

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

October 13, 2017

Leonard R. Olijar, Director
U.S. Department of the Treasury
Bureau of Engraving and Printing
14th and C Streets SW
Washington DC 20228

Subject: **Draft Title V Operating Permit for Bureau of Engraving and Printing (Permit No. 035-R1)**

Dear Mr. Olijar:

The Air Quality Division (AQD) of the District of Columbia Department of the Energy and Environment (the Department) has prepared a Draft Title V operating permit pursuant to Chapters 2 and 3 of Title 20 of the District of Columbia Municipal Regulations (20 DCMR Chapters 2 and 3). This permit, satisfying applicable regulations, is enclosed. Note that this permit, when issued, will be issued pursuant to the Department's authority under both Chapter 2 and Chapter 3 as mentioned above.

As the responsible official for the equipment covered by this permit at the Bureau of Engraving and Printing, it will be your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit once it becomes final and to ensure that any person who operates any emission unit subject to the attached permit does the same.

This draft permit is subject to a 30-day public comment period beginning October 13, 2017 and concluding November 13, 2017. The Bureau of Engraving and Printing, affected states (Maryland, Virginia, and West Virginia), the U.S. Environmental Protection Agency (EPA), and the general public may comment on the draft permit during this review period. Upon closing of this review period the permit may be modified to address comments received during this period. If no substantive comments are received during the public review period of the draft permit, the permit will continue with an EPA-only review period ending 45 days after the public review period began. If substantive comments are received, they will be addressed and the permit will then be issued as a proposed permit for EPA review only for a period of up to 45 days.

If EPA does not object to the issuance of the permit during their 45-day review period, the permit will be issued as a final permit and will become fully enforceable. If EPA raises objections during this period, the objections will be addressed as necessary by issuance of a modified draft permit.

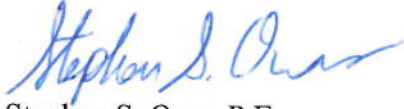
U.S. Department of the Treasury, Bureau of Engraving and Printing
Transmittal of Draft Title V Operating Permit No. 035-R1

October 13, 2017

Page 2

If you have questions or comments or need further information, please write to this office or contact Abraham T. Hagos at (202) 535-1354.

Sincerely,



Stephen S. Ours, P.E.
Chief, Permitting Branch
Air Quality Division

Attachment: 1

SSO:ATH

cc: Babatunde Adebona <*via email*>

06943

**District of Columbia
Air Quality Operating Permit**

**Bureau of Engraving and Printing
14th and C Streets SW
Washington DC 20228**

**Chapter 3 Permit No. 035-R1
Draft Title V Operating Permit**

ICIS AIR Facility ID: DC0000001100100134

**Department of Energy and Environment
Air Quality Division**

Effective Date: <insert date> , 2017 Expiration Date: <insert date> , 2022

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

Chapter 3 Permit No. 035-R1

ICIS AIR Facility ID: DC0000001100100134

Effective Date: <Insert Date>, 2017

Expiration Date: <Insert Date>, 2022

Pursuant to the requirements of Chapter 2, General and Non-Attainment Permits, and Chapter 3, Operating Permits, of Title 20 of the District of Columbia Municipal Regulation (20 DCMR), the District of Columbia Department of Energy and Environment, Air Quality Division hereafter referred to as "the District" or "the Department" as the duly delegated agency, hereby grants approval to operate the emission units listed in Sections III and IV of this permit subject to the terms and conditions of this permit. All terms and conditions of this permit are enforceable by the District and by the U.S. Environmental Protection Agency (EPA) unless specifically designated as enforceable by the District only, as annotated by "*".

SUBJECT TO THE TERMS AND CONDITIONS OF THIS PERMIT, approval to operate is granted to:

Permittee

Facility Location

U.S. Department of the Treasury
Bureau of Engraving and Printing
14th and C Streets SW
Washington DC 20228

U.S. Department of the Treasury
Bureau of Engraving and Printing
14th and C Streets SW
Washington DC 20228

Responsible Official: Leonard R. Olijar, Director

PREPARED BY:

Abraham T. Hagos
Environmental Engineer
Air Quality Division
(202) 535-1354

Date

AUTHORIZED BY:

Stephen S. Ours
Chief, Permitting Branch
Air Quality Division
(202) 535-1747

Date

Table of Contents

I. General Permit Requirements	4
a. Compliance	4
b. Permit Availability	5
c. Record Keeping	5
d. Reporting Requirements	7
e. Certification Requirements	14
f. Fees	14
g. Duty to Provide Supplemental Information	14
h. Construction, Installation, or Alteration	15
i. Permit Renewal, Expiration, Reopening, Revision, and Revocation	15
j. Permit and Application Consultation	18
k. Section 502(b)(10) Changes	18
l. Off-Permit Changes	20
m. Economic Incentives	20
n. Emissions Trading and Averaging	20
o. Entry and Inspection	20
p. Enforcement	21
q. Property Rights	22
r. Severability	22
s. Alternative Operating Scenarios	22
II. Facility-Wide Permit Requirements	22
a. General Maintenance and Operations	22
b. Visible Emissions	22
c. Control of Fugitive Dust	23
d. Open Fires	25
e. Asbestos	25
f. Fuel Oil Sulfur Content	25
g. Onroad Engine Idling and Nonroad Engine Idling*	29
h. Fleet Maintenance	30
i. Lead in Gasoline	30
j. Odors and Nuisance Air Pollutants	30
k. Risk Management	31
l. Protection of Stratospheric Ozone	31
m. Architectural and Maintenance Coatings	32
n. General Conformity	34
III. Emission Unit Specific Requirements	34
a. Emission Units ID 02-2: : Four (4) KBA Giori, I-10 intaglio,	38

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 3

sheet-fed, non-heatset, intaglio, water wipeable presses	
b. Emission Unit ID 02-4: Four (4) KGB Giori, Super Orlof Intaglio II (SOI) presses	44
c. Emission Units ID 08-1: Six (6), Currency Overprinting and Packaging Equipment (COPE) printing lines	50
d. Emission Units ID 08-3: One (1) Large Examining and Printing Equipment (LEPE) letterpress printing unit	55
e. Emission Units ID 09: Three (3) Simultan, sheet fed, two sided, eight plate cylinder, non-heatset, lithographic printing presses	60
f. Emission Units ID 11-1: :Eight (8) miscellaneous intaglio presses	67
g. Emission Units ID 11-2: One (1) Heidelberg job press (061), One (1) Kluge job press (062), and Two (2) Miller SW presses (076 and 077)	74
h. Emission Units ID 11-3: Four (4) Lithographic Presses	79
i. Emission Units ID 11-5: Paint booth at the paint shop	86
j. Emission Unit ID 12-1: Two emergency generator sets	90
k. Emission Unit ID 12-2: Emergency fire pump	94
l. Emission Unit ID 13-4: Chrome plating line	98
m. Emission Unit ID 13-5: Nickel plating line	112
n. Emission Unit ID 14: Central Trim System (CTS)	122
o. Emission Units ID 15: Ink solids handling with associated RotoClone Wet Dust Collector	127
IV. Miscellaneous/Insignificant Activities	132
V. Permit Shield	137
VI. Compliance Schedule	137

I. General Permit Requirements

a. Compliance

1. The Permittee shall comply with all the terms and conditions of this permit. Any non-compliance with this permit constitutes a violation of the federal Clean Air Act and/or District regulations and is grounds for enforcement action, permit revocation, permit modification or denial of permit renewal. [20 DCMR 302.1(g)(1)]
2. In any enforcement action, the Permittee cannot claim as a defense that it would have been necessary to halt or reduce a permitted activity in order to maintain compliance with this permit. [20 DCMR 302.1(g)(2)]
3. To demonstrate compliance, the Permittee must submit an Annual Certification Report to the Department not later than March 1 each year certifying compliance with all permit conditions. See Section I(d)(2) of this permit. [20 DCMR 302.3(e)(1)]
4. Nothing in this permit shall be interpreted to preclude the use of any credible evidence to demonstrate compliance or non-compliance with any term or condition of this permit. [40 CFR 51.212, 52.12, 52.30, 60.11, and 61.12]
5. In the event of an emergency, as defined by 20 DCMR 399.1, noncompliance with the limits contained in this permit shall be subject to the following provisions [20 DCMR 302.7]:
 - A. An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations of this permit if the conditions of Condition I(a)(5)(B) are met.
 - B. The affirmative defense of an emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;
 - ii. The permitted stationary source was at the time being properly operated;
 - iii. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of this permit; and
 - iv. The Permittee submitted notice of the emergency to the Department within two (2) working days of the time when emission limitations were exceeded due to the emergency. The notice shall contain description of the emergency,

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 5

any steps taken to mitigate emissions, and corrective actions taken pursuant to 20 DCMR 302.1(c)(3)(C)(i).

- C. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof; and
 - D. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
6. In addition to any specific testing requirements specified elsewhere in this permit, the Department reserves the right to require that the Permittee perform additional emission tests using methods approved in advance by the Department. [20 DCMR 502.1]

b. Permit Availability

A copy of this permit shall be available at the permitted facility at all times. A copy of this permit shall be provided to the Department upon request. [20 DCMR 101.1]

c. Record Keeping

- 1. Where applicable to the monitoring, reporting, or testing requirements of this permit, the Permittee shall keep the following records [20 DCMR 302.1(c)(2)(A)(i-vi)]:
 - A. The date, place as defined in the permit, and time of sampling or measurements;
 - B. The date(s) analyses were performed;
 - C. The company or entity that performed the analyses;
 - D. The analytical techniques or methods used;
 - E. The results of the analyses; and
 - F. The operating conditions, as existing at the time of sampling or measurement.
- 2. The Permittee must keep and maintain records of all testing results, monitoring information, records, reports, and applications required by this permit for a period of at least five (5) years from the date of such test, monitoring, sample measurement, report or application. [20 DCMR 302.1(c)(2)(B)]
- 3. The Permittee must keep and maintain, in a permanently bound log book or another format approved in writing by the Department, records of all combustion process adjustments. Such records shall include the following [20 DCMR 805.8(c)]:

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 6

- A. The date on which the combustion process was last adjusted;
 - B. The name, title, affiliation of the person who made the adjustment;
 - C. The NO_x emission rate, in parts per million by volume, dry basis (ppmvd), after the adjustments were made;
 - D. The CO emission rate, in ppmvd, after the adjustments were made;
 - E. The CO₂ concentration, in percent (%) by volume dry basis, after the adjustments were made;
 - F. The O₂ concentration, in percent (%) by volume dry basis, after the adjustments were made; and
 - G. Any other information that the Department may require.
4. Unless more specific requirements are included in Condition III or Condition IV of this permit for a specific operation, for surface painting operations, printing operations, and photograph processing operations, etc., as applicable, the Permittee shall maintain the following records [20 DCMR 500.1]:
- A. The names of the chemical compounds contained in the solvents, reagents, coatings, and other substances used in these activities;
 - B. The volatile organic compound (VOC) content, measured in weight percent, of solvents used in these activities,
 - C. The quantity of solvents (not including those that are subject to Condition II(m) of this permit) used in pounds per hour, and
 - D. The number of hours that solvents were applied each day (exclusive of uses subject to Condition II(m) of this permit).
5. If Section 502(b)(10) changes are made pursuant to Condition I(k) of this permit, the Permittee shall maintain a copy of the notice with the permit. [20 DCMR 302.8(a)]
6. If off-permit changes are made pursuant to Condition I(l) of this permit, the Permittee shall keep a record of all such changes that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. [20 DCMR 302.9(d)]

d. Reporting Requirements

1. Semi-Annual Report: The Permittee shall submit semi-annual reports to the Department by March 1 and September 1 of each year. The September 1 report shall cover January 1 through June 30 of that year; the March 1 report shall cover July 1 through December 31 of the previous year. These reports shall contain the following information [20 DCMR 302.1(c)(3)(A) and (B)]:
 - A. Fuel use records in the format required by the unit-specific requirements of this permit;
 - B. All Method 9 visible emissions (opacity) observation results as well as the results of any non-Method 9 monitoring identifying visible emissions, per the unit-specific requirements of this permit;
 - C. The results of any other required monitoring referencing this section; and
 - D. A description of any deviation from permit requirements during the period covered by the report.
2. Annual Certification Report: By March 1 of each year, the Permittee shall submit to the Department and EPA an Annual Certification Report certifying compliance with the terms and conditions of this permit. The report shall cover the period from January 1 through December 31 of the previous year. [20 DCMR 302.1(c)(3) and 302.3(e)(1)]
 - A. The report shall [20 DCMR 302.3(e)(3)]:
 - i. Identify each term or condition of the permit that is the basis for certification;
 - ii. State the Permittee's current compliance status;
 - iii. Describe the testing, monitoring, and record keeping methods used to determine compliance with each emission limit, standard or other requirement over the reporting period; and
 - iv. State whether compliance has been continuous or intermittent during the reporting period for each emission limit, standard or other requirement as shown by these testing, monitoring, and record keeping methods.
 - B. The report shall include the following information for all fuel burning equipment and stationary internal combustion engines/generators.
 - i. Fuel Usage: The total amount of each type and grade of fuel burned during

the reporting period shall be reported for each emission unit and for each group of emission units identified as a miscellaneous activity in this permit. Natural gas use shall be reported in therms (where one therm equals 100 cubic feet); fuel oil use shall be reported in gallons. The Permittee shall submit this information in a form approved by the Department. [20 DCMR 500.1]

ii. Quality of Fuel Information:

1. For commercial fuel oil, as defined at 20 DCMR 899, the Permittee shall submit copies of all records obtained pursuant to Condition II(f)(9) of this permit during the reporting period.
2. For all other fuel oils and diesel, unless more specific testing is specified elsewhere in this permit for a given emission unit, the Permittee shall sample and test the fuel oil burned in its fuel burning equipment and stationary internal combustion engines/generators, using the ASTM methods specified in Condition II(f)(8), at least once each calendar quarter that fuel is fired in the units or at the time of each fuel delivery, whichever is less frequent, and shall report these data with the Annual Certification Report. For each sample, the Permittee must provide [20 DCMR 502]:
 - a. The fuel oil grade and the ASTM method used to determine the grade;
 - b. The weight percent sulfur of the fuel oil;
 - c. The date and time the sample was taken;
 - d. The name, address, and telephone number of the laboratory that analyzed the sample; and
 - e. The type of test or test method performed.

