June 8, 2021

Tashni-Ann Dubroy, Ph.D.

Executive Vice President and COO

Howard University

2400 6th Street NW

Suite 440

Washington, DC 20059

**RE: Permit No.** **7302 to Operate a Non-Emergency Generator at** **the College of Medicine, 520 W St NW, Washington DC 20059**

Dear Dr. Dubroy:

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 Howard University (“the Permittee”) to operate one (1) 30 kWe non-emergency generator set, designated “College of Medicine Generator #2, and powered by a 49 hp diesel-fired engine, located at the College of Medicine, 520 W St NW, Washington DC, per the submitted plans and specifications, received on March 31, 2021, is hereby approved, subject to the following conditions:

I. General Requirements:

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

b. This permit expires on June 7, 2026. [20 DCMR 200.4] If continued operation after this date is desired, the Permittee shall submit a renewal application by March 7, 2026.

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 submitted at the time of issuance of this permit, the Permittee shall submit a complete application to modify the facility’s Title V operating permit to include the requirements of this permit within 12 months of the date of issuance of this permit. [20 DCMR 301.1(a)(3)]

II. Emission Limitations:

a. Emissions from the generator set shall not exceed those found in the following table: [40 CFR 60.4204(a), 40 CFR 60, Subpart IIII, Table 1]

|  |
| --- |
| **Pollutant Emission Limits (g/kWm-hr)** |
| NMHC+NOx | CO | PM  |
| 9.5 | 5.5 | 0.80 |

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:

a. The generator engine shall fire only diesel fuel that contains a maximum sulfur content of 15 ppm (0.0015 percent by weight) and either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. [20 DCMR 801.1 and 40 CFR 60.4207(b)] *Note that this is a streamlined requirement. Compliance with the more stringent requirement of 40 CFR 60.4207(b) reflected here will ensure compliance with 20 DCMR 801.1.*

b. The 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]

c. The generator set and all of its appurtenances shall be maintained and operated as follows: [40 CFR 60.4211(a)]

1. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;

2. Change only those emission-related settings that are permitted by the manufacturer; and

3. Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply to the unit.

d. 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 total number of hours of operation of the generator set each month with the use of a properly operating non-resettable hour meter installed on the unit. [20 DCMR 500.1]

b. The Permittee shall monitor and/or test for the sulfur content in the diesel fuel obtained for use in the generator engine as necessary to show compliance with Conditions III(a) and V(c) in accordance with appropriate ASTM methods. [20 DCMR 502.3 and 502.6]

c. 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]

d. The Permittee shall maintain an awareness of the operation of the generator set to identify potential exceedances of Condition II(b). If significant visible emissions are observed from the unit, the Permittee shall have the visible emissions tested by a qualified person certified to perform testing pursuant to 40 CFR 60, Reference Method 9. [20 DCMR 502.1]

V. Record Keeping and Reporting 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 from the date the information is obtained [20 DCMR 500.8]:

1. 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;

2. Records of the maintenance performed on the unit, sufficient to show compliance with Conditions III(c) and (d);

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

4. Records of any complaints received by the Permittee about the operation of the generator set;

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

6. Records of the actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation; and

7. Records of the quantity of fuel used in the unit, recorded on a monthly basis and summed for each calendar year.

b. The Permittee shall maintain a copy of the 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(a); or

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

A. 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);

B. 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;

C. The date and time the sample was taken;

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

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

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

e. The Permittee shall, within ten (10) days of becoming aware of a deviation from any condition of this permit, submit a written report to the Department at the following address [20 DCMR 502]:

Chief, Compliance and Enforcement Branch

Department of Energy and Environment

Air Quality Division

1200 First Street NE, 5th Floor

Washington DC 20002

f. The Permittee shall include the equipment covered by this permit document in all reports required by the Title V permit for the facility, including, but not limited to, semi-annual and annual compliance certifications and reports, wherein the Permittee shall certify compliance or non-compliance with the conditions of this permit document for the covered equipment.

If you have any questions, please call me at (202) 535-1747 or Thomas Olmstead at (202) 535-2273.

Sincerely,

Stephen S. Ours, P.E.

Chief, Permitting Branch

SSO:TJO