

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

CHAPTER 2 TECHNICAL SUPPORT MEMORANDUM

TO: File

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

**SUBJECT: General Services Administration (GSA)
Central Heating and Refrigeration Plant (CHRP)
Permit No. 7413 to Install Low NO_x Burners and Flue Gas Recirculation
(FGR) on and Operate 500 MMBTU/hr Boiler No. 3**

DATE: December 19, 2025

BACKGROUND INFORMATION

On November 14, 2022, the U.S. General Services Administration (“GSA”) submitted a “Technical Study for the NO_x Reduction Strategy at CHRP-GSA”, dated November 3, 2022. This study supplemented an alternative reasonably available control technology for oxides of nitrogen (NO_x RACT) plan dated March 1, 2022. These documents called for upgrades to several boilers at the GSA Central Heating and Refrigeration Plant (CHRP), located at 325 13th Street SW, Washington DC. One of these boilers is Boiler No. 3.

Boiler No. 3 is a 500 MMBTU/hr dual fuel-fired (natural gas and No. 2 fuel oil) boiler. This boiler was originally installed in 1973. It was originally designed to burn oil, but was converted to primarily natural gas firing in the 1990s. The original burners were replaced during the gas conversion and, per the November 3, 2022 Technical Study, were “seemingly replaced again sometime after that with what were more modern burners at the time.”

Boiler No. 3 does not currently meet the applicable presumptive NO_x RACT standards in 20 DCMR 805.5, as promulgated on November 26, 2021. As a result, with a permit application submitted to the Department of Energy and Environment’s (“DOEE’s” or “the Department’s”) Air Quality Division (“AQD”) on April 18, 2025, with additional clarifying submittals submitted by email on July 9 and July 16, 2025, GSA has proposed to install Falcon Combustion FVF low NO_x burners and a flue gas recirculation (FGR) system to reduce NO_x emissions sufficiently to meet the presumptive RACT standard. This permit action addresses that application.

This permit action will be published in the DC Register on December 26, 2025. Public comments on the permit action will be solicited through January 27, 2026.

GSA has not requested that any of the materials submitted with this application be held confidential. It should be noted that the November 3, 2022 Technical Study was labeled

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“Confidential and Proprietary”, but in an email of November 14, 2022, George Korvah indicated that, per the contractor that prepared the study, this is standard language for all such studies that contractor prepares, and further indicated that GSA was not claiming that the document was confidential.

REGULATORY REVIEW

20 DCMR Chapter 2, Section 200: General Permit Requirements:

The CHRP facility is an air pollution source for criteria and other air pollutants. The applicant is requesting a permit to operate fuel burning equipment greater than 5 MMBTU/hr heat input and to modify the equipment install an FGR system to reduce NO_x emissions from the equipment. Thus a Chapter 2 permit to construct is required pursuant to 20 DCMR 200.1 and a permit to operate is required pursuant to 20 DCMR 200.2.

20 DCMR Chapter 2, Section 205: New Source Performance Standards (NSPSs):

This regulation adopts most NSPSs found in 40 CFR 60, relevant to sources in the District of Columbia, by reference. 40 CFR 60, Subpart D applies to this boiler (see the discussion below). However, it has not been adopted into 20 DCMR 205. Thus 20 DCMR 205 does not apply to this boiler at this time.

20 DCMR Chapter 3, Section 301: Operating Permit Requirements:

The CHRP facility is a major source subject to Chapter 3 and continues to need an operating permit in accordance with 20 DCMR 300.1. The requirements of this permit will need to be moved into the facility’s Chapter 3 operating permit. Condition I(g) of the permit gives GSA twelve months from the issuance of the Chapter 2 permit to revise the pending Chapter 3 permit renewal application to include its requirements, as required by 20 DCMR 301.1(a)(2).

20 DCMR Chapter 5: Source Monitoring and Testing Requirements:

GSA must maintain and operate a continuous emissions monitoring system (CEMS) and continuous opacity monitoring system (COMS) for oxides of nitrogen (NO_x) and opacity in accordance with 20 DCMR 501.1 and 502.10 and submit the information to the District in accordance with 20 DCMR 500.1. These requirements have been established in Conditions IV(a) through (e) of the permit. Additionally, records must be kept according to Conditions V(b) and V(d) as required by 20 DCMR 500.2.

GSA must sample and test the fuel oil at least once each calendar quarter or at the time of each fuel delivery (whichever is less frequent) or otherwise obtain necessary information from their fuel supplier. This requirement has been established in Condition IV(f) of the permit. Records of this information is required to be maintained per Condition V(i).