In lieu of sampling and testing fuel oil each quarter for each of these data, the Permittee may comply with the requirements of Condition II(f)(9) of this permit for these fuels as well. If this option is chosen, the Permittee shall submit copies of all records obtained pursuant to these requirements during the reporting period.

If any of these data cannot be obtained from the fuel supplier, it is the responsibility of the Permittee to sample the fuel and have it analyzed to obtain the required data.

- iii. Boiler and Engine Adjustment Data: For all boiler and engine adjustments required pursuant to the conditions of this permit, the Annual Certification

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 9

Report shall include sufficient data to substantiate that each boiler and engine has been adjusted in accordance with 20 DCMR 805.8(a), (b), and (c) and any other related requirements specified in this permit. [20 DCMR 500.1]

- iv. Visible Emissions Test Data: For all EPA Reference Method 9 (40 CFR 60, Appendix A) testing required by this permit, the Annual Certification Report shall include:
1. The date and time of each test;
 2. The name, address, and telephone number of the tester;
 3. Proof of the certification of the tester pursuant to Reference Method 9;
 4. Identification of the emission unit(s) being observed during the test;
 5. The operation rate of the unit being tested, as applicable, as follows:
Note that if any of these data are estimated, a description of the estimation technique must also be included.
 - a. The boiler load expressed in pounds of steam per hour (where possible) and the percent of rated capacity at which the boiler was operated during the test; or
 - b. The percent of rated capacity at which the engine or other equipment was operated during the test;
 6. The amount and type of fuel fired during the test; and
 7. Data from a minimum of 30 minutes of visible emissions observations.

Unless otherwise specified in this permit, the Permittee shall fire the fuel expected to have the greatest likelihood to result in visible emissions among the fuels permitted to be used in the unit, unless that fuel has not and will not be used during the reporting period. If the only use of a given fuel in the reporting period is for purposes of periodic testing or combustion adjustment required by this permit, no visible emission test for that fuel will be required under this condition. [20 DCMR 502]

- C. As a supplement to the Annual Certification Report submitted to the Department, the Permittee shall submit, in duplicate, a report of the emissions from the facility during the previous calendar year. The emissions shall be reported on a per emission unit basis (though miscellaneous/insignificant sources and area sources may be grouped in a reasonable manner). If multiple fuels are used in fuel-

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 10

burning equipment, the emissions shall also be reported on a per fuel basis for each emission unit. In addition, a summary table shall be provided showing total emissions from all units at the site. This emissions supplement shall include [20 DCMR 500.1]:

- i. Emissions of the following pollutants on a per fuel, per emission unit, and sum total basis as described above:
 1. Oxides of nitrogen (NO_x);
 2. Sulfur dioxide (SO₂);
 3. Carbon monoxide (CO);
 4. Volatile organic compounds (VOCs);
 5. Lead (Pb) and lead compounds, as defined in 40 CFR 50.12;
 6. Ammonia (NH₃);
 7. Particulate matter in each of the following categories:
 - a. Total particulate matter (total filterable plus condensable),
 - b. Total particulate matter less than 10 microns in aerodynamic diameter (PM₁₀, also known as PM₁₀-PRI), equivalent to PM₁₀-FIL plus PM-CON,
 - c. Condensable particulate matter (PM-CON),
 - d. Filterable particulate matter less than 10 microns in aerodynamic diameter (PM₁₀-FIL),
 - e. Total particulate matter less than 2.5 microns in aerodynamic diameter (PM_{2.5}, also known as PM_{2.5}-PRI), equivalent to PM_{2.5}-FIL plus PM-CON, and
 - f. Filterable particulate matter less than 2.5 microns in aerodynamic diameter (PM_{2.5}-FIL); and
 8. All hazardous air pollutants (HAPs) as defined in §112(b) of the Clean Air Act, as revised.
- ii. Calculations and justification for each emission value reported in the summary table. The emissions reported shall be based on the best reasonably available method for estimating emissions. In general, the following list is the hierarchy of most accurate to least accurate methods:
 1. Continuous emission monitoring data,

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 11

2. Emissions data calculated based on emissions test data used with process operational/formulation data,
3. Emissions data calculated based on manufacturer's specifications used with process operational/formulation data, and finally,
4. AP-42 or other general emission factors used with process operational/formulation data.

If questions arise as to the most accurate emissions estimation method, the Permittee is encouraged to consult the Department.

iii. In addition to the summary table of total emissions during the calendar year, the Permittee shall submit the following:

1. An estimate of the average emissions of NO_x during a typical work weekday between May 1 and September 30 (ozone season) from each emission unit (except miscellaneous/insignificant sources);
 2. An estimate of the average emissions of VOCs during a typical work weekday between May 1 and September 30 (ozone season) from each emission unit, with the exception of miscellaneous/insignificant sources.
 3. An estimate of the average CO emissions during a typical winter work weekday (where "winter" is defined as January, February, and December of the same calendar year); and
 4. Any additional information the Department may request in order to collect necessary information to comply the requirements of 40 CFR 51.
3. Progress Reports: If the Permittee is subject to the requirements of a compliance schedule, it shall submit the reports specified in 20 DCMR 302.3(d). These reports shall include:
- A. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
 - B. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
4. Notifications and Supplemental Reports: Unless specifically exempted from these requirements elsewhere in this permit, the Permittee shall submit the following notifications and supplemental reports. Notifications or reports of a deviation from a

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 12

permit condition submitted pursuant to paragraphs A, B, or C below shall contain the following information: the date of the deviation, the time of the deviation, the emission unit involved, the duration and cause of the deviation, and what actions the Permittee took to correct or prevent the deviation. [20 DCMR 302.1(c)(3)(C)]

- A. **Emergencies:** If the Permittee experiences an emergency, as defined in 20 DCMR 399.1, which results in the breach of a permit condition or exceedance of an emission limit, the Permittee shall submit a written notice to the Department within two (2) working days of the date the Permittee first becomes aware of the deviation if the Permittee wishes to assert an affirmative defense authorized under 20 DCMR 302.7. In addition, if the conditions of 20 DCMR 302.7(b) are not followed, the Permittee cannot assert the existence of an emergency as an affirmative defense to an action brought for non-compliance with a technology-based limitation. [20 DCMR 302.1(c)(3)(C)(i)]
- B. **Threat to Public Health, Safety, and the Environment:** The Permittee shall immediately report any permit deviation that poses an imminent and substantial danger to public health, safety, or the environment. [20 DCMR 302.1(c)(3)(C)(ii)] This shall be reported to the Department's Emergency Operations number at (202) 645-5665.
- C. **Emission Exceedance:** The Permittee shall immediately notify the Air Quality Division by telephone via the Department's Emergency Operations number at (202) 645-5665, of any exceedance of any emission limit or any limit established as a surrogate for emissions. Additionally, the Permittee shall submit to the Air Quality Division a written notice of such exceedance within two working days of discovery. [20 DCMR 500.1]
- D. **Operational Flexibility:** Prior to making a change as provided for in Condition I(k) of this permit, titled "Section 502(b)(10) Changes" the Permittee shall give written notice to the Department and EPA at least seven calendar days before the change is to be made. The seven (7) calendar day period may be shortened or eliminated for an operational change that must be implemented more quickly to address unanticipated conditions that pose a significant health, safety, or environmental hazard. If less than a seven calendar day notice is given, the Permittee shall provide notice to the Department and EPA as soon as possible after learning of the need to make the change. In the notice, the Permittee must substantiate why seven-day advance notice could not be given. Written notices must include the following information [20 DCMR 302.8]:
 - i. A description of the change to be made;
 - ii. The date on which the change will occur;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 13

- iii. Any changes in emissions; and
 - iv. Any permit terms and conditions that are affected, including those that are no longer applicable.
- E. Off-Permit Changes: The Permittee shall provide contemporaneous written notice of off-permit changes, made in accordance with Condition I(1) of this permit, to the Department and EPA. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change. [20 DCMR 302.9(b)]
- F. Periodic Maintenance of Pollution Control Equipment: Whenever it is necessary to shut down air pollution control equipment for periodic maintenance, the Permittee shall report the planned shutdown to the Department at least forty-eight hours prior to shutdown. The prior notice shall include, but not be limited to, the following [20 DCMR 107.2]:
- i. Identification of the specific facility to be taken out of service as well as its location and permit number;
 - ii. The expected length of time that the air pollution control equipment will be out of service;
 - iii. The nature and quantity of emissions of air pollutants likely to occur during the shutdown period;
 - iv. Measures that will be taken to minimize the length of shutdown period; and
 - v. The reasons that it would be impossible or impractical to shutdown the source operation during the maintenance period.
5. All notifications, reports, and other documentation required by this permit shall be certified by a responsible official. [20 DCMR 302.1(c)(3)(D)]
6. Nothing in this permit shall relieve the Permittee from any reporting requirements under federal or District of Columbia regulations.
7. Within 15 days of receipt of a written request, the Permittee shall furnish to the Department any information the Department requests to determine whether cause exists for reopening or revoking the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish the Department with copies of records required to be kept by the permit. [20 DCMR 302.1(g)(5)]

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 14

8. The Permittee may request confidential treatment of information submitted in any report required by this permit pursuant to the limitations and procedures in 20 DCMR 301.1(c), [20 DCMR 302.1(c)(3)(E) and 20 DCMR 106]
9. Annual Certification Reports, Semi-Annual Reports, notifications, supplemental reports, and other documentation required by this permit shall be sent to [20 DCMR 302.3(e)(4)]:

Chief, Compliance and Enforcement Branch
Department of Energy and Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington, DC 20002

10. Annual Certification Reports must be submitted to EPA Region 3 in electronic form at the following email address. [20 DCMR 302.3(e)(4)]:

R3_APD_Permits@epa.gov

e. Certification Requirements

Any document including all application forms, reports, and compliance certifications submitted to the Department pursuant to this permit shall contain a signed certification by a responsible official, as defined in 20 DCMR 399.1, with the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." [20 DCMR 301.4]

f. Fees

The Permittee shall pay fees equal to the amount calculated by methods consistent with 20 DCMR 305. The fees shall be paid annually no later than 60 days after the Department issues an invoice or September 1 of each year, whichever comes first, beginning in 2017. The check for the fees shall be made payable to the "D.C. Treasurer" and mailed or otherwise physically delivered to [20 DCMR 302.1(h)]:

Attn: Chief, Compliance and Enforcement Branch
Department of Energy and Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington DC 20002

g. Duty to Provide Supplemental Information

1. Upon becoming aware of a failure to submit any relevant facts or a submittal of

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 15

incorrect information in any permit application or other submittal, the Permittee shall promptly submit to the Department the relevant supplementary facts and corrected information. [20 DCMR 301.2]

2. The Permittee shall promptly submit to the Department the information necessary to address any requirement that becomes applicable to the Permittee after the date the Permittee submitted any permit application. [20 DCMR 301.2]
3. Upon receipt of a written request, the Permittee shall furnish to the Department, within a reasonable time established by the Department:
 - A. Any information that the Department determines is reasonably necessary to evaluate or take final action on a permit application [20 DCMR 301.1(b)(5)];
 - B. Any information the Department requests to determine whether cause exists to reopen, revise, terminate, or revoke this permit, or to determine compliance with the terms and conditions of this permit [20 DCMR 302.1(g)(5)]; and
 - C. Copies of any record(s) required to be kept by this permit. [20 DCMR 302.1(g)(5)]

h. Construction, Installation, or Alteration

1. The Permittee shall not initiate construction, installation, or modification of any equipment or facility which emits or controls air pollutants prior to obtaining a construction permit from the Department in accordance with 20 DCMR 200.
2. When construction, installation, or alteration has been performed, the Permittee shall take all actions required by 20 DCMR 300 to obtain a revision of the Title V operating permit to reflect the new or modified equipment.

i. Permit Renewal, Expiration, Reopening, Revision, and Revocation

1. This permit expires five (5) years after its effective date [20 DCMR 302.1 (b)], but may be renewed before it expires pursuant to 20 DCMR 303.
 - A. The Permittee shall file an application for renewal of this permit at least six (6) months before the date of permit expiration. [20 DCMR 301.1(a)(4)] Compliance with this requirement may be waived if the Permittee has submitted a request for permit termination by this deadline.
 - B. The Permittee's right to operate ceases on the expiration date unless a complete permit renewal application has been submitted to the Department not later than six (6) months prior to the expiration date or the Department has taken final action

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 16

approving the source's application for renewal by the expiration date. [20 DCMR 301.1(a)(4) and 303.3(b)].

