

Columbia submitted a request that EPA approve a revision to the District of Columbia SIP. The revision consists of a September 8, 1994 operating permit issued by the District of Columbia to GSA for its Central and West Heating Plants. The permit establishes general operating procedures at GSA's Central Heating Plant (CHP) and West Heating Plant (WHP), including the exclusive combustion of natural gas (with the provision for the combustion of low-sulfur oil in the event of a natural gas service interruption).

The permit also defines annual and short-term emission limitations for SO<sub>2</sub>, particulate matter (PM-10), nitrogen oxides (NO<sub>x</sub>), volatile organic compounds (VOCs), and carbon monoxide (CO) for both of the plants. Since this permit establishes more stringent emission limitations than the existing SIP or applicable new source performance standards (NSPS), the ambient air quality with respect to each of the criteria pollutants mentioned above shall be significantly improved.

The permit-to-operate issued to GSA promotes continued maintenance of the national ambient air quality standards (NAAQS) for SO<sub>2</sub>, PM-10, and NO<sub>x</sub> in the areas surrounding the CHP and WHP. The District of Columbia is currently designated as nonattainment for the NAAQS for CO. Although the emissions limits established in the permit for CO will not affect the attainment status of the District, they do provide for CO emissions reductions at these two facilities which were previously uncontrolled for CO. The permit also regulates particulate matter and VOC emissions.

In order to achieve these emission reductions, GSA is restricted by its September 8, 1994 operating permit to the combustion of natural gas. The District restricted the fuel capabilities at the two facilities primarily to minimize SO<sub>2</sub> emissions from the Plants. Modeling analyses performed in 1990 as part of the permitting process for GSA's proposed refurbishment of various boilers at CHP and WHP indicated that elevated ambient concentrations of SO<sub>2</sub> were predicted for the areas immediately surrounding the two facilities when the Plants burned coal under typical winter day conditions.

Along with the restrictions on fuel usage, the permit limits the hourly and annual emissions of various pollutants from the facilities. The permit drastically reduces SO<sub>2</sub> emissions from the plant to the point where such emissions present negligible potential for impact on the surrounding areas. For instance, the average annual SO<sub>2</sub> emissions from CHP and WHP were 523

and 626 tons per year, respectively, during the period of 1980 to 1990, inclusive. The current permit-to-operate restricts annual SO<sub>2</sub> emissions to 4 tons per year at CHP and 5 tons per year at WHP. This is an average overall reduction of 1140 tons per year of SO<sub>2</sub> emissions in the vicinity of the two facilities. Annual emissions of PM-10, NO<sub>x</sub>, CO, and VOCs from the two plants are restricted to a degree that further limits the potential for violation of the relevant annual NAAQS in the vicinity of these facilities.

The operating permit is also protective of the short-term NAAQS. For each of the pollutants discussed above, hourly emission limitations are established in the permit. These hourly emission limits are, in every instance, as stringent or more restrictive than the applicable limits in the District's existing SIP or new source performance standards (NSPS) limits.

As mentioned above, the operating permit requires the combustion of natural gas at all times at GSA's CHP and WHP. However, there is a provision for the use of No. 2 "on-road diesel" with a maximum sulfur content of five hundredths weight percent (0.05%<sub>w</sub>) during periods of service interruptions by the supplier. It should be noted that GSA must comply with its annual and short-term emission rates regardless of the fuel it uses. In the event of a service interruption, the permit contains explicit instructions for the notification of the District of this event and recordation of pertinent information.

The permit also requires GSA to report an extensive amount of information to ensure continuous compliance with the annual and short-term emission limits. The principal means for compliance determination is the use of continuous emissions monitoring data collected at the facilities. The District relies primarily on the procedures established in 40 CFR part 60 for monitor operation and data quality assurance. Daily emissions reports that provide hourly emission rates for SO<sub>2</sub>, NO<sub>x</sub>, VOCs, and CO are to be prepared by GSA. GSA must also submit a quarterly report documenting the hourly status of each boiler at CHP and WHP including; hours of service, types and quantities of fuel combusted, fuel composition and heat content, service interruptions, and total tons of SO<sub>2</sub>, NO<sub>x</sub>, PM-10, VOCs, and CO emitted on a monthly basis and as part of a rolling, 12-month annual average. A monthly report is to be prepared demonstrating GSA's maintenance of the NAAQS for SO<sub>2</sub> in the vicinity of the two facilities. Sulfur-in-fuel reports are due each month detailing specific

information about the fuel oil, if any, that was burned during the month. The level of reporting detailed above provides adequate assurances that the compliance status of GSA can be quickly and accurately tracked at all times.

#### EPA Evaluation

EPA has evaluated the District of Columbia's SIP revision request and concluded the following: (1) The operational and emission limitations imposed on GSA's Central and West Heating Plants adequately promote continued maintenance of the NAAQS; (2) the operational and emission limitations are clearly enforceable; and (3) the applicable requirements of CFR part 51 have been met. A more detailed evaluation is provided in the Technical Support Document for this action which is available upon request from the EPA Region III office listed in the ADDRESSES section of this document.

EPA is approving this SIP revision without prior proposal because the Agency views this as a noncontroversial amendment and anticipates no adverse comments. However, in a separate document in this **Federal Register** publication, EPA is proposing to approve the SIP revision should adverse or critical comments be filed. This action will be effective July 3, 1995, unless, by June 1, 1995, adverse or critical comments are received.

If EPA receives such comments, this action will be withdrawn before the effective date by publishing a subsequent notice that will withdraw the final action. All public comments received will then be addressed in a subsequent final rule based on this action serving as a proposed rule. EPA will not institute a second comment period on this action. Any parties interested in commenting on this action should do so at this time. If no such comments are received, the public is advised that this action will be effective on July 3, 1995.

#### Final Action

EPA is approving the District of Columbia's October 24, 1994 submittal consisting of a permit-to-operate for GSA's Central and West Heating Plants as a revision to the District of Columbia SIP.

Nothing in this action should be construed as permitting or allowing or establishing a precedent for any future request for revision to any state implementation plan. Each request for revision to the state implementation plan shall be considered separately in light of specific technical, economic, and environmental factors and in