

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

CHAPTER 2 TECHNICAL SUPPORT MEMORANDUM

TO: File

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

FROM: Hannah Staley
Environmental Protection Specialist

**SUBJECT: Georgetown University
Permit No. 7407-A1 to Construct and Operate Eleven (11) 1.792 MMBTU
per Hour Fuel Oil-Fired Water Heaters at Georgetown University**

DATE: January 8, 2026

BACKGROUND INFORMATION

Permit No. 7407, to construct and operate eleven (11) 1.792 MMBTU per hour fuel oil-fired water heaters at the East Campus of Georgetown University near 1200 35th Street NW, Washington, DC 20057, was issued to Georgetown University on June 10, 2025. On October 1, 2025, Georgetown University submitted a permit application to modify the current Permit No. 7407 by increasing the total fuel oil usage by these water heaters, in aggregate, from 229,574 gallons per 12-consecutive-month rolling period to 364,942 gallons per 12-consecutive-month rolling period. After further analysis, Georgetown University determined that the fuel limit must be increased to ensure that adequate heat can be supplied to the East Campus buildings. This memorandum and associated draft permit proposes to address this application.

This permit will be published in the DC Register and on the Department of Energy and Environment (“DOEE” or “the Department”) website on January 16, 2026. Public comments on the proposed permit action will be solicited through February 17, 2026.

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

REGULATORY AND TECHNICAL REVIEW

Georgetown University is proposing to increase the allowable fuel usage of the eleven (11) water heaters, in aggregate, to 364,942 gallons per 12 consecutive-month rolling period. There are no changes to the regulatory requirements evaluated for issuance of the previous Permit No. 7407 (issued June 10, 2025). For a full regulatory analysis, please see the associated [technical support memorandum](#), dated May 1, 2025.

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The updated fuel usage will increase the potential to emit of each pollutant as shown in the table below. As noted in the table, the total potential to emit each of the listed pollutants does not exceed 5 tons per year

Total Potential To Emit (PTE) from 11 Water Heaters (In Aggregate)			
Pollutant	Total PTE at 229,574 Fuel Usage (Tons/Year)	Total PTE at 364,942 Fuel Usage (Tons/Year)	Difference of Total PTE (Tons/Year)
Carbon Monoxide (CO)	0.6	1.0	+0.4
Oxides of Nitrogen (NO _x)	2.6	4.1	+1.5
Total Particulate Matter (PM Total) [†]	0.38	0.4	+0.2
Sulfur Dioxide (SO ₂)	0.02	0.04	+0.02
Volatile Organic Compounds (VOC)	0.1	0.16	+0.06
Total Hazardous Air Pollutants (Total HAPS)	0.05	0.05	0.0 [‡]

[†] PM Total includes both filterable and condensable particulate matter fractions.

[‡] When calculating potential to emit Total HAPs, the applicant did not take into account the fuel usage limitation, thus overestimating the true PTE. This estimation technique also results in no difference in the estimate with the increase in allowable fuel usage.

RECOMMENDATIONS

The application to construct and operate eleven (11) 1.792 MMBTU per hour fuel oil-fired water heaters and the attached modified operating permit, comply with all applicable federal and District air pollution control laws and regulations.

Public comments for the permit action will be solicited from January 16, 2026 through February 17, 2026. AQD will resolve any comments received before taking any final action on the permit application. If no comments are received, I recommend that permit No. 7407-A1 be issued in accordance with 20 DCMR 200.1 and 200.2.

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