GSA must perform emission testing per 20 DCMR 502 to determine compliance with particulate matter and carbon monoxide limits placed in the permit pursuant to 20 DCMR 201 and 20 DCMR 600.1. This testing is required pursuant to Condition IV(g) of the permit.

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GSA must monitor records of the amount of No. 2 fuel oil and natural gas used each month in Boiler No. 3. These data shall be maintained in a rolling twelve month sum format. These requirements have been established in Conditions IV(i) and V(k) of the permit

20 DCMR Chapter 6, Section 600: Fuel Burning Particulate Emission

The requirements of Section 600.1 were placed in Condition II(b) of the permit and testing requirements to determine compliance were placed in Condition IV(g).

20 DCMR Chapter 6, Section 606: Visible Emissions

The visible emissions regulation was recently revised in 2023. Condition II(d) retains the prior 10% opacity base standard, reflected in Title V permit No. 032. This standard is now found in 20 DCMR 606.1(a)(3) and covers boilers placed in operation on or before January 1, 1977 (Boiler 3 was initially placed in operation in 1973). However, it now limits deviations from this standard to two minutes during any startup, cleaning, adjustment of combustion or operational controls, or regeneration of emission control equipment. During those two minute exceptions, visible emissions must meet a 20% opacity standard when burning exclusively natural gas and a 27% standard when burning fuel oil or a combination of fuel oil and natural gas. See 20 DCMR 606.2. Compliance with these standards is determined with the use of a continuous opacity monitoring system (COMS), as required in Condition IV(b) and (c).

The general duty requirement of this regulation (20 DCMR 606.4(a)) is now found, streamlined with other requirements, in Condition III(c). The maintenance and training requirements of the regulation, 20 DCMR 606.4(b) and (c), are found in Conditions III(f) and (g), respectively.

Record keeping for all aspects of compliance with this regulation is required pursuant to Conditions V(a), in general, and V(q), specifically.

20 DCMR Chapter 8, Section 804: Nitrogen Oxide Emissions

This regulation applies to fossil fuel-fired steam generating units of more than 100 MMBTU/hr heat input and therefore applies to Boiler 3. Its requirements are found in Conditions II(c)(1)(ii) and II(c)(2)(ii) of the permit. Compliance will be determined via operation of NO_x CEMS, the operation and maintenance of which are required throughout the permit. Particular guidance for determining compliance with this regulation is found in Condition IV(a)(4).

20 DCMR Chapter 8, Section 805: Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen

Because the unit is fuel-burning equipment with a heat input greater than 5 MMBTU/hr at a major source of NO_x, this regulation is applicable. As discussed in the “Background Information” section above, GSA identified in a “Technical Study for the NO_x Reduction Strategy at CHRP-GSA”, dated November 3, 2022 that Boiler 3, as currently designed, is not capable of consistent compliance with the presumptive RACT standards applicable to this boiler found in 20 DCMR 805.5(e)(2)(A) and (B) for operations on fuel oil and natural gas, respectively.

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As a result, with a permit application submitted to AQD on April 18, 2025, with additional clarifying submittals submitted by email on July 9 and July 16, 2025, GSA has proposed to install Falcon Combustion FVF low NO_x burners and a flue gas recirculation (FGR) system to reduce NO_x emissions sufficiently to meet the presumptive RACT standards. This permit action addresses that application and proposes to authorize the requested installations.

The standards found in 20 DCMR 805.5(e)(2)(A) and (B) are included in the draft permit as Conditions II(c)(1)(i) and II(c)(2)(i).

Monitoring for compliance using a CEMS for NO_x is required pursuant to 20 DCMR 805.5(f)(2) and 20 DCMR 805.10(a)(1). This latter requirement requires that the CEMS be operated and maintained following the procedures set forth in 40 CFR 60, Appendix B, with certain exceptions, among which is if the facility is required to operate 40 CFR Part 75 CEMS pursuant to 20 DCMR 1002. This exception applies in this case. This is discussed in more detail in the CEMS Streamlining section below. These CEMS procedures are found in Conditions IV(a) and (c) through (e). Records must be kept pursuant to 20 DCMR 805.11 as specified in Conditions V(a) and (b).

In addition, pursuant to 20 DCMR 805.5(b), an annual tune-up is required for this boiler, following the procedures set forth in 20 DCMR 805.9. This requirement is specified in Conditions II(e) and III(d) and (e), with associated record keeping requirements in Condition V(u).

