

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment



Air Quality Division

**FACT SHEET AND STATEMENT OF BASIS
FOR PROPOSED PERMITTING ACTION
UNDER 20 DCMR 300 (TITLE V-OPERATING PERMIT PROGRAM)**

This “Fact Sheet and Statement of Basis” has been prepared pursuant to 20 DCMR 303.1(c) and 40 CFR 70.7(a)(5).

PERMIT NO. 034-R1

APPLICANT AND PERMITTEE:

CJUF II Destination Hotel, LLC dba The Washington Hilton Hotel
1919 Connecticut Avenue
Washington DC 20009

FACILITY LOCATION:

The Washington Hilton Hotel
1919 Connecticut Avenue
Washington DC 20009

FACILITY DESCRIPTION:

CJUF II Destination Hotel, LLC dba The Washington Hilton Hotel is located at 1919 Connecticut Avenue NW, in Washington, DC. The facility is a hotel and hospitality establishment. The facility operates existing equipment under Title V operating permit #034, issued to “Washington Hilton and Towers” which is currently extended beyond its expiration date. Emission sources in relation to hotel operations at this facility consist of two boilers, an emergency generator, kitchen equipment, cooling towers and storage tanks for the fuel oil.

The facility is covered under North American Industrial Classification System (NAICS) code 721110 which covers hotels (except casino hotels) and motels. Under the 19887 Standard Industrial Classification (SIC) system, the facility is covered by code 7011 which covers hotels (except casino hotels) and motels.

This facility includes emission units that are capable of operating twenty-four (24) hours per day, seven (7) days per week, and fifty-two (52) weeks per year. The emission units consist of two 29.7 million BTU per hour boilers, one 1,100 kW emergency generator. Additionally, the facility has several insignificant activities, including one (1) 20,000 gallon capacity underground storage tank, one (1) 5,000 gallon capacity above ground tank, six (6) cooling tower and twelve units of miscellaneous kitchen equipment.



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EMISSIONS SUMMARY:

The following is an estimated overall potential emission summary for the facility:

Plantwide Emissions Summary	
Pollutant	Potential Emissions (tons per year)
Sulfur Dioxide (SO ₂)	194.91
Oxides of Nitrogen (NO _x)	44.508
Particulate Matter (PM/PM10)	16.727
Volatile Organic Compounds (VOCs)	1.370
Carbon Monoxide (CO)	20.864

BASIS OF 20 DCMR CHAPTER 3 (TITLE V) APPLICABILITY:

The Washington Hilton has the potential to emit 44.508 tons per year of NO_x and 194.91 tons per year of sulfur dioxide. These quantities exceed the major source thresholds in the District of 25 tons per year of NO_x and 100 tons per year of SO₂. As such, pursuant to 20 DCMR 300.1(a), the source is subject to Chapter 3 and must obtain an operating permit in accordance with that regulation and Title V of the federal Clean Air Act applicability. This permitting action is based on a revised Chapter 3 permit application received by AQD on February 18, 2014.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS:

The conditions contained in the Title V operating permit are based on underlying requirements of 20 DCMR as well as various federal regulations promulgated pursuant to the federal Clean Air Act. The regulations that are the basis of each condition are cited in the permit, except that conditions added to make another condition, with a direct underlying regulation, enforceable as a practical matter may, in some cases, not have a specific citation. These latter, un-cited conditions generally consist of monitoring, record keeping, and reporting requirements authorized under 20 DCMR 500.1.

The permit has been developed to incorporate the requirements of all applicable requirements as defined in 20 DCMR 399.1 along with additional conditions necessary to make all such requirements enforceable as a practical matter.

Any condition of the Title V Permit that is enforceable by the District but is not federally-enforceable is identified in the Title V permit as such with an asterisk.

REGULATORY REVIEW:

This facility has been found to be subject to the requirements of the following regulations except as identified in the regulation-specific discussions below:

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Federal and District Enforceable:

20 DCMR Chapter 1 - General Rules

20 DCMR Chapter 2 - General and Non-Attainment Area Permits

20 DCMR Chapter 3 - Operating Permits and Acid Rain Programs

20 DCMR 500 - Records and reports

20 DCMR 502 - Sampling, tests, and measurements

20 DCMR 600 - Fuel burning particulate emission

20 DCMR 604 - Open Burning

20 DCMR 605 - Control of Fugitive Dust

20 DCMR 606 - Visible Emissions

20 DCMR 773-778 - Architectural and Maintenance Coatings

20 DCMR 801 - Sulfur contents of fuel oils

20 DCMR 803 - Sulfur Process Emissions

20 DCMR 805 – Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen

40 CFR 82, Subpart G - Protection of Stratospheric Ozone (Federally enforceable only except through Title V) (*Note: AQD did not make a positive determination that this regulation was applicable to the facility, but included it as a standard requirement in the permit.*)

