

# Howard University Environmental Management System Manual





## RECORD OF REVISION

Date	Author	Pages	Description
12/8/2020	AKRF	4, 6, 7, 11, 14, 15, 34, 35, 70, 74	Administrative updates, changes to air permits and locations, UST requirements, removal of future stormwater requirements, and refining of information as systems and updates occur
12/14/2020	Ariel Wilson	Cover/Header	Added HU aerial picture and Howard forward logo
01/11/2021	Ariel Wilson	3, 4, 8	Administrative updates
01/11/2021	All4	18, 19, 32-37, 50, 79-91	Air Permit Regulations
07/22/2021	AKRF	1-2	Updated Section 1.2, Customized Approach.
07/22/2021	AKRF	4	Updated membership in the EMS Implementation Team to reflect current Director of Physical Facilities
07/22/2021	AKRF	6	Included the recent addition of an AVP of Environment, Occupational Health, Safety & Sustainability to Section 3.2, Context of the Organization
07/22/2021	AKRF	92-94	Section 9.2, Awareness, has been updated to reflect that the planned outreach on the existence and requirements of the EMS has been completed
12/15/2021	AKRF	3	Updated membership in the EMS Leadership Team to reflect current Chief Financial Officer and current Director of Physical Facilities
1/4/2022	AKRF	2	Removed implication that Howard University had active stormwater and wastewater compliance commitments.
1/4/2022	AKRF	4	Updated membership in the EMS Implementation Team to include AVP of Environment, Health, Safety, and Sustainability and the Director of Sustainability
1/4/2022	AKRF	7	Corrected title to "Assistant Vice President (AVP) of Environment, Health, Safety, and Sustainability"
1/12/2022	AKRF	Tables 1 and 2 (p.14-91)	Simplified language in Compliance Category column
3/9/2022	AKRF	3-4	Replace names of members on the EMS Leadership and EMS Implementation committees with titles. Updated membership on EMS Leadership Committee to include AVP of Environment, Occupational Health, Safety & Sustainability. Updated membership on EMS Implementation Team to include: Director of Transportation; Director of Communications/Operations; and Chief Information Officer.
4/12/2022	Susan Dreyer	94-96	Updated the Training Procedure to address comments from the last audit. Incorporated a new Table 3 – Training Matrix.
4/27/2022	Lisa Goldberg	13	Updated the Significant Environmental Aspects procedure to clarify the criteria used to rank aspects.
4/28/2022	Christy Stoll	2, 10,12, 13, 14, 20, 98, 99, 100	Modified references to the Compliance Tool to discuss VelocityEHS (the management software that replaced the Compliance Tool).
5/2/2022	Christy Stoll	94	Modified the Awareness Procedure to indicate that stakeholders will be notified of their responsibilities to comply with the EMS on an annual basis.
5/3/2022	Christy Stoll	12	Removed footnote that indicated the Title V permit was pending.

**Record of Revision (continued)**

<b>Date</b>	<b>Author</b>	<b>Pages</b>	<b>Description</b>
5/6/2022	Lisa Goldberg	4, 8-9, 13-14	Minor editorial changes, including updating the name of the EHS Department to EHSS – document-wide. Clarified membership in the EMS Implementation Team and Stakeholders in the EMS. Expanded the Physical Boundaries of the EMS to include North Campus. Updated locations of hazardous material generation in Significant Environmental Aspects.
5/6/2022	Christy Stoll	10-11	Renamed the “Monthly Interdepartmental Environmental Briefing” to the “Monthly Interdepartmental Meeting.”
5/6/2022	Christy Stoll	94	Modified text to indicate that the SPCC would not be made public due to security concerns, but would be made available to staff and vendors responsible for implementing the plan.
5/11/2022	Lisa Goldberg	14	Updated the list of locations where hazardous material is generated to include the Physics Department.
5/11/2022	Susan Dreyer	13	Updated the list of locations where hazardous material is generated to exclude the Cancer Center.
5/11/2022	Susan Dreyer	12	Correct a clerical error in list of compliance obligations related to hazardous waste.

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## 1.0 INTRODUCTION AND BACKGROUND

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### 1.1 The Value of an EMS

An Environmental Management System (EMS) provides a framework to protect the environment and respond to changing environmental conditions through consistent review, evaluation, and improvement of environmental performance. This systematic approach to environmental management will provide Howard University with information to:

- Prevent and/or mitigate adverse environmental impacts;
- Fulfill compliance obligations;
- Enhance environmental performance; and
- Communicate environmental information to relevant interested parties.

The success of an EMS depends on commitment from all levels and functions of the organization, led by senior officials. Senior officials can effectively address risks and opportunities by integrating environmental management into the organization's business processes, strategic direction, and decision making.

The approach underlying an EMS is the concept of Plan–Do–Check–Act. This model provides an iterative process to achieve continual improvement. Consisting of the following actions, it can be applied to an overall EMS, as well as to each of its individual elements:

- **Plan:** establish environmental objectives and processes necessary to deliver results in accordance with the organization's Environmental Policy;
- **Do:** implement the processes as planned;
- **Check:** monitor and measure processes against the Environmental Policy, including its commitments, environmental objectives and operating criteria, and report the results; and
- **Act:** take actions to continually improve.

Howard University has retained AKRF, Inc. (AKRF) to help Howard University establish an effective and comprehensive EMS.

### 1.2 Customized Approach

Howard University is located in Northwest Washington, DC on an approximately 300-acre campus. A research university with colleges of medicine, law, dentistry, nursing, engineering, and pharmacy, among many others, Howard University is required to adhere to environmental regulations set by the District of Columbia Department of Energy and the Environment (DOEE). Howard University requires a specialized EMS that is customized to the unique needs of a university and research facility working to maintain compliance with all applicable environmental regulations.

## **EMS Manual**

Howard University has implemented VelocityEHS, EHS management software that captures the regulatory requirements, including timelines, and action items related to the environmental programs to which the University is subject: air emissions; hazardous waste; underground and above ground storage tanks; the Spill Prevention, Control, and Countermeasure plan, and assess stormwater and wastewater requirements. Howard has also acquired and implemented additional software packages to create the platform to track compliance for additional components (i.e., VelocityEHS for information tracking, Vivid Learning Systems for on-line training, Tiscor for equipment inventory and MSDSonline). The Howard University EMS is built upon these efforts and tools to develop a truly comprehensive system designed to comply with the relevant components of the ISO 14001:2015 standard.

### **1.3 Requirements of the EMS Manual**

The primary function of this EMS manual, developed in accordance with ISO 14001: 2015, Clause 7.5.1, is to ensure continued adherence to all environmental management requirements in the event of personnel or administrative changes.



## **2.0 LEADERSHIP**

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### **2.1 EMS Leadership Team**

The EMS Leadership Team consists of senior officials at the university with the fiscal and leadership authority to define the university's priorities. This team developed an Environmental Policy, established an Implementation Team, empowered that Implementation Team to develop an EMS, and assigned the roles, responsibilities, and resources to do so.

#### **2.1.1 Membership**

Howard University's current EMS Leadership Team (ISO 14001: 2015, Clause 5) includes the following members:

- Chief Operating Officer;
- Chief Financial Officer;
- Assistant Vice President of Environment, Health, Safety & Sustainability
- Director of Environmental Occupational Health and Safety;
- Executive Director of Physical Facilities Management; and
- Additional members, as deemed necessary.

#### **2.1.2 Responsibilities**

The Leadership Team is responsible for (ISO 14001: 2015, Clause 5.1):

- Taking accountability for the effectiveness of the EMS;
- Ensuring that the Environmental Policy and environmental objectives are established and are integrated with the strategic direction and the context of Howard University;
- Ensuring the integration of the EMS requirements into Howard University's business practices;
- Ensuring that the resources needed for the EMS are available (ISO 14001: 2015, Clause 7.1);
- Communicating the importance of effective environmental management and of conforming to the EMS requirements;
- Ensuring the EMS achieves its intended outcomes;
- Directing and supporting persons to contribute to the effectiveness of the EMS;
- Promoting continual improvement; and
- Communicating implementation progress to DOEE on a quarterly basis.

At their discretion, the Leadership Team may appoint one or more members to act as a representative of the larger group. This appointed representative(s) will expedite communication and critical decision making with the Implementation Team. The identified representative(s) of the

Leadership Team will be available on an as-needed basis to review the Implementation Team's work product, offer guidance, and grant approval.

### **2.2 EMS Implementation Team**

The EMS Leadership Team tasked the Implementation Team with developing an EMS pursuant to the Environmental Policy and provided with the necessary resources and authority to conduct their work (ISO 14001: 2015, Clause 5.3). The members of this team fully represent the activities and departments covered by the scope of the EMS. In addition to developing and implementing the EMS, this team is also responsible for communicating the requirements of the EMS to the University community, continually improving the EMS through the process of Plan–Do–Check–Act, and providing routine status reporting to the Leadership Team.

### **2.3 Membership**

The Implementation Team includes the following members:

- Assistant Vice President of Environment, Health, Safety & Sustainability;
- Director of Environment, Occupational Health and Safety;
- Director of Sustainability;
- Executive Director of Physical Facilities Management;
- Chief, Department of Public Safety;
- Executive Director, Office of Procurement & Contracting;
- Executive Director of Real Estate Development Campus Asset Management;
- Assistant Vice President, Auxiliary Enterprises;
- Chief Information Officer; Enterprise Technology Services;
- Director Emergency Management & Safety, Department of Public Safety;
- Assistant Secretary for University Operations and Director of Policy Management;
- Associate General Counsel, Litigation and Agency Claims;
- Director of Transportation;
- Director of Communications/Operations; and
- Other members, as appropriate.

### **2.4 Responsibilities**

The Leadership Team has given the Implementation Team the necessary responsibility and the requisite authority to implement the EMS (ISO 14001: 2015, Clause 5.3). Specifically, they have granted the responsibility and authority to:

- Ensure that the EMS conforms to ISO 14001:2015, to the extent practicable within the context of Howard University; and
- Report on the performance of the EMS and environmental performance to the Leadership Team on a regular basis.

The Implementation Team routinely updates the Leadership Team, informing them of progress, obstacles, resource requirements, and participation rates.

## 3.0 POLICIES AND PROCEDURES

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### 3.1 Environmental Policy

The EMS Leadership Team established an Environmental Policy and facilitated the acceptance of that policy through the University Policy Office, which oversees the review and approval process for Howard University policy (ISO 14001: 2015, Clause 5.2). The EMS Leadership Team, in conjunction with the University Policy Council, will maintain the Environmental Policy, communicate it within the university, and make it available to interested parties.

The policy statement portion of this Environmental Policy is included below. The full policy, including responsible parties, effective date, rationale, entities affected by the policy, definitions, roles and responsibilities, sanctions, and resources, can be found at [www.howard.edu/policy](http://www.howard.edu/policy).

#### **POLICY STATEMENT**

Howard University (the “University”) is committed to protecting the environment, preventing pollution, and creating a sustainable environment. This is reinforced in the University’s strategic plan, *Howard Forward*, with a commitment to use technology to “exceed standards for sustainability and environmental stewardship.”

The University takes reasonable, practical measures to integrate environmental considerations into decision-making associated with its research, educational, and facility management efforts, including:

- Identify and comply with Howard University’s environmental compliance obligations, including all appropriate environmental legislation, regulations, and other requirements.
- Implement, maintain, and continually improve the University’s Environmental Management System (EMS), guided by the principles of International Standards Organization (ISO) standard 14001:2015 to enhance environmental performance.
- Provide appropriate information, training and guidance to faculty, staff, students, and other University stakeholders to promote awareness of and compliance with environmental requirements and regulations.
- Maintain robust contingency plans to minimize the impact of foreseeable environmental incidents.
- Promptly report all accidents and/or incidents which could lead to pollution.
- Communicate this Environmental Policy to the University community and provide public access to the Policy.

Provide the appropriate leadership, management, and resources to implement this Environmental Policy (the “Policy”).

### 3.2 Context of the Organization

Established in 1867, Howard University is one of the nation's Historically Black Colleges and Universities with a proud heritage of commitment to the education and advancement of underrepresented populations in the United States and across the globe. Today, the university's student body exceeds 9,000, drawn from virtually every state, the District of Columbia, and more than 60 countries. Howard students are enrolled in undergraduate, graduate, professional, and joint degree programs spanning more than 80 areas of study within 13 schools and colleges, taught by more than 1,000 faculty members.

As the only truly comprehensive predominantly Black University in the United States, Howard has long been one of the major catalysts of change in our society. Over the 150 years since its founding, Howard has awarded more than 125,000 degrees and certificates in the arts, sciences, and the humanities. The university traditionally has been home to the largest gathering of Black scholars in the world. It is a national treasure.

From a single-frame building in 1867 on a three-acre plot of land in northwest Washington, DC, the university has evolved to occupy more than 250 acres, now including the six-story, 400-bed Howard University Hospital, the School of Law, the School of Divinity, and the 1.8 million-volume library system. The University's Moorland-Spingarn Research Center (MSRC) is recognized as one of the world's largest and most comprehensive repositories for the documentation of the history and culture of people of African descent in Africa, the Americas and other parts of the world.

Howard University is led by Wayne A. I. Frederick, M.D., MBA, the 17<sup>th</sup> President of Howard University. Appointed President in 2014, Dr. Frederick's personal story embodies the mission of Howard University and he has dedicated himself to renewing his alma mater's commitment to academic excellence, thereby continuing the university's legacy as a world-class academic and research institution. As part of his commitment, Dr. Frederick led the development of a five-year strategic plan, *2019-2024 Howard Forward*. Dr. Tashni-Ann Dubroy, Executive Vice President and COO, supported this enterprise-wide strategic planning process and has a pivotal role in the execution of objectives under *Howard Forward's* five over-arching priorities. Since Dr. Dubroy's appointment in 2017, university operations have been optimized with a focus on sustainability and environmental stewardship. Most recently, key hires of the Administration have included the appointment of a Director of Environmental, Health, and Safety (EHS) in 2018, the appointment of the university's first Emergency Manager in 2020, and the appointment of the University's first Assistant Vice President (AVP) of Environment, Health, Safety & Sustainability. The cumulative effect of these appointments under Dr. Dubroy's leadership and initiatives under *Howard Forward* demonstrates Howard University's commitment to the highest level of environmental compliance and stewardship.

### 3.2.1 Environmental Issues

While the strategic planning process involved in *Howard Forward* anticipates future conditions, all possible environmental issues cannot be predicted with certainty. In anticipating environmental issues that could possibly affect the achievement of the intended outcomes of the EMS, the following issues were identified:

- Personnel in leadership roles focused on regulatory compliance;
- Appropriate staffing to support EHSS, Emergency Management, and Physical Facilities to ensure regulatory compliance;
- Appropriate environmental training across departments;
- Limited financial resources;
- Various groups within the organization that impact regulatory compliance require careful coordination;
- Expectations of students, alumni, faculty, and staff regarding the university's environmental responsibility;
- The dynamic nature of any university campus, with continual modification, development, and improvement to address changing needs;
- Public scrutiny of Howard University's activities;
- The complexity of navigating higher education requirements;
- Navigating the federal and local environmental regulatory systems;
- An aging physical plant affected by years of deferred maintenance; and
- The effect of extreme weather events (e.g., a polar vortex) on the university's aging buildings.

### 3.2.2 Stakeholders

The following entities, groups, organizations, and/or individuals both from within and external to Howard University are considered key stakeholders in the EMS:

- Office of the President;
- Office of the Chief Operating Officer;
- Office of the Chief Financial Officer;
- Board of Trustees;
- Office of the Provost;
- Office of the General Counsel;
- Environment, Health, Safety and Sustainability Department;
- Physical Facilities Management Office (PFM);
- Real Estate Development & Capital Asset Management (REDCAM);

- Office of Procurement & Contracting (OPC);
- Department of Public Safety;
- Faculty;
- Researchers;
- Staff;
- Students;
- Alumni;
- Vendors;
- University-affiliated organizations and associations;
- Adjacent land holders; and
- Regulatory Agencies
  - DOEE;
  - DC Water; and
  - United States Environmental Protection Agency (EPA).

### **3.2.3 EMS Boundaries**

Howard University's EMS will address applicable components of the ISO 14001:2015 standard. The boundaries, or limits, to the EMS are described below.

#### **3.2.3.1. Physical Boundaries**

The EMS will cover all activities conducted on Howard University-owned property, including the main campus, west campus, north campus, and any additional property for which Howard University is identified as the responsible party. The EMS will not cover Howard University Hospital.

#### **3.2.3.2. Organizational Boundaries**

The EMS will be compliance-focused and cover all activities conducted by the Howard University faculty, researchers, staff, students, and volunteers. The EMS will not cover Howard University vendor, contractor activities, 3<sup>rd</sup> party vendors or adjacent landowners.

### **3.3 Communication Plan**

Clear, effective, documented communication is essential to the success of the EMS and successful environmental compliance and stewardship. Different communication approaches to appeal to the various key stakeholder groups will be in place, depending on whether or not that communication is internal to Howard University or involves outside parties.

### **3.3.1 Internal Communication**

Strategies are identified for communication among EMS Implementation Team members and for communication between the Implementation Team members and the larger group of EMS stakeholders.

#### **3.3.1.1. Among Implementation Team Members**

To ensure that Implementation Team members communicate all necessary information efficiently and in a timely manner, a number of strategies are identified below:

- Issues with the potential to affect environmental compliance that are identified by any EMS Implementation Team member (e.g., REDCAM, procurement) will be communicated directly to the EHSS Team, along with any other pertinent member(s).
- The EHSS Team will notify EMS Implementation Team members of compliance responsibilities, as identified in the VelocityEHS. This notification will occur with sufficient time for response. In the event that a response is not received within a reasonable time frame, the issue will be elevated, first to the Office of General Counsel and then to the Chief Operating Officer.
- Whenever possible, communication of environmental issues should occur using electronic mail, to provide proper documentation. In the event that information is conveyed verbally, a confirmation email documenting the conversation will be sent to all parties.

#### **3.3.1.2. Monthly Interdepartmental Environmental Meeting**

In order to facilitate communication between those departments most likely to identify and respond to environmental issues, a monthly interdepartmental environmental meeting will be established. This meeting, which can occur in person, via video conferencing, or via phone, will include, at a minimum, representatives from the EMS Implementation team, including but not limited to the following departments and offices:

- EHSS;
- PFM;
- REDCAM;
- OPC;
- Office of the General Counsel (OGC); and
- Risk Management.

This will be an open meeting; participants from departments across Howard University, including any invited vendors or contractors, will be welcome to attend; if university-sensitive information is to be discussed (e.g., confidential development plans), the meeting's attendees may be limited as appropriate. Active members of the Implementation Team will be invited to attend all meetings.



The EHSS Team, or other designee of the Chief Operating Officer, will take the lead in scheduling the meeting and, as appropriate, forward any agenda in advance of the meeting and/or communicate any relevant outcomes or action items to interested parties.

### **3.3.1.3. Howard University General Stakeholders**

It is the responsibility of all EMS Stakeholders to ensure that environmental issues, questions, and compliance issues are ultimately routed to EHSS. Concerns raised throughout the university will be directed to the EMS Team in any of the following manners:

- Direct communication with a member of the EMS Implementation Team, who will then notify EHSS;
- Direct communication with staff in EHSS;
- HUTM-EHSInterdepartmentalMeeting@howard.edu; or
- <https://ehs.howard.edu/contact>.

The EHSS Team will be responsible for documenting communications and disseminating all relevant information to the required parties at Howard University.

