

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment



CHAPTER 2 TECHNICAL MEMORANDUM

TO: Stephen S. Ours, P.E. *SSO*
Chief, Permitting and Enforcement

FROM: Abraham T. Hagos *ATH*
Environmental Engineer

SUBJECT: **Bureau of Engraving and Printing (BEP)**
Permit Number 6338-R1
Permit to Operate One KBA-GIORI Mini Orlof Intaglio II, Non-Heatset Intaglio Sheet-Fed Research Press

DATE: April 1, 2014

BACKGROUND INFORMATION

The Bureau of Engraving and Printing (BEP) submitted a permit application to renew and modify Chapter 2 operating permit (#6338-O) on September 19, 2013 as follows:

The Mini-Orlof Intaglio II press was installed to replace an existing Intaglio Test Press (ITP). The old ITP press has been disconnected and will be removed from the site.

The old ITP press had maximum VOC emissions of 0.714 lbs per hour and 0.446 tons per year. The requested VOC limits for the renewal of permit (#6338-O) emitted from operating only the KBA-Giori Mini-Orlof Intaglio II press are, 0.29 lbs per hour and 0.29 tons per year, base on 2000 hours per year of operation. The effects of the permit amendment will be to increase allowable annual VOC emissions (though hourly emission rates will actually be reduced) by increasing the allowable material use, sheet production, and press hours of operation as compared to the previous permit, issued December 22, 2010.

It should be noted that the old limits were not put in place to avoid the applicability of the New Source Review (NSR) program (20 DCMR 204), nor will the emission increase proposed in this permitting action trigger this rule.

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Permit (#6338-O) expired on December 22, 2013. Due to the Department's delayed review of the request for renewal, a 30-day extension to operate permit (#6338-O) was issued on January 10, 2013 pursuant to 20 DCMR 200.3.

The Air Quality Division (AQD) has drafted permit (#6338-R1) for public review and proposed issuance to BEP.

RECOMMENDATIONS

The renewal application will be posted in the D.C. Register on April 4, 2014 and will be available for public comment through May 5, 2014. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that the attached permit #6338-R1 be issued in accordance with 20 DCMR 200.2.

SSO:ATH