



Outlook

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## Proposed Boiler Adjustment Deadline Changes

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**Date** Fri 2/14/2025 1:35 PM

**To** Air Quality Regulations (DOEE) <airqualityregulations@dc.gov>

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Hello Joseph,

GWU would like to comment on the proposed Rule Change:

*"DOEE proposes to amend 20 DCMR § 805.5(b) to allow tune-ups to occur each year from October 1 until December 31 beginning in 2025. The amended timeframe will provide flexibility for sources to make combustion adjustments while continuing to ensure that emission reductions occur during the months with the highest heating demand."*

While we agree that the extension to December 31 is very helpful toward allowing enough cold weather to be able to adjust on 100% combustion, we have found that the best time of year to adjust our 16 Title V boilers is in January and February of each year which predictably has the coldest temperatures. Adjusting in these months also gives us the month of October to adjust any that we missed or could not tune because the boiler was down or being serviced in Jan or Feb (it is often difficult to adjust 16 boilers quickly). However, as you know, October has been historically very difficult to adjust boilers at 100% load since the weather is not cold enough to guarantee that load. Furthermore, the order to switch from cooling to heating season does not come at the same time every year. In other words, the boilers often are not put on heating duties until mid to late October in some years. Lastly, in order to ensure that incomplete or poor combustion does not occur (thereby creating visual emissions or other non-compliant emissions) when the heating season actually does begin, it is the policy of GW to test fire these boilers on both fuels before the heating season begins to ensure proper combustion.

Thank you for your consideration and please let me know if you have any questions, concerns, or need additional information.

Regards,



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