### **3.3.2 External Communication**

There are a number of key stakeholders that are external to Howard University. Strategies are identified for communication coming from outside Howard University to the EMS Implementation Team/EHSS and for information going from the EMS Implementation Team/EHSS to individuals and/or organizations outside of Howard University.

#### **3.3.2.1. Communication into Howard University**

An individual or organization outside of Howard University could contact the EMS Implementation Team or EHSS with an environmental issue or concern through the Office of External Affairs' Community Association: (<https://www2.howard.edu/external-affairs/contact>).

It is the responsibility of the EHSS Team to ensure that individuals monitoring this external point of contact are advised to direct all concerns about environmental issues to EHSS. The EHSS Team is further responsible for forwarding all concerns to the appropriate department for follow-up (e.g., real estate, facilities).

#### **3.3.2.2. Communication from Howard University**

There are a number of reasons that the EMS Implementation Team or EHSS might need to communicate with individuals or organizations outside of Howard University, such as public notifications or press releases. All messaging should be coordinated with EHSS for fact-checking and through the Offices of University Communication and External Affairs, as appropriate.

### 3.4 Compliance Obligations

Consistent with ISO 14001: 2015, Clause 6.1.3, Howard University has developed implemented VelocityEHS. This software identifies and documents all Compliance Obligations, required actions, responsible parties, schedules, escalation of identified issues, and the university's current status towards meeting those obligations. General Compliance Obligations include:

- Hazardous Waste
  - 40 CFR 262.13
  - 40 CFR 262.18
  - 40 CFR 262.20
  - 40 CFR 262.40
  - 40 CFR 262.41
  - 40 CFR 262 Subpart K
  - DCMR Title 20 Chapter 20 4204.1
  - DCMR Title 20 Chapter 20 4206.1
  - DCMR Title 20 Chapter 20 4206.2
- Underground and Above Ground Storage Tanks
  - DCMR Title 20 Chapter 56 5601.2
  - DCMR Title 20 Chapter 56 5601.11
  - DCMR Title 20 Chapter 56 5602.4
  - DCMR Title 20 Chapter 56 6003.1
- Spill Prevention, Control, and Countermeasures
  - 40 CFR 112.1 (d)(2)(ii)
- Air Emissions
  - Title V Permit requirements
  - DOEE Chapter 2 Permit to Construct and/or Operate requirements
- Stormwater and Wastewater
  - 40 CFR § 122.26
  - 40 CFR 122.21
  - DCMR Title 21 Chapter 15 1504
  - DCMR Title 21 Chapter 15 1509

Compliance obligations change over time, either through changing regulations or through new compliance requirements in issued permits. The EHSS Team will be responsible for maintaining the VelocityEHS, or some similar tool, on an ongoing basis to track all current compliance obligations at

Howard University continually. The Compliance Obligations identified in VelocityEHS will be reviewed for completeness and accuracy on a routine basis – at a minimum, annually. Updates will be made whenever necessary, either as a result of an annual review or when one or more Compliance Obligations change.

### **3.5 Significant Environmental Aspects**

The university identifies operational activities that may pose environmental risks and potential impacts to the University communities as those which must be managed by members of the EMS team. The criteria include risk through human and environmental exposures, regulatory compliance requirements, damage to university property, financial impacts and risk to University reputation. Those activities which pose potential impact to human health and safety through potential exposures to hazardous materials, presence of situational risk and related incidents are considered significant environmental aspects.

A comprehensive list of ways in which Howard University interacts with the environment is presented below. This list is prioritized such that the largest potential impacts are listed first.

- Steam generation – temporary boilers
- Power and steam generation – planned combined heat and power (CHP) under design/build by ENGIE North America (ENGIE)
- Emergency Generators
- Fuel Storage
  - Underground storage tanks
  - Above ground storage tanks
- Stormwater
  - Construction-related
  - Operational
- Hazardous material generation
  - Biology Department
  - College of Medicine
  - College of Dentistry
  - Integrated Research Laboratories (IRB)
  - Chemistry Department
  - College of Engineering
  - College of Pharmacy
  - Physical Facilities

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- Physics Department
  - Fine Arts Department (Photography)
  - Biology
  - Pharmacy
- Waste water discharge
  - Sanitary sewer
  - Combined Sewer manholes (e.g., temporary boilers)
- Construction
- Solid/hazardous/universal waste disposal
- Emissions of air toxics (e.g., lead)
- Snow/ice removal and management
- Radioactive material (research and education)

### 3.6 Environmental Objectives

Howard University identified measurable Environmental Objectives, associated with the university's environmental aspects and compliance obligations; they are presented in Table 1, below. VelocityEHS identifies and documents all required actions, responsible parties, schedules, escalation of identified issues, and the university's current status towards meeting those Environmental Objectives.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
Hazardous Waste	40 CFR 262.13	A generator must determine its generator category. A generator's category is based on the amount of hazardous waste generated each month and may change from month to month. This section sets forth procedures to determine whether a generator is a very small quantity generator, a small quantity generator, or a large quantity generator for a particular month.
Hazardous Waste	40 CFR 262.18	(a) A generator must not treat, store, dispose of, transport, or offer for transportation hazardous waste without having received an EPA identification number from the Administrator. (d) (2) A large quantity generator must re-notify EPA by March 1 of each even-numbered year thereafter using EPA Form 8700-12. A large quantity generator may submit this re-notification as part of its Biennial Report required under §262.41.
Hazardous Waste	40 CFR 262.20	(a)(1) A generator that transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, or a treatment, storage, or disposal facility that offers for transport a rejected hazardous waste load, must prepare a Manifest (OMB Control number 2050-0039) on EPA Form 8700-22, and, if necessary, EPA Form 8700-22A.
Hazardous Waste	40 CFR 262.40	(a) A generator must keep a copy of each manifest signed in accordance with §262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
		This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter. (b) A generator must keep a copy of each Biennial Report and Exception Report for a period of at least three years from the due date of the report.
Hazardous Waste Permitting	40 CFR 262.41	(a) A generator which is a large quantity generator for at least one month of an odd-numbered year (reporting year) who ships any hazardous waste off-site to a treatment, storage or disposal facility within the United States must complete and submit EPA Form 8700-13 A/B to the Regional Administrator by March 1 of the following even-numbered year and must cover generator activities during the previous year.
Hazardous Waste Permitting	40 CFR 262 Subpart K	Alternative Requirements for Hazardous Waste Determination and Accumulation of Unwanted Material for Laboratories Owned by Eligible Academic Entities
Hazardous Waste Permitting	Title 20 Chapter 20 4204.1	Except as provided in § 4204.2, each person required by the Standards for the Management of Hazardous Waste and Used Oil (20 DCMR chapter 42) to comply with the notification requirements of § 3010 of RCRA, 42 USC § 6930 (notification of regulated waste activity), and to obtain an EPA identification number shall do so by submitting to the Director a completed EPA Form 8700-12 (RCRA Subtitle C Identification Form).
Hazardous Waste Permitting	Title 20 Chapter 20 4206.1	Each generator of hazardous waste or used oil handler shall keep on-site all records required to be kept under the Hazardous Waste Management Regulations, 20 DCMR Chapters 42 and 43.
Hazardous Waste Permitting	Title 20 Chapter 20 4206.2	Whenever the RCRA regulations in 40 CFR Parts 124, 260 through 266, 268, 270, 273, and 279 require that a document be sent to EPA, DOT, or another federal agency, the person required to send the document to EPA, DOT, or other federal agency shall, at the same time, send a copy to the Department's Hazardous Waste Division.
Underground/ Above Ground Storage Tank Permitting	Title 20 Chapter 56 5601.2	An owner of an existing underground storage tank or tanks containing a regulated substance shall have registered each tank with the Director and shall have paid the required fee, as provided in § 5601.9.
Underground/ Above Ground Storage Tank Permitting	Title 20 Chapter 56 5601.11	A copy of the current registration certificate shall be posted in a visible location at the facility at all times.
Underground/ Above Ground Storage Tank Permitting	Title 20 Chapter 56 5602.4	Each owner or operator shall maintain the following records and information for each facility, in accordance with the provisions of this chapter: (a) Documentation of the operation of corrosion protection equipment (§ 5901); (b) Documentation of UST system repairs (§ 5902); (c) Recent record of compliance with release detection requirements (§ 6001); and (d) Results of the site investigation conducted at permanent closure (§ 6101).
Underground/ Above Ground Storage Tank Permitting	Title 20 Chapter 56 6003.1	Each owner or operator of a petroleum UST system shall provide release detection for tanks in accordance with the provisions of this section, except as provided elsewhere in Chapter 60.
Underground/ Above Ground Storage Tank Permitting	Title 20 Chapter 57 5700.10	Each owner or operator of an UST that is more than thirty (30) years old shall remove the tank from the ground in accordance with Chapter 61 within five (5) years of February 21, 2020.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
Underground/ Above Ground Storage Tank	Title 20 Chapter 57 5700.10	Each owner or operator of an UST that is more than thirty (30) years old shall perform a tightness test within one (1) year of February 21, 2020, and if the UST fails, remove the UST within one (1) year of the date of the test failure.
Spill Prevention, Control, and Countermeasure	40 CFR 112.1 (d)(2)(ii)	SPCC required if the aggregate aboveground storage capacity of the facility is greater than 1,320 gallons
Air	Title V Operating Permit, <sup>1</sup> Condition No. A3 20 DCMR 606.3 (Visible Emissions)	Stationary source fuel burning and pollution control equipment must be operated and maintained in a manner to minimize emissions.
Air	Title V Operating Permit, Condition Nos. A5-A7 20 DCMR 801 (Sulfur Content of Fuel Oils)	Facility will not purchase, sell, or store fuel for use that contains more than 1% sulfur by weight.
Air	Title V Operating Permit, Condition No. A8 20 DCMR 902 (Lead Content of Gasoline)	Facility cannot sell gasoline with more than 1 g/gal of lead.
Air	Title V Operating Permit, Condition No. B1a 20 DCMR 200.2 (General Permit Requirements)	Boilers CU-1, CU-3, and CU-4 must burn only natural gas and #2 fuel oil.
Air	Title V Operating Permit, Condition No. B1b 40 CFR 60.42b(a), District permit #3869	The permittee shall store or use #2 fuel oil that contains no greater than 0.5% sulfur by weight and 0.05% nitrogen by weight
Air	Title V Operating Permit, Condition No. B1c 20 DCMR 600.1 (Fuel Burning Particulate Emissions) and therefore compliant with 40 CFR 60.43b [Standard for particulate matter (PM)]	Particulate matter emission from each boiler, CU-1, CU-3, and CU-4 shall not be greater than 0.05 pound per million Btu
Air	Title V Operating Permit, Condition No. B1d 40 CFR 60.44b [Standard for nitrogen oxides (NO <sub>2</sub> )] and therefore compliant with 20 DCMR 805.5(c) (RACT for Major Stationary Sources of the Oxides of Nitrogen)	NO <sub>x</sub> emission limit must not be greater than 0.20 pound per million BTU
Air	Title V Operating Permit, Condition No. B1e	Permittee must certify and operate a (CEMS) for opacity. No visible emissions shall be emitted into the outdoor atmosphere from boilers

<sup>1</sup> An application has been submitted for a new Title V Operating Permit. Howard University anticipates that the new Title V Operating Permit will be forthcoming shortly and will update the Environmental Obligations at that time. Until the new permit is issued, all requirements of the now-expired Title V Operating Permit have been included in this table.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	20 DCMR 606.1 (Visible Emissions)	CU-1, CU-3 and CU-4; except that no greater than 40% opacity (unaveraged) shall be permitted for two minutes per hour and for an aggregate of twelve minutes per 24-hour period during start-up, cleaning, soot blowing, adjustment of combustion controls, or malfunction of boilers CU-1, CU-3 and CU-4.
Air	Title V Operating Permit, Condition No. B1f 20 DCMR 502 (Sampling, Tests, and Measurements)	Quarterly sampling of fuel oil for sulfur content and other parameters.
Air	Title V Operating Permit, Condition No. B2a 20 DCMR 200.2 (General Permit Requirements)	The permittee must fire only natural gas, #2 or #4 oil in boilers numbers CU-5 through CU-7, CU-10, CU-11, CU-16, CU-17.
Air	Title V Operating Permit, Condition No. B2b 20 DCMR 500 (Records and Reports)	The permittee must keep a log of fuel usage, specifying type and amount used & Quality Assurance
Air	Title V Operating Permit, Condition No. B3a 20 DCMR 200.11 (General Permit Requirements)	The permittee must fire only natural gas, #2 or #4 oil in boilers numbers CU-8, CU-9, CU-12 through CU-15
Air	Title V Operating Permit, Condition No. B4c 20 DCMR 805.1(c)(2) (RACT for Major Stationary Sources of the Oxides of Nitrogen)	Each of the generators must operate less than 500 hours per any consecutive twelve-month period
Air	Title V Operating Permit, Condition No. B5a 20 DCMR 708.1 (Non-photochemically Reactive Solvents)	Cold Solvent Degreaser Equipment Requirements
Air	Title V Operating Permit, Condition No. B5b 20 DCMR 708.5 (Non-photochemically Reactive Solvents) *No longer active rule	Cold Solvent Degreaser operational requirements
Air	Title V Operating Permit, Condition No. B6 Plant-wide Emission Limits	Permittee must ensure that annual plant-wide emissions shall not exceed the following limits: 115.7 tons sulfur dioxide (SO <sub>2</sub> ), 43.8 tons nitrogen oxides (NO <sub>x</sub> ), 40.7 tons volatile organic carbon (VOC), 19.8 tons particulate matter (PM <sub>10</sub> ), 30.2 tons PM and 110.9 tons carbon monoxide (CO) per District permit #3869. Emissions shall be computed on a rolling 12-month basis using data from all sources of emission including CEMS (for units CU-1, CU-3 & CU- 4), fuel, coatings and solvent use data for small boilers, emergency generators and other emission units identified in Section B of this permit.
Air	Title V Operating Permit, Condition No. C1a2 20 DCMR 500 (Records and Reports)	Perform QA procedures on CEMS.
Air	Title V Operating Permit, Condition No. C1a3	Conduct weekly observations and conduct minimum of one Method 9 test on small boilers and boilers less than 5 MMBtu/hr.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	20 DCMR 502 (Sampling, Tests, and Measurements)	
Air	Title V Operating Permit, Condition No. C2 20 DCMR 502 (Sampling, Tests, and Measurements)	Provide the District with written notification at least 10 days prior to a required annual [visible emission] test so that air quality enforcement personnel can observe on site testing
Air	Title V Operating Permit, Condition No. D1 20 DCMR 302.1(c)(B) (Monitoring Requirements)	Keep records of fuel use for fuel burning equipment and emergency generators in Section B of Title V Permit; solvents used in degreasers; all test results, fuel quality information, and rolling 12-month data for facility-wide emissions.
Air	Title V Operating Permit, Condition No. D2 20 DCMR 302.1(c)(B) (Monitoring Requirements)	Certify and operate CEMS
Air	Title V Operating Permit, Condition No. D3 20 DCMR 302.1(c)(B) (Monitoring Requirements)	Maintain records of plant-wide emissions
Air	Title V Operating Permit, Condition No. E1 20 DCMR 302.1(c)(3)(A)&(B) (Reporting Requirements)	Semi-Annual Report
Air	Title V Operating Permit, Condition No. E2 20 DCMR 302.3(e) (Reporting Requirements)	Annual Certification Report
Air	Title V Operating Permit, Condition No. E4 20 DCMR 302.1(c)(3)(C) (Reporting Requirements)	Notifications and Supplemental Reports
Air	Title V Operating Permit, Condition No. E4a 20 DCMR 399.1 (Definitions and Abbreviations)	Emergency Written Notice
Air	Title V Operating Permit, Condition No. E4b 20 DCMR 302.1 (c)(3)(C)(iii) (Reporting Requirements)	The permittee must immediately report any permit deviation that poses an imminent and substantial danger to public health, safety or the environment
Air	Title V Operating Permit, Condition No. E4c 20 DCMR 302.8, 302.9(b) (Change Notices)	Provide written of changes in operation.
Air	Title V Operating Permit, Condition No. F1 20 DCMR 302.1(c)(2)(A)(I-vi) (Record Keeping Requirements)	Record-Keeping Requirements
Air	Title V Operating Permit, Condition No. F2 20 DCMR 302.1(c)(2)(B) (Record Keeping Requirements)	The permittee must keep and maintain records of all testing results, monitoring information, records and reports required by this permit for a period of at least five years from the date of such test, monitoring sample, measurements or report



