

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment



Air Quality Division

**CHAPTER 2 TECHNICAL SUPPORT MEMORANDUM**

TO: File

FROM: Stephen S. Ours, P.E.   
Chief, Permitting and Enforcement

SUBJECT: **United States Government Printing Office  
Permit No. 6402 to Operate a Heidelberg PM GTO 52-2 Printing Press as  
Part of Press Group 50**

DATE: October 3, 2013

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**BACKGROUND INFORMATION**

On September 2, 2010, the Air Quality Division (AQD) of the District Department of the Environment (DDOE or the Department) received an application with cover letter, dated August 30, 2010, from the United States Government Printing Office (GPO) to install and operate a 7-color Heidelberg Speedmaster Printing Press in the Passport Division Building D (also known as Building 4). It is classified by the facility as part of Group 96. This press was intended to replace two existing A.B. Dick 9890 presses at the same location. It is intended to be used minimally as a backup press to the Ryobi 3302-HA press.

In this same application package, the facility proposed to remove a 6-Color press from the Passports Division in Building D and replace it with a 7-Color Heidelberg Speedmaster press at the same location. This application will be addressed under separate cover.

The facility stated that these equipment changes would “not result in any significant increased or decreased air emissions from [their] facilities”.

The Company has not requested that any of the information submitted to the Department be held confidential pursuant to 20 DCMR 106.

Due to serious delays in addressing the permit application, the applicant installed and began operation of the equipment prior to issuance of any permit. This permitting action is intended to finally address this application.

**TECHNICAL INFORMATION**



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The equipment to be permitted is a Heidelberg PM GTO 52-2 sheet-fed offset lithographic printing press.

The potential to emit at this facility exceeds 25 tons per year of VOCs, which makes the facility a major source. It therefore already has a Title V Operating Permit (#029) which is currently in the renewal process.

### **REGULATORY REVIEW**

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

#### 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.

As noted above, due to the great delay in addressing the application, the facility constructed and began operation of the equipment without such a permit. However, a permit is still required. This permitting action is taking place to address this need.

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

Because the facility is not significantly increasing emissions as a result of this project, the requirements of this section are not applicable. It should be noted that at the time of construction of the equipment, any increase in emissions from the facility as a result of the project was considered "significant".

#### Chapter 2, Section 205: New Source Performance Standards

There are no NSPS subparts applicable to this printing press.

#### 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 (#029). It is in the renewal process. Condition I (g) of the attached permit requires that the Title V permit application be supplemented within 120 days of the initiation of operation of this press. Additionally, the record keeping requirements in the permit have been extended to five years from three years required elsewhere as Chapter 3 requires this longer retention schedule.

#### 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 (a), but no other particulate matter requirements have been included in the permit. However, because any visible emissions from this type of source would be an

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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.

### Chapter 7: Volatile Organic Compounds and Hazardous Air Pollutants

Because this is an offset lithographic press located at a major source of VOCs, 20 DCMR 716 is applicable. The requirements of this section are included throughout the proposed permit, but especially significantly throughout the operating conditions of Condition III. Appropriate monitoring, testing, record keeping, and reporting requirements have been included in subsequent sections of the permit to make those requirements enforceable as a practical matter.

### 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(c) of the permit.

### 40 CFR 63 – National Emission Standards for Hazardous Air Pollutants for Source Categories

There are no identified Part 63 NESHAPs applicable to this lithographic press.

### 40 CFR 64 – Compliance Assurance Monitoring (CAM)

This regulation is not applicable to this equipment as it does not use a control device to meet emission limits.

## **RECOMMENDATIONS**

The proposed project and attached permit comply with all applicable federal and District air pollution control laws and regulations (except as discussed above with regard to the installation and operation of the equipment without a permit).

The application and draft permit will be posted for public review in the D.C. Register and on the DDOE website on October 11, 2013 and will be available for public comment through November 11, 2013. If no public comments are received, it is recommended that permit #6402 be issued. If comments are submitted or a hearing is requested, AQD will consider all comments before determining whether it is appropriate to issue the permit as drafted.

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