##### August 11, 2015

Amon Brown

Interim Director, Maintenance and Operations

Office of Administration

Gallaudet University

800 Florida Avenue NE

Washington, DC 20002

**RE: Permit (#7027) Permit to Construct and Operate a Diesel Fired Emergency Generator Set at the EMG Memorial**

Dear Mr. Brown:

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 may construct or operate a new stationary source in the District of Columbia. The application of Georgetown University (the Permittee) to construct and operate a 400 kWe MTU Onsite Energy Model-DS00400D6S emergency generator set with a 600 bhp diesel fired engine at the EMG Memorial Building of Gallaudet University, located at 800 Florida Avenue NE, per the submitted plans and specifications, dated May 19, 2015, is hereby approved subject to the following conditions:

I. General Requirements:

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

b. This permit expires on August 10, 2020 [20 DCMR 200.4]. If continued operation after this date is desired, the owner or operator shall submit a renewal application by May 10, 2020.

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.

f. Failure to comply with the provisions of this permit may be grounds for suspension or revocation. [20 DCMR 202.2]

g. If not already completed by the time of issuance of this permit, the Permittee shall, within 12 months of issuance of this permit, submit a revision to the facility’s pending Chapter 3 (Title V) permit application or a significant Chapter 3 permit modification request, as appropriate, depending upon if a renewed permit has been issued by that time, to include the requirements of this permit in the Chapter 3/Title V permit for the facility.

II. Emission Limitation:

a. Emissions from the unit shall not exceed those in the following table, as measured according to the procedures set forth in 40 CFR 89, Subpart E. [40 CFR 60.4205(b), 40 CFR 60.4202(a)(2) and 40 CFR 89.112(a)]:

|  |  |  |
| --- | --- | --- |
| **Pollutant Emission Limits (g/kWm-hr)** | | |
| NMHC+NOx | CO | PM |
| 4.0 | 3.5 | 0.20 |

b. Visible emissions shall not be emitted into the outdoor atmosphere from this generator, 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]

c. In addition to Condition II(b), exhaust opacity, measured and calculated as set forth in 40 CFR 86, Subpart I, shall not exceed [40 CFR 60.4205(b), 40 CFR 60.4202(a), and 40 CFR 89.113]:

1. 20 percent during the acceleration mode;

2. 15 percent during the lugging mode;

3. 40 percent during the peaks in either the acceleration or lugging modes. *Note that this condition is streamlined with the requirements of 20 DCMR 606.1.*

d. 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. The 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 this permit to comply with the conditions of 20 DCMR 805 and shall obtain the Department’s approval of such application prior to initiating such operation. [20 DCMR 201]

b. With the exceptions specified in Condition III (c), the emergency generator shall be operated only during emergencies as follows [20 DCMR 201]:

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. When there is a deviation of voltage or frequency from the electrical service provider to the premises of five (5) percent or more below standard voltage or frequency 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. The emergency generator may be operated for the purpose of maintenance checks and readiness testing and in non-emergency situations for a period not to exceed one hundred (100) hours per year as specified in Conditions III(c)(1) and (2) below. Any such operation shall be considered as part of the 500 hours allowed under Condition III(a) above. [40 CFR 60.4211(f)]

1. The emergency generator may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. [40 CFR 60.4211(f)(2)(i) and DCMR 201]; and

2. The emergency generator may be operated for up to fifty (50) hours per calendar year in non-emergency situations. Any such operation shall be counted as part of the 100 hours per calendar year for maintenance and testing as provided in Condition III(c). These 50 hours of non-emergency operations per calendar year cannot be used for peak shaving, or as part of any program to supply power to generate income for the facility as part of a financial arrangement with another entity. All operations prohibited under Condition III(f) are also prohibited under this condition. [40 CFR 60.4211(f)(3) and 20 DCMR 201]

d. The emergency generator shall fire only diesel fuel which contains a maximum sulfur content of 15 ppm (0.0015% by weight) and either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. [40 CFR 60.4207(b)]

e. The emergency generator shall be operated and maintained in accordance with the recommendations of the equipment manufacturer. [20 DCMR 201]

f. The emergency generator 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 unit 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 Condition 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 each month with the use of a properly functioning, non-resettable hour metering device. [40 CFR 60.4209(a) and 40 CFR 60.4214(b)]

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 502.6]

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 five (5) years and shall be made available to the Department upon written or verbal request [20 DCMR 30302.1(c)(2)(B) and 20 DCMR 500.8]:

1. The date, time, duration, and reason for each start-up of the emergency generator, including the following specific information:

i. If the unit is operated due to a deviation in voltage from the utility pursuant to Condition III(b)(2) this shall be specifically noted;

ii. If the unit is operated in non-emergency situations pursuant to Condition III(c), the specific purpose for each operation period must be recorded; and

iii. If the unit is operated for emergency purposes, what classified the operation as emergency.

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 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, 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. The total hours of operation each calendar year for non-emergency purposes pursuant to Condition III(c);

6. Records of the maintenance performed on each unit;

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

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

9. 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 generator’s manufacturer’s maintenance and operating recommendations at the facility. [20 DCMR 501]

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

1. A fuel delivery receipt and documentation of sampling and analysis containing the following information:
   * + 1. 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);
       2. The weight percent sulfur of the fuel oil as determined using ASTM test method D-4294 or D-5453 or other method approved in advance by the Department;
       3. The date and time the sample was taken;
       4. The name, address, and telephone number of the laboratory that analyzed the sample; and
       5. The test method used to determine the sulfur content.

d. The Permittee shall maintain a copy of the EPA Certificate of Conformity at the facility at all times. [20 DCMR 500.1]

VI. Reporting Requirements

a. If the Permittee ever operates the emergency generator for more than 15 hours in a calendar year for the purpose described in Condition III(b)(2), the Permittee shall thereafter submit annual reports to the U.S. Environmental Protection Agency (EPA) and the Department as specified in Condition VI(b). These annual reports shall contain the following information [40 CFR 60.4214(d)]:

1. Company name and address where the engine is located;

2. Date of report and the beginning and ending dates of the reporting period;

3. Engine site rating and model year;

4. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place;

5. Hours operated for the purpose specified in Condition III(b)(2), including the date, start time, and end time for engine operation for the purpose specified in Condition III(b)(2); and

b. Reports shall be submitted as follows:

1. Reports to the Department shall be submitted to the following address:

District Department of the Environment

Chief, Compliance and Enforcement Branch

Air Quality Division

1200 First Street, NE, 5th Floor

Washington, D.C. 20002

2. Reports to EPA must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA’s Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the EPA Administrator at the following address:

EPA Region III

Director, Air Protection Division

1650 Arch Street

Philadelphia PA, 19103

c. The first annual report must cover the calendar year 2015 or the first calendar year thereafter that the unit operated for more than 15 hours for the purpose specified in Condition III(b)(2). Each annual report must be submitted by March 31 of the calendar year following the year covered by the report.

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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