**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
Air	Title V Operating Permit, Condition No. F3 40 CFR 60 Appendix B & F (Record Keeping Requirements)	Maintain all CEMS and Quality Assurance Data
Air	Title V Operating Permit, Condition No. H 20 DCMR 302.1(h) (Permit Content)	Permitting fee payments.
Air	Title V Operating Permit, Condition No. M 20 DCMR 200 and 300 (General Requirements and Applicability)	Construction permits are required for the installation or modification of air emission or control equipment.
Air	Title V Operating Permit, Condition No. X 40 CFR 82 & 20 DCMR 399.1	Protection of Stratospheric Ozone
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition No. II(b) 20 DCMR 606.1 (Visible Emissions)	Visible emissions must not be emitted from boilers except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60 minute period and an aggregate of 12 minutes in 24 hours.
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition Nos. II(e), V(f) 20 DCMR 805.1(a)(4) and 20 DCMR 805.8(a) and (b) (Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	Perform annual combustion adjustments on each boiler to minimize NO <sub>x</sub> and CO emissions, by inspecting flame pattern, burners, air-to-fuel ratio control system and necessary adjustments to ensure proper calibration and operation as per manufacturer specifications. These records must be maintained for at least five years and available upon request by DOEE and U.S. EPA.
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition No. III(a) 20 DCMR 201 (General Requirements for Permit Issuance)	The only fuel permitted for use in the boiler is Natural Gas.
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1,	The boilers will be operated consistent with the manufacturer specifications.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	Condition No. III(b) 20 DCMR 201 (General Requirements for Permit Issuance)	
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition No. III(c) 20 DCMR 201 (General Requirements for Permit Issuance)	The boilers will be operated in a manner consistent with good air pollution control practice for minimizing emissions including during times of startup, shutdown, and malfunction.
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition Nos. IV(b), V(a) 20 DCMR 502 (Sampling, Tests, and Measurements), 20 DCMR 302.I(c)(2)(B) (Permit Content) and 20 DCMR 500.2 and 500.8 (Records and Reports), 20 DCMR 201 (General Requirements for Permit Issuance)	Performance testing, performed by the facility, must be conducted within 180 days of permit issuance, which will determine compliance for short term emissions (lb/hr) of CO, NO <sub>x</sub> , and PM, including total suspended particles (TSP). The facility will submit a test protocol 30 days in advance and test report within 60 days upon test completion. The results of this testing must be maintained for at least five years and available upon request by DOEE and U.S. EPA.
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition Nos. IV(c), V(b) 20 DCMR 502 (Sampling, Tests, and Measurements), 20 DCMR 302.I(c)(2)(B) (Permit Content) and 20 DCMR 500.2 and 500.8 (Records and Reports)	Facility will conduct visual observations of each boiler emissions once per quarter. If the boiler is not operating, this will be noted. If there are emissions visible, a certified visual emissions observer will be scheduled to conduct a visible emissions test (Method 9). The results of this testing must be maintained for at least five years and available upon request by DOEE and U.S. EPA.
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition Nos. IV(d), V(c) 20 DCMR 502 (Sampling, Tests, and Measurements), 20 DCMR 302.I(c)(2)(B) (Permit Content) and 20 DCMR 500.2 and 500.8 (Records and Reports)	A certified visual observer will conduct at least one visible emissions test (Method 9) per year per boiler even if there was not a visible emissions event. The results of this testing must be maintained for at least five years and available upon request by DOEE and U.S. EPA.
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition No. V(e)	Facility will maintain monthly fuel records (amount used) and compile for a yearly record for each calendar year.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. III(a)   VI(c) 40 CFR 60.4233 (NSPS JJJJ - Emissions Standards), 20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 60.4245(a)(3) (NSPS JJJJ - Reporting and	Comply with emissions limits as stated on the certificate of conformity for the engine family and keep a record of the certificate of conformity.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	Recordkeeping Requirements)	
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. III(b)   VI(a)(6) 20 DCMR 606.1 (Visible Emissions)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.4245(a) (NSPS JJJJ - Reporting and Recordkeeping Requirements)	Visible emissions must not be emitted from engine except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60-minute period and an aggregate of 12 minutes in 24 hours. Keep records of all VE tests for 5 years.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. III(c) 20 DCMR 903.1 (Odorous or Other Nuisance Air Pollutants)	Odorous emissions which are, or are likely to be, injurious to the public health or welfare, or which interfere with the reasonable enjoyment of life or property are prohibited.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. IV(a)	Engines will not exceed 500 operating hours in a rolling 12-month period.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. IV(b)(1)	Engines associated with emergency generators can only be operated in an "emergency", defined as, a failure of the electrical grid; on-site disaster; local equipment failure; or public service emergencies such as flood, fire, natural disaster, or severe weather conditions (e.g. hurricane, tornado, blizzard, etc.).
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. IV(c) 40 CFR 60.4243(d) (NSPS JJJJ - Compliance Requirements)	Emergency engines can be operated for the non-emergency purpose of maintenance checks and readiness testing (MC/RT) for 100 hours per calendar year. These 100 hours are part of the operating limit of 500 hours per rolling 12-month period.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. IV(c)(1) 20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 60.4243(d)(2)(i) (NSPS JJJJ - Compliance Requirements)	Emergency engines can be operated for MC/RT provided the tests are recommended by a governing authority, manufacturer, or insurance company associated with the engine.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. IV(c)(2), IV(f) 20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 60.4243(d)(3) (NSPS JJJJ - Compliance Requirements)	Emergency engines can run for up to 50 hours per calendar year for non-emergency purposes as part of the 100 hours allocated for non-emergency purposes as long as they are not run as part of peak shaving, income generating purposes, or voluntary demand reduction. All operations of the emergency engine resulting from a deviation in voltage or frequency from the electric provider will also count as part of the 50 hours of non-emergency runtime.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. IV(d) 20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 60.4243(d) (NSPS JJJJ -	Emergency engines will only fire natural gas.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	Compliance Requirements)	
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. IV(e)   VI(a)(5)   VI(b) 20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4243 (NSPS JJJJ - Compliance Requirements)   40 CFR 60.4245(a) (NSPS JJJJ - Recordkeeping and Reporting Requirements)   20 DCMR 501 (Monitoring Devices)	Follow manufacturer's operation and maintenance (O&M) manual recommendations, or if unavailable, develop and follow a written maintenance plan consistent with industry standards for similar models. Keep maintenance records for 5 years.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. IV(g) 20 DCMR 201 (General Requirements for Permit Issuance), 40 CFR 60.4243 (NSPS JJJJ - Compliance Requirements)	The engines will be operated in a manner consistent with good air pollution control practice for minimizing emissions including during times of startup, shutdown, and malfunction.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. V(a)   VI(a)(1) 20 DCMR 201 (General Requirements for Permit Issuance) )   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports), 40 CFR 60.4245(a) (NSPS JJJJ - Recordkeeping and Reporting Requirements)	Record, initialize, and maintain in a log on-site for at least five years: • The date, time, duration, and reason for each engine start-up, for any type of operation: o What classified the operation as an emergency, if operated for that purpose.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. V(b) 40 CFR 60.4237(c) (Monitoring Requirements)	Monitor the total hours of operation each month with the use of a properly functioning, non-resettable hour metering device.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. VI(a) (2)-(4) 20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4245(a) (NSPS JJJJ - Recordkeeping and Reporting Requirements)	By the 15th of each month for the previous month, facility must maintain: o Total hours: emergency, maintenance checks and readiness testing, and non-emergency operation: ▪ Not to exceed 100 hours per calendar year for maintenance checks and readiness testing (of these hours, no more than 50 hours for allowable non-emergencies). o 12-month rolling total of operating hours: ▪ Not to exceed 500 hours.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. VI(a) (7)-(8)	Records must be kept of each occurrence, duration, and corrective actions taken during each malfunction.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4245(a) (NSPS JJJJ - Recordkeeping and Reporting Requirements)	
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. VI(a)(9) 20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4245(a) (NSPS JJJJ - Recordkeeping and Reporting Requirements)	Facility will maintain monthly fuel records (amount used) and compile for a yearly record for each calendar year.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. VII 20 DCMR Chapter 3 (Title V)	Facility must complete Semi-Annual and Annual Compliance Certifications and Reports.
Air	Chapter 2 Permit No. 7048-R1, Condition No. III(a) 40 CFR 60.4205 (Emissions Standards)   20 DCMR 201 (General Requirements for Permit Issuance)	Emissions from the engine shall not exceed those specified in 40 CFR 60.4205 for the appropriate engine type. Any engine subject to a Family Emission Limit (FEL) shall comply with any such limits as specified on an EPA Certificate of Conformity.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. III(b)   VI(a)(6) 20 DCMR 606.1 (Visible Emissions)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.4214(b) (Notification, Reporting, and Recordkeeping Requirements)	Visible emissions must not be emitted from engines except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60-minute period and an aggregate of 12 minutes in 24 hours. Keep records of all VE observations for 5 years.
Air	Chapter 2 Permit No. 7048-R1, Condition No. III(c) 20 DCMR 903.1 (Odorous or Other Nuisance Air Pollutants)	Odorous emissions are prohibited.
Air	Chapter 2 Permit No. 7048-R1, Condition No. IV(a) 20 DCMR 201 (General Requirements for Permit Issuance)	Engines will not exceed 500 operating hours in a rolling 12-month period.
Air	Chapter 2 Permit No. 7048-R1, Condition No. IV(b)(1) 20 DCMR 201 (General Requirements for Permit Issuance)	Engines associated with emergency generators can only be operated in an "emergency", defined as, a failure of the electrical grid; on-site disaster; local equipment failure; or public service emergencies such as flood, fire, natural disaster, or severe weather conditions (e.g.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	Issuance)	hurricane, tornado, blizzard, etc.).
Air	Chapter 2 Permit No. 7048-R1, Condition No. IV(c) 40 CFR 60.4211(f) (Compliance Requirements)	Emergency engines can be operated for the non-emergency purpose of maintenance checks and readiness testing (MC/RT) for 100 hours per calendar year. These 100 hours are part of the operating limit of 500 hours per rolling 12-month period.
Air	Chapter 2 Permit No. 7048-R1, Condition No. IV(c)(1) 40 CFR 60.4211(f) (Compliance Requirements)	Emergency engines can be operated for MC/RT provided the tests are recommended by a governing authority, manufacturer, or insurance company associated with the engine.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. IV(c)(2)   IV(f) 20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 60.4211(f)(3) (Compliance Requirements)	Emergency engines can run for up to 50 hours per calendar year for non-emergency purposes as part of the 100 hours allocated for non-emergency purposes as long as they are not run as part of peak shaving, income generating purposes, or voluntary demand reduction.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. IV(d)   V(c) 40 CFR 60.4207(b) (Fuel Requirements)   20 DCMR 502.3 and 502.6 (Sampling, Tests, and Measurements)	Emergency engines will only fire diesel fuel with a maximum sulfur content of 15 ppm (0.0015 percent by weight) and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume. The owner or operator shall monitor and/or test fuel oil as necessary to show compliance.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. IV(e)   VI(a)(5)   VI(b) 20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)	Follow manufacturer's operation and maintenance (O&M) manual recommendations, or if unavailable, develop and follow a written maintenance plan consistent with industry standards for similar models. Keep maintenance records for 5 years.
Air	Chapter 2 Permit No. 7048-R1, Condition No. IV(g) 20 DCMR 201 (General Requirements for Permit Issuance)	The engines will be operated in a manner consistent with good air pollution control practice for minimizing emissions including during times of startup, shutdown, and malfunction.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. V(a)   VI(a)(1) 20 DCMR 500.2 (Records and Reports)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4214(b) (Notification, Reporting, and Recordkeeping Requirements)	Record, initialize, and maintain in a log on-site for at least five years: • The date, time, duration, and reason for each engine start-up, for any type of operation: o What classified the operation as an emergency, if operated for that purpose.
Air	Chapter 2 Permit No. 7048-	Monitor the total hours of operation each month with the use of a

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	R1, Condition No. V(b) 40 CFR 60.4209(a) (Monitoring Requirements)   40 CFR 60.4214(b) (Recordkeeping and Reporting Requirements)	properly functioning, non-resettable hour metering device.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. VI(a)(2)-(4) 20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4214(b) (Recordkeeping and Reporting Requirements)	By the 15th of each month for the previous month, facility must maintain o Total hours: emergency, maintenance checks and readiness testing, and non-emergency operation: ▪ Not to exceed 100 hours per calendar year for maintenance checks and readiness testing (of these hours, no more than 50 hours for allowable non-emergencies). o 12-month rolling total of operating hours: ▪ Not to exceed 500 hours.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. VI(a)(7)-(8) 20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4214(b) (Recordkeeping and Reporting Requirements)	Records must be kept of each occurrence, duration, and corrective actions taken during each malfunction.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. VI(a)(9)   VI(c) 20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4214(b) (Recordkeeping and Reporting Requirements)	Facility will maintain monthly fuel records (amount used, fuel delivery tickets, and either fuel certifications or documentation of fuel sampling and analysis) and compile for a yearly record for each calendar year.
Air	Chapter 2 Permit No. 7048-R1, Condition No. VI(d) 40 CFR 60.4214(a)(2)(iii) (Recordkeeping and Reporting Requirements)	Facility must maintain a copy of the U.S. EPA Certificate of Conformity at the facility (in either hardcopy and/or electronic form) at all times.
Air	Chapter 2 Permit No. 7048-R1, Condition No. VII	Facility must complete Semi-Annual Compliance Report and Annual Compliance Certification.
Air	Chapter 2 Permit No. 7115, Condition Nos. III(a)   VI(a)(6) 20 DCMR 606.1 (Visible Emissions)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping)	Visible emissions must not be emitted from engines except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60-minute period and an aggregate of 12 minutes in 24 hours. Keep records of all VE tests for 5 years.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	
Air	Chapter 2 Permit No. 7115, Condition No. III(b) 20 DCMR 903.1 (Odorous or Other Nuisance Air Pollutants)	Odorous emissions are prohibited.
Air	Chapter 2 Permit No. 7115, Condition No. IV(a) 20 DCMR 201 (General Requirements for Permit Issuance)	Engines will not exceed 500 operating hours in a rolling 12-month period.
Air	Chapter 2 Permit No. 7115, Condition No. IV(b)(1) 20 DCMR 201 (General Requirements for Permit Issuance)	Engines associated with emergency generators can only be operated in an "emergency", defined as, a failure of the electrical grid; on-site disaster; local equipment failure; or public service emergencies such as flood, fire, natural disaster, or severe weather conditions (e.g. hurricane, tornado, blizzard, etc.).
Air	Chapter 2 Permit No. 7115, Condition No. IV(c) 20 DCMR 201 (General Requirements for Permit Issuance)	Emergency engines can be operated for the non-emergency purpose of maintenance checks and readiness testing (MC/RT) for 100 hours per calendar year. These 100 hours are part of the operating limit of 500 hours per rolling 12-month period.
Air	Chapter 2 Permit No. 7115, Condition No. IV(c)(1) 20 DCMR 201 (General Requirements for Permit Issuance) and 40 CFR 63.6640(f)(2)(i) (NESHAP ZZZZ - Compliance Demonstration)	Emergency engines can be operated for MC/RT provided it is recommended by a governing authority, manufacturer, or insurance company associated with the engine.
Air	Chapter 2 Permit No. 7115, Condition Nos. IV(c)(2), IV(e) 20 DCMR 201 (General Requirements for Permit Issuance) and 40 CFR 63.6640(f)(2)(i) (NESHAP MACT ZZZZ - Compliance Demonstration)	Emergency engines can run for up to 50 hours per calendar year for non-emergency purposes as part of the 100 hours allocated for non-emergency purposes as long as they are not run as part of peak shaving, income generating purposes, or voluntary demand reduction. All operations of the emergency engine resulting from a deviation in voltage or frequency from the electric provider will also count as part of the 50 hours of non-emergency runtime.
Air	Chapter 2 Permit No. 7115, Condition No. IV(d) 20 DCMR 201 (General Requirements for Permit Issuance)	Emergency engines will only fire diesel fuel with a maximum sulfur content of 15 ppm (0.0015 percent by weight).
Air	Chapter 2 Permit No. 7115, Condition Nos. IV(f)   VI(a)(5)   VI(b) 40 CFR 63.6625(e) (NESHAP ZZZZ - Maintenance Requirements)   40 CFR	Follow manufacturer's operation and maintenance (O&M) manual recommendations, or if unavailable, develop and follow a written maintenance plan consistent with industry standards for similar models. Keep maintenance records for 5 years.



**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	63.6640(a) (NESHAP ZZZZ - Compliance Demonstration)   40 CFR 63, Subpart ZZZZ, Table 6 (NESHAP ZZZZ - Emissions Limitations and Other Requirements)   20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports)   40 CFR 63.6660 (Recordkeeping Requirements)   40 CFR 63.6655 (Recordkeeping)   40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)   20 DCMR 500.2 (Records and Reports)	
Air	Chapter 2 Permit No. 7115, Condition No. IV(g) 40 CFR 63.6603(a) (NESHAP ZZZZ - Emissions, Operating Limitations, and Other Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions)   40 CFR 63.6640(a) (NESHAP ZZZZ - Compliance Demonstration)   40 CFR 60, Subpart ZZZZ, Table 2d (Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions)	Annually perform and document the following management practices/maintenance requirements: o Change oil and filter. o Inspect air cleaner (replace if necessary). o Inspect all hoses and belts (replace if necessary).
Air	Chapter 2 Permit No. 7115, Condition No. IV(h) 40 CFR 63.6625(e) (NESHAP ZZZZ - Maintenance Requirements)	Engine idling at startup must not exceed 30 minutes (this supersedes what the O&M manual may state).
Air	Chapter 2 Permit No. 7115, Condition No. IV(i) 40 CFR 63.6605 (NESHAP ZZZZ - General Requirements for Compliance) and 20 DCMR 201 (General Requirements for Permit Issuance)	The engines will be operated in a manner consistent with good air pollution control practice for minimizing emissions including during times of startup, shutdown, and malfunction.
Air	Chapter 2 Permit No. 7115, Condition Nos. V(a)	Record, initialize, and maintain in a log on-site for at least five years: • The date, time, duration, and reason for each engine start-up, for

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	VI(a)(1) 20 DCMR 500.2 (Records and Reports)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 - Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	any type of operation: o What classified the operation as an emergency, if operated for that purpose.
Air	Chapter 2 Permit No. 7115, Condition No. V(b) 40 CFR 63.6625(e) (NESHAP ZZZZ - Maintenance Requirements) and 40 CFR 63.6655(f) (Recordkeeping Requirements)	Monitor the total hours of operation each month with the use of a properly functioning, non-resettable hour metering device.
Air	Chapter 2 Permit No. 7115, Condition No. VI(a) (2)-(4) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	By the 15th of each month for the previous month, facility must maintain: o Total hours: emergency, maintenance checks and readiness testing, and non-emergency operation: ▪ Not to exceed 100 hours per calendar year for maintenance checks and readiness testing (of these hours, no more than 50 hours for allowable non-emergencies). o 12-month rolling total of operating hours: ▪ Not to exceed 500 hours.
Air	Chapter 2 Permit No. 7115, Condition No. VI(a) (7)-(8) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	Records must be kept of each occurrence, duration, and corrective actions taken during each malfunction.
Air	Chapter 2 Permit No. 7115, Condition No. VI(a)(9) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping),	Facility will maintain monthly fuel records containing date of delivery, supplier name and address, consumer name and address, volume, fuel grade, and sulfur content certification and compile for a yearly record for each calendar year.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	
Air	Chapter 2 Permit No. 7115, Condition No. VII	Facility must complete Semi-Annual Compliance Report and Annual Compliance Certification
Air	Chapter 2 Permit No. 7116, Condition Nos. III(a)   VI(a)(6)   20 DCMR 606.1 (Visible Emissions)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 63.6660 (Recordkeeping Requirements)   40 CFR 63.6655 (Recordkeeping)   40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	Visible emissions must not be emitted from engines except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60-minute period and an aggregate of 12 minutes in 24 hours. Keep records of all VE tests for 5 years.
Air	Chapter 2 Permit No. 7116, Condition No. III(b)   20 DCMR 903.1 (Odorous or Other Nuisance Air Pollutants)	Odorous emissions are prohibited.
Air	Chapter 2 Permit No. 7116, Condition No. IV(a)   20 DCMR 201 (General Requirements for Permit Issuance)	Engines will not exceed 500 operating hours in a rolling 12-month period.
Air	Chapter 2 Permit No. 7116, Condition No. IV(b)(1)   20 DCMR 201 (General Requirements for Permit Issuance)	Engines associated with emergency generators can only be operated in an "emergency", defined as, a failure of the electrical grid; on-site disaster; local equipment failure; or public service emergencies such as flood, fire, natural disaster, or severe weather conditions (e.g. hurricane, tornado, blizzard, etc.).
Air	Chapter 2 Permit No. 7116, Condition No. IV(c)   20 DCMR 201 (General Requirements for Permit Issuance)	Emergency engines can be operated for the non-emergency purpose of maintenance checks and readiness testing (MC/RT) for 100 hours per calendar year. These 100 hours are part of the operating limit of 500 hours per rolling 12-month period.
Air	Chapter 2 Permit No. 7116, Condition No. IV(c)(1)   20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 63.6640(f)(2)(i) (NESHAP ZZZZ - Compliance Demonstration)	Emergency engines can be operated for MC/RT provided the tests are recommended by a governing authority, manufacturer, or insurance company associated with the engine.
Air	Chapter 2 Permit No. 7116, Condition Nos. IV(c)(2), IV(e)   20 DCMR 201 (General Requirements for Permit Issuance)	Emergency engines can run for up to 50 hours per calendar year for non-emergency purposes as part of the 100 hours allocated for non-emergency purposes as long as they are not run as part of peak shaving, income generating purposes, or voluntary demand reduction. All operations of the emergency engine resulting from a deviation in