- C. If a timely and complete application for renewal of this permit is submitted to the Department, but the Department, through no fault of the Permittee, fails to take final action to issue or deny the renewal permit before the end of the term of this permit, then this permit shall not expire until the renewal permit has been issued or denied. [20 DCMR 303.3(c)]
 - D. An application for renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. The Department may similarly, in issuing a draft renewal permit or proposed renewal permit, specify only those portions that will be revised, supplemented, or deleted, incorporating the remaining permit terms by reference. [20 DCMR 303.1(a) and 303.3(a)]
2. This permit may be amended at any time in accordance with the requirements of 20 DCMR 303.4 or 303.5, as applicable.
 3. This permit shall be reopened for cause if any of the following occur [20 DCMR 303.6(a)]:
 - A. The Department or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms of the permit;
 - B. Additional applicable requirements under the Clean Air Act become applicable to the facility; provided, that reopening on this ground is not required if the following occurs:
 - i. The facility is not a major source;
 - ii. The permit has a remaining term of less than three (3) years;
 - iii. The effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 20 DCMR 303.3(c); or
 - iv. The additional applicable requirements are implemented in a general permit that is applicable to the facility and the facility receives approval for coverage under that general permit;
 - C. Additional requirements (including excess emissions requirements) become applicable to a source under the Acid Rain program; provided, that upon approval

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 17

by EPA excess emissions offset plans shall be deemed to be incorporated into the permit; or

- D. The Department or EPA determines that the permit must be revised to assure compliance by the source with applicable requirements.
4. While a reopening proceeding is pending, the Permittee shall be entitled to the continued protection of any permit shield provided in this permit pending issuance of a modified permit unless the Department specifically suspends the shield on the basis of a finding that the suspension is necessary to implement applicable requirements. If such a finding applies only to certain applicable requirements or to certain permit terms, the suspension shall extend only to those requirements or terms. [20 DCMR 303.6(d)]
5. This permit may be reopened for modifications or revoked for cause by EPA in accordance with 20 DCMR 303.7.
6. The Department may terminate a permit in accordance with 20 DCMR 303.8 at the request of the Permittee or revoke it for cause. Cause for revocation exists if the following occurs [20 DCMR 303.8(a)]:
 - A. The permitted stationary source is in violation of any term or condition of the permit and the Permittee has not undertaken appropriate action (such as a schedule of compliance) to resolve the violation;
 - B. The Permittee has failed to disclose material facts relevant to issuance of the permit or has knowingly submitted false or misleading information to the Department;
 - C. The Department finds that the permitted stationary source or activity substantially endangers public health, safety, or the environment, and that the danger cannot be removed by a modification of the terms of the permit;
 - D. The Permittee has failed to pay permit fees required under 20 DCMR 305 and Section I(f) of this permit; or
 - E. The Permittee has failed to pay a civil or criminal penalty imposed for violations of the permit.
7. The Permittee may at any time apply for termination of all or a portion of this permit relating solely to operations, activities, and emissions that have been permanently discontinued at the permitted stationary source. An application for termination shall identify with specificity the permit or permit terms that relate to the discontinued operations, activities, and emissions. In terminating all or portions of this permit

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 18

pursuant to this condition, the Department may make appropriate orders for the submission of a final report or other information from the Permittee to verify the complete discontinuation of the relevant operations, activities, and emissions. [20 DCMR 303.8(d)]

8. The Permittee may apply for termination of this permit on the ground that its operations, activities, and emissions are fully covered by a general permit for which it has applied for and received coverage pursuant to 20 DCMR 302.4. [20 DCMR 303.8(e)]
9. Except as provided under 20 DCMR 303.5(b) for minor permit modifications, the filing of a permit reopening, revocation or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [20 DCMR 302.1(g)(3)]

j. Permit and Application Consultation

The Permittee is encouraged to consult with Department personnel at any time concerning the construction, operation, modification or expansion of any facility or equipment; the operation of required pollution control devices or systems; the efficiency of air pollution control devices or systems; applicable requirements; or any other air pollution problem associated with the installation.

k. Section 502(b)(10) Changes

Under the following conditions, the Permittee is expressly authorized to make Clean Air Act ("the Act") Section 502(b)(10) changes without a permit amendment or permit modification provided that such a change is not a modification under any provision of Title I of the Act, does not include any changes in the date(s) included in any compliance schedule, and does not result in a level of emissions exceeding the emissions allowed under the permit, whether expressed herein as a rate of emissions or in terms of total emissions: [20 DCMR 302.8]

1. Before making a change under this provision, the Permittee shall provide advance written notice to the Department and to the Administrator, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected including those which are no longer applicable. The Permittee shall thereafter maintain a copy of the notice with the permit, and the Department shall place a copy with the permit in the public file. The written notice shall be provided to the Department and the Administrator at least seven (7) days before the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need

to respond more quickly to the unanticipated conditions, the Permittee shall provide notice to the Department and the Administrator immediately upon learning of the need to make the change;

2. A permitted source may rely on the authority of this section to trade increases and decreases in emissions within the stationary source, where the applicable requirements provide for the emissions trades without a permit revision. In such a case, the advance written notice provided by the Permittee shall identify the underlying authority authorizing the trading and shall state when the change will occur, the types and quantities of emissions to be traded, the permit terms or other applicable requirements with which the source will comply through emissions trading, and any other information as may be required by the applicable requirement authorizing the emissions trade;
3. Any permit shield provided under Condition V of this permit pursuant to 20 DCMR 302.6 shall not apply to changes made under this section, except those provided for in Condition I(k)(4) of this permit; however, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the changes; provided, that the Permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The shield may be reinstated for emissions and operations affected by the change:
 - A. If subsequent changes cause the stationary source's operations and emissions to revert to those contained in the permit and the Permittee resumes compliance with the terms and conditions of the permit; or
 - B. If the Permittee obtains a significant modification to the permit pursuant to Condition I(i) of this permit to codify the change in the permit, and the modified permit expressly provides protection under the shield for the change; and
4. Upon the request of the Permittee, the Department shall issue a permit that contains terms and conditions allowing for the trading of emissions increases and decreases in the permitted stationary source solely for the purpose of complying with a federally-enforceable emissions cap that is established in the permit independent of otherwise applicable requirements. The Permittee shall include in its application proposed replicable procedures and permit terms that assure that the emissions trades are quantifiable and enforceable and comply with all applicable requirements and 20 DCMR Sections 302.1 and 302.3. The permit shield under Condition V of this permit shall apply to permit terms and conditions authorizing such increases and decreases in emissions. Under this paragraph, the written notification required under this section shall state when the change will occur and shall describe the changes in emissions that will result and how these increases and decreases in emissions will comply with the terms and conditions of the permit.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 20

l. Off-Permit Changes

The Permittee may make any change in its operations or emissions not addressed or prohibited in this permit without obtaining an amendment or modification of this permit subject to the following requirements and restrictions [20 DCMR 302.9]:

1. The change shall meet all applicable requirements and may not violate any existing permit term or condition;
2. The Permittee shall provide contemporaneous written notice of the change to the Department and the Administrator. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change;
3. The change shall not qualify for any permit shield found in Condition V of this permit;
4. The Permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
5. The Permittee may make, without a revision of its permit, a change that is not addressed or prohibited by its permit if such change is subject to any requirements under Title IV of the Act or is a modification under any provision of Title I of the Act.

m. Economic Incentives

This permit shall require no revision under any approved economic incentives, marketable permits, emissions trading, or other similar programs or processes for changes that are provided for in this permit. [20 DCMR 302.1(i)]

n. Emissions Trading and Averaging

There are no applicable emissions trading or averaging applicable at this facility, unless otherwise specified in this permit. [20 DCMR 302.1(k)]

o. Entry and Inspection

The Permittee shall allow authorized officials of the District, upon presentation of identification, to [20 DCMR 302.3(b) and 20 DCMR 101] *Note: This is a streamlined condition. The requirements of 20 DCMR 302.3(b) are more stringent than those of 20 DCMR 101, thus this permit only incorporates the conditions of 20 DCMR 302.3(b).*

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 21

Compliance with these conditions will be considered compliance with both regulations.:

1. Enter upon the Permittee's premises where a source or emission unit is located, an emissions related activity is conducted, or where records required by this permit are kept;
2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of this permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
4. Sample or monitor, at reasonable times, any substance or parameter for the purpose of assuring compliance with this permit or any applicable requirement.

p. Enforcement

1. Failure to comply with the federally enforceable terms and conditions of this permit constitutes a violation of the federal Clean Air Act. The District, EPA, and/or citizens may enforce federally enforceable permit terms and conditions. [20 DCMR 302.2(a) and 20 DCMR 302.1(g)(1)]
2. Failure to comply with the terms and conditions of this permit designated as a District-only requirement constitutes a violation of the District of Columbia air quality laws and regulations. The Department will enforce these permit terms and conditions. [20 DCMR Chapter 1]
3. Failure to comply with permit terms and conditions is grounds for enforcement action, permit revocation, or for denial of a permit renewal application [20 DCMR 302.1(g)(1)]; and/or administrative, civil, or criminal enforcement action. [20 DCMR 105]
4. In any enforcement proceeding, the Permittee shall have the burden of proof when seeking to establish the existence of an emergency. [20 DCMR 302.7(c)]
5. This permit may be amended, reopened, modified, revoked, or reissued for cause in accordance with 20 DCMR 303 and Condition I(i) of this permit. Except as provided under 20 DCMR 303.5, the filing by the Permittee of a request for a permit revision, termination, or notification of planned changes or anticipated noncompliance, does not stay any term or condition of this permit. [20 DCMR 302.1(g)(3)]

q. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege to the Permittee. [20 DCMR 302.1(g)(4)]

r. Severability

The provisions of this permit are severable. If any part of this permit is held invalid, the remainder of this permit shall not be affected thereby and shall remain valid and in effect. [20 DCMR 302.1(f)]

s. Alternative Operating Scenarios

No alternative operating scenarios are applicable unless specified in the emission unit specific conditions of this permit (Condition III). [20 DCMR 302.1(j)]

II. Facility-Wide Permit Requirements

The Permittee shall comply with the following facility-wide permit requirements wherever applicable to the facility:

a. General Maintenance and Operations

At all times, including periods of start-up and malfunction, the Permittee shall, to the extent practicable, maintain and operate stationary sources and fuel-burning equipment, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. [20 DCMR 606.4]

b. Visible Emissions

1. Visible emissions shall not be emitted into the outdoor atmosphere from stationary sources (excluding fuel-burning equipment placed in initial operation before January 1, 1977); provided, that discharges not exceeding forty percent (40%) opacity (unaveraged) shall be permitted for two (2) minutes in any sixty (60) minute period for an aggregate of twelve (12) minutes in any twenty-four hour (24 hr.) period during start-up, cleaning, soot blowing, adjustment of combustion controls, or malfunction of equipment. [20 DCMR 606.1]

2. Visible emissions whose opacity is in excess of ten percent (10%) (unaveraged), at any time shall not be permitted into the outdoor atmosphere, from any fuel-burning equipment placed in initial operation before January 1, 1977; provided that [20 DCMR 606.2]:

A. Opacity not in excess of forty percent (40%) (unaveraged) shall be permitted for

two (2) minutes in any sixty (60) minute period and for an aggregate of twelve (12) minutes in any twenty-four hour (24 hr.) period other than during start-up of equipment;

- B. During start-up of equipment, opacity not in excess of forty percent (40%) [averaged over six (6) minutes] shall be permitted for an aggregate of five (5) times per start-up; and
- C. In addition to the emissions permitted under Condition II(b)(2)(A), during shutdown of equipment, opacity not in excess of fifteen percent (15%) (unaveraged) shall be allowed and in addition, opacity not in excess of thirty percent (30%) [averaged over three (3) minutes] shall be permitted for an aggregate of three (3) times per shutdown.

