

GOVERNMENT OF THE DISTRICT OF COLUMBIA

Department of Energy and Environment

TECHNICAL SUPPORT MEMORANDUM

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

FROM: Abraham T. Hagos *ATH*
Environmental Engineer

SUBJECT: **U.S. Department of the Treasury, Bureau of Engraving and Printing
Permit No. 6947-Permit to Construct and Operate a Currency Overprinting
and Packaging Equipment (COPE) Press (No. 023) from the Western
Currency Facility (WCF)**

DATE: July 29, 2016

BACKGROUND INFORMATION

A permit application to construct and operate permit a Currency Overprinting and Packaging Equipment (COPE) press to be transferred from the Western Currency Facility (WCF) of the Bureau of Engraving and Printing, to the Main Building 1st Floor B wing of the 14th and C Streets SW, Washington DC facility was received by the Air Quality Division on October 10, 2014. The applicant is the U.S. Department of the Treasury, Bureau of Engraving and Printing.

After the submission of the permit application on October 10, 2014, BEP requested that the permit application to be on hold until further notice. On June 23, 2016, BEP requested the permit application to be reactivated and be issued by November of 2016.

The permit action will be published in the DC Register on August 12, 2016. Public comments for the permit action will be solicited through September 12, 2016.

The applicant has not requested that any of the materials submitted with this application be held confidential.

TECHNICAL INFORMATION

The equipment to be covered by this permit is a single COPE printing press. The primary activity at this location is printing United States of America (USA) currency. Other high-security documents are also printed. The applicant will use ink with a maximum of 30% by weight volatile organic compound (VOC) content as well as solvents that comply with 20 DCMR 716.

REGULATORY REVIEW

20 DCMR Chapter 2, Section 200: General Permit Requirements:

The printing press is a potential air pollution source since ink and solvents contain volatile organic compounds. Thus a chapter 2 permit is required.

CHAPTER 2 TECHNICAL MEMORANDUM

Bureau of Engraving and Printing

Permit No. 6974 to Construct and Operate Currency Overprinting and Packaging Equipment (COPE)

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20 DCMR Chapter 3: Operating Permits and Acid Rain Programs

The facility is considered a major source facility. As such, the requirements of this permit will need to be incorporated into the facility's Chapter 3 (Title V) permit during the ongoing permit renewal process. Condition I(h) of the permit requires that the Permittee update their Title V permit application to include this unit. Additionally, in order to bring reporting requirements in line with Title V standards, Conditions VI(d) and (e) were added to require that emissions from the press be included in the annual Title V emissions statement for the facility and that the Permittee certifies compliance or non-compliance with the conditions of this Chapter 2 permit when doing so for other equipment included in the Title V permit.

20 DCMR Chapter 7: Volatile Organic Compound Emissions Reduction

The requirements of 20 DCMR 716 are applicable to this press.

The applicant indicated that the press does not use fountain or dampening solutions. For a thorough review of the applicability of 20 DCMR 716, please see the permit application's regulatory analysis. Note that there is one error in the regulatory analysis. The regulatory analysis indicates that 20 DCMR 716.11 is applicable and limits ink VOC concentrations to 30% by weight. This is incorrect as this condition is only applicability prior to January 1, 2012. This limit was, however, included in the permit as an applicant request pursuant to 20 DCMR 201.

The appropriate requirements of 20 DCMR 716 have been included in the permit.

Chapter 9, Section 903: Odorous or Other Nuisance Air Pollutants

"An emission into the atmosphere of odorous or other air pollutants from any source in any quantity and of any characteristic, and duration which is, or is likely to be injurious to the public health or welfare, or which interferes with the reasonable enjoyment of life or property is prohibited [20 DCMR 903.1]" is applicable to all sources. It is contained in Condition II(e) of the permit.

RECOMMENDATIONS

The proposed project and attached permit comply with all applicable federal and the District air pollution control laws and regulations. Public comments for the permit action will be solicited from August 12 through September 12, 2016. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permit No. 6974 be issued in accordance with 20 DCMR 200.1 and 200.2.

SSO/ATH

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