

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment



CHAPTER 2 TECHNICAL MEMORANDUM

TO: File

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

FROM: Abraham T. Hagos *ATH*
Environmental Engineer

SUBJECT: **Georgetown University
Permit Number 6870
Permit to Construct and Operate a Cold-Cleaning Degreaser at Georgetown University**

DATE: October 30, 2014

BACKGROUND INFORMATION

A permit application to construct and operate a cold-cleaning degreaser at Georgetown University, Washington, DC was received by the Air Quality Division on April 4, 2014. The applicant is Georgetown University. According to the application, the unit was actually installed and has been in use since 2009.

The permit action will be published in the D.C. Register on November 7, 2014. Public comments for the permit action will be solicited through December 8, 2014.

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

REGULATORY REVIEW

Chapter 2, Section 200: General Permit Requirements:

The cold-cleaning degreaser equipment is a potential air pollution source for volatile organic compounds. Thus a chapter 2 permit is required.

Chapter 7, Section 764: Solvent Cleaning – Cold Cleaning

The solvent cleaning control requirements of 20 DCMR 764 are applicable to this cold-cleaning degreaser equipment. The operational requirements of this regulation are found in Conditions



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III(a), (b), (c), (d) and (e) of this permit. The facility must monitor the site for compliance per Conditions IV(a) and (b).

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

“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 [20 DCMR 903.1]” is applicable to all sources. This requirement is contained in Condition II(a) of the permit.

RECOMMENDATIONS

The application to operate a cold-cleaning degreaser and the requirements of the draft 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 November 7, 2014 through December 8, 2014. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permit (#6870) be issued in accordance with 20 DCMR 200.1 and 200.2.

ATH

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