

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment



Air Quality Division

TECHNICAL SUPPORT MEMORANDUM

TO: File

FROM: Stephen S. Ours, P.E. *SSO*
Chief, Permitting and Enforcement

Abraham T. Hagos *SSO For ATH*
Environmental Engineer

SUBJECT: **General Services Administration (GSA) Central Heating &
Refrigeration Plant
Permit Nos. 6796, 6797 and 6798
Permit to Construct and Operate Three (3) Used Emergency Diesel
Generators**

DATE: February 13, 2014

BACKGROUND INFORMATION

A permit application to construct and operate three (3) emergency diesel generators at the U.S. General Services Administration (GSA) Central Heating and Refrigeration Plant (CHRP), located at 325 13th Street, SW, was received by the Air Quality Division (AQD) of the District Department of the Environment (DDOE) on July 25, 2013. A revised application was received August 6, 2013. The applicant is GSA..

The permit action is scheduled to be published in the DC Register on February 14, 2014. Public comments for the permit action will be solicited through March 17, 2014.

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

TECHNICAL INFORMATION

The equipment to be covered by this permit are three (3) emergency diesel generators. GSA acquired these three (3) 1,250 kW emergency generators from the National Oceanic & Atmospheric Administration (NOAA) for use as a stand-by power source, primarily to support black start of their onsite boilers when necessary.



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REGULATORY EVALUATION

4 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines: These emergency generators were manufactured on October 2, 2003. Because the engines are pre-2007 model year engines and manufactured before April 1, 2006, they are not subject to Subpart IIII. Note that AQD confirmed with the U.S. Environmental Protection Agency that the provisions of 40 CFR 60.4208 (limiting installation of older model year engines after certain dates) are not meant to apply to an engine that had previously been installed and operated at another location as these had been. Additionally, the location referenced in 40 CFR 60.4208 does not have to be under the control of the same owner/operator.

Minor new source review (Minor-NSR), 20 DCMR 209: Minor-NSR is not applicable to this permit application because the permit application of the three emergency generators was received by the Air Quality Division on July 25, 2013. The effective date for the implementation of minor-NSR is January 1, 2014.

Major non-attainment new source review (Major-NSR), 20 DCMR 204: In order to avoid the applicability of 20 DCMR 204 the applicant requested a limit on the number of allowable hours of operation of the equipment via an email to Stephen Ours of AQD from George Korvah of GSA on February 11, 2014. Therefore, the proposed permits requires that the emergency generators not be operated in excess of 400 hours in any given 12 month period. If operation beyond 400 hours is desired, the owner or operator shall submit an application to amend these permits to comply with the conditions of 20 DCMR 805 and 20 DCMR 204 as if the equipment were being installed new at that time and shall obtain the Department's approval of such application prior to initiating such operation. This requirement must be transferred to the facility's Title V operating permit when it is renewed pursuant to Condition I(g) of the proposed permit.

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 February 14, 2014 through March 17, 2014. AQD will resolve any comments received before issuing the permit. If no comments are received, I recommend that permit numbers 6796, 6797 and 6798 be issued in accordance with 20 DCMR 200.1 and 200.2 upon expiration of the public comment period.

ATH