

GOVERNMENT OF THE DISTRICT OF COLUMBIA

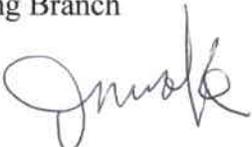
District Department of the Environment

Air Quality Division



**CHAPTER 2 TECHNICAL MEMORANDUM**

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

FROM: John C. Nwoke   
Engineer

SUBJECT: **District of Columbia Water and Sewer Authority (DC Water)  
Permits # 6472-A1  
Amended Permit to Construct a Packed-Bed Wet Air Scrubber**

DATE: October 28, 2014

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**BACKGROUND INFORMATION**

On April 8, 2014 the District of Columbia Water and Sewer Authority (DC Water) requested a permit modification to Permit #6472, Permit to Construct a Packed-Bed Wet Air Scrubber at its Blue Plains Advanced Wastewater Treatment Plant.

DC Water has not requested that any aspects of the application be held confidential.

The permit application was processed following a face-to-face meeting with the facility personnel.

**TECHNICAL INFORMATION**

DC Water identified that if the temperature of the air entering the foul air fan drops to or below 34°F, there is a danger of the scrubbing liquid freezing and causing permanent damage to the foul air fan, the recirculation pumps, and other related equipment. In order to avoid this problem, they requested that the permit be modified to allow the odor control system to be shut down when in danger of this happening.

**RATIONALE FOR PERMIT AMENDMENT**

Equipment failure due to a lack of maintenance or improper operational procedures can lead to unnecessary equipment downtime. Downtime can lead to non-compliance due to emission limit exceedance.



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**District of Columbia Water and Sewer Authority (DC Water)**

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This permit amendment will revise the following conditions to reflect this exemption:

- Condition III (leading paragraph);
- Condition III(a)(3);
- Condition IV(d);
- Condition V(b)(6) (added); and
- Condition VI(e) (added).

These changes were made after a carefully reviewing the information presented by DC Water. AQD believes that those changes are necessary and consistent with good air quality management and protection.

**RECOMMENDATIONS**

The application and draft permit are scheduled for posting in the D.C. Register and on the Department's website on October 31, 2014 and will be available for public comment through December 1, 2014.

The proposed project and attached permit comply with all applicable federal and District air pollution control laws and regulations. Assuming no comments are received during the public review period, I recommend that the attached permit document be issued. If comments are received, they will be reviewed and addressed appropriately before the permit is issued.

JCN