Note that 20 DCMR 606 is subject to an EPA-issued call for a State Implementation Plan (SIP) revision (known as a "SIP call") requiring the District to revise 20 DCMR 606. See "State Implementation Plans: Response to Petition for Rulemaking: Restatement and Update of EPA's SSM Policy Applicable to SIPs; Findings of Substantial Inadequacy; and SIP Calls To Amend Provisions Applying to Excess Emissions During Periods of Startup, Shutdown and Malfunction", 80 Fed. Reg. 33840 (June 12, 2015). It is likely that this federal action will result in changes to the requirements of 20 DCMR 606. Any such changes, once finalized in the DCMR, will supersede the language of Condition II(b) as stated above.

c. Control of Fugitive Dust

The Permittee shall ensure that fugitive dust from the facility is controlled in accordance with 20 DCMR 605 as follows:

- 1. Reasonable precautions shall be taken to minimize the emission of any fugitive dust into the outdoor atmosphere. The reasonable precautions shall include, but not be limited to, the following:

- A. In the case of unpaved roads, unpaved roadways, and unpaved parking lots;

- i. Use of binders, chemicals, or water in sufficient quantities and at sufficient frequencies to prevent the visible emission of dust due to the movement of vehicles or of the wind; and
- ii. Prompt clean-up of any dirt, earth, or other material from the vicinity of the road, roadway, or lot which has been transported from the road, roadway, or lot due to anthropogenic activity or due to natural forces.

- B. In the case of paved roads, paved roadways, and paved parking lots: Maintenance

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 24

of the road, roadway, lot, or paved shoulder in a reasonably clean condition through reasonably frequent use of water, sweepers, brooms, or other means, through reasonably frequent removal of accumulated dirt from curb-side gutters, through reasonably prompt repair of pavement, or through any other means;

- C. In the case of vehicles transporting dusty material or material which is likely to become dusty:
 - i. Fully covering the material in question, with a tarpaulin or other material; and
 - ii. Operation, maintenance, and loading of the vehicle, distribution of the loaded material on or in the vehicle, and limiting the quantity of material loaded on or in the vehicle, so that there will be no spillage of the material onto the roads;
 - D. In the case of vehicles which accumulate dirt on the wheels, undercarriages, and other parts of the vehicle, due to the movement of the vehicle on dusty, dirty or muddy surfaces: Water washing of all of the dirty parts of the vehicle to thoroughly remove the dirt before or immediately after the vehicle leaves the dusty, dirty, or muddy surface;
 - E. In the case of the demolition of buildings or structures: Use, to the extent possible, of water;
 - F. In the case of removal of demolition debris which is dusty or likely to become dusty: Use of water to thoroughly wet the material before moving or removing the material and keeping it wet or otherwise in a dust-free condition until eventual disposal;
 - G. In the case of loading and unloading of dusty material and in the case where dry sand-blasting or dry abrasive cleaning is necessary: Use of enclosed areas or hoods, vents, and fabric filters. If it is shown to the satisfaction of the Department that use of enclosed areas, hoods, vents, and fabric filters is not possible, alternate control techniques acceptable to the Department and designed to minimize the emissions to the extent possible shall be utilized; and
 - H. In the case of stockpiles of dusty material: Use, where possible, of closed silos, closed bins or other enclosures which are adequately vented to fabric filters. Where the use of closed silos, closed bins, or other enclosures is not possible, thorough wetting of the material before loading onto the stockpile and keeping the stockpile wetted, covered, or otherwise in a non-dusty condition.
2. The emission of fugitive dust from the following is prohibited:
- A. Any material handling, screening, crushing, grinding, conveying, mixing, or other

industrial-type operation or process;

- B. Heater-planers in repairing asphaltic concrete pavements;
- C. Portable tar-melters, unless close-fitting lids, in good repair, for the tar-pots are available and are used;
- D. The ventilation of any tunneling operation; or
- E. The cleaning of exposed surfaces through the use of compressed gases.

- 3. All persons shall comply with the provisions of this Condition and those of the Soil Erosion and Sedimentation Control Act of 1977 (D.C. Law 2-23).
- 4. In those circumstances where it is not possible to comply with specific provisions of both this Condition and the Soil Erosion and Sedimentation Control Act of 1977 (D.C. Law 2-23), the provisions of the Soil Erosion and Sedimentation Control Act of 1977 (D.C. Law 2-23), shall prevail.

d. Open Fires

Open fires shall be prohibited at the Permittee's facility, except as otherwise provided for in 20 DCMR 604.2. [20 DCMR 604]

e. Asbestos

The Permittee shall adhere to the requirements of 20 DCMR 800* pertaining to handling of asbestos-containing materials.

f. Fuel Oil Sulfur Content

Except where a more stringent requirement exists elsewhere in this permit, the Permittee shall comply with the following requirements governing the sulfur content of fuel oils: [20 DCMR 801]

- 1. The purchase, sale, offer for sale, storage, transport, or use of fuel oil that contains more than one percent (1%) sulfur by weight in the District is prohibited, if the fuel oil is to be burned in the District.
- 2. On and after July 1, 2016, commercial fuel oil that is purchased, sold, offered, stored, transported, or used in the District shall meet the following requirements, unless otherwise specified in Condition II(f)(5):

A. Number two (No. 2) commercial fuel oil shall not contain sulfur in excess of five

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 26

hundred parts per million (500 ppm) by weight, or five one-hundredths percent (0.05%) by weight;

- B. Number four (No. 4) commercial fuel oil shall not contain sulfur in excess of two thousand five hundred parts per million (2,500 ppm) by weight, or twenty-five one-hundredths percent (0.25%) by weight; and
 - C. Number five (No. 5) and heavier fuel oils are prohibited.
3. On and after July 1, 2018, the purchase, sale, offer for sale, storage, transport, or use of number two (No. 2) commercial fuel oil is prohibited if it contains more than fifteen parts per million (15 ppm) or fifteen ten-thousandths percent (0.0015%) by weight of sulfur, unless otherwise specified in Condition II(f)(5).
 4. Fuel oil that was stored in the District by the ultimate consumer prior to the applicable compliance date in Condition II(f)(2) or (3), which met the applicable maximum sulfur content at the time it was stored, may be used in the District after the applicable compliance date.
 5. When EPA temporarily suspends or increases the applicable limit or percentage by weight of sulfur content of fuel required or regulated by EPA by granting a waiver in accordance with Clean Air Act § 211(c)(4)(C) provisions, the federal waiver shall apply to corresponding limits for fuel oil in the District as set forth in Condition II(f)(2) or (3).
 6. If a temporary increase in the applicable limit of sulfur content is granted under Condition II(f)(5):
 - A. The suspension or increase in the applicable limit will be granted for the duration determined by EPA; and
 - B. The sulfur content for number two (No. 2) and lighter fuel oils may not exceed five hundred parts per million (500 ppm) by weight.
 7. Unless precluded by the Clean Air Act or the regulations thereunder, Conditions II(f)(2) and (3) shall not apply to:
 - A. A person who uses equipment or a process to reduce the sulfur emissions from the burning of a fuel oil, provided that the emissions may not exceed those that would result from the use of commercial fuel oil that meets the applicable limit or percentage by weight specified in Condition II(f)(2) or (3);
 - B. The Permittee of a stationary source where equipment or a process is used to reduce the sulfur emissions from the burning of a fuel oil, provided that the

emissions may not exceed those that would result from the use of commercial fuel oil that meets the applicable limit or percentage by weight specified in Condition II(f)(2) or (3); and

- C. Commercial fuel oil that is transported through the District but is not intended for purchase, sale, offering, storage, or use in the District.
8. For the purpose of determining compliance with the requirements of this section, the sulfur content of fuel oil shall be determined in accordance with the sample collection, test methods, and procedures specified under 20 DCMR 502.6 (relating to sulfur in fuel oil) as follows:
- A. Testing of fuel oil shall be undertaken in accordance with the most current version of the following methods, as appropriate for the application:
 - i. To obtain fuel samples:
 - 1. ASTM D 270, "Standard Method of Sampling Petroleum and Petroleum Products;"
 - 2. ASTM D 4057, "Practice for Manual Sampling of Petroleum and Petroleum Products;" or
 - 3. ASTM D 4177, "Standard Practice for Automatic Sampling of Petroleum and Petroleum Products;"
 - ii. To determine the fuel oil grade: ASTM D 396, "Standard Specification for Fuel Oils;"
 - iii. To determine the sulfur concentration of fuels:
 - 1. ASTM D 129, "Standard Test Method for Sulfur in Petroleum Products (General Bomb Method)";
 - 2. ASTM D 1266, "Standard Test Method for Sulfur in Petroleum Products (Lamp Method)";
 - 3. ASTM D 1552, "Standard Test Method for Sulfur in Petroleum Products (High-Temperature Method)";
 - 4. ASTM D 2622, "Standard Test Method for Sulfur in Petroleum Products by Wavelength Dispersive X-Ray Fluorescence Spectrometry";

requirement. Compliance with the five (5) year record keeping requirement in 20 DCMR 302.1(c)(2)(B) will ensure compliance with the three (3) year record keeping requirement in 20 DCMR 801.9(d).

- E. A product transfer document that meets federal requirements, such as a Bill of Lading, may be used for the data in Condition II(f)(9)(i) through (vi) and shall be considered a certification that the information is accurate; and
- F. The Department may opt to require supplemental sampling and testing of the fuel oil to confirm the certifications.

g. Onroad Engine Idling and Nonroad Diesel Engine Idling*

- 1. The Permittee shall ensure that the provisions of 20 DCMR 900.1 pertaining to onroad engine idling are met at the facility. Specifically, the Permittee shall ensure that no engine of a gasoline or diesel powered motor vehicle, the engine of a public vehicle for hire, including buses with a seating capacity of twelve (12) or more persons, shall idle for more than three (3) minutes while the motor vehicle is parked, stopped, or standing, on the premises or on roadways adjacent to the premises for the purpose of serving the premises, including for the purpose of operating air conditioning equipment in those vehicles, except as follows:
 - A. To operate private passenger vehicles;
 - B. To operate power takeoff equipment including: dumping, cement mixers, refrigeration systems, content delivery, winches, or shredders;
 - C. To idle the engine for five (5) minutes to operate heating equipment when the ambient air temperature is thirty two degrees Fahrenheit (32 °F) or below; or
 - D. To operate warming buses during a Cold Emergency Alert in accordance with 20 DCMR 900.1(d).
- 2. No person owning, operating, leasing, or having control over a nonroad diesel engine, or the holder of the permit for the activity for which the nonroad diesel engine is being operated, shall cause or allow the idling of a nonroad diesel engine under its control or on its property for more than three (3) consecutive minutes. [20 DCMR 900.2]
- 3. Condition II(g)(2) does not apply to locomotives, generator sets, marine vessels, recreational vehicles, farming equipment, military equipment when it is being used during training exercises, emergency or public safety situations, or any private use of a nonroad diesel engine that is not for compensation. [20 DCMR 900.3]

4. The idling limit in Condition II(g)(2) does not apply to [20 DCMR 900.4]:
 - A. Idling necessary to ensure the safe operation of the equipment and safety of the operator, such as conditions specified by the equipment manufacturer in the manual or an appropriate technical document accompanying the nonroad diesel engine;
 - B. Idling for testing, servicing, repairing, diagnostic purposes, or to verify that the equipment is in good working order, including regeneration of a diesel particulate filter, in accordance with the equipment manufacturer manual or other technical document accompanying the nonroad diesel engine;
 - C. Idling for less than fifteen (15) minutes when queuing (*i.e.*, when nonroad diesel equipment, situated in a queue of other vehicles, must intermittently move forward to perform work or a service), not including the time an operator may wait motionless in line in anticipation of the start of a workday or opening of a location where work or a service will be performed.
 - D. Idling by any nonroad diesel engine being used in an emergency or public safety capacity;
 - E. Idling for a state or federal inspection to verify that all equipment is in good working order, if idling is required as part of the inspection; and
 - F. Idling for up to five (5) consecutive minutes to operate heating equipment when the ambient air temperature is thirty-two degrees Fahrenheit (32°F) or below.

h. Fleet Maintenance

Permittee shall ensure that the engines, power, and exhaust mechanisms of each vehicle of its motor fleet is equipped, adjusted, maintained, and operated so as to prevent the escape of a trail of visible fumes or smoke for more than ten (10) consecutive seconds. [20 DCMR 901]*

i. Lead in Gasoline

The Permittee shall ensure that gasoline sold at the facility contains no more than one gram of lead per gallon. [20 DCMR 902]*

j. Odors and Nuisance Air Pollutants

The Permittee shall ensure that the facility does not emit into the atmosphere any odorous or other air pollutant, 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 and property. [20 DCMR 903]*

k. Risk Management

1. The Permittee shall ensure that the requirements of 40 CFR part 68, as in effect on September 30, 1997, are complied with at the site for the purposes of preventing, detecting, and responding to accidental chemical releases to the air, pursuant to the requirements of Section 112(r) of the Federal Clean Air Act with the terms used and defined in those provisions. [20 DCMR 402]*
2. Should this stationary source, as defined in 40 CFR part 68.3, become subject to part 68, then the Permittee shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of part 68 as part of the annual compliance certification required by 40 CFR part 70 or 71. [20 DCMR 302.1(d)]

l. Protection of Stratospheric Ozone

The Permittee shall comply with the protection of stratospheric ozone requirements contained in 40 CFR 82 as follows [20 DCMR 302.1 and 399.1 "Applicable Requirement" (k)]:

