaned parts shall be drained at least fifteen (15) seconds or until dripping ceases, whichever is longer;

i. Parts having cavities or blind holes shall be tipped or rotated while the part is draining; and

ii. During the draining, tipping or rotating, the parts shall be positioned so that solvent drains directly back to the cold cleaning machine.

3. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray, at a pressure that does not exceed ten pounds (10 lb.) per square inch gauge (psig);

4. The Permittee shall ensure that when the cover is open, the cold cleaning machine is not exposed to drafts greater than forty meters (40 m.) per minute (one hundred thirty-two feet (132 ft.) per minute), as measured between one meter (1 m.) and two meters (2 m.) (three and three tenths feet (3.3 ft.) and six and six tenths feet (6.6 ft.) upwind, and at the same elevation as the tank lip;

5. Sponges, fabric, wood, leather, paper products, and other absorbent materials shall not be cleaned in the cold cleaning machine;

6. When a pump‑agitated solvent bath is used, the agitator shall be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned. Air-agitated solvent baths may not be used;

7. Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately, and the wipe rags or other absorbent materials shall be immediately stored in covered containers for disposal or recycling;

8. Work area fans shall be located and positioned so that they do not blow across the opening of the degreaser unit; and

9. The Permittee shall ensure that the solvent level does not exceed the fill line.

d. Any solvent for use in a cold cleaning machine shall not have a vapor pressure of one millimeter of mercury (1.0 mm. Hg) or greater, measured at twenty degrees Celsius (20o C) or sixty-eight degrees Fahrenheit (68° F) containing VOCs [20 DCMR 764.5];

e. A person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide the following written information to the purchaser [20 DCMR 764.6]:

1. The name and address of the solvent supplier;

2. The type of solvent, including the product or vendor identification number; and

3. The vapor pressure of the solvent, measured in millimeters of mercury (mm Hg) at twenty degrees Celsius (20o C) or sixty-eight degrees Fahrenheit (68° F).

IV. Monitoring and Testing Requirements:

a. The Permittee shall monitor any odor emitted from the facility and take any actions necessary to ensure compliance with Condition II(a).

b. The Permittee shall monitor the operating procedures of the cold-cleaning degreaser to ensure compliance with Condition III(b), (c) and (d).

V. Record Keeping Requirements:

a. The Permittee shall maintain for not less than five (5) years and shall provide to the Department, on request, the information specified in Condition III(e). An invoice, bill of sale, certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section. [20 DCMR 764.7 and 20 DCMR 302.1(c)(2)(B)]

If you have any questions, please call me at (202) 535-1747 or Abraham T. Hagos at (202) 535-1354.

Sincerely,

Stephen S. Ours, P.E.

Chief, Permitting Branch

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