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	Issuance)   40 CFR 63.6640(f)(2)(i) (NESHAP MACT ZZZZ - Compliance Demonstration)	voltage or frequency from the electric provider will also count as part of the 50 hours of non-emergency runtime.
Air	Chapter 2 Permit No. 7116, Condition No. IV(d) 20 DCMR 201 (General Requirements for Permit Issuance)	Emergency engines will only fire natural gas.
Air	Chapter 2 Permit No. 7116, Condition Nos. IV(f)   VI(a)(5)   VI(b) 40 CFR 63.6625(e) (NESHAP ZZZZ - Maintenance Requirements)   40 CFR 63.6640(a) (NESHAP ZZZZ - Compliance Demonstration)   40 CFR 63, Subpart ZZZZ, Table 6 (NESHAP ZZZZ - Emissions Limitations and Other Requirements)   20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 63.6660 (Recordkeeping Requirements)   40 CFR 63.6655 (Recordkeeping)   40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)   20 DCMR 500.2 (Records and Reports)	Follow manufacturer's operation and maintenance (O&M) manual recommendations, or if unavailable, develop and follow a written maintenance plan consistent with industry standards for similar models. Keep maintenance records for 5 years.
Air	Chapter 2 Permit No. 7116, Condition No. IV(h) 40 CFR 63.6625(h) (NESHAP ZZZZ - Maintenance Requirements)	Engine idling at startup must not exceed 30 minutes (this supersedes what the O&M manual may state).
Air	Chapter 2 Permit No. 7116, Condition No. IV(i) 40 CFR 63.6605 (NESHAP ZZZZ - General Requirements for Compliance) and 20 DCMR 201 (General Requirements for Permit Issuance)	The engines will be operated in a manner consistent with good air pollution control practice for minimizing emissions including during times of startup, shutdown, and malfunction.
Air	Chapter 2 Permit No. 7116, Condition Nos. V(a)   VI(a)(1) 20 DCMR 500.2 (Records	Record, initialize, and maintain in a log on-site for at least five years: <ul style="list-style-type: none"> <li>• The date, time, duration, and reason for each engine start-up, for any type of operation: <ul style="list-style-type: none"> <li>o What classified the operation as an emergency, if operated for that</li> </ul> </li> </ul>

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	and Reports)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	purpose.
Air	Chapter 2 Permit No. 7116, Condition No. V(b) 40 CFR 63.6625(e) (NESHAP ZZZZ - Maintenance Requirements) and 40 CFR 63.6655(f) (Recordkeeping Requirements)	Monitor the total hours of operation each month with the use of a properly functioning, non-resettable hour metering device.
Air	Chapter 2 Permit No. 7116, Condition No. VI(a) (2)-(4) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	By the 15th of each month for the previous month, facility must maintain: o Total hours: emergency, maintenance checks and readiness testing, and non-emergency operation: ▪ Not to exceed 100 hours per calendar year for maintenance checks and readiness testing (of these hours, no more than 50 hours for allowable non-emergencies). o 12-month rolling total of operating hours: ▪ Not to exceed 500 hours.
Air	Chapter 2 Permit No. 7116, Condition No. VI(a) (7)-(8) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	Records must be kept of each occurrence, duration, and corrective actions taken during each malfunction.
Air	Chapter 2 Permit No. 7116, Condition No. VI(a)(9) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	Facility will maintain monthly fuel records (amount used) and compile for a yearly record for each calendar year.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	Reporting Requirements)	
Air	Chapter 2 Permit No. 7116, Condition No. VII	Facility must complete Semi-Annual Compliance Report and Annual Compliance Certification
Air	Chapter 2 Permit No. 7231, Condition No. II(b) 20 DCMR 606.1 (Visible Emissions)	Visible emissions must not be emitted from boilers except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60-minute period and an aggregate of 12 minutes in 24 hours.
Air	Chapter 2 Permit No. 7231, Condition No. II(e) 20 DCMR 805.1(a)(4) and 20 DCMR 805.8(a) and (b) (Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen)	Perform annual combustion adjustments on each boiler to minimize NO <sub>x</sub> and CO emissions, by inspecting flame pattern, burners, air-to-fuel ratio control system and necessary adjustments to ensure proper calibration and operation as per manufacturer specifications.
Air	Chapter 2 Permit No. 7231, Condition No. III(a) 20 DCMR 201 (General Requirements for Permit Issuance)	The only fuel used for the boiler is Natural Gas.
Air	Chapter 2 Permit No. 7231, Condition No. III(b) 20 DCMR 201 (General Requirements for Permit Issuance)	The boiler will be operated consistent with the manufacturer specifications.
Air	Chapter 2 Permit No. 7231, Condition No. III(c) 20 DCMR 201 (General Requirements for Permit Issuance)	The boiler will be operated in a manner consistent with good air pollution control practice for minimizing emissions including during times of startup, shutdown, and malfunction.
Air	Chapter 2 Permit No. 7231, Condition No. IV(b) 20 DCMR 502 (Sampling, Tests, and Measurements)	DOEE can request performance testing, performed by the facility, which will determine compliance for short term emissions (lb/hr) of CO, NO <sub>x</sub> , and PM, including total suspended particles (TSP). The facility will submit a test protocol 30 days in advance and test report within 60 days upon test completion.
Air	Chapter 2 Permit No. 7231, Condition No. IV(c)	Facility will conduct visual observations of the boiler emissions once per quarter. If the boiler is not operating, this will be noted. If there are emissions visible, a certified visual emissions observer will be scheduled to conduct a visible emissions test (Method 9).
Air	Chapter 2 Permit No. 7231, Condition No. IV(d)	A certified visual observer will conduct at least one visible emissions test (Method 9) per year even if there was not a visible emissions event.
Air	Chapter 2 Permit No. 7231, Condition No. V(e)	Facility will maintain monthly fuel records (amount used) and compile for a yearly record for each calendar year.
Air	40 CFR 63, Subpart CCCCCC (NESHAP for Gasoline Dispensing Facilities)	Record monthly throughput (i.e., fuel deliveries on a rolling 12-month total that can be demonstrated as being current within 24 hours of request).
Air	40 CFR 63, Subpart CCCCCC (NESHAP for Gasoline Dispensing Facilities)	Conduct annual Stage II Vapor Recovery System (VRS) testing.
Air	40 CFR 63, Subpart CCCCCC (NESHAP for Gasoline Dispensing Facilities)	Ensure the following: minimize spills, clean up spills expeditiously, cover gasoline containers and storage tank fill pipes with gasketed

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	Dispensing Facilities)	seal.
Air	Chapter 2 Permit Nos. 7248-7252, Condition No. II(b) 20 DCMR 606.1 (Visible Emissions)	Visible emissions must not be emitted from boilers except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60 minute period and an aggregate of 12 minutes in 24 hours.
Air	Chapter 2 Permit Nos. 7248-7252, Condition No. II(c) 20 DCMR 205 (New Source Performance Standards) and 40 CFR 60.43(c) and (d) (NSPS Subpart Dc - Standard for Steam Generating Units - Particulate Matter)	In addition to Condition II(b), visible emissions from the boilers must not exceed 20% opacity for more than one six-minute period per hour and must not exceed 27% (averaged) opacity during that period. This applies except for periods of startup, shutdown or malfunction.
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. II(e), V(h) 20 DCMR 805.1(a)(4) and 20 DCMR 805.8(a) and (b) (Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	Perform annual combustion adjustments on each boiler and using each allowable fuel to minimize NOX and CO emissions, by inspecting flame pattern, burners, air-to-fuel ratio control system and necessary adjustments to ensure proper calibration and operation as per manufacturer specifications. These records must be maintained for at least five years and available upon request by DOEE and U.S. EPA.
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. III(a), III(b), IV(e), V(b) 20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 801.3 (Sulfur Content of Fuel Oils), 40 CFR 60.42c(d) (NSPS Subpart Dc - Standard for Steam Generating Units - Sulfur Dioxide), 40 CFR 63.11210(f) (NESHAP Subpart JJJJJ - Compliance Requirements)   20 DCMR	The primary fuel source for the boilers is Natural Gas, only Ultra Low Sulfur Diesel with a maximum of 0.0015% sulfur (15 ppm) by weight, is approved as a secondary fuel source. Obtain fuel certification upon each fuel oil delivery (or conduct fuel sampling/analysis if compliant fuel certification can't be obtained). These records must be maintained for at least five years and available upon request by DOEE and U.S. EPA.

**Table 1 – Environmental Objectives**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective
	502 (Sampling, Tests, and Measurements), 40 CFR 60.46c(d)(2) and (e) (NSPS Subpart Dc - Standard for Steam Generating Units - Sulfur Dioxide)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. III(c), IV(f), V(e), V(f) 20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 and 20 DCMR 500.2 (Records and Reports), 40 CFR 60.48c(i) and 40 CFR 60.48c(g)(2) and (g)(3) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11210(f), 40 CFR 63.11225(d), 40 CFR 63.11225(c)(2)(iv) (NESHAP Subpart JJJJJ - Compliance Requirements)	Fuel consumption must be tracked for each calendar year in a rolling 12 month calculation format and cannot exceed a combined 1,271 million standard cubic feet (MMscf) of natural gas and a combined 799,000 gallons of ULSD in any 12-consecutive-month period. ULSD usage must also contain dates of usage, reason for operation, hours of operation, and which boilers burned the secondary fuel. These records must be included in the TVOP Semi-annual report.
Air	Chapter 2 Permit Nos. 7248-7251, Condition Nos. III(d), V(g) 20 DCMR 201 (General Requirements), 40 CFR 63.11195(e) and 40 CFR 63.11237 (NESHAP Subpart JJJJJ - Applicability and Compliance Requirements)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and	The Power Plant temporary boilers #3, #4, #5, and #6 must only operate on ULSD during periods of gas curtailment, gas supply interruption, or for periodic testing, maintenance, or operator training on liquid fuel not to exceed a combined total of 48 hours (per boiler) during any calendar year. Usage must be tracked for at least five years.



**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	Reports), 40 CFR 60.48c(i) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	
Air	Chapter 2 Permit No. 7252, Condition Nos. III(e), III(f), V(i), VI(e) 40 CFR 63.11201(b), 40 CFR 63.11223, (NESHAP Subpart JJJJJ - Industrial, Commercial, and Institutional Boilers Area Sources)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8, 20 DCMR 500.1 (Records and Reports), 40 CFR 60.48c(i) and 40 CFR 60.48c(c) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	Biennial tune-up and submittal to U.S. EPA and DOEE.
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. III(g), III(h), V(j) 20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) and 40 CFR 60.48c(c) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	The boiler will be operated consistent with the manufacturer specifications and in a manner consistent with good air pollution control practices for minimizing emissions including during times of startup, shutdown, and malfunction. These records must be maintained for five years, initialed to attest to their accuracy, and available upon request by DOEE and U.S. EPA.
Air	Chapter 2 Permit Nos.	DOEE can request performance testing, performed by the facility,

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	7248-7252, Condition Nos. IV(a), IV(g), V(a) 20 DCMR 502 (Sampling, Tests, and Measurements), 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	which will determine compliance for short term emissions (lb/hr) of CO, NO <sub>x</sub> , and PM, including total suspended particles (TSP). The facility will submit a test protocol 30 days in advance and test report within 60 days upon test completion. The results of this testing must be maintained for at least five years and available upon request by DOEE and U.S. EPA.
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. IV(b), V(c) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	Facility will conduct visual observations of the boilers' emissions once per month. If the boiler is not operating, this will be noted. If there are emissions visible, a certified visual emissions observer will be scheduled to conduct a visible emissions test (Method 9). These records must be maintained for at least five years and available upon request by DOEE and U.S. EPA.
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. IV(c), IV(d), V(d) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) and 40 CFR 60.48c(c) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	A certified visual observer will conduct at least one visible emissions test (Method 9) per year even if there was not a visible emissions event. These records must be maintained for at least five years and available upon request by DOEE and U.S. EPA.
Air	Chapter 2 Permit No. 7252, Condition No. V(k) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR	A copy of each notification and report for compliance with Subpart JJJJJ and Chapter 2 Permit No. 7252 and all documentation supporting any Initial Notification or Notification of Compliance Status must be kept for at least five years.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	500.8 (Records and Reports), 40 CFR 60.48c(i) and 40 CFR 60.48c(c) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(c)(1) and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. V(l), V(m) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) and 40 CFR 60.48c(c) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(c)(5) and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	Records must be kept of each occurrence, duration, and corrective actions taken during each malfunction for at least five years.
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. VI(a), VI(i) 40 CFR 60.4(a) (NSPS - General Provisions), 40 CFR 60.7(a) (NSPS - Notification and Record Keeping), 40 CFR 60.28c(a) (NSPS - Plan Revisions by State), 40 CFR 60.48c(a) and 40 CFR 60.48c(b) (NSPS Subpart Dc - Reporting and Recordkeeping Requirements), 40 CFR 63.11225(a)(4) (NESHAP Subpart JJJJJ - Recordkeeping and Reporting Requirements)	Submit initial notification forms.
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. VI(b), VI(c) 40 CFR 60.4(a) (NSPS - General Provisions), 40 CFR 60.7(a) (NSPS - Notification	Initial performance test data must be submitted to DOEE and U.S. EPA.

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
	and Record Keeping), 40 CFR 60.28c(a) (NSPS - Plan Revisions by State), 40 CFR 60.48c(a) (NSPS Subpart Dc - Reporting and Recordkeeping Requirements)	
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. VI(g), VI(h) 40 CFR 60.4(a) (NSPS - General Provisions), 40 CFR 60.7(a) (NSPS - Notification and Record Keeping), 40 CFR 60.28c(a) (NSPS - Plan Revisions by State), 40 CFR 60.48c(a) (NSPS Subpart Dc - Reporting and Recordkeeping Requirements)	Subpart JJJJJ notification requirement if there's a change in applicability.
Air	Chapter 2 Permit No. 7252, Condition No. VI(j) 40 CFR 60.4(a) (NSPS - General Provisions), 40 CFR 60.7(a) (NSPS - Notification and Record Keeping), 40 CFR 60.28c(a) (NSPS - Plan Revisions by State), 40 CFR 60.48c(a) and 40 CFR 60.48c(b) (NSPS Subpart Dc - Reporting and Recordkeeping Requirements), 40 CFR 63.11225(b)(3) (NESHAP Subpart JJJJJ - Recordkeeping and Reporting Requirements)	Annual Deviation Report and Biennial compliance report.
Air	Facility-wide Requirement 40 CFR Part 98, Subpart A [40 CFR 98.3(g)(5)]	Develop and maintain a Greenhouse Gas (GHG) Monitoring Plan.
Air	Facility-wide Requirement 40 CFR Part 98, Subpart A [40 CFR 98.2(a)(3)]	Prepare annual GHG Report.
Stormwater and Wastewater	40 CFR § 122.26	Storm water discharges Operators shall be required to obtain an NPDES permit for storm water discharge associated with construction activities.
Stormwater and Wastewater	40 CFR 122.21	Individual Permit NPDES permits required for discharges that do not meet the conditions of general permits.
Stormwater and Wastewater	DCMR Title 21 Chapter 15 1504	Non-Significant Non-Categorical Industrial User Wastewater Discharge Permit This type of permit is issued to minor industrial/commercial businesses and government agencies that have less than 25,000

**Table 1 – Environmental Objectives**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>
		gallons per day of process flow and are specifically designated by DC Water due to the type of business, characteristics of the discharge, or presence of pretreatment facilities. Businesses with the contaminated non-wastewater flow may also be issued this type of permit if discharging less than 25,000 gpd. These permits are valid for three years.
Stormwater and Wastewater	DCMR Title 21 Chapter 15 1509	<p>Temporary Discharge Authorization Permits</p> <p>Businesses and government agencies that meet the following criteria may be required to have a Temporary Discharge Authorization Permit:</p> <ul style="list-style-type: none"> <li>- Users with temporary construction dewatering</li> <li>- Users with temporary discharges from groundwater remediation</li> <li>- Users with temporary discharges that are directed to a catch basin or manhole in public space</li> <li>- Users with temporary discharges on private property that involve high volume discharges or contain chemicals of concern</li> </ul>

### 3.7 Operational Controls

Howard University established the processes (i.e., Operational Controls) needed to meet the Environmental Objectives defined as part of the EMS. Full details of these processes, such as responsible parties, implementation dates, issue escalation, etc., are described and documented in VelocityEHS. A summary of these Environmental Controls is presented in Table 2, below.

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Hazardous Waste	40 CFR 262.13	A generator must determine its generator category. A generator's category is based on the amount of hazardous waste generated each month and may change from month to month. This section sets forth procedures to determine whether a generator is a very small quantity generator, a small quantity generator, or a large quantity generator for a particular month.	Biennial review of generator status to determine if Howard University is a very small, small, or large quantity generator.
Hazardous Waste	40 CFR 262.18	(a) A generator must not treat, store, dispose of, transport, or offer for transportation hazardous waste without having received an EPA identification number from the Administrator. (d) (2) A large quantity generator must re-notify EPA by March 1 of each even-numbered year thereafter using EPA Form 8700-12. A large quantity generator may submit this re-notification as part of its Biennial Report required under §262.41.	Biennial reporting for hazardous waste
Hazardous Waste	40 CFR 262.20	(a)(1) A generator that transports, or offers for transport a hazardous waste for offsite treatment, storage, or disposal, or a treatment, storage, or disposal facility that offers for transport a rejected hazardous waste load, must prepare a Manifest (OMB Control number 2050-0039) on EPA Form 8700-22, and, if necessary, EPA Form 8700-22A.	Quarterly file review to ensure complete and accurate records of all manifests generated by contracted hazardous waste transporters.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Hazardous Waste	40 CFR 262.40	(a) A generator must keep a copy of each manifest signed in accordance with §262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter. (b) A generator must keep a copy of each Biennial Report and Exception Report for a period of at least three years from the due date of the report.	Quarterly file review to ensure complete and accurate records of all manifests generated by contracted hazardous waste transporters and biennial reports.
Hazardous Waste	40 CFR 262.41	(a) A generator which is a large quantity generator for at least one month of an odd-numbered year (reporting year) who ships any hazardous waste off-site to a treatment, storage, or disposal facility within the United States must complete and submit EPA Form 8700-13 A/B to the Regional Administrator by March 1 of the following even-numbered year and must cover generator activities during the previous year.	Quarterly file review to ensure complete and accurate records of required biennial reports.
Hazardous Waste	40 CFR 262 Subpart K	Alternative Requirements for Hazardous Waste Determination and Accumulation of Unwanted Material for Laboratories Owned by Eligible Academic Entities	Evaluate the applicability of a Laboratory Management Plan (LMP)
Hazardous Waste	Title 20 Chapter 20 4204.1	Except as provided in § 4204.2, each person required by the Standards for the Management of Hazardous Waste and Used Oil (20 DCMR chapter 42) to comply with the notification requirements of § 3010 of RCRA, 42 USC § 6930 (notification of regulated waste activity), and to obtain an EPA identification number shall do so by submitting to the Director a completed EPA Form 8700-12 (RCRA Subtitle C Identification Form).	Annual file review to ensure complete and accurate records. Ensure that all required copies of EPA Form 8700-12 have been submitted and that EPA ID# DCD106341449 issued for LQG

