



Fw: Comments on Proposed Rulemaking - Amendments to Tuning Deadline for Reasonably Available Control Technology

From Jakuta, Joseph (DOEE) <Joseph.Jakuta@dc.gov>
Date Wed 3/12/2025 12:57 PM
To Gerike, Thatch (DOEE) <thatch.gerike@dc.gov>

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From: Terry Darton <tdarton@all4inc.com>
Sent: Sunday, February 23, 2025 8:20 PM
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Subject: Comments on Proposed Rulemaking - Amendments to Tuning Deadline for Reasonably Available Control Technology

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Good day, Mr. Jakuta,

We appreciate the opportunity to comment on the subject Proposed Rulemaking and are very pleased to see that the District of Columbia is proposing to change its regulations based on changing environmental conditions. We would like to propose the following minor adjustment to the proposal new regulation.

Subsection 805.5 Paragraph (b) (2) is proposed to change from:

(b) Beginning January 1, 2022, for any fuel burning equipment with a heat input capacity of five million (5,000,000) BTU per hour or greater shall, prior to November 1st of each year, adjust the combustion process in accordance with the procedure for doing so set forth at § 805.9;

to:

(b) Beginning January 1, 2022, any fuel burning equipment with a heat input capacity of five million (5,000,000) BTU per hour or greater shall adjust the combustion process in accordance with the procedure and timeline for doing so set forth at § 805.9 and the following schedule:

(1) For calendar year 2022 through calendar year 2024, prior to November 1 of that year; and

(2) For the calendar year 2025 and subsequent calendar years, ~~between October 1 and December 31~~ no later than December 31, of that year.

We feel that this change will most likely adversely affect the sources subject to this requirement as this still provides a very narrow window for accomplishing the required annual tune-up, whereby a warm October and November would provide only one month again for a tune-up to occur. We believe that Subsection 805.5 (b) (2) should read “For the calendar year 2025 and subsequent calendar years, no later than December 31, of that year.”

This change would allow sources that operate their boilers year-round to perform tune-ups when it best suits their operations and prevailing weather conditions. It also does not relieve the owner/operator of the requirement to tune a boiler after it has been shut down for any reason.

Thank you for considering this change.



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