1. If the Permittee manufactures, transforms, destroys, imports, or exports a Class I or Class II substance, the Permittee is subject to all the requirements as specified in 40 CFR 82, Subpart A (Production and Consumption Controls).
2. If the Permittee performs a service on a motor vehicle that involves an ozone-depleting substance refrigerant or regulated substitute substance in the MVAC, then Permittee is subject to all the applicable requirements as specified in 40 CFR 82, Subpart B (Servicing of Motor Vehicle Air Conditioners).
3. The Permittee shall comply with the ban on nonessential products containing Class I substances and ban on nonessential products containing or manufactured with Class II substances as specified in 40 CFR 82, Subpart C.
4. The Permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR 82 Subpart E, as applicable.
5. The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, as applicable.
6. The Permittee may switch from any ozone-depleting substance to any alternative that is listed as acceptable in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR 82, Subpart G.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 32

7. Halon Emissions Reduction: Any person testing, servicing, maintaining, repairing or disposing of equipment that contains halons or using such equipment during technical training and any person disposing of halons, manufacturers of halon blends, and organizations employing technicians who service halon containing equipment shall comply with the requirements of 40 CFR 82, Subpart H.
8. The Permittee shall comply with the ban on refrigeration and air-conditioning appliances containing HCFCs as specified in 40 CFR 82, Subpart I.

m. Architectural and Maintenance Coatings

1. Paints and refinishing coatings that contain VOCs in excess of the limits specified in the table below, including any VOC containing materials added to the original coating supplied by the manufacturer, shall be prohibited. [20 DCMR 773.1, 774.1, and 774.10]

VOC Content Limits for Architectural Coatings.¹

<u>Coating Category</u>	<u>VOC Content Limit</u> (Grams VOC per liter) ²
Flat Coatings	100
Non-flat Coatings	150
Non-flat- High Gloss Coatings	250

<u>Specialty Coatings</u>	<u>VOC Content Limit</u> (Grams VOC per liter) ²
Antenna Coatings	530
Antifouling Coatings	400
Bituminous Roof Coatings	300
Bituminous Roof Primers	350
Bond Breakers	350
Calcimine Recoater	475
Clear Wood Coatings	
• Clear Brushing Lacquers	680
• Lacquers (including lacquer sanding sealers)	550
• Sanding Sealers (other than lacquer sanding sealers)	350
• Varnishes	350
Concrete Curing Compounds	350
Concrete Surface Retarders	780
Conjugated Oil Varnish	450
Conversion Varnish	725
Dry Fog Coatings	400
Faux Finishing Coatings	350

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 33

<u>Specialty Coatings</u>	<u>VOC Content Limit</u> (Grams VOC per liter) ²
Fire-Resistive Coatings	350
Fire-Retardant Coatings	
●Clear	650
●Opaque	350
Floor Coatings	250
Flow Coatings	420
Form-Release Compounds	250
Graphic Arts Coatings (Sign Paints)	500
High-Temperature Coatings	420
Industrial Maintenance Coatings	340
Impacted Immersion Coatings	780
Low-Solids Coatings ³	120
Magnesite Cement Coatings	450
Mastic Texture Coatings	300
Metallic Pigmented Coatings	500
Multi-Color Coatings	250
Nuclear Coatings	450
Pre-Treatment Wash Primers	420
Primers, Sealers, and Undercoaters	200
Reactive Penetrating Carbonate Stone Sealer	600
Quick-Dry Enamels	250
Quick-Dry Primers, Sealers and Undercoaters	200
Recycled Coatings	250
Roof Coatings	250
Rust Preventative Coatings	400
Shellacs	
●Clear	730
●Opaque	550
Specialty Primers, Sealers, and Undercoaters	350
Stains	250
Stone Consolidants	450
Swimming Pool Coatings	340
Swimming Pool Repair and Maintenance Coatings	340
Temperature-Indicator Safety Coatings	550
Thermoplastic Rubber Coatings and Mastics	550
Traffic Marking Coatings	150
Waterproofing Sealers	250
Waterproofing Concrete/Masonry Sealers	400
Wood Preservatives	350

²Limits are expressed in grams of VOC per liter of coating thinned to the manufacturer's maximum recommendation, excluding the volume of any water, exempt compounds, or colorant added to tint bases. Manufacturer's maximum recommendation means

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 34

the maximum recommendation for thinning that is indicated on the label or lid of the coating container.

² Conversion factor: one pound VOC per gallon (U.S.) = 119.95 grams per liter.

³ Units for this coating are grams of VOC per liter (pounds of VOC/gallon) of coating, including water and exempt compounds.

2. The Permittee shall not apply a coating that is thinned to exceed the applicable VOC limit specified in the above table. [20 DCMR 774.5]
3. The Permittee shall not apply any rust preventive coating for industrial use, unless such a rust preventive coating complies with the industrial maintenance coating VOC limit specified in the above table. [20 DCMR 774.6]
4. For any coating that does not meet any of the definitions for the specialty coatings categories listed in the table above, the VOC content limit shall be determined by classifying the coating as a flat coating or a non-flat coating, based on its gloss, as defined in 20 DCMR 799, and the corresponding flat or non-flat coating limit shall apply. [20 DCMR 774.7]
5. Notwithstanding the provisions of Condition II(m)(1) of this permit, a person or facility may add up to ten percent (10%) by volume of VOC to a lacquer to avoid blushing of the finish during days with relative humidity greater than seventy percent (70%) and temperature below sixty-five degrees Fahrenheit (65° F) or eighteen degrees Celsius (18° C) at the time of application, provided that the coating contains acetone and no more than five hundred fifty grams (550 g.) of VOC per liter of coating, less water and exempt compounds, before the addition of VOC. [20 DCMR 774.10]

n. General Conformity

As a department, agency, or instrumentality of the Federal Government, the Permittee shall comply with the General Conformity requirements of 20 DCMR 1501 and 40 CFR 93, Subpart B, as amended.

III. Emission Unit Specific Requirements

This operating permit identifies emission units based on information provided by the Permittee and cites specific applicable regulations from 20 DCMR, as well as the Code of Federal Regulations (CFR). These cited regulations and rules stipulate the conditions under which the Permittee is permitted to operate, the control equipment (where applicable) that must be used to minimize air pollution, and the monitoring, testing, record keeping, and reporting requirements that will enable the Permittee to demonstrate, to the District and EPA, compliance with regulatory requirements.

Operation of the emission units listed below is permitted subject to the facility complying with the following emission limits, standards, and other requirements specified herein and

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 35

elsewhere in this permit [20 DCMR 300].

Emission Units¹				
Emission Unit ID	Equipment No., Area	Emission Unit Name	Ch. 2 Permit²	Description
02-2	201, Section 2	Giori I-10	6974	Sheet-fed Non-Heatset Intaglio Cylinder Wipe Currency Press Located at Main Building, Basement A Wing, Installed 1999
02-2	202, Section 2	Giori I-10	6975	Sheet-fed Non-Heatset Intaglio Cylinder Wipe Currency Press Located at Main Building, Basement A Wing, Installed 1999
02-2	110, Section 10	Giori I-10	6976	Sheet-fed Non-Heatset Intaglio Cylinder Wipe Currency Press Located at Main Building, Basement C Wing, Installed 2000
02-2	210, Section 10	Giori I-10	6977	Sheet-fed Non-Heatset Intaglio Cylinder Wipe Currency Press Located at Main Building, Basement C Wing, Installed 2000
02-4	901, Section 9	Super Orlof	6581-R1	Sheet-fed Non-Heatset Cylinder Wipe Intaglio SOI Located at M-100-C, Installed 2006
02-4	902, Section 9	Super Orlof	6582-R1	Sheet-fed Non-Heatset Cylinder Wipe Intaglio SOI Located at M-100-C, Installed 2006
02-4	601, Section 6	Super Orlof	6706-R1	Sheet-fed Non-Heatset Cylinder Wipe Intaglio SOI Located at M-400-C, Installed 2009
02-4	602, Section 6	Super Orlof	6707-R1	Sheet-fed Non-Heatset Cylinder Wipe Intaglio SOI Located at M-400-C, Installed 2009
08-1	013, COPE	Giori COPE Pak		Sheet-fed Non-Heatset Letterpress, Located M-200-B, Installed 1998
08-1	014, COPE	Giori COPE Pak		Sheet-fed Non-Heatset Letterpress, Located M-200-B, Installed 1997
08-1	015, COPE	Giori COPE Pak		Sheet-fed Non-Heatset Letterpress, Located M-200-B, Installed 1997
08-1	016, COPE	Giori COPE Pak		Sheet-fed Non-Heatset Letterpress, Located M-200-B, Installed 1985
08-1	019, COPE	Giori COPE Pak		Sheet-fed Non-Heatset Letterpress, Located D-300-M, Installed 1987

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 36

Emission Units¹				
Emission Unit ID	Equipment No., Area	Emission Unit Name	Ch. 2 Permit²	Description
08-1	023, COPE	Giori COPE Pak	6947	Sheet-fed Non-Heatset Letterpress, Located M-100-A, Moved to this facility from Western Currency Facility and Installed 2017
08-3	None, LEPE	LEPE Press (formerly SCOPE)	6574-R1	Sheet-fed Non-Heatset Letterpress, Located A-400-M, Installed 2012
09	203, Section 2	Simultan	6739	Sheet-fed Non-Heatset Offset Lithographic Press, Located M-BSMT-A, Installed 1999
09	310, Section 10	Simultan	6373-R1	Sheet-fed Non-Heatset Offset Lithographic Press, Located M-BSMT-C, Installed. 2001
09	903, Section 9	Simultan	6374-R1	Sheet-fed Non-Heatset Offset Lithographic Press, Located M-100-C, Installed 2002
11-1	113, 1	Carver hand die stamp		Sheet-fed Non-Heatset, Paper Wipe Intaglio, Located at M-325-A, Installed 1951
11-1	114, 1	Carver hand die stamp		Sheet-fed HS & Non-Heatset Paper Wipe Intaglio, Located M-325-A, Installed 1951
11-1	115, 1	Miehle 4-plateflatbed		Sheet-fed Non-Heatset, Paper Wipe Intaglio, Located at M-325-A, Installed 1954
11-1	116, 1	Cronite die stamp Hi Speed		Sheet-fed HS & Non-Heatset Paper Wipe Intaglio, Located M-325-A, Installed 1992
11-1	117, 1	Hand press		Sheet-fed Non-Heatset, Paper Wipe Intaglio, Located at M-325-A, Installed 1951
11-1	118, 1	Hand press		Sheet-fed Non-Heatset, Paper Wipe Intaglio, Located at M-325-A, Installed 1951
11-1	119, 1	Elephant press		Sheet-fed Non-Heatset, Paper Wipe Intaglio, Located at M-325-A, Installed 2003
11-1	None, Research & Development (R&D) Center	KBA Giori Mini Orlof II Research press	6338-R1	Sheet-fed Non-Heatset, Cylinder Wipe Intaglio SOI, Located at M-100-A, Installed 2010

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 37

Emission Units¹				
Emission Unit ID	Equipment No., Area	Emission Unit Name	Ch. 2 Permit²	Description
11-2	061, Flatbed	Heidelberg job press		Job press, Located at M-300-B, Installed 1968
11-2	062, Flatbed	Kluge job press		Job press Located at M-300-B, Installed 1968
11-2	076, Flatbed	Miller SW letterpress		SW letterpress, Located at M-300-B, Installed 1952
11-2	077, Flatbed	Miller SW letterpress		SW letterpress, Located at M-300-B, Installed 1952
11-3	034, S-OFFSET	Ryobi 3302M		Sheet-fed Non-Heatset, Offset Lithographic press, Located at M-300-B, Installed 1992
11-3	044, S-OFFSET	Heidelberg Speedmaster		Sheet-fed Non-Heatset, Offset Lithographic press, Located at M-300-B, Installed 1998
11-3	None, S-OFFSET	GTO Heidelberg		Sheet-fed Non-Heatset, Offset Lithographic press, Located at M-100-A, Installed 2003
11-3	None, S-OFFSET	Komori Offset Lithographic press	6589-R1	Sheet-fed Non-Heatset, Cylinder Wipe Intaglio, Located at M-300-B, Installed 2012
11-5	None, Carpentry Shop	Paint Shop		Paint Shop
12	None, Freight Building	Emergency Generator (#1)	6404-R1	MTU Onsite Energy 1000-XC6DT2, Located at Freight Building, Installed in 2011
12	None, Freight Building	Emergency Generator (#2)	6405-R1	MTU Onsite Energy 1000-XC6DT2, Located at Freight Building, Installed in 2011
12	None, M-019	Main Building Fire Pump		Patterson Model 8x8 MI, Located M-019, Installed 1996
13-4-Cr	None, D-200	Dalmar Chromium Plating Line	6378	Dalmar Chromium Plating Line (including 3 Chrome Plating tanks), with a control device 13-4-Cr, Located D-200, Installed 2009
13-5-Ni	None, D-200	Dalmar Nickel Plating Line	6377	Dalmar Nickel Plating Line, with a control device 13-5-Ni, Located D-200, Installed 2009

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 38

Emission Units ¹				
Emission Unit ID	Equipment No., Area	Emission Unit Name	Ch. 2 Permit ²	Description
14	None, M-BSMT Between A&B	Central Trim System		Central Trim System, with dual Mactiflo 4MTF80 baghouse control device 14-CTS Located at M-BSMT between A&B, Installed 1997
15	None, Annex 1 st Floor & Basement	Ink Manufacturing		Ink Manufacturing and Solids Handling with RotoClone control device 15-WDC, Located in Annex 1 st Floor & Basement, Installed 1996

¹ Miscellaneous/Insignificant activities are listed separately in Condition IV of this permit

² The Chapter 2 permits listed are those being incorporated into this Title V permit that have been issued since the previous Title V permit was issued on August 27, 2001. Those units with no Chapter 2 permit listed were in the older Title V permit.