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Hazardous Waste	Title 20 Chapter 20 4206.1	Each generator of hazardous waste or used oil handler shall keep on-site all records required to be kept under the Hazardous Waste Management Regulations, 20 DCMR Chapters 42 and 43.	Annual file review to ensure complete and accurate records of all manifests generated by contracted hazardous waste transporters and biennial reports.
Hazardous Waste	Title 20 Chapter 20 4206.2	Whenever the RCRA regulations in 40 CFR Parts 124, 260 through 266, 268, 270, 273, and 279 require that a document be sent to EPA, DOT, or another federal agency, the person required to send the document to EPA, DOT, or other federal agency shall, at the same time, send a copy to the Department's Hazardous Waste Division.	Annual file review to ensure complete and accurate records of all manifests generated by contracted hazardous waste transporters and biennial reports.
Underground/ Above Ground Storage Tank	Title 20 Chapter 56 5601.2	An owner of an existing underground storage tank or tanks containing a regulated substance shall have registered each tank with the Director and shall have paid the required fee, as provided in § 5601.9.	Semi-annual record check to confirm all UST registrations are current
Underground/ Above Ground Storage Tank	Title 20 Chapter 56 5601.11	A copy of the current registration certificate shall be posted in a visible location at the facility at all times.	Semi-annual confirmation that all USTs registrations are posted and visible
Underground/ Above Ground Storage Tank	Title 20 Chapter 56 5602.4	Each owner or operator shall maintain the following records and information for each facility, in accordance with the provisions of this chapter: (a) Documentation of the operation of corrosion protection equipment (§ 5901); (b) Documentation of UST system repairs (§ 5902); (c) Recent record of compliance with release detection requirements (§ 6001); and (d) Results of the site investigation conducted at permanent closure (§ 6101).	Semi-annual record checks to confirm complete and accurate records of system repairs, release detection, and closures.
Underground/ Above Ground Storage Tank	Title 20 Chapter 56 6003.1	Each owner or operator of a petroleum UST system shall provide release detection for tanks in accordance with the provisions of this section, except as provided elsewhere in Chapter 60.	Conduct tank tightness testing on all heating oil USTs



**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Underground/ Above Ground Storage Tank	Title 20 Chapter 57 5700.10	Each owner or operator of an UST that is more than thirty (30) years old shall remove the tank from the ground in accordance with Chapter 61 within five (5) years of February 21, 2020.	Evaluate compliance options.
Underground/ Above Ground Storage Tank	Title 20 Chapter 57 5700.11	Each owner or operator of an UST that is more than thirty (30) years old shall perform a tightness test within one (1) year of February 21, 2020, and if the UST fails, remove the UST within one (1) year of the date of the test failure.	Conduct tightness test.
Underground/ Above Ground Storage Tank	Title 20 Chapter 57 5700.10	Each owner or operator of a petroleum UST system shall provide release detection for tanks in accordance with the provisions of this section, except as provided elsewhere in Chapter 60.	Conduct tank tightness testing on all heating oil USTs
Spill Prevention, Control, and Countermeasure	40 CFR 112.1 (d)(2)(ii)	SPCC required if the aggregate aboveground storage capacity of the facility is greater than 1,320 gallons	Conduct an annual review of SPCC to ensure accurate and complete
			Fuel leak visual inspections per SPCC plan, fuel tanks and fuel lines, and SPCC Plan annual training
Air	Title V Operating Permit <sup>2</sup> , Condition No. A3 20 DCMR 606.3 (Visible Emissions)	Stationary source fuel burning and pollution control equipment must be operated and maintained in a manner to minimize emissions.	Quarterly file review to confirm stationary source fuel burning and pollution control equipment is operated and maintained in a manner to minimize emissions
Air	Title V Operating Permit, Condition Nos. A5-A7 20 DCMR 801 (Sulfur Content of Fuel Oils)	Facility will not purchase, sell, or store fuel for use that contains more than 1% sulfur by weight.	Analysis of Power Plant's UST contents
			Obtain fuel oil certification - each shipment
			Notification to Suppliers when fuel is not in compliance

<sup>2</sup> An application has been submitted for a new Title V Operating Permit. Howard University anticipates that the new Title V Operating Permit will be forthcoming shortly and will update the Environmental Controls at that time. Until the new permit is issued, all requirements of the now-expired Title V Operating Permit have been included in this table.

## EMS Manual

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Title V Operating Permit, Condition No. A8 20 DCMR 902 (Lead Content of Gasoline)	Facility cannot sell gasoline with more than 1 g/gal of lead.	NA, Facility does not sell gasoline.
Air	Title V Operating Permit, Condition No. B1a 20 DCMR 200.2 (General Permit Requirements)	Boilers CU-1, CU-3, and CU-4 must burn only natural gas and #2 fuel oil.	NA, boilers no longer in operation.
Air	Title V Operating Permit, Condition No. B1b 40 CFR 60.42b(a) [Standards for Sulfur Dioxide (SO <sub>2</sub> )], District permit #3869	Permittee shall store or use #2 fuel oil that contains no greater than 0.5% sulfur by weight and 0.05% nitrogen by weight	NA, boilers no longer in operation.
Air	Title V Operating Permit, Condition No. B1c 20 DCMR 600.1 (Fuel Burning Particulate Emissions) and therefore compliant with 40 CFR 60.43b [Standard for particulate matter (PM)].	Particulate matter emission from each boiler, CU-1, CU-3 and CU-4 shall not be greater than 0.05 pound per million Btu	NA, boilers no longer in operation.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Title V Operating Permit, Condition No. B1d 40 CFR 60.44b [Standard for nitrogen oxides (NO <sub>2</sub> )] and therefore compliant with 20 DCMR 805.5(c) (RACT for Major Stationary Sources of the Oxides of Nitrogen)	NO <sub>x</sub> emission limit must not be greater than 0.20 pound per million BTU	NA, boilers no longer in operation.
Air	Title V Operating Permit, Condition No. B1e 20 DCMR 606.1 (Visible Emissions)	Permittee must certify and operate a (CEMS) for opacity. No visible emissions shall be emitted into the outdoor atmosphere from boilers CU-1, CU-3 and CU-4; except that no greater than 40% opacity (unaveraged) shall be permitted for two minutes per hour and for an aggregate of twelve minutes per 24-hour period during start-up, cleaning, soot blowing, adjustment of combustion controls, or malfunction of boilers CU-1, CU-3 and CU-4.	NA, boilers no longer in operation.
Air	Title V Operating Permit, Condition No. B1f 20 DCMR 502 (Sampling, Tests, and Measurements)	Quarterly sampling of fuel oil for sulfur content and other parameters.	NA, boilers either no longer exist on site or are incapable of operation.
Air	Title V Operating Permit, Condition No. B2a 20 DCMR 200.2 (General Permit Requirements)	Permittee must fire only natural gas, #2 or #4 oil in boilers	NA, boilers either no longer exist on site or are incapable of operation.

## EMS Manual

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Title V Operating Permit, Condition No. B2b 20 DCMR 500 (Records and Reports)	Permittee must keep a log of fuel usage, specifying type and amount used & Quality Assurance	NA, boilers either no longer exist on site or are incapable of operation.
Air	Title V Operating Permit, Condition No. B3a 20 DCMR 200.11 (General Permit Requirements)	Permittee must fire only natural gas, #2 or #4 oil in boilers	NA, boilers do not exist on-site or are incapable of operation.
Air	Title V Operating Permit, Condition No. B4c 20 DCMR 805.1(c)(2) (RACT for Major Stationary Sources of the Oxides of Nitrogen)	Each of the generators must operate less than 500 hours per any consecutive twelve-month period	Ensure generators are operated within the Title V and Federal regulation operational limits by providing monthly data to ALL4 on time.
Air	Title V Operating Permit, Condition No. B5a 20 DCMR 708.1 (Nonphotochemically Reactive Solvents)	Cold Solvent Degreaser equipment requirements	NA, cold solvent degreasers no longer exist
Air	Title V Operating Permit, Condition No. B5b 20 DCMR 708.5 (Nonphotochemically Reactive Solvents) *No longer active rule	Cold Solvent Degreaser operational requirements	NA, cold solvent degreasers no longer exist

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Title V Operating Permit, Condition No. B6 Plant-wide Emission Limits	Permittee must ensure that annual plant-wide emissions shall not exceed the following limits: 115.7 tons sulfur dioxide (SO <sub>2</sub> ), 43.8 tons nitrogen oxides (NO <sub>x</sub> ), 40.7 tons volatile organic carbon (VOC), 19.8 tons particulate matter (PM <sub>10</sub> ), 30.2 tons PM and 110.9 tons carbon monoxide (CO) per District permit #3869. Emissions shall be computed on a rolling 12-month basis using data from all sources of emission including CEMS (for units CU-1, CU-3 & CU-4), fuel, coatings and solvent use data for small boilers, emergency generators and other emission units identified in Section B of this permit	Calculation of university-wide emissions to ensure that limits are not exceeded on a rolling 12-month basis.
Air	Title V Operating Permit, Condition No. C1a2 20 DCMR 500	Perform QA procedures on CEMS.	NA, boilers no longer in operation.
Air	Title V Operating Permit, Condition No. C1a3 20 DCMR 502	Conduct weekly observations and conduct minimum of one Method 9 test on small boilers and boilers less than 5 MMBtu/hr.	NA, boilers either no longer exist on site or are in operation.
Air	Title V Operating Permit, Condition No. C2 20 DCMR 502	Provide the District with written notification at least 10 days prior to a required annual [visible emission] test so that air quality enforcement personnel can observe on site testing	Notify DOEE of VE tests at least 10 days prior to test date.
Air	Title V Operating Permit, Condition No. D1 20 DCMR 302.1(c)(B) (Monitoring Requirements)	Keep records of fuel use for fuel burning equipment and emergency generators in Section B of Title V Permit; solvents used in degreasers; all test results, fuel quality information, and rolling 12-month data for facility-wide emissions.	Obtain compliant fuel certifications upon each fuel delivery for EGs.

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**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Title V Operating Permit, Condition No. D2 20 DCMR 302.1(c)(B) (Monitoring Requirements)	Certify and operate CEMS	NA, boilers no longer in operation.
Air	Title V Operating Permit, Condition No. D3 20 DCMR 302.1(c)(B) (Monitoring Requirements)	Maintain records of plant-wide emissions	Maintain all testing results monitoring information, records and reports required by permit for five years from the date of the activity/ report
Air	Title V Operating Permit, Condition No. E1 20 DCMR 302.1(c)(3)(A)&(B) (Reporting Requirements)	Semi-Annual Report	Submit semi-annual report to DOEE outlining all Title V required testing, reports, maintenance, correspondence, fuel burning logs, and oil analysis results from January through June of current year.
Air	Title V Operating Permit, Condition No. E2 20 DCMR 302.3(e) (Reporting Requirements)	Annual Certification Report	Submit annual report to DOEE and U.S. EPA outlining all Title V required testing, reports, maintenance, correspondence, fuel burning logs, and oil analysis results from previous year.
Air	Title V Operating Permit, Condition No. E4 20 DCMR 302.1(c)(3)(C) (Reporting Requirements)	Notifications and Supplemental Reports	As applicable
Air	Title V Operating Permit, Condition No. E4a 20 DCMR 399.1 (Definitions and Abbreviations)	Emergency Written Notice	As applicable

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Title V Operating Permit, Condition No. E4b 20 DCMR 302.1 (c)(3)(C)(ii) (Reporting Requirements)	Permittee must immediately report any permit deviation that poses an imminent and substantial danger to public health, safety or the environment	As applicable
Air	Title V Operating Permit, Condition No. E4c 20 DCMR 302.8, 302.9(b) (Change Notices)	Provide written of changes in operation.	As applicable
Air	Title V Operating Permit, Condition No. F1 20 DCMR 302.1(c)(2)(A)(I-vi) (Record Keeping Requirements)	Record-Keeping Requirements	Ensure at least 5 years of test results, records and reports are on file.
Air	Title V Operating Permit, Condition No. F2 20 DCMR 302.1(c)(2)(B) (Record Keeping Requirements)	Permittee must keep and maintain records of all testing results, monitoring information, records and reports required by this permit for a period of at least five years from the date of such test, monitoring sample, measurements or report.	Ensure at least 5 years of test results, records and reports are on file.
Air	Title V Operating Permit, Condition No. F3 40 CFR 60, Appendices B & F (Record Keeping Requirements)	Maintain all CEMS and Quality Assurance Data	Ensure at least 5 years of test results, records and reports are on file.
Air	Title V Operating Permit, Condition No. H 20 DCMR 302.1(h) (Permit Content)	Permitting fee payments.	Ensure that Title V fees are properly calculated and paid.

## EMS Manual

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Title V Operating Permit, Condition No. M 20 DCMR 200 and 300 (General Requirements and Applicability)	Construction permit required for the installation or modification for air emission or control equipment.	Bi-annual review of planned construction projects to determine potential need for GCP. EHG will coordinate a meeting with office of real estate, office of procurement and contracting, and physical facilities every 6 months.
Air	Title V Operating Permit, Condition No. X 40 CFR 82 & 20 DCMR 399.1	Protection of Stratospheric Ozone	Comply with the standard for the labeling of products using ozone-depleting substances. Comply with the standards for recycling and emission reduction. Certifications of persons opening appliances for maintenance service or repair. Maintain leak, purchasing, and maintenance records regarding commercial or industrial process refrigeration equipment and appliances normally containing greater than 50 pounds of ozone depleting substances. Any records maintained will be provided to EHS for Air permitting compliance.
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition No. II(b) 20 DCMR 606.1 (Visible Emissions)	Visible emissions must not be emitted from boilers except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60 minute period and an aggregate of 12 minutes in 24 hours.	Be aware of visible emissions from stack during operations and keep record at least once per quarter as required. If visible emissions are observed, then inform EHS immediately and investigate cause.



**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition Nos. II(e), V(f) 20 DCMR 805.1(a)(4) and 20 DCMR 805.8(a) and (b) (Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	Perform annual combustion adjustments on each boiler to minimize NO <sub>x</sub> and CO emissions, by inspecting flame pattern, burners, air-to-fuel ratio control system and necessary adjustments to ensure proper calibration and operation as per manufacturer specifications. These records must be maintained for at least five years and available upon request by DOEE and U.S. EPA.	Review contractor report. Once final, distribute it to Thompson Facilities. Copy should be onsite with EHS and Thompson. A copy must be included in TVOP Annual Compliance Certification.
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition No. III(a) 20 DCMR 201 (General Requirements for Permit Issuance)	The only fuel permitted for use in the boiler is Natural Gas.	-
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition No. III(b) 20 DCMR 201 (General Requirements for Permit Issuance)	The boilers will be operated consistent with the manufacturer specifications.	Obtain confirmation from Thompson each quarter during boiler operation that its personnel are operating the boilers in accordance with the manufacturer O&M Manual.

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition No. III(c) 20 DCMR 201 (General Requirements for Permit Issuance)	The boilers will be operated in a manner consistent with good air pollution control practice for minimizing emissions including during times of startup, shutdown, and malfunction.	Obtain confirmation from Thompson each quarter that the boiler operators follow good operating practices to ensure emissions are minimized.
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition Nos. IV(b), V(a) 20 DCMR 502 (Sampling, Tests, and Measurements), 20 DCMR 302.I(c)(2)(B) (Permit Content) and 20 DCMR 500.2 and 500.8 (Records and Reports), 20 DCMR 201 (General Requirements for Permit Issuance)	Performance testing, performed by the facility, must be conducted within 180 days of permit issuance, which will determine compliance for short term emissions (lb/hr) of CO, NO <sub>x</sub> , and PM, including total suspended particles (TSP). The facility will submit a test protocol 30 days in advance and test report within 60 days upon test completion. The results of this testing must be maintained for at least five years and available upon request by DOEE and U.S. EPA.	Testing was implemented in 2019 twice and rescheduled due to various factors. Test protocol was sent at least 30 days in advance of proposed test. Submit test results/report within 60 days of test completion. All test records must be kept.
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition Nos. IV(c), V(b) 20 DCMR 502 (Sampling, Tests, and Measurements), 20 DCMR 302.I(c)(2)(B) (Permit Content) and 20 DCMR 500.2 and 500.8 (Records and Reports)	Facility will conduct visual observations of each boiler emissions once per quarter. If the boiler is not operating, this will be noted. If there are emissions visible, a certified visual emissions observer will be scheduled to conduct a visible emissions test (Method 9). The results of this testing must be maintained for at least five years and available upon request by DOEE and U.S. EPA.	At least once per quarter, if the boiler is online at any point during the quarter, a visible emissions observation must be made and recorded on the visible emissions logs maintained by Thompson Facilities. If the boiler does not operate at all during an entire quarter, this must be recorded as well.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition Nos. IV(d), V(c) 20 DCMR 502 (Sampling, Tests, and Measurements), 20 DCMR 302.I(c)(2)(B) (Permit Content) and 20 DCMR 500.2 and 500.8 (Records and Reports)	A certified visual observer will conduct at least one visible emissions test (Method 9) per year per boiler even if there was not a visible emissions event. The results of this testing must be maintained for at least five years and available upon request by DOEE and U.S. EPA.	Coordinate with U.S. EPA Method 9 certified observer to conduct annual visible emissions test.
Air	Chapter 2 Permit Nos. 6942-R1 and 6943-R1, Condition No. V(e)	Facility will maintain monthly fuel records (amount used) and compile for a yearly record for each calendar year.	Thompson shall maintain records of fuel used on a monthly basis and provide to the EHS Director and ALL4 by the 10th of each month. ALL4 provides the updated 12-Month Rolling Totals Tracking Tool by the 15th of each month.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. III(a)   VI(c) 40 CFR 60.4233 (NSPS JJJJ - Emissions Standards), 20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 60.4245(a)(3) (NSPS JJJJ - Reporting and Recordkeeping Requirements)	Comply with emissions limits as stated on the certificate of conformity for the engine family and keep a record of the certificate of conformity.	Retain EPA Certificate of Conformity for life of engine

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. III(b)   VI(a)(6) 20 DCMR 606.1 (Visible Emissions)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.4245(a) (NSPS JJJJ - Reporting and Recordkeeping Requirements)	Visible emissions must not be emitted from engine except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60-minute period and an aggregate of 12 minutes in 24 hours. Keep records of all VE tests for 5 years.	Be aware of visible emissions from stack during operations. Any observed visible emissions which do not quickly clear up when the unit is started shall be reported immediately to the EHS Director and the cause investigated. Upon discovery of a visible emissions issue, arrangements should be made to have a U.S. EPA Method 9-certified visible emissions observer perform a visible emissions test on the unit in question.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. III(c) 20 DCMR 903.1 (Odorous or Other Nuisance Air Pollutants)	Odorous emissions which are, or are likely to be, injurious to the public health or welfare, or which interfere with the reasonable enjoyment of life or property are prohibited.	For any odor complaints received, the EHS Director will coordinate with the Department of Public Safety (DPS), who will investigate further to determine the source of the odorous emissions and what follow up action items, if any, are needed.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. IV(a)	Engines will not exceed 500 operating hours in a rolling 12-month period.	Review summation tabs in the 12-Month Rolling Totals Tracking Tool on a monthly basis after operating data for the previous month has been entered to verify compliance.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. IV(b)(1)	Engines associated with emergency generators can only be operated in an "emergency", defined as, a failure of the electrical grid; on-site disaster; local equipment failure; or public service emergencies such as flood, fire, natural disaster, or severe weather conditions (e.g. hurricane, tornado, blizzard, etc.).	Each time an emergency generator operates for emergency operation, the reason for operation (beyond just stating "emergency operation") must be recorded.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. IV(c) 40 CFR 60.4243(d) (NSPS JJJJ - Compliance Requirements)	Emergency engines can be operated for the non-emergency purpose of maintenance checks and readiness testing (MC/RT) for 100 hours per calendar year. These 100 hours are part of the operating limit of 500 hours per rolling 12-month period.	Each time an emergency generator operates for MC/RT, the type of MC/RT activity must be recorded on the log sheet for the EG.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. IV(c)(1) 20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 60.4243(d)(2)(i) (NSPS JJJJ - Compliance Requirements)	Emergency engines can be operated for MC/RT provided the tests are recommended by a governing authority, manufacturer, or insurance company associated with the engine.	Maintain records of all recommended maintenance practices.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. IV(c)(2), IV(f) 20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 60.4243(d)(3) (NSPS JJJJ - Compliance Requirements)	Emergency engines can run for up to 50 hours per calendar year for non-emergency purposes as part of the 100 hours allocated for non-emergency purposes as long as they are not run as part of peak shaving, income generating purposes, or voluntary demand reduction. All operations of the emergency engine resulting from a deviation in voltage or frequency from the electric provider will also count as part of the 50 hours of non-emergency runtime.	Each time an emergency generator operates for non-emergency purposes, the operation must be recorded on the log sheet for the EG as non-emergency operation.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. IV(d) 20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 60.4243(d) (NSPS JJJJ - Compliance Requirements)	Emergency engines will only fire natural gas.	-