In addition to the requirements for Boiler No. 3 specifically, this permit has incorporated a previously existing facility-wide emissions limit for NO_x of 268 tons in any 12-consecutive-month period. This limit applies, in part, to Boiler No. 3, but also applies to all other NO_x-emitting equipment at the site. It is being incorporated into this permit in Condition II(h), which also specifies, generally, the required compliance methodology for all units at the site.

20 DCMR Chapter 9, Section 903: Odorous or Other Nuisance Air Pollutants

The following requirement is applicable to all sources pursuant to 20 DCMR 903.1: “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”. This requirement is contained in Condition II(g) of the permit.

In addition the recently established affirmative defense provisions of 20 DCMR 903.13(b) are also found in Condition II(g).

20 DCMR 903 is not found in the District’s SIP and is therefore District-enforceable only. This is so noted in the permit.

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20 DCMR Chapter 10: Nitrogen Oxides Emissions Budget Program

This regulation is applicable to the equipment covered by this permit (Boiler No. 3) in combination with the two combustion turbines and the duct burners and Boiler No. 4 at the facility. It requires emissions from these three units to not exceed 25 tons per control period (May 1 - September 30 each year, inclusive). It additionally requires NOx monitoring via CEMS pursuant to the procedures in 40 CFR 75, Subpart H. Note that, while 40 CFR Part 75 has provisions for monitoring opacity with continuous opacity monitoring systems (COMS), these requirements are not triggered by 20 DCMR Chapter 10. The requirements of this regulation have been incorporated throughout the permit. See also the CEMS Streamlining section of this memorandum, below.

20 DCMR Chapter 14, Section 1410: Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers

The requirements of 40 CFR 63, Subpart DDDDD are adopted by reference in this section. This subpart is applicable to this equipment and has been addressed in the permit. See the more complete discussion of this subpart below.

40 CFR 52.470(d): EPA-Approved State Source-Specific Requirements

This portion of the District's State Implementation Plan (SIP) incorporates the majority of an October 21, 1997 permit issued by the District to GSA and covering CHRP and the now demolished West Heating Plant (WHP). Many of the requirements are no longer relevant to the equipment covered by this draft permit 7413. However, one aspect of the permit that is relevant is a requirement for all of the boilers at the facility to use CEMS and operate and maintain them in accordance with 40 CFR 60, Appendix F.

As discussed in the CEMS Streamlining section below, AQD has determined that 40 CFR 75 CEMS are at least as stringent as 40 CFR 60 CEMS, and is therefore streamlining this requirement with other CEMS requirements.

Other requirements in the 1997 permit that remain applicable include:

- 1) A requirement to burn only natural gas except during gas supplier service interruptions and related limits on the quality of the natural gas. These requirements have been incorporated into Conditions III(a)(1) and (2) of the permit.
- 2) A facility-wide limit of 4,435,035 gallons of fuel-oil use in any 12-month rolling period. This requirement has been incorporated into Condition III(b) of the permit.
- 3) A requirement to maintain certification of an operate a continuous opacity monitoring system (COMS). This has been incorporated into Conditions IV(b) and (c) of the permit.
- 4) A requirement to submit CEMS and COMS data reports. This has been incorporated into Condition VI(b) of the permit.

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40 CFR Part 60, Subpart D: Standards of Performance for Fossil-Fuel-fired Steam Generators

Per 40 CFR 60.40, this regulation applies to “each fossil-fuel-fired steam generating unit of more than 73 megawatts (MW) heat input rate (250 million British thermal units per hour (MMBtu/hr))” (this unit has a heat input rate of 500 MMBTU/hr), that commenced construction or modification after August 17, 1971 (this unit was installed in 1973) and is not subject to 40 CFR 60 Subparts Da or KKKK. This unit is not subject to either of those standards. As such, Subpart D applies.

The standard for particulate matter in 40 CFR 60.42 does not apply. 40 CFR 60.42(a) establishes a particulate matter standard, but one of the exceptions is where 40 CFR 60.42(e) applies. 40 CFR 60.42(e) states: “An owner or operator of an affected facility that combusts only gaseous or liquid fossil fuel (excluding residual oil) with potential SO₂ emissions rates of 26 ng/J (0.060 lb/MMBtu) or less and that does not use post-combustion technology to reduce emissions of SO₂ or PM is exempt from the PM standards specified in paragraph (a) of this section.” Condition III(a)(2) of the permit limits the total sulfur content of natural gas to less than 20 gr/100 SCF, which equates to slightly less than 0.060 lb SO₂/MMBTU (estimated as 0.056 lb SO₂/MMBTU). Similarly, Condition III(a)(3)(i) limits the sulfur content of fuel oil to 0.0015% by weight, which equates to approximately 0.0015 lb SO₂/MMBTU. As such, no particulate matter standard from NSPS Subpart D is incorporated into the permit. With no particulate matter requirement applicable, no continuous opacity monitoring system (COMS) is required under 40 CFR 60, Subpart D.

