

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment

Air Quality Division



CHAPTER 2 TECHNICAL SUPPORT MEMORANDUM

TO: File

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

FROM: Abraham T. Hagos *ATH For ATH*
Environmental Engineer

SUBJECT: Department of the Treasury, Bureau of Engraving and Printing
Permit Nos. 6373-R1, 6374-R1, and 6739 to Operate Three Simultan Non-
Heatset Lithographic Printing Presses (Press Numbers 203, 310 and 903)

DATE: September 22, 2014

BACKGROUND INFORMATION

The Air Quality Division (“AQD”) of the District Department of the Environment (“DDOE” or “the Department”) received an application with cover letter, dated May 15, 2013, from the U.S. Department of the Treasury, Bureau of Engraving and Printing (BEP) for renewal of Permit Nos. 6373 and 6374 covering two Simultan presses (Presses 310 and 903), and to install an on-line continuous inkjet printer know as a “Parvis System” on each of these presses. Additionally, the application package included a request to install a Parvis System on Simultan press 203, an older press covered by Title V permit 035.

BEP was granted an approval to install the Parvis System inkjet printer on one of the three Simultan presses in 2013 for a pilot test, because as DDOE was led to believe that any VOC emissions would be negligible. It turned out, however, that there were some VOC emissions of note, thus the permitting was delayed. Subsequently, BEP withdrew the requests to install the Parvis Systems, though the single unit installed on press 903 for the pilot test would remain on the press, unused.

As noted, Simultan press 203 is permitted to operate under the BEP Title V permit. Since AQD revised 20 DCMR Chapter 7 in 2011, AQD and BEP agreed that it would be wise to update the requirements for all three Simultans presses through a single Chapter 2 permitting action.

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



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TECHNICAL INFORMATION

The equipment to be permitted are three Simultan, sheet fed, two-sided, eight plate cylinder, non-heatset lithographic printing presses.

As noted above, BEP withdrew their request to install Parvis Systems on presses 310 and 203. They also committed to not using the Parvis System on press 903. The commitment to not operate the installed Parvis System is included in Condition I(a) of the proposed permit document. This permitting action does not authorize installation of either of the other proposed Parvis Systems.

REGULATORY REVIEW

Chapter 2, Section 200: General Permit Requirements

Pursuant to 20 DCMR 200.1 and 200.2, because each press 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.

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

Because the facility is not significantly increasing emissions as a result of these renewal permits, the requirements of this section are not applicable.

Chapter 2, Section 205: New Source Performance Standards

There are no NSPS subparts applicable to these printing presses.

Chapter 3: Operating Permits and Acid Rain Programs

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 (#035). It is in the renewal process. Condition I(h) of the attached permit requires that the Title V permit application be supplemented within 90 days of the issuance of the permits. Additionally, the record keeping requirements in the permit have been extended to five years from the three years required for minor sources as Chapter 3 requires this longer retention schedule.

Chapter 6: Particulates

No significant amount of particulate matter is expected to result from the operation of this equipment. The visible emission requirements of 20 DCMR 606 have been included in Condition II(a), but no other particulate matter requirements are applicable. However, because any visible emissions from these types of sources 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. BEP will be required to generally monitor the outlets for compliance with this requirement per Condition IV(i) and keep records of any observations of visible emissions per

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Condition V(b)(14). Relevant reporting requirements are found in Conditions VI(b) and (c) of the permit.

Chapter 7: Volatile Organic Compounds and Hazardous Air Pollutants

Because these are offset lithographic presses 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 permits 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 these permits. Associated monitoring can be found in Condition IV(j); record keeping in Condition V(b)(15), and reporting in Conditions VI(b) and (c).

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 renewal applications and attached permits 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 DDOE website on September 26, 2014 and will be available for public comment through October 27, 2014. If no public comments are received, it is recommended that permits Nos. 6373-R1, 6374-R1 and 6739) 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.

ATH

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