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**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. IV(e)   VI(a)(5)   VI(b) 20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4243 (NSPS JJJJ - Compliance Requirements)   40 CFR 60.4245(a) (NSPS JJJJ - Recordkeeping and Reporting Requirements)   20 DCMR 501 (Monitoring Devices)	Follow manufacturer's operation and maintenance (O&M) manual recommendations, or if unavailable, develop and follow a written maintenance plan consistent with industry standards for similar models. Keep maintenance records for 5 years.	Review O&M manuals for each unit to ensure they are being followed each time the unit is operated, and each time maintenance is performed on the unit.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. IV(g) 20 DCMR 201 (General Requirements for Permit Issuance), 40 CFR 60.4243 (NSPS JJJJ - Compliance Requirements)	The engines will be operated in a manner consistent with good air pollution control practice for minimizing emissions including during times of startup, shutdown, and malfunction.	Obtain confirmation each quarter that the EGs operators follow good operating practices to ensure emissions are minimized.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. V(a)   VI(a)(1) 20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports), 40 CFR 60.4245(a) (NSPS JJJJ - Recordkeeping and Reporting Requirements)	Record, initialize, and maintain in a log on-site for at least five years: <ul style="list-style-type: none"> <li>• The date, time, duration, and reason for each engine start-up, for any type of operation: <ul style="list-style-type: none"> <li>o What classified the operation as an emergency, if operated for that purpose.</li> </ul> </li> </ul>	Provide records to the EHS Director and ALL4 by the 10th of each month.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. V(b) 40 CFR 60.4237(c) (Monitoring Requirements)	Monitor the total hours of operation each month with the use of a properly functioning, non-resettable hour metering device.	Provide records to the EHS Director and ALL4 by the 10th of each month.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. VI(a) (2)-(4) 20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4245(a) (NSPS JJJJ - Recordkeeping and Reporting Requirements)	By the 15th of each month for the previous month, facility must maintain: <ul style="list-style-type: none"> <li>o Total hours: emergency, maintenance checks and readiness testing, and non-emergency operation: <ul style="list-style-type: none"> <li>▪ Not to exceed 100 hours per calendar year for maintenance checks and readiness testing (of these hours, no more than 50 hours for allowable non-emergencies).</li> </ul> </li> <li>o 12-month rolling total of operating hours: <ul style="list-style-type: none"> <li>▪ Not to exceed 500 hours.</li> </ul> </li> </ul>	Records must be provided to the EHS Director and ALL4 by the 10th so records can be updated by the 15th.

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**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Chapter 2 Permit No. 7043-SC-R1, Condition Nos. VI(a) (7)-(8)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4245(a) (NSPS JJJJ - Recordkeeping and Reporting Requirements)	Records must be kept of each occurrence, duration, and corrective actions taken during each malfunction.	Provide records of any malfunctions to the EHS Director and ALL4.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. VI(a)(9)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4245(a) (NSPS JJJJ - Recordkeeping and Reporting Requirements)	Facility will maintain monthly fuel records (amount used) and compile for a yearly record for each calendar year.	Provide records to the EHS Director and ALL4 by the 10th of each month.
Air	Chapter 2 Permit No. 7043-SC-R1, Condition No. VII   20 DCMR Chapter 3 (Title V)	Facility must complete Semi-Annual and Annual Compliance Certifications and Reports.	By March 1 and August 1 submit reports to DOEE.
Air	Chapter 2 Permit No. 7048-R1, Condition No. III(a)   40 CFR 60.4205 (Emissions Standards)   20 DCMR 201 (General Requirements for Permit Issuance)	Emissions from the engine shall not exceed those specified in 40 CFR 60.4205 for the appropriate engine type. Any engine subject to a Family Emission Limit (FEL) shall comply with any such limits as specified on an EPA Certificate of Conformity.	-



**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. III(b)   VI(a)(6) 20 DCMR 606.1 (Visible Emissions)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.4214(b) (Notification, Reporting, and Recordkeeping Requirements)	Visible emissions must not be emitted from engines except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60-minute period and an aggregate of 12 minutes in 24 hours. Keep records of all VE observations for 5 years.	Be aware of visible emissions from stack during operations. Any observed visible emissions which do not quickly clear up when the unit is started shall be reported immediately to the EHS Director and the cause investigated. Upon discovery of a visible emissions issue, arrangements should be made to have a U.S. EPA Method 9-certified visible emissions observer perform a visible emissions test on the unit in question.
Air	Chapter 2 Permit No. 7048-R1, Condition No. III(c) 20 DCMR 903.1 (Odorous or Other Nuisance Air Pollutants)	Odorous emissions are prohibited.	For any odor complaints received, the EHS Director will coordinate with the Department of Public Safety (DPS), who will investigate further to determine the source of the odorous emissions and what follow up action items, if any, are needed.
Air	Chapter 2 Permit No. 7048-R1, Condition No. IV(a) 20 DCMR 201 (General Requirements for Permit Issuance)	Engines will not exceed 500 operating hours in a rolling 12-month period.	Review summation tabs in the 12-Month Rolling Totals Tracking Tool on a monthly basis after operating data for the previous month has been entered to verify compliance.
Air	Chapter 2 Permit No. 7048-R1, Condition No. IV(b)(1) 20 DCMR 201 (General Requirements for Permit Issuance)	Engines associated with emergency generators can only be operated in an "emergency", defined as, a failure of the electrical grid; on-site disaster; local equipment failure; or public service emergencies such as flood, fire, natural disaster, or severe weather conditions (e.g. hurricane, tornado, blizzard, etc.).	Each time an emergency generator operates for emergency operation, the reason for operation (beyond just stating "emergency operation") must be recorded.

## EMS Manual

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Chapter 2 Permit No. 7048-R1, Condition No. IV(c) 40 CFR 60.4211(f) (Compliance Requirements)	Emergency engines can be operated for the non-emergency purpose of maintenance checks and readiness testing (MC/RT) for 100 hours per calendar year. These 100 hours are part of the operating limit of 500 hours per rolling 12-month period.	Each time an emergency generator operates for MC/RT, the type of MC/RT activity must be recorded on the log sheet for the EG.
Air	Chapter 2 Permit No. 7048-R1, Condition No. IV(c)(1) 40 CFR 60.4211(f) (Compliance Requirements)	Emergency engines can be operated for MC/RT provided the tests are recommended by a governing authority, manufacturer, or insurance company associated with the engine.	Maintain records of all recommended maintenance practices.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. IV(c)(2)   IV(f) 20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 60.4211(f)(3) (Compliance Requirements)	Emergency engines can run for up to 50 hours per calendar year for non-emergency purposes as part of the 100 hours allocated for non-emergency purposes as long as they are not run as part of peak shaving, income generating purposes, or voluntary demand reduction.	Each time an emergency generator operates for non-emergency purposes, the operation must be recorded on the log sheet for the EG as non-emergency operation.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. IV(d)   V(c) 40 CFR 60.4207(b) (Fuel Requirements)   20 DCMR 502.3 and 502.6 (Sampling, Tests, and Measurements)	Emergency engines will only fire diesel fuel with a maximum sulfur content of 15 ppm (0.0015 percent by weight) and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume. The owner or operator shall monitor and/or test fuel oil as necessary to show compliance.	-

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. IV(e)   VI(a)(5)   VI(b) 20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)	Follow manufacturer's operation and maintenance (O&M) manual recommendations, or if unavailable, develop and follow a written maintenance plan consistent with industry standards for similar models. Keep maintenance records for 5 years.	Review O&M manuals for each unit to ensure they are being followed each time the unit is operated, and each time maintenance is performed on the unit.
Air	Chapter 2 Permit No. 7048-R1, Condition No. IV(g) 20 DCMR 201 (General Requirements for Permit Issuance)	The engines will be operated in a manner consistent with good air pollution control practice for minimizing emissions including during times of startup, shutdown, and malfunction.	Obtain confirmation each quarter that the EGs operators follow good operating practices to ensure emissions are minimized.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. V(a)   VI(a)(1) 20 DCMR 500.2 (Records and Reports)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4214(b) (Notification, Reporting, and Recordkeeping Requirements)	Record, initialize, and maintain in a log on-site for at least five years: <ul style="list-style-type: none"> <li>• The date, time, duration, and reason for each engine start-up, for any type of operation: <ul style="list-style-type: none"> <li>o What classified the operation as an emergency, if operated for that purpose.</li> </ul> </li> </ul>	Provide records to the EHS Director and ALL4 by the 10th of each month.

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Chapter 2 Permit No. 7048-R1, Condition No. V(b) 40 CFR 60.4209(a) (Monitoring Requirements)   40 CFR 60.4214(b) (Recordkeeping and Reporting Requirements)	Monitor the total hours of operation each month with the use of a properly functioning, non-resettable hour metering device.	Provide records to the EHS Director and ALL4 by the 10th of each month.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. VI(a) (2)-(4) 20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4214(b) (Recordkeeping and Reporting Requirements)	By the 15th of each month for the previous month, facility must maintain <ul style="list-style-type: none"> <li>o Total hours: emergency, maintenance checks and readiness testing, and non-emergency operation: <ul style="list-style-type: none"> <li>▪ Not to exceed 100 hours per calendar year for maintenance checks and readiness testing (of these hours, no more than 50 hours for allowable non-emergencies).</li> </ul> </li> <li>o 12-month rolling total of operating hours: <ul style="list-style-type: none"> <li>▪ Not to exceed 500 hours.</li> </ul> </li> </ul>	Records must be provided to the EHS Director and ALL4 by the 10th so records can be updated by the 15th.
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. VI(a) (7)-(8) 20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4214(b) (Recordkeeping and Reporting Requirements)	Records must be kept of each occurrence, duration, and corrective actions taken during each malfunction.	Provide records of any malfunctions to the EHS Director and ALL4.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7048-R1, Condition Nos. VI(a)(9)   VI(c) 20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 60.4214(b) (Recordkeeping and Reporting Requirements)	Facility will maintain monthly fuel records (amount used, fuel delivery tickets, and either fuel certifications or documentation of fuel sampling and analysis) and compile for a yearly record for each calendar year.	Provide records to the EHS Director and ALL4 by the 10th of each month.
Air	Chapter 2 Permit No. 7048-R1, Condition No. VI(d) 40 CFR 60.4214(a)(2)(iii) (Recordkeeping and Reporting Requirements)	Facility must maintain a copy of the U.S. EPA Certificate of Conformity at the facility (in either hardcopy and/or electronic form) at all times.	Retain EPA Certificate of Conformity for life of engine
Air	Chapter 2 Permit No. 7048-R1, Condition No. VII	Facility must complete Semi-Annual Compliance Report and Annual Compliance Certification.	By March 1 and August 1 submit reports to DOEE.

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Chapter 2 Permit No. 7115, Condition Nos. III(a)   VI(a)(6) 20 DCMR 606.1 (Visible Emissions)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	Visible emissions must not be emitted from engines except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60-minute period and an aggregate of 12 minutes in 24 hours. Keep records of all VE tests for 5 years.	Be aware of visible emissions from stack during operations. Any observed visible emissions which do not quickly clear up when the unit is started shall be reported immediately to the EHS Director and the cause investigated.  Upon discovery of a visible emissions issue, arrangements should be made to have a U.S. EPA Method 9-certified visible emissions observer perform a visible emissions test on the unit in question.
Air	Chapter 2 Permit No. 7115, Condition No. III(b) 20 DCMR 903.1 (Odorous or Other Nuisance Air Pollutants)	Odorous emissions are prohibited.	For any odor complaints received, the EHS Director will coordinate with the Department of Public Safety (DPS), who will investigate further to determine the source of the odorous emissions and what follow up action items, if any, are needed.
Air	Chapter 2 Permit No. 7115, Condition No. IV(a) 20 DCMR 201 (General Requirements for Permit Issuance)	Engines will not exceed 500 operating hours in a rolling 12-month period.	Review summation tabs in the 12-Month Rolling Totals Tracking Tool on a monthly basis after operating data for the previous month has been entered to verify compliance.
Air	Chapter 2 Permit No. 7115, Condition No. IV(b)(1) 20 DCMR 201 (General Requirements for Permit Issuance)	Engines associated with emergency generators can only be operated in an "emergency", defined as, a failure of the electrical grid; on-site disaster; local equipment failure; or public service emergencies such as flood, fire, natural disaster, or severe weather conditions (e.g. hurricane, tornado, blizzard, etc.).	Each time an emergency generator operates for emergency operation, the reason for operation (beyond just stating "emergency operation") must be recorded.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7115, Condition No. IV(c) 20 DCMR 201 (General Requirements for Permit Issuance)	Emergency engines can be operated for the non-emergency purpose of maintenance checks and readiness testing (MC/RT) for 100 hours per calendar year. These 100 hours are part of the operating limit of 500 hours per rolling 12-month period.	Each time an emergency generator operates for MC/RT, the type of MC/RT activity must be recorded on the log sheet for the EG.
Air	Chapter 2 Permit No. 7115, Condition No. IV(c)(1) 20 DCMR 201 (General Requirements for Permit Issuance) and 40 CFR 63.6640(f)(2)(i) (NESHAP ZZZZ - Compliance Demonstration)	Emergency engines can be operated for MC/RT provided it is recommended by a governing authority, manufacturer, or insurance company associated with the engine.	Maintain records of all recommended maintenance practices.
Air	Chapter 2 Permit No. 7115, Condition Nos. IV(c)(2), IV(e) 20 DCMR 201 (General Requirements for Permit Issuance) and 40 CFR 63.6640(f)(2)(i) (NESHAP MACT ZZZZ - Compliance Demonstration)	Emergency engines can run for up to 50 hours per calendar year for non-emergency purposes as part of the 100 hours allocated for non-emergency purposes as long as they are not run as part of peak shaving, income generating purposes, or voluntary demand reduction. All operations of the emergency engine resulting from a deviation in voltage or frequency from the electric provider will also count as part of the 50 hours of non-emergency runtime.	Each time an emergency generator operates for non-emergency purposes, the operation must be recorded on the log sheet for the EG as non-emergency operation.
Air	Chapter 2 Permit No. 7115, Condition No. IV(d) 20 DCMR 201 (General Requirements for Permit Issuance)	Emergency engines will only fire diesel fuel with a maximum sulfur content of 15 ppm (0.0015 percent by weight).	-

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**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7115, Condition Nos. IV(f)   VI(a)(5)   VI(b) 40 CFR 63.6625(e) (NESHAP ZZZZ - Maintenance Requirements)   40 CFR 63.6640(a) (NESHAP ZZZZ - Compliance Demonstration)   40 CFR 63, Subpart ZZZZ, Table 6 (NESHAP ZZZZ - Emissions Limitations and Other Requirements)   20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports)   40 CFR 63.6660 (Recordkeeping Requirements)   40 CFR 63.6655 (Recordkeeping)   40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)   20 DCMR 500.2 (Records and Reports)	Follow manufacturer's operation and maintenance (O&M) manual recommendations, or if unavailable, develop and follow a written maintenance plan consistent with industry standards for similar models. Keep maintenance records for 5 years.	Review O&M manuals for each unit to ensure they are being followed each time the unit is operated, and each time maintenance is performed on the unit.



**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7115, Condition No. IV(g) 40 CFR 63.6603(a) (NESHAP ZZZZ - Emissions, Operating Limitations, and Other Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions)   40 CFR 63.6640(a) (NESHAP ZZZZ - Compliance Demonstration)   40 CFR 60, Subpart ZZZZ, Table 2d (Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions)	Annually perform and document the following management practices/maintenance requirements: o Change oil and filter. o Inspect air cleaner (replace if necessary). o Inspect all hoses and belts (replace if necessary).	Ensure records obtained from maintenance contractor contain documentation these work practices have been completed.
Air	Chapter 2 Permit No. 7115, Condition No. IV(h) 40 CFR 63.6625(e) (NESHAP ZZZZ - Maintenance Requirements)	Engine idling at startup must not exceed 30 minutes (this supersedes what the O&M manual may state).	Ensure engine idling time at startup is minimized and does not exceed 30 minutes.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7115, Condition No. IV(i) 40 CFR 63.6605 (NESHAP ZZZZ - General Requirements for Compliance) and 20 DCMR 201 (General Requirements for Permit Issuance)	The engines will be operated in a manner consistent with good air pollution control practice for minimizing emissions including during times of startup, shutdown, and malfunction.	Obtain confirmation each quarter that the EGs operators follow good operating practices to ensure emissions are minimized.
Air	Chapter 2 Permit No. 7115, Condition Nos. V(a)   VI(a)(1) 20 DCMR 500.2 (Records and Reports)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 - Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	Record, initialize, and maintain in a log on-site for at least five years: • The date, time, duration, and reason for each engine start-up, for any type of operation: o What classified the operation as an emergency, if operated for that purpose.	Provide records to the EHS Director and ALL4 by the 10th of each month.
Air	Chapter 2 Permit No. 7115, Condition No. V(b) 40 CFR 63.6625(e) (NESHAP ZZZZ - Maintenance Requirements) and 40 CFR 63.6655(f) (Recordkeeping Requirements)	Monitor the total hours of operation each month with the use of a properly functioning, non-resettable hour metering device.	Provide records to the EHS Director and ALL4 by the 10th of each month.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7115, Condition Nos. VI(a) (2)-(4) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	By the 15th of each month for the previous month, facility must maintain: o Total hours: emergency, maintenance checks and readiness testing, and non-emergency operation: ▪ Not to exceed 100 hours per calendar year for maintenance checks and readiness testing (of these hours, no more than 50 hours for allowable non-emergencies). o 12-month rolling total of operating hours: ▪ Not to exceed 500 hours.	Records must be provided to the EHS Director and ALL4 by the 10th so records can be updated by the 15th.
Air	Chapter 2 Permit No. 7115, Condition Nos. VI(a) (7)-(8) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	Records must be kept of each occurrence, duration, and corrective actions taken during each malfunction.	Provide records of any malfunctions to the EHS Director and ALL4.