The 0.80 lb/MMBTU standard for sulfur dioxide (SO₂) in 40 CFR 60.43(a)(1) applies when the boiler is burning No. 2 fuel oil. This requirement has been incorporated into Condition II(f) of the permit. However, SO₂ CEMS are not required pursuant to 40 CFR 60.45(b)(1) which exempts from CEMS requirements any “fossil-fuel-fired steam generator that combusts only gaseous or liquid fossil fuel (excluding residual oil) with potential SO₂ emissions rates of 26 ng/J (0.060 lb/MMBtu) or less and that does not use post-combustion technology to reduce emissions of SO₂ or PM”. As discussed in the previous paragraph, the sulfur content of the fuel is sufficiently low to qualify for this exemption, and no post-combustion technology is used to reduce emissions of SO₂ or PM. Thus, SO₂ CEMS are not required in the permit.

The standard for nitrogen oxides (NO_x) in 40 CFR 60.44(a)(1) and (2) apply for natural gas and No. 2 fuel oil, respectively, and has been incorporated into Conditions II(c)(1)(iii) and II(c)(2)(iii) of the permit. Based on 40 CFR 60.45(g)(3)(i), these standards are determined by CEMS on a 3-hour average basis. It should be noted that the regulation provides options in 40 CFR 60.44(b) to calculate a different emission limit to account for simultaneous firing of gaseous, liquid, and solid fuels. This unit is not capable of burning solid fuels. Based on a call with George Korvah of GSA on September 30, 2025, there are no circumstances where the boiler will burn natural gas and No. 2 fuel oil simultaneously, so this option has not been incorporated into the permit.

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Because the NOx standards of 40 CFR 60.44 apply, pursuant to 40 CFR 60.45(a), GSA is required to maintain a CEMS for NOx and either oxygen (O₂) or carbon dioxide (CO₂). GSA has elected to maintain an O₂ CEMS. See the CEMS Streamlining section of this memorandum below for further discussion of the applicable CEMS.

40 CFR 60, Subpart Da – Standards of Performance for Electric Utility Steam Generating Units

This regulation applies only to “electric utility steam generating units”. Boiler 3 does not meet the definition of an “electric utility steam generating unit” in 40 CFR 60.41Da, thus this regulation does not apply.

40 CFR Part 63 - National Emission Standards for Hazardous Air Pollutants (NESHAP)

A major source of hazardous air pollutants (HAPs) is defined as a source having potential emissions in excess of 25 tons per year of total HAPs and/or potential emissions in excess of 10 tons per year of any individual HAP. CHRP is a major source of HAPs with the potential to emit 10 tons or more of hexane (C₆H₁₄), an individual HAP.

40 CFR 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (also known as the Major Source Boiler MACT)

The Major Source Boiler MACT applies to industrial, commercial, and institutional boilers at major sources of HAPs. GSA is subject to the requirements of the Major Source Boiler MACT because CHRP was previously determined to have the potential to emit 17.85 tons per year of a single HAP, hexane.

Under this regulation, Boiler No. 3 is considered a “unit designed to burn gas 1 subcategory” unit as defined in 40 CFR 63.7575. As it relates to Boiler No. 3, this means that the unit burns only natural gas except for up to 48 hours per calendar year for “periodic testing of liquid fuel, maintenance, or operator training” and for any period of time that the natural gas supply is interrupted or curtailed. However, because the current Title V permit does not allow operation of the unit on fuel oil for any reason other than natural gas interruption, and Chapter 2 permits cannot contravene Title V permits, this Chapter 2 permit does not allow the 48-hour exception noted above. Note that this requirement originates in Condition 2 of the October 17, 1997 District permit issued to GSA, which has been incorporated into the District’s SIP at 40 CFR 52.470(d).

The requirements of this NESHAP regulation have been included in the Chapter 2 permit, wherever relevant. The requirements for this equipment generally consist of an annual boiler tune-up and a one-time energy assessment. GSA has previously reported that they completed the one-time energy assessment, and AQD has a copy of the resultant report, dated January 2016. As such, the energy assessment requirements have not been placed in the permit. Pursuant to 40 CFR 63.7500(e), “Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or Tables 11 through 15 to

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[40 CFR 63, Subpart DDDDD], or the operating limits in Table 4 to [40 CFR 63 Subpart DDDDD].”