- a. **Emission Unit ID 02-2: Press Numbers 201, 202, 110 and 210: Four (4) KBA Giori, I-10 Intaglio, sheet-fed, non-heatset, intaglio, water wipeable presses, identified as Nos. 201 and 202, in the Main Building, Section 2 (Basement A Wing) and Nos. 110 and 210, in the Main Building, Section 10 (Basement C Wing)**

1. Emission Limitations:

A. Emissions of volatile organic compounds (VOC) from the ink used in the process shall not exceed 0.56 pounds per press hour. Except when tested on a one-time basis in accordance with Condition III(a)(3)(F), compliance with this condition shall be determined on a monthly average basis. Monthly average emissions shall be calculated by determining the amount of ink used in the I-10 presses in a given month, in pounds, multiplying that value by the percent of the ink used that is emitted as VOC emissions (1% of the total ink weight shall be used unless a more current factor is developed based on sampling data and that factor is approved by the Department), and dividing the result by the number of hours of operation of the presses. This calculation may be performed on a press specific basis or on an average basis across these four I-10 presses.

B. VOC emissions from any cleaning solvent used shall not exceed 0.68 pounds per press hour. Except when tested on a one-time basis in accordance with Condition III(a)(3)(F), compliance with this condition shall be determined on a monthly average basis. Monthly average emissions shall be calculated by determining the amount of each cleaning solvent used by these four I-10 presses in a given month, in pounds, multiplying that by the percent of the solvent used that is emitted (100% of the solvent VOC content shall be assumed to be emitted except where a solvent retention factor for low vapor pressure solvents used in manual cleaning is applied in accordance with document EPA-453/R-06-002, as revised), and dividing the result by the number of hours of operation of the presses. This

calculation may be performed on a press specific basis or on an average basis across these four I-10 presses.

- C. The total annual VOC emitted from the ink and cleaning solvent as a result of operation of the four presses combined shall not exceed 19 tons in any 12-month period (an average of 4.75 tons per press).
- D. Visible emissions shall not be emitted into the outdoor atmosphere from these presses, except that discharges not exceeding forty percent (40%) opacity (unaveraged) shall be permitted for two (2) minutes in any sixty (60) minute period and for an aggregate of twelve (12) minutes in any twenty-four hour (24 hr.) period during start-up, cleaning, adjustment of combustion controls, or malfunction of the equipment [20 DCMR 606.1]

Note that 20 DCMR 606 is subject to an EPA-issued call for a State Implementation Plan (SIP) revision (known as a "SIP call") requiring the District to revise 20 DCMR 606. See "State Implementation Plans: Response to Petition for Rulemaking; Restatement and Update of EPA's SSM Policy Applicable to SIPs; Findings of Substantial Inadequacy; and SIP Calls To Amend Provisions Applying to Excess Emissions During Periods of Startup, Shutdown and Malfunction", 80 Fed. Reg. 33840 (June 12, 2015). It is likely that this federal action will result in changes to the requirements of 20 DCMR 606. Any such changes, once finalized in the DCMR, will supersede the language of Condition III(a)(1)(D) as stated above.

- E. 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]

2. Operational Limitations:

- A. The VOC content of any ink used in connection with the presses shall not be greater than twelve percent (12%) by weight. [20 DCMR 710.4, 710.5, and 710.9(a)]
- B. The VOC emissions released to the atmosphere from the twelve percent (12%) VOC content by weight ink used in connection with the presses shall not exceed one percent (1%) of the total weight of ink used on the presses. [20 DCMR 201]
- C. Emissions from cleaning solvents shall be minimized by the following methods [20 DCMR 201]:

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 40

- i. The vapor pressure of the cleaning solvent(s) used on these presses shall be less than 5 mmHg at 20 degrees C;
 - ii. The VOC content of the cleaning solvent(s) used on these presses shall be less than 50% by weight; and
 - iii. Automatic plate wash units shall be used to reduce solvent consumption.
- D. The VOC content of the "wiping solution" shall not exceed one percent (1%) by weight. [20 DCMR 710.4, 710.8(b) and 710.9(a)]
- E. For Conditions III(a)(2)(A) and (D), compliance shall be determined consistent with the testing requirements of Condition III(a)(3)(G). [20 DCMR 710.9]
- F. The average hours of operation per press shall not exceed 7,665 hours per 12-month rolling period. [20 DCMR 201]
- G. Solvent cleaning operations shall not exceed an average of 7,665 hours per 12-month rolling period per press. [20 DCMR 201]
- H. Ink usage in connection with all forms of intaglio printing shall be minimized to the extent feasible by routing the inking cylinders or other techniques. [20 DCMR 710.10]
- I. All containers holding VOC containing materials shall be open only when necessary and openings shall be restricted to the extent feasible. [20 DCMR 710.12]
- J. The leaking of any solvent or solvent-containing material from any printing unit or associated equipment is prohibited. [20 DCMR 710.13]
- K. The storage or disposal of any solvent-containing material, including waste material, in a manner that will cause or allow its evaporation into the atmosphere is prohibited. [20 DCMR 710.14]
- L. To the greatest extent feasible, persons operating printing units and associated equipment shall minimize their use of VOC containing materials by restricting wasteful usage and by replacing the material with emulsions or other materials. [20 DCMR 710.15]
- M. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the units in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being

used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

3. Monitoring and Testing Requirements:

- A. The Permittee shall monitor the types, constituents, characteristics, and quantities of inks and cleaning solvents used on the press to ensure compliance with Conditions III(a)(2)(A) through (C) of this permit.
- B. The Permittee shall monitor the operating hours of the press to ensure compliance with Conditions III(a)(1)(A) and (B) and III(a)(2)(F) and (G) of this permit.
- C. The Permittee shall monitor use of storage containers for VOC and solvent-containing materials and disposal practices for such materials to ensure compliance with Conditions III(a)(2)(I) and (K) of this permit.
- D. The Permittee shall monitor the status of the presses and related equipment to ensure that no leaking is occurring and that they are being operated properly to ensure compliance with Conditions III(a)(2)(J) and (M) of this permit. Any leaks identified as a result of this monitoring shall be repaired promptly.
- E. The Permittee shall monitor and continually review and observe operational practices to ensure compliance with Conditions III(a)(2)(H) and (L) of this permit.
- F. The Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]
- G. At least on a quarterly basis and whenever there is a change in formulation of inks or wiping solutions, the Permittee shall analyze samples of each ink and wiping solution used on the presses during that quarter to determine the weight percent VOCs in the inks and wiping solutions. [20 DCMR 502.1 and 20 DCMR 710.9]

Compliance determinations and testing pursuant to this condition shall be performed as follows:

- i. The percentage VOC content is by weight and applies to the inks and solutions as contained in the storage wells (fountains) of the printing unit, and does not include water;
- ii. The percentage VOC content shall be determined in accordance with Procedure B of test method ASTM D-2369-81; where, in lieu of testing the formulated inks and solutions, the individual components of the formulations may be tested and the VOC content of the formulations may be calculated

there from; and

iii. The percentage water content shall be determined in accordance with test method ASTM D-3792-79.

H. The Permittee shall monitor the emission points for visible emissions as needed to ensure compliance with Condition III(a)(1)(D) of this permit.

4. Record Keeping Requirements:

The following information shall be maintained at the facility for a period not less than five (5) years from the date of the monitoring sample, measurement, report, or application [20 DCMR 500.8 and 20 DCMR 302.1(c)(2)(B)] and shall be made available to the Department upon written or verbal request:

- A. Records of the identity and volume of each cleaning solvent used on the presses each month;
- B. Records of the mass of each ink used on the presses each month;
- C. Records of the VOC content, by weight, of each ink used.
- D. Records of the chain of custody of each ink sample taken as well as the identification of any laboratory used to analyze the sample and the methods used by that laboratory.
- E. Records of the identity, vapor pressure, and VOC content of any cleaning solvents used. This information is usually contained in Material Safety Data Sheets (MSDSs) for the products used.
- F. Records, updated monthly, of the total mass of VOCs emitted as a result of the operation of the presses (including VOCs emitted by use of inks and cleaning solvents);
- G. Records of the total hours of operation of each press each month;
- H. Records, updated monthly, of the average VOC emissions per hour of press operation that month from each of the following sources:
 - i. inks; and
 - ii. solvents.

(Note: these records shall be used to determine compliance with Conditions

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 43

III(a)(1)(A) and (B) of this permit. They shall be updated within thirty (30) days of the end of each calendar month.);

- I. Records of the results of the occurrence of any leaks of any solvent-containing material from any printing unit or associated equipment, along with the actions taken to address the leak;
- J. Records of the dates, methods and procedures used, and results of all testing performed by the Permittee or its representatives or contractors pursuant to Conditions III(a)(3)(F) and (G) of this permit.
- K. Records of the maintenance performed on the presses; and
- L. Records of the results of any visible emissions observed pursuant to condition III(a)(3)(H) of this permit. If no visible emissions were observed, no records are required.

5. Reporting Requirements:

- A. A copy of the analytical results of the ink and wiping solution samples taken quarterly and upon formulation changes pursuant to Condition III(a)(3)(G) of this permit shall be submitted to the Department with the Permittee's Title V semi-annual and annual reports required pursuant to Conditions I(d)(1) and (2).
- B. The Permittee shall comply with the reporting requirements of Condition I(d)(4).
- C. In addition to complying with Condition III(a)(5)(B) and any other reporting requirement mandated by 20 DCMR, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:
 - i. The name and location of the facility;
 - ii. The subject source(s) that caused the excess emissions;
 - iii. The time and date of the first observation of the excess emissions;
 - iv. The cause and estimated/expected duration of excess emissions;
 - v. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 44

- vi. The proposed corrective actions and schedule to correct the conditions causing the excess emission.

b. Emission Unit ID 02-4: Press Numbers 601, 602, 901, and 902: Four (4) KBA Giori, Super Orlof Intaglio II (SOI) sheet-fed, non-heatset, four color, water wipeable intaglio currency presses. Press numbers 601 and 602 are located in the Main Building, Room C-400. Press numbers 901 and 902 are located in the Main Building, Room C-100.

1. Emission Limitations:

- A. Emissions of volatile organic compounds (VOC) from the ink used in the process shall not exceed 0.88 pounds per press hour. Except when tested on a one-time basis in accordance with Condition III(b)(3)(F) of this permit, compliance with this condition shall be determined on a monthly average basis. Monthly average emissions shall be calculated by determining the amount of ink used in the SOI presses in a given month, in pounds, multiplying that value by the percent of the ink used that is emitted as VOC emissions (1% of the total ink weight shall be used unless a more current factor is developed based on sampling data and that factor is approved by the Department), and dividing the result by the number of hours of operation of the presses. This calculation may be performed on a press specific basis or on an average basis across these four SOI presses. [Chapter 2 Permit Nos. 6581-R1 & 6582-R1 and 6706-R1 & 6707-R1]
- B. VOC emissions from cleaning solvent used shall not exceed 0.60 pounds per press hour. Except when tested on a one-time basis in accordance with Condition III(b)(3)(F) of this permit, compliance with this condition shall be determined on a monthly average basis. Monthly average emissions shall be calculated by determining the amount of each cleaning solvent used by these four SOI presses in a given month, in pounds, multiplying that by the percent of the solvent used that is emitted (100% of the solvent VOC content shall be assumed to be emitted except where a solvent retention factor for low vapor pressure solvents used in manual cleaning is applied in accordance with document EPA-453/R-06-002), and dividing the result by the number of hours of operation of the presses. This calculation may be performed on a press specific basis or on an average basis across these four SOI presses. [Chapter 2 Permit Nos. 6581-R1 & 6582-R1 and 6706-R1 & 6707-R1]
- C. The total annual VOC emitted from the ink and cleaning solvent as a result of operation of the four presses combined shall not exceed 22.68 tons per 12-month rolling period (an average of 5.67 tons per press). [Chapter 2 Permit Nos. 6581-R1 & 6582-R1 and 6706-R1 & 6707-R1]

- D. Visible emissions shall not be emitted into the outdoor atmosphere from these presses, except that discharges not exceeding forty percent (40%) opacity (unaveraged) shall be permitted for two (2) minutes in any sixty (60) minute period and for an aggregate of twelve (12) minutes in any twenty-four hour (24 hr.) period during start-up, cleaning, adjustment of combustion controls, or malfunction of the equipment [20 DCMR 606.1]

Note that 20 DCMR 606 is subject to an EPA-issued call for a State Implementation Plan (SIP) revision (known as a "SIP call") requiring the District to revise 20 DCMR 606. See "State Implementation Plans: Response to Petition for Rulemaking; Restatement and Update of EPA's SSM Policy Applicable to SIPs; Findings of Substantial Inadequacy; and SIP Calls To Amend Provisions Applying to Excess Emissions During Periods of Startup, Shutdown and Malfunction", 80 Fed. Reg. 33840 (June 12, 2015). It is likely that this federal action will result in changes to the requirements of 20 DCMR 606. Any such changes, once finalized in the DCMR, will supersede the language of Condition III(b)(1)(D) as stated above.