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Chapter 2 Permit No. 7115, Condition No. VI(a)(9) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	Facility will maintain monthly fuel records containing date of delivery, supplier name and address, consumer name and address, volume, fuel grade, and sulfur content certification and compile for a yearly record for each calendar year.	Provide records to the EHS Director and ALL4 by the 10th of each month.
Air	Chapter 2 Permit No. 7115, Condition No. VII	Facility must complete Semi-Annual Compliance Report and Annual Compliance Certification	By March 1 and August 1 submit reports to DOEE.
Air	Chapter 2 Permit No. 7116, Condition Nos. III(a)   VI(a)(6) 20 DCMR 606.1 (Visible Emissions)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 63.6660 (Recordkeeping Requirements)   40 CFR 63.6655 (Recordkeeping)   40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	Visible emissions must not be emitted from engines except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60-minute period and an aggregate of 12 minutes in 24 hours. Keep records of all VE tests for 5 years.	Be aware of visible emissions from stack during operations. Any observed visible emissions which do not quickly clear up when the unit is started shall be reported immediately to the EHS Director and the cause investigated.  Upon discovery of a visible emissions issue, arrangements should be made to have a U.S. EPA Method 9-certified visible emissions observer perform a visible emissions test on the unit in question.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7116, Condition No. III(b) 20 DCMR 903.1 (Odorous or Other Nuisance Air Pollutants)	Odorous emissions are prohibited.	For any odor complaints received, the EHS Director will coordinate with the Department of Public Safety (DPS), who will investigate further to determine the source of the odorous emissions and what follow up action items, if any, are needed.
Air	Chapter 2 Permit No. 7116, Condition No. IV(a) 20 DCMR 201 (General Requirements for Permit Issuance)	Engines will not exceed 500 operating hours in a rolling 12-month period.	Review summation tabs in the 12-Month Rolling Totals Tracking Tool on a monthly basis after operating data for the previous month has been entered to verify compliance.
Air	Chapter 2 Permit No. 7116, Condition No. IV(b)(1) 20 DCMR 201 (General Requirements for Permit Issuance)	Engines associated with emergency generators can only be operated in an "emergency", defined as, a failure of the electrical grid; on-site disaster; local equipment failure; or public service emergencies such as flood, fire, natural disaster, or severe weather conditions (e.g. hurricane, tornado, blizzard, etc.).	Each time an emergency generator operates for emergency operation, the reason for operation (beyond just stating "emergency operation") must be recorded.
Air	Chapter 2 Permit No. 7116, Condition No. IV(c) 20 DCMR 201 (General Requirements for Permit Issuance)	Emergency engines can be operated for the non-emergency purpose of maintenance checks and readiness testing (MC/RT) for 100 hours per calendar year. These 100 hours are part of the operating limit of 500 hours per rolling 12-month period.	Each time an emergency generator operates for MC/RT, the type of MC/RT activity must be recorded on the log sheet for the EG.
Air	Chapter 2 Permit No. 7116, Condition No. IV(c)(1) 20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 63.6640(f)(2)(i) (NESHAP ZZZZ - Compliance Demonstration)	Emergency engines can be operated for MC/RT provided the tests are recommended by a governing authority, manufacturer, or insurance company associated with the engine.	Maintain records of all recommended maintenance practices.

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**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Chapter 2 Permit No. 7116, Condition Nos. IV(c)(2), IV(e) 20 DCMR 201 (General Requirements for Permit Issuance)   40 CFR 63.6640(f)(2)(i) (NESHAP MACT ZZZZ - Compliance Demonstration)	Emergency engines can run for up to 50 hours per calendar year for non-emergency purposes as part of the 100 hours allocated for non-emergency purposes as long as they are not run as part of peak shaving, income generating purposes, or voluntary demand reduction. All operations of the emergency engine resulting from a deviation in voltage or frequency from the electric provider will also count as part of the 50 hours of non-emergency runtime.	Each time an emergency generator operates for non-emergency purposes, the operation must be recorded on the log sheet for the EG as non-emergency operation.
Air	Chapter 2 Permit No. 7116, Condition No. IV(d) 20 DCMR 201 (General Requirements for Permit Issuance)	Emergency engines will only fire natural gas.	-

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7116, Condition Nos. IV(f)   VI(a)(5)   VI(b) 40 CFR 63.6625(e) (NESHAP ZZZZ - Maintenance Requirements)   40 CFR 63.6640(a) (NESHAP ZZZZ - Compliance Demonstration)   40 CFR 63, Subpart ZZZZ, Table 6 (NESHAP ZZZZ - Emissions Limitations and Other Requirements)   20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content)   20 DCMR 500.8 (Records and Reports)   40 CFR 63.6660 (Recordkeeping Requirements)   40 CFR 63.6655 (Recordkeeping)   40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)   20 DCMR 500.2 (Records and Reports)	Follow manufacturer's operation and maintenance (O&M) manual recommendations, or if unavailable, develop and follow a written maintenance plan consistent with industry standards for similar models. Keep maintenance records for 5 years.	Review O&M manuals for each unit to ensure they are being followed each time the unit is operated, and each time maintenance is performed on the unit.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7116, Condition No. IV(g) 40 CFR 63.6603(a) (NESHAP ZZZZ - Emissions, Operating Limitations, and Other Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions)   40 CFR 63.6640(a) (NESHAP ZZZZ - Compliance Demonstration)   40 CFR 60, Subpart ZZZZ, Table 2d (Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions)	Annually perform and document the following management practices/maintenance requirements: o Change oil and filter. o Inspect spark plugs (replace if necessary). o Inspect all hoses and belts (replace if necessary).	Ensure records obtained from maintenance contractor contain documentation these work practices have been completed.
Air	Chapter 2 Permit No. 7116, Condition No. IV(h) 40 CFR 63.6625(h) (NESHAP ZZZZ - Maintenance Requirements)	Engine idling at startup must not exceed 30 minutes (this supersedes what the O&M manual may state).	Ensure engine idling time at startup is minimized and does not exceed 30 minutes.



**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7116, Condition No. IV(i) 40 CFR 63.6605 (NESHAP ZZZZ - General Requirements for Compliance) and 20 DCMR 201 (General Requirements for Permit Issuance)	The engines will be operated in a manner consistent with good air pollution control practice for minimizing emissions including during times of startup, shutdown, and malfunction.	Obtain confirmation each quarter that the EGs operators follow good operating practices to ensure emissions are minimized.
Air	Chapter 2 Permit No. 7116, Condition No. V(a)   VI(a)(1) 20 DCMR 500.2 (Records and Reports)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	Record, initialize, and maintain in a log on-site for at least five years: • The date, time, duration, and reason for each engine start-up, for any type of operation: o What classified the operation as an emergency, if operated for that purpose.	Provide records to the EHS Director and ALL4 by the 10th of each month.
Air	Chapter 2 Permit No. 7116, Condition No. V(b) 40 CFR 63.6625(e) (NESHAP ZZZZ - Maintenance Requirements) and 40 CFR 63.6655(f) (Recordkeeping Requirements)	Monitor the total hours of operation each month with the use of a properly functioning, non-resettable hour metering device.	Provide records to the EHS Director and ALL4 by the 10th of each month.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7116, Condition No. VI(a) (2)-(4) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	By the 15th of each month for the previous month, facility must maintain: o Total hours: emergency, maintenance checks and readiness testing, and non-emergency operation: ▪ Not to exceed 100 hours per calendar year for maintenance checks and readiness testing (of these hours, no more than 50 hours for allowable non-emergencies). o 12-month rolling total of operating hours: ▪ Not to exceed 500 hours.	Records must be provided to the EHS Director and ALL4 by the 10th so records can be updated by the 15th.
Air	Chapter 2 Permit No. 7116, Condition No. VI(a) (7)-(8) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	Records must be kept of each occurrence, duration, and corrective actions taken during each malfunction.	Provide records of any malfunctions to the EHS Director and ALL4.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7116, Condition No. VI(a)(9) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 63.6660 (Recordkeeping Requirements), 40 CFR 63.6655 (Recordkeeping), and 40 CFR 63.10(b) (Recordkeeping and Reporting Requirements)	Facility will maintain monthly fuel records (amount used) and compile for a yearly record for each calendar year.	Provide records to the EHS Director and ALL4 by the 10th of each month.
Air	Chapter 2 Permit No. 7116, Condition No. VII	Facility must complete Semi-Annual Compliance Report and Annual Compliance Certification	By March 1 and August 1 submit reports to DOEE.
Air	Chapter 2 Permit No. 7231, Condition No. II(b) 20 DCMR 606.1 (Visible Emissions)	Visible emissions must not be emitted from boilers except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60-minute period and an aggregate of 12 minutes in 24 hours.	Be aware of visible emissions from stack during operations and keep record at least once per quarter as required. If visible emissions are observed, then inform EHS immediately and investigate cause.
Air	Chapter 2 Permit No. 7231, Condition No. II(e) 20 DCMR 805.1(a)(4) and 20 DCMR 805.8(a) and (b) (Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen)	Perform annual combustion adjustments on each boiler to minimize NOX and CO emissions, by inspecting flame pattern, burners, air-to-fuel ratio control system and necessary adjustments to ensure proper calibration and operation as per manufacturer specifications.	Review contractor report. Once final, distribute it to Thompson Facilities. Copy should be onsite with EHS and Thompson. A copy must be included in TVOP Annual Compliance Certification.

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	Chapter 2 Permit No. 7231, Condition No. III(a) 20 DCMR 201 (General Requirements for Permit Issuance)	The only fuel used for the boiler is Natural Gas.	-
Air	Chapter 2 Permit No. 7231, Condition No. III(b) 20 DCMR 201 (General Requirements for Permit Issuance)	The boiler will be operated consistent with the manufacturer specifications.	Obtain confirmation from Thompson each quarter during boiler operation that its personnel are operating the boilers in accordance with the manufacturer O&M Manual.
Air	Chapter 2 Permit No. 7231, Condition No. III(c) 20 DCMR 201 (General Requirements for Permit Issuance)	The boiler will be operated in a manner consistent with good air pollution control practice for minimizing emissions including during times of startup, shutdown, and malfunction.	Obtain confirmation from Thompson each quarter that the boiler operators follow good operating practices to ensure emissions are minimized.
Air	Chapter 2 Permit No. 7231, Condition No. IV(b) 20 DCMR 502 (Sampling, Tests, and Measurements)	DOEE can request performance testing, performed by the facility, which will determine compliance for short term emissions (lb/hr) of CO, NO <sub>x</sub> , and PM, including total suspended particles (TSP). The facility will submit a test protocol 30 days in advance and test report within 60 days upon test completion.	If testing is requested, a third-party testing firm will have to be utilized in order to conduct testing. Testing protocol and report should be prepared by the testing firm and reviewed by EHS Director. Test ports would need to be installed.
Air	Chapter 2 Permit No. 7231, Condition No. IV(c)	Facility will conduct visual observations of the boiler emissions once per quarter. If the boiler is not operating, this will be noted. If there are emissions visible, a certified visual emissions observer will be scheduled to conduct a visible emissions test (Method 9).	At least once per quarter, if the boiler is online at any point during the quarter, a visible emissions observation must be made and recorded on the visible emissions logs maintained by Thompson Facilities. If the boiler does not operate at all during an entire quarter, this must be recorded as well.
Air	Chapter 2 Permit No. 7231, Condition No. IV(d)	A certified visual observer will conduct at least one visible emissions test (Method 9) per year even if there was not a visible emissions event.	Coordinate with U.S. EPA Method 9 certified observer to conduct annual visible emissions test.
Air	Chapter 2 Permit No. 7231, Condition No. V(e)	Facility will maintain monthly fuel records (amount used) and compile for a yearly record for each calendar year.	Thompson shall maintain records of fuel used on a monthly basis and provide to the EHS Director and ALL4 by the 10th of each month. ALL4 provides the updated 12-Month Rolling Totals Tracking Tool by the 15th of each month.

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
Air	40 CFR 60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Quarterly reminder - combustion adjustment of the internal combustion engines of the boilers
Air	40 CFR 63, Subpart CCCCCC (NESHAP for Gasoline Dispensing Facilities)	Record monthly throughput (i.e., fuel deliveries on a rolling 12-month total that can be demonstrated as being current within 24 hours of request).	Provide monthly fuel delivery information by 10th of each month to ALL4. Maintain fuel delivery tickets for each fuel delivery. Maintain log of confirmation of tanker truck tank tightness test.
Air	40 CFR 63, Subpart CCCCCC (NESHAP for Gasoline Dispensing Facilities)	Conduct annual Stage II Vapor Recovery System (VRS) testing.	Coordinate with 3rd party contractor.
Air	40 CFR 63, Subpart CCCCCC (NESHAP for Gasoline Dispensing Facilities)	Ensure the following: minimize spills, clean up spills expeditiously, cover gasoline containers and storage tank fill pipes with gasketed seal.	Thompson Facilities ensures spill kit is full and kept nearby. Conduct monthly inspections.
Air	Chapter 2 Permit Nos. 7248-7252, Condition No. II(b) 20 DCMR 606.1 (Visible Emissions)	Visible emissions must not be emitted from boilers except for during periods of startup, cleaning, combustion controls adjustment, or malfunction; visible emissions must not exceed 40% opacity (unaveraged) for more than two minutes in a 60 minute period and an aggregate of 12 minutes in 24 hours.	Coordinate with U.S. EPA Method 9 certified observer to conduct annual visible emissions test.
Air	Chapter 2 Permit Nos. 7248-7252, Condition No. II(c) 20 DCMR 205 (New Source Performance Standards) and 40 CFR 60.43c(c) and (d) (NSPS Subpart Dc - Standard for Steam Generating Units - Particulate Matter)	In addition to Condition II(b), visible emissions from the boilers must not exceed 20% opacity for more than one six-minute period per hour and must not exceed 27% (averaged) opacity during that period. This applies except for periods of startup, shutdown or malfunction.	Coordinate with U.S. EPA Method 9 certified observer to conduct annual visible emissions test.

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**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. II(e), V(h) 20 DCMR 805.1(a)(4) and 20 DCMR 805.8(a) and (b) (Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	Perform annual combustion adjustments on each boiler and using each allowable fuel to minimize NOX and CO emissions, by inspecting flame pattern, burners, air-to-fuel ratio control system and necessary adjustments to ensure proper calibration and operation as per manufacturer specifications. These records must be maintained for at least five years and available upon request by DOEE and U.S. EPA.	Review contractor report. Once final, distribute it to Thompson Facilities. Copy should be onsite with EHS and Thompson. A copy must be included in TVOP Annual Compliance Certification.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. III(a), III(b), IV(e), V(b) 20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 801.3 (Sulfur Content of Fuel Oils), 40 CFR 60.42c(d) (NSPS Subpart Dc - Standard for Steam Generating Units - Sulfur Dioxide), 40 CFR 63.11210(f) (NESHAP Subpart JJJJJ - Compliance Requirements)   20 DCMR 502 (Sampling, Tests, and Measurements), 40 CFR 60.46c(d)(2) and (e) (NSPS Subpart Dc - Standard for Steam Generating Units - Sulfur Dioxide)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	The primary fuel source for the boilers is Natural Gas, only Ultra Low Sulfur Diesel with a maximum of 0.0015% sulfur (15 ppm) by weight, is approved as a secondary fuel source. Obtain fuel certification upon each fuel oil delivery (or conduct fuel sampling/analysis if compliant fuel certification can't be obtained). These records must be maintained for at least five years and available upon request by DOEE and U.S. EPA.	Prior to purchasing any new fuel, obtain new fuel oil contractor who can provide compliant fuel certs.

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**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. III(c), IV(f), V(e), V(f) 20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 and 20 DCMR 500.2 (Records and Reports), 40 CFR 60.48c(i) and 40 CFR 60.48c(g)(2) and (g)(3) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11210(f), 40 CFR 63.11225(d), 40 CFR 63.11225(c)(2)(iv) (NESHAP Subpart JJJJJ - Compliance Requirements),	Fuel consumption must be tracked for each calendar year in a rolling 12 month calculation format and cannot exceed a combined 1,271 million standard cubic feet (MMscf) of natural gas and a combined 799,000 gallons of ULSD in any 12-consecutive-month period. ULSD usage must also contain dates of usage, reason for operation, hours of operation, and which boilers burned the secondary fuel. These records must be included in the TVOP Semi-annual report.	Thompson shall maintain records of fuel used on a monthly basis and provide to the EHS Director and ALL4 by the 10th of each month. All4 provides the updated 12-Month Rolling Totals Tracking Tool by the 15th of each month.



**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit Nos. 7248-7251, Condition Nos. III(d), V(g) 20 DCMR 201 (General Requirements), 40 CFR 63.11195(e) and 40 CFR 63.11237 (NESHAP Subpart JJJJJ - Applicability and Compliance Requirements)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	The Power Plant temporary boilers #3, #4, #5, and #6 must only operate on ULSD during periods of gas curtailment, gas supply interruption, or for periodic testing, maintenance, or operator training on liquid fuel not to exceed a combined total of 48 hours (per boiler) during any calendar year. Usage must be tracked for at least five years.	If required to operate on ULSD, must maintain records of each operation with the following information: -Date of operation -Reason for operation -Identity of boiler -Daily number of hours the boiler is operated

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**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit No. 7252, Condition Nos. III(e), III(f), V(i), VI(e) 40 CFR 63.11201(b), 40 CFR 63.11223, (NESHAP Subpart JJJJJ - Industrial, Commercial, and Institutional Boilers Area Sources)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8, 20 DCMR 500.1 (Records and Reports), 40 CFR 60.48c(i) and 40 CFR 60.48c(c) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	Biennial tune-up and submittal to U.S. EPA and DOEE.	Coordinate with 3rd party contractor. If requested, submit the results of the tune-up to the regulatory agency.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. III(g), III(h), V(j) 20 DCMR 201 (General Requirements for Permit Issuance)   20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) and 40 CFR 60.48c(c) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	The boiler will be operated consistent with the manufacturer specifications and in a manner consistent with good air pollution control practices for minimizing emissions including during times of startup, shutdown, and malfunction. These records must be maintained for five years, initialed to attest to their accuracy, and available upon request by DOEE and U.S. EPA.	Obtain confirmation from Thompson each quarter that the boiler operators follow good operating practices to ensure emissions are minimized.

Table 2 – Environmental Controls

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. IV(a), IV(g), V(a) 20 DCMR 502 (Sampling, Tests, and Measurements), 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	DOEE can request performance testing, performed by the facility, which will determine compliance for short term emissions (lb/hr) of CO, NO <sub>x</sub> , and PM, including total suspended particles (TSP). The facility will submit a test protocol 30 days in advance and test report within 60 days upon test completion. The results of this testing must be maintained for at least five years and available upon request by DOEE and U.S. EPA.	Submit results of initial performance testing/any subsequent testing as required by DOEE within 60 days of the completion of testing.
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. IV(b), V(c) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJ - Compliance Requirements)	Facility will conduct visual observations of the boilers' emissions once per month. If the boiler is not operating, this will be noted. If there are emissions visible, a certified visual emissions observer will be scheduled to conduct a visible emissions test (Method 9). These records must be maintained for at least five years and available upon request by DOEE and U.S. EPA.	At least once per quarter, if the boiler is online at any point during the quarter, a visible emissions observation must be made and recorded on the visible emissions logs maintained by Thompson Facilities. If the boiler does not operate at all during an entire quarter, this must be recorded as well.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. IV(c), IV(d), V(d) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) and 40 CFR 60.48c(c) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJJ - Compliance Requirements)	A certified visual observer will conduct at least one visible emissions test (Method 9) per year even if there was not a visible emissions event. These records must be maintained for at least five years and available upon request by DOEE and U.S. EPA.	Perform Method 9 Visible Emissions test on the boiler, pursuant to the requirements of 40 CFR Part 60 Subpart Dc.
Air	Chapter 2 Permit No. 7252, Condition No. V(k) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) and 40 CFR 60.48c(c) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(c)(1) and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJJ - Compliance Requirements)	A copy of each notification and report for compliance with Subpart JJJJJJ and Chapter 2 Permit No. 7252 and all documentation supporting any Initial Notification or Notification of Compliance Status must be kept for at least five years.	Maintain records for at least five years.

