

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
941 Chestnut Building  
Philadelphia, Pennsylvania 19107

Ms. Westy McDermid  
DC Advisory Neighborhood Council 2-E01  
1631 34th Street, NW  
Washington DC 20007

Dear Ms.McDermid:

This is in response to your letters concerning the proposed Georgetown Cogeneration Project. After a thorough review of the available information concerning the proposed permit, EPA Region III office does not have sufficient reason to reject the District's decision to permit the Georgetown Cogeneration Project as a minor source. The project was originally considered to be a major source, for which EPA would issue a prevention of significant deterioration (PSD) permit. Subsequently the projected emissions were revised so that the new emissions when compared with the emission reductions from the required shutdown of the fluidized bed boiler (FBB) result in net emissions increases which are not major and, therefore, not subject to PSD.

EPA has considered the issue of common control which you raised. We have reviewed the contract between Georgetown University and Dominion Energy, which requires Dominion Energy to operate the heating plant and furnish steam to Georgetown University. The contract is sufficient basis for considering the heating plant to be under common control. The replacement of the coal fired FBB boiler by an efficient combustion turbine plus duct burner will result in a net environmental benefit while providing additional electrical power. Region III is not troubled about enforceability issues regarding the shutdown of the coal-fired FBB boiler as required in the permit. If the FBB is not shut down, appropriate enforcement action will be taken against Dominion Energy as the operator of the facility.

We appreciate your concern and efforts at clarifying prospective emissions in the District of Columbia..

Sincerely,

Bernard E. Turlinski, Chief  
Air Enforcement Branch

cc: Ferial Bishop (DCRA)  
R. Usher (Dominion Energy)