GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment

Air Quality Division

TO: File

THROUGH: Stephen S. Ours, P.E.
Chief, Permitting Branch

FROM: Olivia Achuko
Environmental Engineer

SUBJECT: AT&T Corp.
Permits Nos. 6249-R1 and 6250-R1 to Operate Two Diesel Fired Generators

DATE: May 20, 2015

BACKGROUND INFORMATION

AT&T Communications of Washington DC, LLC submitted a request to amend two current permits (6249-A1 and 6250-A1) that were issued on February 11, 2011 as amendments to original permits issued on January 7, 2010. Permit Nos. 6249 and 6250 were originally issued on January 7, 2010 for two 1,600 kW kerosene fired emergency generators. The "Request to use Ultra-Low Sulfur Diesel", received on September 20, 2012, was to change the permitted fuel from kerosene to diesel. The letter stated that AT&T was submitting an application modification for the proposed change in permitted fuel used in two of three currently permitted emergency generators located at 725 13th Street NW, Washington DC. Problems were identified with the emission calculations and other aspects of the application, thus the applicant submitted a revised application, received May 2, 2013. This new application indicated a name change to AT&T Corp. (confirmed by email from Debra Moran to Olivia Achuko on May 14, 2015).

The Company has not requested that any of the materials submitted with these applications be held confidential.

TECHNICAL INFORMATION

The two units that will be affected by the amendment are non-NSPS engines installed in October of 1998 (See email from Ali Farnoud dated February 24, 2014). There are total of three emergency generators at this location. The third is a 1,750 kW engine installed in 2012 and permitted under Permit #6549.

When the amendment letter was submitted to switch to diesel, it was noticed that the plant-wide potential to emit (PTE) will exceed the 25 ton per year threshold if operated at 500 hours limit for emergency generators. This would put the source in a position to go through the New Source

Review (NSR) process. The source was contacted, and it decided to take a limit on operation (340 hours per year for each of the two units) to stay below the threshold and avoid NSR applicability. Revised applications were received on May 2, 2013.

After several communications (emails and phone calls) to get additional information about this facility, the DDOE air quality permitting engineer (Ms. Olivia Achuko) decided to do a site visit which was completed on March 27, 2014 with Ali Farnoud, a contractor for the source. After further discussions, it was determined that the change of fuel does not constitute a "modification" to the source for purposes of the federal New Source Performance Standards.

While the amendments were being processed, permit numbers 6249-A1 and 6250-A1 expired, therefore the amendment was changed to a combined renewal and amendment, hence the "R1" instead of "A2" designation in the permit number.

The District does not have synthetic minor provision in the Title V operating permit program regulations at this time, therefore the source will be required to submit a Chapter 3 operating permit application within twelve months of issuance the Chapter 2 permits to incorporate the requirements of these permits, including the limits on operating hours. Condition I(h) was included in the permits to address this issue.

REGULATORY REVIEW

20 DCMR 200: General Permit Requirements:
Emergency generator engines are sources of oxides of nitrogen and other air pollutants because they use diesel fuel. Thus a Chapter 2 permit is required for installation and operation.

Among other requirements, the applicant volunteered to use diesel fuel that contains a maximum sulfur content of 15 ppm (0.0015% by weight), therefore Condition III(d) has been incorporated into the permits using authority under this regulatory section as a basis for inclusion.

Relevant testing and record keeping requirements associated with this limit were included in Conditions IV(c) and V(c) of the permits.

20 DCMR 204: Permit Requirements for Major Sources Located in Non-Atainment Areas (New Source Review)
The facility would have become a new major stationary source with the change in potential to emit related to the change in fuel type in these two generators. However, to avoid triggering this

rule, they requested an operating hour limit of 340 hours per year. This limit has been included in the permit and has been made enforceable as a practical matter.

20 DCMR 805: Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen

These units are emergency engines with operational limits less than 500 hours per 12-month rolling period (340 hours, each). Therefore, per 20 DCMR 805.1(c)(2), this regulation is not applicable.

20 DCMR 606: Visible Emissions:

The visible emission limitations of 20 DCMR 606 are applicable to this facility. Condition II(b) of the permits include this requirement.

20 DCMR 903: Odorous or Other Nuisance Air Pollutants

"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]" is applicable to all sources. It is contained in Condition II(c) of the permit.

Other Regulations:

40 CFR 60, Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

This is not applicable to the units because they were installed in 1998, prior to the applicability date of this regulation.

40 CFR 63, Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The permits have been written to not allow operation as part of demand response programs and to not allow operation in low voltage/frequency situations. See Conditions III(b) and (f) and V(a) of the permits. These limits allow the facility to qualify for an exemption from this regulation pursuant to 40 CFR 63.6585((f)(2).

RECOMMENDATIONS

The public notice announcement was submitted to the D.C. Register for publication on May 29, 2015. The draft permits are available for public comment through June 29, 2015. If no comments are received, I recommend that these permits be issued promptly after the expiration of the public comment period. If comments are received, they will be addressed before issuance of any permit.

SSO/NOA