

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Department of Energy and Environment

CHAPTER 2 TECHNICAL SUPPORT MEMORANDUM

TO: File

FROM: Stephen S. Ours, P.E. *SSO*  
Chief, Permitting Branch

SUBJECT: **U.S. Department of State  
Permit Numbers 6892-R1 through 6900-R1  
Permits to Operate Nine 6.0 MMBtu/hr Natural Gas-Fired Boilers**

DATE: May 14, 2019

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**BACKGROUND INFORMATION**

A set of permit renewal requests for permit numbers 6892 through 6900 to operate nine (9) 6.0 MMBTU/hr natural gas-fired boilers at the U.S. Department of State, located at 2201 C Street NW, was received by the Air Quality Division (AQD) on March 5, 2019.

The permit action will be published in the DC Register and on DOEE's website on May 24, 2019. Public comments for the permit action will be solicited through June 24, 2019.

The applicant has not requested that any of the materials submitted with this application be held confidential.

**REGULATORY REVIEW**

Since the previous permits were issued in 2014, it has been identified that the Department of State facility at 2201 C Street NW is a major source of air pollutants, specifically, oxides of nitrogen (NOx). This means that 20 DCMR Chapter 3 is applicable to the facility. They have submitted a Title V permit application (received August 2, 2018), but this application has not been processed.

Additionally, because the facility is now a major source of NOx, 20 DCMR 805.1(a)(4) covers the equipment and requires that reasonably available control technologies (RACT) be applied to the equipment. AQD has previously determined that annual tuning pursuant to the requirements of 20 DCMR 805.8 meets this requirement for small external combustion equipment at major NOx sources. As such, this requirement has been added to the permit.

Otherwise, no new regulations have been identified as applicable to the source. See the May 30, 2014 memorandum for a more complete regulatory review. Note that the area source boiler rule (40 CFR 63, Subpart JJJJJ) is not applicable because the units are exclusively natural gas fired.

Note that some additional conditions were updated, such as record keeping requirements, to

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address the above revision to the permit as well as to address Chapter 3 record keeping requirements.

**RECOMMENDATIONS**

The proposed project and attached permit comply with all applicable federal and District air pollution control laws and regulations.

Public comments for the permit action will be solicited from May 24, 2019 through June 24, 2019. AQD will resolve any comments received before issuing the final permit. If no adverse public comments are received, I recommend that permit Nos. 6321-R2, 6322-R2, and 6323-R2 be issued in accordance with 20 DCMR 200.2 promptly upon the expiration of the public notice period. If comments are received, they will be addressed before final action on the applications are taken.

SSO

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