

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

CHAPTER 2 TECHNICAL SUPPORT MEMORANDUM

TO: File

THROUGH: Stephen S. Ours, P.E.
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FROM: Afewerki Birhane
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SUBJECT: **United States Government Publishing Office
Permit No. 7450 to Construct and Operate a Canon ProStream 2000 Series
Industrial Web-fed Inkjet Printer (Press Group 55 / Unit ID 5591)**

DATE: September 10, 2026

BACKGROUND INFORMATION

On May 22, 2026, the Air Quality Division ("AQD") of the Department of Energy and Environment ("DOEE" or "the Department") received an application from the United States Government Publishing Office ("GPO") to install and operate one (1) Canon ProStream 2000 Series industrial web-fed inkjet printer (Press Group 55 / Unit ID 5591) on the fourth floor of Building C, at 732 North Capitol Street NW, Washington DC.

The applicant has not requested that any of the information submitted to the Department be held confidential pursuant to 20 DCMR 101.

TECHNICAL INFORMATION

The printer to be constructed and operated pursuant to this permitting action is a Canon ProStream 2000 Series industrial web-fed inkjet printer.

Currently, the potential to emit volatile organic compounds (VOC) from this facility exceeds 25 tons per year (TPY), classifying it as a major source. According to the facility's emission calculations (modified by AQD to correct calculation errors, but keeping the same methodology), this specific printer would have the potential to emit 0.61 TPY of VOCs if operated continuously (8,760 hours per year). The facility is currently covered by Title V Operating Permit No. 029-R1-A4. Within one year of startup, GPO is required to apply to have the requirements to which this unit are subject under Chapter 2, incorporated into the Title V permit.

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Estimated Emissions:

Based on emissions estimates provided by the facility, with errors to the calculations identified by AQD corrected, the potential to emit volatile organic compounds (VOCs) from the printer is 0.61 tons per year. This estimate is based on several conservative assumptions including an assumption that the maximum amount of ink possible (i.e. printing a fully covered page) plus a 15% safety factor is used continuously all year (365 days per year, 24 hours per day).

The equipment is not expected to emit any other criteria pollutants or any hazardous air pollutants (HAPs).

REGULATORY REVIEW

In developing this permit, the following regulations were evaluated for applicability.

20 DCMR Chapter 2, Section 200: General Permit Requirements

Pursuant to 20 DCMR 200.1 and 200.2, because the equipment is a stationary source that has the potential to emit air pollutants, a permit from the Department must be obtained to install and operate the equipment. The permit proposed by this action will address this requirement.

20 DCMR Chapter 2, Section 204: Permit Requirements for Sources Affecting Non-Attainment Areas

Because the facility is not significantly increasing emissions as a result of the press (the potential to emit VOCs of 0.61 tons per year (TPY) is well below the 25 TPY value meeting the definition of "significant"), the requirements of this section are not applicable.

20 DCMR Chapter 2, Section 205: New Source Performance Standards

There are no NSPS subparts applicable to this printing press.

20 DCMR Chapter 2, Section 209: Permit Requirements for Non-Major Stationary Sources (Minor New Source Review)

The equipment would not be subject to Minor New Source Review as it would emit 0.61 TPY of VOC which is lower than threshold of 5 TPY. Therefore 20 DCMR 209 is not applicable to this equipment.

20 DCMR Chapter 3: Operating Permits and Acid Rain Programs

As discussed above, the facility has the potential to emit greater than the major source threshold of VOCs. As such, the facility already has a Title V permit (No. 029-R1-A4). Condition I(g) of the draft permit requires that GPO apply to have the Title V permit amended to incorporate the requirements of this permit within 12 months of initial startup of the printing press. Additionally, the record keeping requirements in the permit have been extended to five years from the three-year standard required elsewhere as Chapter 3 requires this longer retention schedule.

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Furthermore, Condition VI(b) requires that the Permittee comply with the reporting requirements of Condition I(d) of the Title V permit for the equipment covered by this Chapter 2 permit, including complying with compliance certification and reporting requirements.

20 DCMR Chapter 6: Particulates

No significant amount of particulate matter is expected to result from construction or operation of this equipment. As a result, the visible emission requirements of 20 DCMR 606 have been included in Condition II(c). However, because any visible emissions from this type of source would be an indication of improper operation of the equipment, the language of this requirement was made more stringent to not allow any visible emissions from the equipment. This modification was made pursuant to authority under 20 DCMR 201. Additionally, the operations, maintenance, and training requirements of 20 DCMR 606.4 are found in Conditions III(b), (c), and (d). Associated record keeping requirements are found in Condition V(c) and (d).

20 DCMR Chapter 7: Volatile Organic Compounds and Hazardous Air Pollutants

20 DCMR 700 is applicable to the envelope press because the press is not subject to subsequent sections of Chapter 7. Pursuant to 20 DCMR, no person shall discharge into the atmosphere more than fifteen (15) pounds of volatile organic compound (VOC) emissions in any one (1) day, nor more than three pounds (3 lb.) in any one (1) hour, from any combination of articles, machines, units, equipment, or other contrivances at a facility, unless the uncontrolled VOC emissions are reduced by at least ninety percent (90%) overall capture and control efficiency. The requirements of this regulation are incorporated into Condition II(b) of the permit for this unit. Monitoring is included in Conditions IV(b) and (c). Record keeping requirements are included in Condition V(b).

20 DCMR 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 can be found in Condition II(d) of the permit. Additionally, the affirmative defense provisions of 20 DCMR 903.13(b) have been added to the permit as a continuation of Condition II(d). Furthermore, a note has been added to this condition to clarify that it is a District enforceable only condition.

20 DCMR 1404: Emission Standards for the Printing and Publishing Industry

This regulation adopts the requirements of 40 CFR 63, Subpart KK, to which the proposed unit is not subject as the unit is not considered a publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing press, as defined in 40 CFR 63.822. Therefore, 20 DCMR 1404 does not apply to this envelope press.

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40 CFR 64 – Compliance Assurance Monitoring (CAM)

This regulation is not applicable to this equipment pursuant to 40 CFR 64.2(a)(3). In order for 40 CFR 64 to be applicable, the unit must be subject to an emission limitation or standard, use a control device to achieve compliance with it, and pre-control device emissions from the unit must exceed the major source threshold for the controlled pollutant. In this case, no control device is used to achieve compliance. Therefore, 40 CFR 64 is not applicable.

RECOMMENDATIONS

The proposed project and attached permit comply with all applicable federal and District air pollution control laws and regulations.

The application and draft permit will be posted for public review in the D.C. Register and on the DOEE website on September 18, 2026 and will be available for public comment through October 19, 2026. If no adverse comments are received, it is recommended that permit No. 7450 be issued immediately following the comment period. If comments are submitted or a hearing is requested, AQD will consider all comments before taking final action on the application.

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