

**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. 039**

**APPLICANT AND PERMITTEE:**

Washington Metropolitan Area Transit Authority (WMATA)  
3500 Pennsy Drive  
Landover, MD 20785

**FACILITY LOCATION:**

Washington Metropolitan Area Transit Authority (WMATA)  
Bladensburg Bus Facility  
2250 New York Avenue NE  
Washington, DC 20002

**FACILITY DESCRIPTION:**

Washington Metropolitan Area Transit Authority (WMATA) operates the Bladensburg Bus Facility located at 2250 and 2251 26<sup>th</sup> Street, NE, Washington, DC. This facility is at the northwest intersection of Bladensburg Road and 26<sup>th</sup> Street and is bounded by the B & O Railroad tracks to the west. The facility consists of three buildings (Building 1-3) that make up the facility. The primary emission sources boilers, emergency generators, paint booths, part washer, gasoline dispensing station, and some miscellaneous equipment.

The Permittee is covered under North American Industrial Classification System (NAICS) code 488490 which covers terminal and service facilities for motor vehicle passenger transportation.

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 units consist of two 14.7 million BTU per hour boilers, seven paint booths, six emergency generators, one gasoline dispensing station and one 8,000 gallon capacity gasoline storage tank. Additionally, the facility has several insignificant activities, including one 1.176 million BTU per hour dual fuel boiler, several other small natural gas fired units of fuel burning equipment, a diesel fuel dispensing station, storage tanks, and aqueous parts washer, carpentry and woodworking operations, and an abrasive blaster with water controls.



**Fact Sheet and Statement of Basis**

**Permit No. 039**

**Washington Metropolitan Area Transit Authority**

**February 4, 2014**

**Page 2**

**EMISSIONS SUMMARY:**

The following is an overall emission summary for the facility:

<b>Plantwide Emissions Summary (tons per year)</b>	
<b>Pollutant</b>	<b>Potential Emissions</b>
Sulfur Dioxide (SO <sub>2</sub> )	67.01
Oxides of Nitrogen (NO <sub>x</sub> )	49.92
Particulate Matter (PM/PM10)	14.51
Volatile Organic Compounds (VOCs)	6.97
Carbon Monoxide (CO)	18.76

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

WMATA has the potential to emit more than 25 tons per year of oxides of nitrogen (NO<sub>x</sub>). This exceeds the major source threshold in the District of 25 tons per year. 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. WMATA was not one of the original Title V sources, but when the District's NAAQS for ozone was reclassified as severe nonattainment, the threshold for NO<sub>x</sub> dropped from 50 TPY to 25 TPY for Title V applicability. This permitting action is based on a revised Chapter 3 permit application received by AQD on December 26, 2012.

**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.

It should also be noted that this permit is being issued pursuant to the District's authority under 20 DCMR Chapter 2 as well as Chapter 3. When the permit is issued for public review, the public notice will reflect this fact.

Any condition of the draft Title V Permit that is enforceable by the District but is not federally-

**Fact Sheet and Statement of Basis**

**Permit No. 039**

**Washington Metropolitan Area Transit Authority**

February 4, 2014

Page 3

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:

**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 and performance testing
- 20 DCMR 604 - Open Burning
- 20 DCMR 605 - Control of Fugitive Dust
- 20 DCMR 606 - Visible Emissions
- 20 DCMR 704 - Stage I Vapor Recovery
- 20 DCMR 705 - Stage II Vapor Recovery
- 20 DCMR 718 - Content limit of VOC in mobile equipment repair and refinishing
- 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 63, Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities.
- 40 CFR 63, Subpart HHHHHH – National Emissions Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.
- 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

## **Fact Sheet and Statement of Basis**

**Permit No. 039**

**Washington Metropolitan Area Transit Authority**

February 4, 2014

Page 4

### **Chapter 2 Permits:**

One Chapter 2 permit (#6590) was issued to this facility for a new emergency generator in August 2012. No other equipment at this facility is permitted under Chapter 2 permitting therefore; this permit will be issued under the authority of Chapter 2 as well as Chapter 3. WMATA has two pieces of fuel burning equipment that have heat capacities greater than 5 million BTU. Therefore Chapter 2 permits are required for those units. WMATA has seven paint booths and a gas station that could qualify to obtain Chapter 2 permits individually, but no such permits have been issued to the facility for these units in the past. Since no such permits have been previously obtained by the facility, the Title V permit will be used to address both Chapter 2 and Chapter 3 permitting requirements for this facility. The requirements under the authority of 20 DCMR Chapter 2 have been incorporated into the Title V permit.

### **20 DCMR 705 – Stage II Vapor Recovery:**

The gas station should have been exempted from the requirements of 20 DCMR 705 because there is only one gas island, but the throughput from that single island is over 20,000 gallons per month. The threshold for 20 DCMR 705 is 10,000 gallons per month throughput per 20 DCMR 705.3. Thus 20 DCMR 705 is applicable and has been included in the permit.

### **40 CFR 63 Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities:**

40 CFR 63 Subpart CCCCCC applies to any existing or new gasoline distribution facility that is located at an area source of Hazardous Air Pollutants (HAP) as defined in 40 CFR 63.2. WMATA is an area source of HAP and has a gasoline dispensing station with monthly throughput of 10,000 gallons of gasoline or more. This subpart is applicable to this source; therefore a streamlined component has been added to Condition III(e)(1)(B) covering the gasoline storage tank. Also Condition III(e)(3)(D) has been added to address the need for recording keeping. The notification requirement of this subpart did not apply since the source is currently using submerged filling as required by the District regulation. See 40 CFR 63.11124(a)(3). This subpart also affects the gasoline dispensing unit covered by Condition III(f). A new condition has been added as Condition III(f)(2)(H) to address the requirements of 40 CFR 63.11117(a).

### **40 CFR 63, Subpart JJJJJJ – 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 in an Area Source. The permittee has indicated that only natural gas will be burn in the boilers during normal operations. Fuel oil will be used only during gas interruptions and periodic testing; therefore the requirements of this

**Fact Sheet and Statement of Basis**

**Permit No. 039**

**Washington Metropolitan Area Transit Authority**

**February 4, 2014**

**Page 5**

NESHAP are not applicable. To ensure that this regulation is not triggered by operation using fuel oil at other times, operational limits, monitoring conditions, and record keeping requirements corresponding to this exemption have been added to the permit.

**40 CFR 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

This facility has seven paint booths covered by this rule as identified in 40 CFR 63.11169(b). As such, the requirements of this subpart are included in Condition III(d). It should be noted that the rule does allow methylene chloride paint stripping to occur, but has stringent requirements for its use. Since the facility does not use methylene chloride paint stripping methods, instead of including these requirements, Condition III(d)(1)(A) prohibits the use of methylene chloride for paint stripping purposes.

**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 Tailoring Rule. Other than this requirement, there are no other applicable requirements related to GHGs at this time, therefore none were included in the permit.

**COMMENT PERIOD:**

Beginning Date: February 7, 2014

Ending Date: March 10, 2014

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, 5<sup>th</sup> 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

**Fact Sheet and Statement of Basis**

**Permit No. 039**

**Washington Metropolitan Area Transit Authority**

**February 4, 2014**

**Page 6**

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, 5<sup>th</sup> Floor  
Washington, DC 20002  
(202) 535-2997

**REVIEWS:**

Prepared by:



Olivia Achuko  
Environmental Engineer

Approved by:



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

SSO:OA

JJ180