40 CFR 82, Subpart H - Halon Emissions Reduction (Federally enforceable only except through Title V) (*Note: AQD did not make a positive determination that this regulation was applicable to the facility, but included it as a standard requirement in the permit.*)

40 CFR 61.12 – Credible Evidence

District Enforceable Only:

20 DCMR 900 - Engine idling

20 DCMR 901 - Vehicular exhaust emissions

20 DCMR 902 - Lead Content of Gasoline

20 DCMR 903 - Odorous or other nuisance air pollutants

20 DCMR Chapter 2 – General and Non-Attainment Area Permits:

No Chapter 2 permits have been issued to this facility since the last Title V permit was issued. However, as part of the permit renewal process, permit conditions were updated pursuant to Chapter 2 authority to reflect current permitting standards.

20 DCMR 801: Sulfur Content of Fuel Oils

This regulation limits fuel oil sulfur content to 1% by weight. However, the permit application asserted that potential emissions of sulfur dioxide were based on use of 0.69% by weight sulfur #4 fuel oil. As a result, pursuant to authority under Chapter 2, the 0.69% level was adopted as a limitation in the permit, a level more stringent than the requirement of 20 DCMR 801.

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

NO_x emissions have the potential to exceed 25 tons per year, primarily as a result of the two boilers with heat input ratings in excess of 20 MMBTU/hr. These units are therefore covered by 20 DCMR 805.1 and 805.5(a). Section 805.5(a) requires annual combustion adjustments pursuant to Section 805.8. These requirements are included in Condition III(a)(1)(D) of the permit and subsequent sections require record keeping and reporting of the results of the combustion adjustments. Note that the May 1 deadline in 20 DCMR 805.5(a) is not included in the permit because it makes more sense from an environmental and economic standpoint to perform combustion adjustments near the end of a calendar year at the beginning of heating season. This is also consistent with industry practice. The Department intends to revise this portion of the regulation in the future.

40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

The emergency generator's engine is not covered by this regulation. The unit was installed in 2005. Therefore, it was not a model year 2007 or later engine nor was it manufactured after April 1, 2006, the relevant applicability triggers in 40 CFR 60.4200.

40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)

This NESHAP standard does not apply to this specific internal combustion engine. The internal combustion engine is operated for emergency purposes only. It is an existing commercial emergency RICE with limits in the permit prohibiting participation in demand response programs and prohibiting operation for more than 15 hours per calendar year when there is a substantial deviation of voltage or frequency from the electrical provider to the premises of 5 percent or more below standard voltage or frequency. This exempts the unit from applicability pursuant to 40 CFR 63.6585(f)(2).

40 CFR 63, Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources:

This is the subpart that deals with the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers at area sources. The Permittee has indicated that only natural gas will be burn in the boilers except during gas interruptions and periodic testing. As a result the units are considered "gas-fired boilers" and the requirements of this NESHAP are not applicable. However, the permit was written to ensure that these limitations of fuel oil operations are maintained.

Greenhouse Gas (GHG) Requirements:

Because Chapter 3 (Title V) was triggered by other pollutants, no evaluation was made to determine if the facility would trigger Title V applicability under the GHG Tailoring Rule. No modifications have been made to the source that would trigger PSD applicability under the GHG

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Tailoring Rule (which has been overturned by the U.S. Supreme Court in any case). Other than this requirement, there are no other applicable requirements related to GHGs at this time, therefore none were included in the permit.

COMPLIANCE HISTORY:

The applicant has been subject to no enforcement actions by AQD in the past three years. No air quality violations are identified in the EPA Enforcement and Compliance History Online (ECHO) database over the last three years, as of the time of this writing.

COMMENT PERIOD:

Beginning Date: December 5, 2014

Ending Date: January 5, 2015

All written comments should be addressed to the following individual and office:

Stephen S. Ours, P.E.
Chief, Permitting Branch
District Department of the Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington, DC 20002

PROCEDURE FOR REQUESTING PUBLIC HEARING:

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The District shall grant such a request if it is deemed appropriate. The venue, date, and time for any public hearing shall be announced in the District Register and a daily newspaper.

POINT OF CONTACT FOR INQUIRIES:

Olivia Achuko
Environmental Engineer
District Department of the Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington, DC 20002
(202) 535-2997

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REVIEWS:

Prepared by:



Olivia Achuko
Environmental Engineer

Approved by:



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

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