Additionally, the regulation requires submittal of an initial notification to EPA. This was submitted late, but AQD has a copy of such a submittal dated April 3, 2017 in the file for this permit. As such, the requirement to submit the initial notification has not been included in the permit. However, because AQD does not have records of the subsequently required Notification of Compliance Status, which would be overdue at this time, AQD has included requirements to submit this notification immediately upon issuance of the permit, if it has not already been submitted as required. See Condition VI(h) of the permit.

The regulation also requires various other reporting and notifications found in Conditions V(l), (m), (n), (o), and (p), and VI(g) and (i).

CEMS Streamlining

Several separate regulations require monitoring with the use of CEMS as follows:

- 20 DCMR 805, Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen (NO_x RACT) requires CEMS compliant with 20 DCMR 805.10(a)(1), which requires CEMS compliant with 40 CFR 60, Appendix B, except where 20 DCMR 306 or 1002 requires the use of 40 CFR 75 CEMS.
- 20 DCMR Chapter 10, Nitrogen Oxides Emissions Budget Program (NO_x Budget Program), requires monitoring of this unit using CEMS compliant with 40 CFR 75, Subpart H.
- 40 CFR 52.470(d): EPA-Approved District of Columbia Source-Specific Requirements incorporates portions of the operating permit issued to GSA by the District of Columbia on October 17, 1997. Relevant to this evaluation, Condition 7 of this permit required a CEMS complying with the applicable performance specifications of 40 CFR 60, Appendices B and F for NO_x and O₂ (or CO₂).
- 40 CFR Part 60, Subpart D: Standards of Performance for Fossil-Fuel-fired Steam Generators, requires CEMS compliant with 40 CFR 60.13, which states: “For the purposes of this section, all continuous monitoring systems required under applicable subparts shall be subject to the provisions of this section upon promulgation of performance specifications for continuous monitoring systems under appendix B to this part and, if the continuous monitoring system is used to demonstrate compliance with emission limits on a continuous basis, appendix F to this part, unless otherwise specified in an applicable subpart or by the Administrator”.

Compliance with the detailed requirements of 40 CFR Part 60 and 40 CFR Part 75 CEMS requirements would be both difficult and duplicative. The Department has determined that compliance with the CEMS requirements of 40 CFR 75, Appendix H, combined with the adjustments/requirements specified in this permit to account for requirements in 40 CFR 60.

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Subpart D, is at least as stringent as compliance with 40 CFR 60, Appendices B and F while allowing for streamlined monitoring. This is a similar determination to the one associated with permit No. 5197-R1, issued August 23, 2022 for the cogeneration system at GSA-CHRP. Also note that, per the September 1993 EPA Memo: "Use of Acid Rain CEMS as NSPS CEMS" from John B. Rasnic, Director, Stationary Source Compliance Division (SSCD), OAQPS, "SSCD has determined that since the CEMS requirements of 40 CFR Part 75 are equivalent to or more stringent than the requirements of 40 CFR Part 60, EPA can accept Acid Rain CEMSs as NSPS CEMSs provided that the utility demonstrates compliance with all applicable NSPS regulations." Also note that similar determinations, with slight exceptions were made during revisions of 40 CFR 60, Subpart GG (see 69 FR 41345, published July 8, 2004, as reflected at 40 CFR 60.334(b)(3)(iii), and revisions of 40 CFR 60, Subpart Db (see 63 FR 49442, published September 16, 1998, as reflected at 40 CFR 60.48b(b)(2)). Based on these determinations, the Department (with support from EPA Administrator determinations cited) has determined that the CEMS requirements of 40 CFR 75 are an acceptable alternative to those of 40 CFR 60, for Subpart D applicability purposes, as long as the appropriate information required in 40 CFR 60.45 is collected and associated reporting requirements are followed. These relevant requirements have been incorporated into the permit.

Also note that 40 CFR Part 75 COMS are not required by any regulation for this unit, thus 40 CFR Part 60 COMS requirements are referenced throughout the permit rather than those of 40 CFR Part 75.

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 January 2, 2026 through February 2, 2026. AQD will address any comments received before taking any final action on the permit application. If no comments are received, and a public hearing is not requested, I recommend that permit No. 7413 be issued promptly after the expiration of the public comment period in accordance with 20 DCMR 200.1 and 200.2.

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