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**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. V(l), V(m) 20 DCMR 302.1(c)(2)(B) (Permit Content), 20 DCMR 500.8 (Records and Reports), 40 CFR 60.48c(i) and 40 CFR 60.48c(c) (NSPS Subpart Dc - Standard for Steam Generating Units - Reporting and Recordkeeping Requirements), and 40 CFR 63.11225(c)(5) and 40 CFR 63.11225(d) (NESHAP Subpart JJJJJJ - Compliance Requirements)	Records must be kept of each occurrence, duration, and corrective actions taken during each malfunction for at least five years.	Maintain records for at least five years.

**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. VI(a), VI(i) 40 CFR 60.4(a) (NSPS - General Provisions), 40 CFR 60.7(a) (NSPS - Notification and Record Keeping), 40 CFR 60.28c(a) (NSPS - Plan Revisions by State), 40 CFR 60.48c(a) and 40 CFR 60.48c(b) (NSPS Subpart Dc - Reporting and Recordkeeping Requirements), 40 CFR 63.11225(a)(4) (NESHAP Subpart JJJJJ - Recordkeeping and Reporting Requirements)	Submit initial notification forms.	Submit the initial notification by the required end date.
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. VI(b), VI(c) 40 CFR 60.4(a) (NSPS - General Provisions), 40 CFR 60.7(a) (NSPS - Notification and Record Keeping), 40 CFR 60.28c(a) (NSPS - Plan Revisions by State), 40 CFR 60.48c(a) (NSPS Subpart Dc - Reporting and Recordkeeping Requirements)	Initial performance test data must be submitted to DOEE and U.S. EPA.	Submit the initial performance test data by the required end date.

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**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Chapter 2 Permit Nos. 7248-7252, Condition Nos. VI(g), VI(h) 40 CFR 60.4(a) (NSPS - General Provisions), 40 CFR 60.7(a) (NSPS - Notification and Record Keeping), 40 CFR 60.28c(a) (NSPS - Plan Revisions by State), 40 CFR 60.48c(a) (NSPS Subpart Dc - Reporting and Recordkeeping Requirements)	Subpart JJJJJ notification requirement if there's a change in applicability.	Submit the initial performance test data within 30 days of the change being made.
Air	Chapter 2 Permit No. 7252, Condition No. VI(j) 40 CFR 60.4(a) (NSPS - General Provisions), 40 CFR 60.7(a) (NSPS - Notification and Record Keeping), 40 CFR 60.28c(a) (NSPS - Plan Revisions by State), 40 CFR 60.48c(a) and 40 CFR 60.48c(b) (NSPS Subpart Dc - Reporting and Recordkeeping Requirements), 40 CFR 63.11225(b)(3) (NESHAP Subpart JJJJJ - Recordkeeping and Reporting Requirements)	Annual Deviation Report and Biennial compliance report.	If deviations occur, report must be submitted by March 1.



**Table 2 – Environmental Controls**

Compliance Category	Regulatory Citation (as applicable)	Environmental Objective	Operational Control
Air	Facility-wide Requirement 40 CFR Part 98, Subpart A [40 CFR 98.3(g)(5)]	Develop and maintain a Greenhouse Gas (GHG) Monitoring Plan.	Review GHG Monitoring Plan at least annually.
Air	Facility-wide Requirement 40 CFR Part 98, Subpart A [40 CFR 98.2(a)(3)]	Prepare annual GHG Report.	Review report from ALL4. Submit report to U.S. EPA.
Stormwater and Wastewater	40 CFR § 122.26	Storm water discharges Operators shall be required to obtain a NPDES permit for storm water discharge associated with construction activities.	Bi-annual review of planned construction projects to determine potential need for GCP. EHG will coordinate a meeting with the office of real estate, the office of procurement and contracting, and physical facilities every six months.
Stormwater and Wastewater	40 CFR 122.21	Individual Permit NPDES permits required for discharges that do not meet the conditions of general permits.	Review of discharges will be conducted every two years to ensure that status has not changed. EHS will coordinate with the office of facilities.
Stormwater and Wastewater	DCMR Title 21 Chapter 15 1504	Non-Significant Non-Categorical Industrial User Wastewater Discharge Permit This type of permit is issued to minor industrial/commercial businesses and government agencies that have less than 25,000 gallons per day of process flow and are specifically designated by DC Water due to the type of business, characteristics of the discharge, or presence of pretreatment facilities. Businesses with contaminated non-wastewater flow may also be issued this type of permit if discharging less than 25,000 gpd. These permits are valid for three years.	Retain consultant to address wastewater permitting issues
			Complete and submit a Wastewater Discharge Questionnaire to DC Water (wastewater discharge)
			Meet with DC Water to discuss the required permits, the application process, required information needs, and calculation of the appropriate permit fees.
			Coordinate with ENGIE as they move through the design and construction phases of the CHP and backup boilers to ensure that the permit application accurately reflects the current understanding of the anticipated discharge from the CHP and backup boilers, and that ENGIE is aware of requirements to modify the final permit (as appropriate) once their design is final.
			Prepare wastewater discharge application and submit, along with any required permit fee, to DC Water
Stormwater and Wastewater	DCMR Title 21 Chapter 15 1509	Temporary Discharge Authorization Permits Businesses and government agencies that meet the following criteria may be required to have a Temporary Discharge Authorization Permit:	Retain consultant to address temporary wastewater discharge permitting issues
			Complete and submit a Wastewater Discharge Questionnaire to DC Water (temporary discharge)

## EMS Manual

**Table 2 – Environmental Controls**

<b>Compliance Category</b>	<b>Regulatory Citation (as applicable)</b>	<b>Environmental Objective</b>	<b>Operational Control</b>
		<ul style="list-style-type: none"> <li>- Users with temporary construction dewatering</li> <li>- Users with temporary discharges from groundwater remediation</li> <li>- Users with temporary discharges that are directed to a catch basin or manhole in public space</li> <li>- Users with temporary discharges on private property that involve high volume discharges or contain chemicals of concern</li> </ul>	<p>Meet with DC Water to discuss the required temporary wastewater discharge permits, the application process, required information needs, and calculation of the appropriate permit fees.</p> <p>Prepare temporary wastewater discharge application and submit, along with any required permit fee, to DC Water</p>

### **3.8 Emergency Preparedness and Response**

Howard University has a robust Environment, Health, Safety and Sustainability (EHSS) Department. EHSS provides information, training, procedures, and guidance to prevent events that could lead to emergencies. Details on these efforts can be found on the EHSS website (<https://ehs.howard.edu/>).

Howard University has also developed detailed plans that provide detailed guidance to staff on how to prepare for and respond to emergencies. These are described in the sections below.

#### **3.8.1.1. Emergency Management Plan and Associated Annexes**

Howard University has developed and continually updates an Emergency Management Plan (HU-EMP) that establishes policies, procedures, and an organizational structure to respond to emergencies that would cause a significant disruption of the functioning of all or portions of the university. This document, which is modified routinely, was last updated in July 2020.

The HU-EMP describes the roles and responsibilities of departments, schools, units, and personnel during emergencies. The basic emergency procedures are designed to protect lives and property through the effective use of university and community resources. Since an emergency may be sudden and without warning, these procedures are designed to be flexible to accommodate contingencies of various types and magnitudes.

Using annexes, the HU-EMP addresses several specific types of emergencies on an individual basis, providing guidelines for the stabilization and recovery from those specific types of incidents. The Annexes include emergency instructions and references in a concise format for the individuals designated to manage University resources. The annexes provide responses for a wide variety of potential emergencies; those that have the potential for adverse environmental impacts include, but are not limited to:

- Hazardous Material incidents
- Natural Disasters
- Fire

The HU-EMP is tested or exercised on real-world events (i.e., after-action review) annually to ensure that Howard University is prepared for and able to prevent events that lead to emergencies.

The HU-EMP base plan is available on the Department of Public Safety's website at: <https://publicsafety.howard.edu/>. The annexes are distributed to the appropriate departments of Howard University on an as-needed basis; these are not considered public information.

### **3.8.1.2. Continuity of Operations Planning (COOP)**

The Continuing Operations Plan (COOP) details Howard University's continuity and organizational policies in the event of an emergency. It contains details necessary to ensure that Howard University's essential functions continue to be performed during a wide range of emergencies, addressing items such as, but not limited to staffing requirements, alternate locations, points of contact, etc.

The COOP is reviewed annually and updated on an as-needed basis. The COOP is maintained by the Office of Emergency Management and is not a public document.

### **3.8.1.3. Spill Prevention, Control, and Countermeasure (SPCC)**

Howard University has a Spill Prevention, Control, and Countermeasure (SPCC), a documented plan to prevent an oil spill, as well as control a spill should one occur. The SPCC includes information on oil handling operations, spill prevention practices, discharge and drainage controls, resources used to prevent spills, and details on response activities, in the event spill does occur.

The most recent version of the Howard University SPCC is made available to the following stakeholders via a SharePoint site:

- EHSS;
- DPS;
- PFM;
- Thompson Facilities staff (as appropriate);
- COO; and
- Any other stakeholders identified by EHSS.

In the event that one or more stakeholders don't have access to the SharePoint site, an electronic copy of the SPCC will be provided via email on no less than an annual basis.

### **3.8.1.4. Contingency Plans for Accidental Chemical Spills**

Contingency Plans for Accidental Chemical Spills are documented response plans for the accidental spill of any hazardous substances stored or used at Howard University. These plans focus on stopping the source of the spill, containing any spilled material, and cleaning up the spill in a timely manner to prevent accidental injury or other damage. Contingency Plans are established for individual buildings, based on a template contingency plan made available by EHSS. Contingency plans are reviewed annually or as needed.

The Contingency Plan template is available on the Environment Health, Safety and Sustainability's website at: <https://ehs.howard.edu/resources/health-safety-templates>.

### 3.9 Awareness

The Environmental Policy has been formally approved by the University Policy Working Group and the University Policy Counsel, and members of the Howard community have been notified of their responsibilities to comply with and work within the Howard University EMS. This notification will occur on an annual basis to ensure that stakeholders are consistently aware of their responsibilities.

### 3.10 Training Procedure

Certain environmental compliance activities require certification/qualifications. The EHSS Director, or other designee of the Chief Operating Officer, will be responsible for maintaining documentation of the following information for all individuals employed by Howard University conducting these activities:

- The dates for which they assumed compliance activities;
- The certifications/qualifications they maintain;
- The credentialing entity;
- The date they acquired their credentials;
- The most recent date that their credentials were renewed (if applicable);
- The date that their credentials are due to expire (if applicable); and
- A copy of any certificate, license, or diploma, as appropriate.

In the event that compliance activities are conducted by a vendor(s), the vendor(s) will be required to maintain proper credentialing as a condition of their contract, purchase order, or requisition. These credentials will not be individually tracked by EHSS.

The following environmental compliance activities, as identified in the Operational Controls (see Section 3.7) have been identified as requiring credentialing:

- Air Permitting: opacity testing – visible emissions training and certification
- SPCC – developed and signed by a licensed Professional Engineer (P.E.) in the District of Columbia or Maryland as appropriate
- Underground Storage Tanks – Class A, Class B, and Class C Oil Operator certification
- Steam plant operator – DC Class 1 – Steam Engineer
- 30-hour OSHA certification
- CFC certification
- 40-hour HAZWOPER certification
- DOT manifest training for signers of Hazardous Waste Manifests.

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The EHSS Director, or other designee of the Chief Operating Officer, will further be responsible for reviewing the above information to determine if all necessary staff are properly credentialed and if their credentialing is up-to-date. Any identified deficiencies will be brought to the attention of the individual and his or her direct supervisor and department head. All deficiencies must be rectified as soon as possible. Under no condition can environmental compliance work be conducted on behalf of Howard University without proper credentials. If there is any indication that this is or may be occurring, it is the responsibility of any stakeholder to alert the COO and the Office of General Counsel within 48 hours of learning of the situation.

Table 3 - Training Matrix

Training is required for those who....		use boilers, generator s, or tanks	work on and with Boilers	create Waste	manage properties/ buildings and real estate	manage tanks, buildings properties	is on the HVAC team	works on piping, walls, or doors	works with or uses tanks	works in Labs	uses the pump	is a powerplant employee	Signs Haz Waste Manifests	works for Crafts and EHSS	works for EHSS	performs Opacity Method 9 for Combustion
Name of Department	Name of Person	HU Air Safety Training General	HU Air Safety Training Specific	Hazardous Waste Training and Spill Cleanup	Stormwater Training	Oil Spill Prevention Control and Counter-measures	Refrigerant HVAC Training	Asbestos Awareness	Oil Operations A/B/C	Lab Safety	Gas Pump	Boiler Operator s DC Class 1	DOT Training Manifest	30 Hour OSHA	40 Hour Hazwoper	Opacity Training
EHSS	EHSS Team	R	R	R	R	R	R	R	Required A or B	R	R	X	R	R	R	X
Howard EHSS Team Partners	Fire Team	R	R	R	X	R	X	R	R	X	R	X	X	X	X	X
	COO	Information only	Information only	X	X	X	X	X	X	X	X	X	X	X	X	X
	PFM Executive Director	R	R	R	R	X	X	R	X	X	R	X	X	X	X	X
	DPS Emergency Response Director	R	R	R	X	X	X	X	X	X	R	X	X	X	X	X
	REDCAM	R	X	X	R	X	X	R	X	X	X	X	X	X	X	X
	Building Safety Managers	R	R	R	R	R	X	R	X	X	X	X	X	X	X	X
	Laboratory Owners and workers	X	X	R	X	X	X	R	R	R	X	X	X	X	X	X
Thompson Facilities	Carpentry	R	R	R	X	X	X	R	X	X	R	X	X	R	X	X
	Plumbing	R	R	R	X	X	X	R	X	X	R	X	X	R	X	X
	Transportation/Moves	R	R	R	X	X	X	R	X	X	R	X	X	R	X	X
	Powerplant	R	R	R	X	R	X	R	R	X	X	R	X	R	X	X
	Electric	R	R	R	X	X	X	R	X	X	R	X	X	R	X	X
	HVAC	R	R	X	X	X	R	R	X	X	R	X	X	R	X	X
	Project Managers and Architects	R	X	X	R	X	X	R	X	X	X	X	X	X	X	X
		R	R	R												
Contractors Air Emissions	Method 9 Combustion Team	R	X	X	X	X	X	X	X	X	X	X	X	X	X	R

Notes: R=REQUIRED X= NOT NEEDED Info = Information only

### 3.11 Management Review Procedure

Howard University will conduct routine management reviews to ensure that the EMS meets the needs of Howard University, is being adequately implemented, and that sufficient resources are dedicated to its maintenance and implementation. Further, the review will explore opportunities for improvement to the EMS.

The Leadership Team will assume responsibility for annual Management Reviews. Working with staff at EHSS, they will review, at a minimum, the following materials, to ensure that they are reflective of the University's priorities:

- Environmental Policy (see **Section 3.1**);
- Context of the Organization (see **Section 3.2**);
- Significant Environmental Obligations (see **Section 3.5**);
- Results of current audit (see **Section 3.12**);
- Resolutions of issues identified during previous audit and management review;
- Input from EHSS on
  - non-compliance rate;
  - resolutions for non-compliances, as appropriate;
  - challenges (e.g., risks and opportunities); and
  - need for additional resources; and
- Communications from interested parties, both internal and external.

A final report will be prepared that details the findings of the management review. This report will detail the Leadership Teams conclusions on the adequacy and effectiveness of the EMS. In addition, the report will detail any modifications, actions, or opportunities to improve the EMS, integrate the EMS more fully into the management of Howard University, and/or improve environmental compliance at the University.



### 3.12 Self-Inspection/Audit and Corrective Actions Procedure

As part of a continuous improvement process, Howard University will conduct routine audits to assess the effectiveness of the EMS and its overall performance according to the following:

- Compliance with the policies and procedures outlined in this manual;
- Compliance with the relevant components of the ISO 14001:2015 standard; and
- Effectiveness, with regards to implementation and maintenance of the EMS.

Audit responsibility will lie with the EHSS department. EHSS will conduct audits on an annual basis. These audits may be either conducted in-house or rely on the services of a third-party auditor.

Each audit will review and evaluate, at a minimum, the following information:

- The EMS Manual;
- VelocityEHS;
- The actions and activities of the Leadership Team and the Implementation Team; and
- Documentation of activities related to implementation of the EMS.

Audit results will be fully documented and all instances of non-compliances will be identified in the audit report. Where possible, the necessary steps to resolve instances of non-compliance will be delineated. The audit report will seek to answer the following questions:

#### EMS Manual

- Has the EMS Manual been kept current?
- Does the EMS Manual accurately reflect best-practices at Howard University?
- Are the following individual policies carried out in a routine fashion?
  - Communication Plan (see **Section 3.3**)
  - Emergency Preparedness and Response (see **Section 3.8**)
  - Awareness (see **Section 3.9**)
  - Training Procedure (see **Section 3.10**)
- For the above procedures (Sections 3.3, 3.8, 3.9, and 3.10), does sufficient documentation exist to demonstrate compliance?

#### Environmental Compliance

- Are the identified Compliance Obligations (see **Section 3.4**) complete and accurate?
- Are the Significant Environmental Aspects (see **Section 3.5**) reasonable and appropriate?
- Are the Significant Environmental Aspects (see **Section 3.5**) reflective of the University's priorities?

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- Are the Operational Controls (see **Section 3.5**) sufficient to address the identified Significant Environmental Aspects?
- Does appropriate documentation exist to demonstrate implementation of the Operational Controls?

### VelocityEHS

- Is VelocityEHS reflective of the Compliance Obligations, Significant Environmental Aspects, Environmental Objectives, and Operational Controls reported in the EMS Manual? If not, how is it not reflective?
- Is VelocityEHS current?
- Does sufficient documentation exist to indicate that the VelocityEHS is routinely reviewed and fully implemented?

### Previous Audits

- When was the last audit completed?
- Were instances of non-compliance from the previous audit addressed? If not, why not?
- Were instances of non-compliance from the previous audit brought to the attention of management (e.g., the Leadership Team)?
- Did instances of non-compliance from the previous audit result in modifications to the EMS Manual, as appropriate?

### Previous Management Review

- When was the last Management Review (see **Section 3.12**)?
- Were issues identified in the last management review addressed?
- Did issues identified in the last management review result in modifications to the EMS Manual, as appropriate?

The auditors (e.g., EHSS or a retained third-party auditor acting on behalf of Howard University) will prepare a report detailing the findings of each self-audit, any required corrective actions, and the outcome of those corrective actions. These reports will be submitted to the Leadership Team for their review within 60 days of each audit.

## **3.13 Improving the EMS and Environmental Performance Procedure**

The EMS is a constantly evolving system that will change and improve over time under the iterative Plan-Do-Check-Act model. When opportunities for improvement occur (e.g., a nonconformity) the following steps will be taken by EHSS:

- Take action to control the nonconformity;
- Mitigate any adverse environmental consequences;
- Identify action, if necessary, to eliminate the cause of the nonconformity;

- Make any necessary changes to the EMS to prevent recurrence; and
- Document the event.

EHSS will maintain documentation of all nonconformities and associated corrective actions in a central location. While there are numerous, valid ways to organize this documentation, the current method will be in a spreadsheet, with references to associated emails and documents. As appropriate, this spreadsheet will be cross-referenced to entries in VelocityEHS. This documentation will be an important source of data for evaluation in both the annual audits and management reviews.

*This project was undertaken in connection with the settlement of an enforcement action initiated by the District of Columbia Department of Energy and Environment.*