August 15, 2017

Mr. G.H. Simmons, PE, CFM

Georgetown University

3700 O Street, NW

Washington, DC 20057

**RE: Permit No. 7169 to Construct and Operate One (1) 40 kWe Natural Gas Fired-Emergency Generator Set at Georgetown University, Yates Building, 3700 O Street NW, Washington, DC**

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 Department of Energy and Environment (the Department) shall be obtained before any person can construct and operate a stationary source in the District of Columbia. The application of Georgetown University (the Permittee) to construct and operate a 40 kWe emergency generator set powered by a 72 hp Kohler model 40REZG natural gas-fired engine at the Yates Building of Georgetown University, 3700 O Street NW**,** Washington DC, per the submitted plans and specifications, received on May 4, 2017 is hereby approved, subject to the following conditions:

I. General Requirements:

a. The emergency generator shall be maintained and operated in accordance with the applicable section of Title 20 of the District of Columbia Municipal Regulations (20 DCMR).

b. This permit will expire on August 14, 2022 [20 DCMR 200.4]. If continued operation after this date is desired, the Permittee shall submit an application for renewal by May 14, 2022.

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]

g. If not already completed, within three (3) months of issuance of this permit to operate, the Permittee shall submit a complete application to modify the facility’s Title V operating permit to include the requirements of this permit. [20 DCMR 301.1(a)(2) and 20 DCMR 301.1(b)(5)].

h. This unit shall replace an existing diesel 15 kWe unit identified as IEPN-4DD in the Title V master emission unit list.

II. Emission Limitations:

a. Emissions from this unit shall not exceed those in the following table [40 CFR 60.4233(e) and Subpart JJJJ, Table 1]:

|  |  |
| --- | --- |
| **Pollutant Emission Limits** | |
| **g/HP-hr** | |
| NOx + HC | CO |
| 10 | 387 |

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].

*Note that 20 DCMR 606 is subject to an EPA-issued call for a State Implementation Plan (SIP) revision (known as a “SIP call”) requiring the District to revise 20 DCMR 606. See “State Implementation Plans: Response to Petition for Rulemaking; Restatement and Update of EPA’s SSM Policy Applicable to SIPs; Findings of Substantial Inadequacy; and SIP Calls To Amend Provisions Applying to Excess Emissions During Periods of Startup, Shutdown and Malfunction”, 80 Fed. Reg. 33840 (June 12, 2015). It is likely that this federal action will result in changes to the requirements of 20 DCMR 606. Any such changes, once finalized in the DCMR, will supersede the language of Condition II(b) as stated above.*

c. 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:

* 1. a. The emergency generator shall be operated for fewer than 500 hours in any given 12 month period. If operation of 500 hours or more 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.

b. Except as specified in Condition III(c), the emergency generator shall be operated only during emergencies resulting from electrical power outages 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.). [20 DCMR 201]

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 60.4243(d)]

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 60.4243(d)(2)(i) and DCMR 201]; and

2. The emergency generator may be operated for up fifty (50) hours per calendar year in non-emergency situations, subject to the following conditions [40 CFR 60.4243(d)(3) and 20 DCMR 201]:

i. Any such operations shall be counted as part of the 100 hours per calendar year for maintenance and testing as provided in Condition III(c);

ii. 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;

iii. All operations prohibited under Condition III(f) are also prohibited under this condition; and

iv. All operations of the emergency generator resulting from a deviation in voltage or frequency from the electric provider to the premises such that the equipment being supported cannot be safely or effectively operated shall be considered non-emergency operation and counted as part of this 50 hour per calendar year allowance.

d. The emergency generator shall fire only natural gas per the submitted plan and specifications. [20 DCMR 201]

e. The emergency generator shall be operated and maintained in accordance with the recommendations of the equipment manufacturer. [20 DCMR201]

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 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 each month with the use of properly functioning, non-resettable hour metering device. [40 CFR 60.4237(c)]

c. The Permittee shall monitor the equipment as necessary to ensure compliance with Conditions II(b) and (c). Records of such monitoring shall be kept in accordance with the record keeping requirements of this permit.

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 [20 DCMR 302.1(c)(2)(B), 20 DCMR 500. 8, and 40 CFR 60.4245(a)]:

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 in non-emergency situations pursuant to Condition III(c)(2), the specific purpose for each operation period must be recorded; and

ii. 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 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 and non-emergency operation 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;

1. The total hours of operation each calendar year for non-emergency purposes pursuant to Condition III(c)(2);
2. Records of the maintenance performed on the unit *[Note that these records must be sufficient such that the Permittee is complying with the requirements of Condition III(e)];*
3. Records of the results of any visible emissions monitoring performed;
4. Records of the occurrence and duration of each malfunction of operation;

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; and

9. Fuel usage records maintained on a monthly and annual total basis for use in reporting fuel use and emissions from the facility, including equipment covered by this permit, pursuant to the requirements of the facility’s Title V permit.

b. The Permittee shall maintain a copy of the emergency generator’s manufacturer’s maintenance and operating recommendations at the facility.

c. The Permittee shall maintain a copy of the EPA Certificate of Conformity at the facility at all times. [40 CFR 60.4245(a)(3)]

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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