- E. 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]

2. Operational Limitations:

- A. The VOC content of any ink used in connection with the presses shall not be greater than twelve percent (12%) by weight. [20 DCMR 710.4, 710.5, and 710.9(a)]
- B. The VOC emissions released to the atmosphere from the twelve percent (12%) VOC content by weight ink used in connection with the presses shall not exceed one percent (1%) of the total weight of ink used on the presses. [20 DCMR 201 and Chapter 2 Permit Nos. 6581-R1 & 6582-R1 and 6706-R1 & 6707-R1]
- C. Emissions from cleaning solvents shall be minimized by the following methods [20 DCMR 201 and Chapter 2 Permit Nos. 6581-R1 & 6582-R1 and 6706-R1 & 6707-R1]:
- i. The vapor pressure of the cleaning solvent(s) used on these presses for manual cleaning and in the automatic plate wash units shall be less than 5 mmHg at 20 degrees C;
 - ii. The VOC content of the cleaning solvent(s) used on these presses shall be less than 50% by weight; and

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 46

- iii. Automatic plate wash and automatic blanket wash units shall be used to reduce solvent consumption.
- iv. Use of automatic blanket wash solvents(s) which exceed a VOC content of 50% by weight must not exceed 50 gallons/press/12-month rolling period.
- D. The VOC content of the "wiping solution" shall not exceed one percent (1%) by weight. [20 DCMR 710.4, 710.8(b) and 710.9(a)]
- E. For Conditions III(b)(2)(A) and (D), compliance shall be determined consistent with the testing requirements of Condition III(b)(3)(G) of this permit. [20 DCMR 710.9]
- F. The average hours of operation per press shall not exceed 7,665 hours per 12-month rolling period. [20 DCMR 201 and Chapter 2 Permit Nos. 6581-R1 & 6582-R1 and 6706-R1 & 6707-R1]
- G. Solvent cleaning operations shall not exceed an average of 7,665 hours per year per 12-month rolling period per press. [20 DCMR 201 and Chapter 2 Permit Nos. 6581-R1 & 6582-R1 and 6706-R1 & 6707-R1]
- H. Ink usage in connection with all forms of intaglio printing shall be minimized to the extent feasible by routing the inking cylinders or other techniques. [20 DCMR 710.10]
- I. All containers holding VOC containing materials shall be open only when necessary and openings shall be restricted to the extent feasible. [20 DCMR 710.12]
- J. The leaking of any solvent or solvent-containing material from any printing unit or associated equipment is prohibited. [20 DCMR 710.13]
- K. The storage or disposal of any solvent-containing material, including waste material, in a manner that will cause or allow its evaporation into the atmosphere is prohibited. [20 DCMR 710.14]
- L. To the greatest extent feasible, persons operating printing units and associated equipment shall minimize their use of VOC containing materials by restricting wasteful usage and by replacing the material with emulsions or other materials. [20 DCMR 710.15]
- M. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the units in a manner consistent with good air pollution control practice for minimizing

emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

3. Monitoring and Testing Requirements:

- A. The Permittee shall monitor the types, constituents, characteristics, and quantities of inks and cleaning solvents used on the press to ensure compliance with Conditions III(b)(2)(A) through (C) of this permit.
- B. The Permittee shall monitor the operating hours of the press to ensure compliance with Conditions III(b)(1)(A) and (B) and III(b)(2)(F) and (G) of this permit.
- C. The Permittee shall monitor use of storage containers for VOC and solvent-containing materials and disposal practices for such materials to ensure compliance with Conditions III(b)(2)(I) and (K) of this permit.
- D. The Permittee shall monitor the status of the presses and related equipment to ensure that no leaking is occurring and that they are being operated properly to ensure compliance with Conditions III(b)(2)(J) and (M) of this permit. Any leaks identified as a result of this monitoring shall be repaired promptly.
- E. The Permittee shall monitor and continually review and observe operational practices to ensure compliance with Conditions III(b)(2)(H) and (L) of this permit.
- F. The Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]
- G. At least on a quarterly basis and whenever there is a change in formulation of inks or wiping solutions, the Permittee shall analyze samples of each ink and wiping solution used on the presses during that quarter to determine the weight percent VOCs in the inks and wiping solutions. [20 DCMR 502.1 and 20 DCMR 710.9]

Compliance determinations and testing pursuant to this condition shall be performed as follows:

- i. The percentage VOC content is by weight and applies to the inks and solutions as contained in the storage wells (fountains) of the printing unit, and does not include water;
- ii. The percentage VOC content shall be determined in accordance with Procedure B of test method ASTM D-2369-81; where, in lieu of testing the

formulated inks and solutions, the individual components of the formulations may be tested and the VOC content of the formulations may be calculated there from; and

iii. The percentage water content shall be determined in accordance with test method ASTM D-3792-79.

H. The Permittee shall monitor the emission points for visible emissions as needed to ensure compliance with condition III(b)(1)(D) of this permit.

4. Record Keeping Requirements:

The following information shall be maintained at the facility for a period not less than five (5) years from the date of the monitoring sample, measurement, report, or application [20 DCMR 500.8 and 20 DCMR 302.1(c)(2)(B)] and shall be made available to the Department upon written or verbal request:

- A. Records of the identity and volume of each cleaning solvent used on the presses each month;
- B. Records of the volume of automatic blanket wash solvent exceeding a VOC content of 50% by weight used on the presses each month, maintained in a 12-month rolling sum format;
- C. Records of the mass of each ink used on the presses each month;
- D. Records of the VOC content, by weight, of each ink used;
- E. Records of the chain of custody of each ink sample taken as well as the identification of any laboratory used to analyze the sample and the methods used by that laboratory;
- F. Records of the identity, vapor pressure, and VOC content of any cleaning solvents used. This information is usually contained in Material Safety Data Sheets (MSDSs) for the products used;
- G. Records, updated monthly and maintained in a 12-month rolling sum format, of the total mass of VOCs emitted as a result of the operation of the presses (including VOCs emitted by use of inks and cleaning solvents);
- H. Records of the total hours of operation of each press each month, maintained in a 12-month rolling format;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 49

I. Records, updated monthly, of the average VOC emissions per hour of press operation that month from each of the following sources:

i. inks; and

ii. solvents

(Note: these records shall be used to determine compliance with Conditions III(b)(1)(A) and (B) of this permit. They shall be updated within thirty (30) days of the end of each calendar month.);

J. Records of the results of the occurrence of any leaks of any solvent-containing material from any printing unit or associated equipment, along with the actions taken to address the leak;

K. Records of the dates, methods and procedures used, and results of all testing performed by the Permittee or its representatives or contractors pursuant to Conditions III(b)(3)(F) and (G);

L. Records of the maintenance performed on the presses; and

M. Records of the results of any visible emissions observed pursuant to Condition III(b)(3)(H). If no visible emissions were observed, no records are required.

5. Reporting Requirements:

A. A copy of the analytical results of the ink and wiping solution samples taken quarterly and upon formulation changes pursuant to Condition III(b)(3)(G) of this permit shall be submitted to the Department with the Permittee's Title V semi-annual and annual reports required pursuant to Conditions I(d)(1) and (2).

B. The Permittee shall comply with the reporting requirements of Condition I(d)(4).

C. In addition to complying with Condition III(b)(5)(B) and any other reporting requirement mandated by 20 DCMR, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:

ii. The name and location of the facility;

ii. The subject source(s) that caused the excess emissions;

iii. The time and date of the first observation of the excess emissions;

- iv. The cause and estimated/expected duration of excess emissions;
 - v. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
 - vi. The proposed corrective actions and schedule to correct the conditions causing the excess emission.
- c. **Emission Unit 08-1: Six (6) Currency Overprinting and Packaging Equipment (COPE) non-heatset, sheet-fed, letterpress, currency printing lines (Giori COPE Pak) - Equipment Numbers 013, 014, 015, 016, 019 and 023.**
1. **Emission Limitations:**
 - A. Emissions of VOC from the ink used in the process shall not exceed 0.01 pounds per press hour. Except when tested on a one-time basis in accordance with Condition III(c)(3)(E) of this permit, compliance with this condition shall be determined on a monthly average basis across all six COPE presses. Monthly average emissions shall be calculated by determining the amount of ink used in the COPE presses in a given month, in pounds, multiplying that value by the percent of the ink used that is emitted as VOC emissions (5% based on the 95% ink VOC retention factor found in document EPA-453/R-06-002), and dividing the result by the number of hours of operation of the presses that month. [20 DCMR 201]
 - B. VOC emissions from any cleaning solvents used shall not exceed 0.44 pounds per press hour. Except when tested on a one-time basis in accordance with Condition III(c)(3)(E) of this permit, compliance with this condition shall be determined on a monthly average basis. Monthly average emissions shall be calculated by determining the amount of each cleaning solvent used by the COPE presses in a given month, in pounds, multiplying that by the percent of the solvent used that is emitted (100% of the solvent VOC content shall be assumed to be emitted except where a solvent retention factor for low vapor pressure solvents used in manual cleaning is applied in accordance with document EPA-453/R-06-002, as revised), and dividing the result by the number of hours of operation of the presses. [20 DCMR 201]
 - C. The total annual VOC emitted from the ink and cleaning solvent as a result of operation of these six presses shall not exceed 11.88 tons per 12-month rolling period (an average of 1.98 tons per press). [20 DCMR 201]

- D. Visible emissions shall not be emitted into the outdoor atmosphere from the printing presses. [20 DCMR 107 and 606]
- E. 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]

2. Operational Limitations:

- A. The VOC content of any ink used in connection with the presses shall not be greater than thirty percent (30%) by weight. [20 DCMR 201 and, for Unit 016, installed before December 31, 1985, 20 DCMR 716.11(d)]
- B. The Permittee shall not use, in conjunction with the presses, cleaning solutions containing VOCs in excess of one of the following limits (i.e. meeting one or the other of the listed standards will be considered compliance with this condition) [20 DCMR 716.8]:
 - i. Seventy percent (70%) VOC (by weight); or
 - ii. Ten millimeters of mercury (10 mm Hg) at twenty degree Celsius (20 C or 68° F) of VOC composite partial pressure calculated as follows:

$$P_{pc} = \frac{\sum_{i=1}^n (W_i)(VP_i)/Mw_i}{W_w/Mw_w + \sum_{i=1}^n W_e/Mw_e + \sum_{i=1}^n W_i/Mw_i}$$

where:

P_{pc} = VOC composite partial pressure at twenty degrees Celsius (20°C) or sixty-eight degrees Fahrenheit (68° F), in mm Hg;

W_i = Weight of the "i"th VOC compound, in grams, as determined by ASTM E 260-91;

W_w = Weight of water, in grams as determined by ASTM D 3792-86;

W_e = Weight of the "i"th exempt compound, in grams, as determined by ASTM E 260-91;

Mw_i = Molecular weight of the "i"th VOC compound, in grams per g-mole, as given in chemical reference literature;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 52

Mww = Molecular weight of water, eighteen grams (18 g.) per g- mole;

Mwe = Molecular weight of the "i"th exempt compound, in grams per g- mole, as given in chemical reference literature; and

Vpi = Vapor pressure of the "i"th VOC compound at twenty degrees Celsius (20° C) or sixty-eight degrees Fahrenheit (68° F), in mm. Hg, as determined in accordance with ASTM test method ASTM D2879-86.

- C. All containers holding VOC containing materials shall be open only when necessary and openings shall be restricted to the extent feasible. [20 DCMR 716.21]
- D. The leaking of any solvent or solvent-containing material from any printing unit or associated equipment is prohibited. [20 DCMR 716.22]
- E. The storage or disposal of any solvent-containing material, including waste material, in a manner that will cause or allow its evaporation into the atmosphere is prohibited. [20 DCMR 716.23]
- F. To the greatest extent feasible, persons operating printing units and associated equipment shall minimize their use of VOC containing materials by restricting wasteful usage and by replacing the material with emulsions or other materials. [20 DCMR 716.24]
- G. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the units in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

3. Monitoring and Testing Requirements:

- A. The Permittee shall monitor the types, constituents, characteristics, and quantities of inks and cleaning solvents used on the presses to ensure compliance with Conditions III(c)(2)(A) and (B) of this permit.
- B. The Permittee shall monitor use of storage containers for VOC and solvent-containing material and disposal practices for such materials to ensure compliance with Conditions III(c)(2)(C) and (E) of this permit.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 53

- C. The Permittee shall monitor the status of the presses and related equipment to ensure that no leaking is occurring and that they are being operated properly to ensure compliance with Conditions III(c)(2)(D) and (G) of this permit. Any leaks identified as a result of this monitoring shall be repaired promptly.
- D. The Permittee shall monitor and continually review and observe operational practices to ensure compliance with Condition III(c)(2)(F) of this permit.
- E. The Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]
- F. At least on a quarterly basis and whenever there is a change in formulation of inks, the Permittee shall analyze samples of each ink used on the presses during that quarter to determine the weight percent VOCs in the inks. [20 DCMR 502.1]

Testing pursuant to this condition shall be performed as follows:

- i. The percentage VOC content is by weight and applies to the inks and solutions as contained in the storage of the printing unit. The VOC content does not include water. [20 DCMR 716.12(a)]
 - ii. The percentage VOC content of the inks shall be determined in accordance with Procedure B of ASTM test method D-2369-81. In lieu of testing the formulated inks and solutions, the individual components of the formulations may be calculated there from. [20 DCMR 716.12(b)]
 - iii. The percentage water content shall be determined in accordance with ASTM test method D-3792-79. [20 DCMR 716.12(c)]
- G. The Permittee shall monitor the emission points for visible emissions as needed to ensure compliance with Condition III(c)(1)(D).

4. Record Keeping Requirements:

The following information shall be maintained at the facility for a period not less than five (5) years from the date the information is collected [20 DCMR 302.1(c)(2)(B) and 20 DCMR 716.25] and shall be made available to the Department upon written or verbal request:

- A. Records of the identity, volume, and VOC content of each cleaning solvent used on the presses each month;
- B. Records of the mass of each ink used on the presses each month;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 54

- C. Records of the VOC content, by weight, of each ink used.
- D. Records of the chain of custody of each ink sample taken as well as the identification of any laboratory used to analyze the sample and the methods used by that laboratory.
- E. Records of the identity and vapor pressure of any cleaning solvents used. This information is usually contained in Material Safety Data Sheets (MSDSs) for the products used.
- F. Records, updated monthly, of the total mass of VOCs emitted as a result of the operation of the presses (including VOCs emitted by use of inks and cleaning solvents);
- G. Records, updated monthly, of the average VOC emissions per hour of press operation that month from each of the following sources:
 - i. inks; and
 - ii. solvents

(Note: these records shall be used to determine compliance with Conditions III(c)(1)(A) and (B) of this permit. They shall be updated within thirty (30) days of the end of each calendar month.);

- H. Records of the maintenance performed on the presses.

5. Reporting Requirements:

- A. A copy of the analytical results of the ink samples taken quarterly under Condition III(c)(3)(F) of this permit shall be submitted to the Department with the Permittee's Title V semi-annual and annual reports required pursuant to Conditions I(d)(1) and (2).
- B. The Permittee shall comply with the reporting requirements of Condition I(d)(4).
- C. In addition to complying with Condition III(c)(5)(B) and any other reporting requirement mandated by 20 DCMR, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:
 - iii. The name and location of the facility;
 - ii. The subject source(s) that caused the excess emissions;

- iii. The time and date of the first observation of the excess emissions;
- iv. The cause and estimated/expected duration of excess emissions;
- v. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
- vi. The proposed corrective actions and schedule to correct the conditions causing the excess emission.

d. Emission Unit 08-3: One (1) Large Examining and Printing Equipment (LEPE), Dela Rue Giori, non-heatset, sheet-fed, letterpress printing unit.

1. Emission Limitations:

- A. Emissions of volatile organic compounds (VOC) from the ink used in the process shall not exceed 0.04 pounds per press hour. Except when tested on a one-time basis in accordance with Condition III(d)(3)(E) of this permit, compliance with this condition shall be determined on a monthly average basis. Monthly average emissions shall be calculated by determining the amount of ink used in the LEPE press in a given month, in pounds, multiplying that value by the percent of the ink used that is emitted as VOC emissions (5% based on the 95% ink VOC retention factor found in document EPA-453/R-06-002), and dividing the result by the number of hours of operation of the press that month. [20 DCMR 201 and Chapter 2 Permit No. 6574-R1]
- B. VOC emissions from any cleaning solvents used shall not exceed 0.40 pounds per press hour. Except when tested on a one-time basis in accordance with Condition III(d)(3)(E) of this permit, compliance with this condition shall be determined on a monthly average basis. Monthly average emissions shall be calculated by determining the amount of each cleaning solvent used by the LEPE press in a given month, in pounds, multiplying that by the percent of the solvent used that is emitted (100% of the solvent VOC content shall be assumed to be emitted except where a solvent retention factor for low vapor pressure solvents used in manual cleaning is applied in accordance with document EPA-453/R-06-002, as revised), and dividing the result by the number of hours of operation of the press. [20 DCMR 201 and Chapter 2 Permit No. 6574-R1]
- C. The total annual VOC emitted from the ink and cleaning solvent as a result of operation of the press shall not exceed 1.92 tons in any 12-month period. [20 DCMR 201 and Chapter 2 Permit No. 6574-R1]

- D. Visible emissions shall not be emitted into the outdoor atmosphere from the printing press. [20 DCMR 107 and 20 DCMR 606]
- E. 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]

2. Operational Limitations:

- A. The VOC content of any ink used in connection with the press shall not be greater than thirty percent (30%) by weight. [20 DCMR 201 and 20 DCMR 716.11(d)]
- B. The Permittee shall not use, in conjunction with the press, cleaning solutions containing VOCs in excess of one of the following limits (i.e. meeting one or the other of the listed standards will be considered compliance with this condition) [20 DCMR 716.8]:
 - i. Seventy percent (70%) VOC (by weight); or
 - ii. Ten millimeters of mercury (10 mm Hg) at twenty degree Celsius (20° C or 68° F) of VOC composite partial pressure calculated as follows:

$$Pp_c = \frac{\sum_{i=1}^n (W_i)(VP_i)/Mw_i}{W_w/Mw_w + \sum_{i=1}^n W_e/Mw_e + \sum_{i=1}^n W_i/Mw_i}$$

where:

- Ppc = VOC composite partial pressure at twenty degrees Celsius (20°C) or sixty-eight degrees Fahrenheit (68° F), in mm Hg;
- Wi = Weight of the "i"th VOC compound, in grams, as determined by ASTM E 260-91;
- Ww = Weight of water, in grams as determined by ASTM D 3792-86;
- We = Weight of the "i"th exempt compound, in grams, as determined by ASTM E 260-91;
- Mwi = Molecular weight of the "i"th VOC compound, in grams per g-mole, as given in chemical reference literature;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 57

M_{ww} = Molecular weight of water, eighteen grams (18 g.) per g-mole;

M_{w*i*} = Molecular weight of the "i"th exempt compound, in grams per g-mole, as given in chemical reference literature; and

V_{p*i*} = Vapor pressure of the "i"th VOC compound at twenty degrees Celsius (20° C) or sixty-eight degrees Fahrenheit (68° F), in mm. Hg, as determined in accordance with ASTM test method ASTM D2879-86.

C. All containers holding VOC containing materials shall be open only when necessary and openings shall be restricted to the extent feasible. [20 DCMR 716.21]

D. The leaking of any solvent or solvent-containing material from any printing unit or associated equipment is prohibited. [20 DCMR 716.22]

E. The storage or disposal of any solvent-containing material, including waste material, in a manner that will cause or allow its evaporation into the atmosphere is prohibited. [20 DCMR 716.23]

F. To the greatest extent feasible, persons operating printing units and associated equipment shall minimize their use of VOC containing materials by restricting wasteful usage and by replacing the material with emulsions or other materials. [20 DCMR 716.24]

G. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the units in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

3. Monitoring and Testing Requirements:

A. The Permittee shall monitor the types, constituents, characteristics, and quantities of inks and cleaning solvents used on the press to ensure compliance with Conditions III(d)(2)(A) and (B) of this permit.

B. The Permittee shall monitor use of storage containers for VOC and solvent-containing material and disposal practices for such materials to ensure compliance with Conditions III(d)(2)(C) and (E) of this permit.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 58

- C. The Permittee shall monitor the status of the press and related equipment to ensure that no leaking is occurring and that they are being operated properly to ensure compliance with Conditions III(d)(2)(D) and (G) of this permit. Any leaks identified as a result of this monitoring shall be repaired promptly.
- D. The Permittee shall monitor and continually review and observe operational practices to ensure compliance with Condition III(d)(2)(F) of this permit.
- E. The Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]
- F. At least on a quarterly basis and whenever there is a change in formulation of inks, the Permittee shall analyze samples of each ink used on the press during that quarter to determine the weight percent VOCs in the inks. [20 DCMR 502.1]

Testing pursuant to this condition shall be performed as follows:

- i. The percentage VOC content is by weight and applies to the inks and solutions as contained in the storage of the printing unit. The VOC content does not include water. [20 DCMR 716.12(a)]
 - ii. The percentage VOC content of the inks shall be determined in accordance with Procedure B of ASTM test method D-2369-81. In lieu of testing the formulated inks and solutions, the individual components of the formulations may be calculated there from. [20 DCMR 716.12(b)]
 - iii. The percentage water content shall be determined in accordance with ASTM test method D-3792-79. [20 DCMR 716.12(c)]
- G. The Permittee shall monitor the emission point for visible emissions as needed to ensure compliance with Condition III(d)(1)(D) of this permit.

4. Record Keeping Requirements:

The following information shall be maintained at the facility for a period not less than five (5) years from the date the information is collected [20 DCMR 302.1(c)(2)(B) and 20 DCMR 716.25] and shall be made available to the Department upon written or verbal request:

- A. Records of the identity and volume of each cleaning solvents used on the presses each month;
- B. Records of the mass of each ink used on the presses each month;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 59

- C. Records of the VOC content, by weight, of each ink used.
- D. Records of the chain of custody of each ink sample taken as well as the identification of any laboratory used to analyze the sample and the methods used by that laboratory.
- E. Records of the identity, VOC content, and vapor pressure of any cleaning solvents used. This information is usually contained in Material Safety Data Sheets (MSDSs) for the products used.
- F. Records, updated monthly, of the total mass of VOCs emitted as a result of the operation of the presses (including VOCs emitted by use of inks and cleaning solvents);
- G. Records, updated monthly, of the average VOC emissions per hour of press operation that month from each of the following sources:
 - i. inks; and
 - ii. solvents

(Note: these records shall be used to determine compliance with Conditions III(d)(1)(A) and (B) of this permit. They shall be updated within thirty (30) days of the end of each calendar month.);

- H. Records of the maintenance performed on the presses.

5. Reporting Requirements:

- A. A copy of the analytical results of the ink samples taken quarterly under Condition III(d)(3)(F) of this permit shall be submitted to the Department with the Permittee's Title V semi-annual and annual reports required pursuant to Conditions I(d)(1) and (2).
- B. The Permittee shall comply with the reporting requirements of Condition I(d)(4).
- C. In addition to complying with Condition III(d)(5)(B) and any other reporting requirement mandated by 20 DCMR, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:
 - iv. The name and location of the facility;
 - ii. The subject source(s) that caused the excess emissions;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 60

- iii. The time and date of the first observation of the excess emissions;
- iv. The cause and estimated/expected duration of excess emissions;
- v. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
- vi. The proposed corrective actions and schedule to correct the conditions causing the excess emission.

e. Emission Unit ID 9 - Press Numbers 310, 903 and 203: Three (3) Simultan, Sheet Fed, Two Sided, Eight Plate Cylinder, Non-Heatset, Lithographic Printing Presses. *(Note: An in-line continuous inkjet printer, also known as the "Parvis system", was installed on press #903 in 2013 for a pilot test; it remains on the press but is not permitted to operate. A request to install a similar unit on press #310 was withdrawn and permission for its installation is not granted.)*

1. Emission Limitations:

A. The maximum average emissions, determined on monthly basis, of volatile organic compounds (VOC) resulting from the operation of each of the three Simultans presses shall not exceed the amounts in the following table: [20 DCMR 201 and Chapter 2 Permit Nos. 6373-R1, 6374-R1 and 6739]

Press Number	Allowable Emissions (lbs/day, monthly average)
310	23.8
903	23.8
203	23.8

- B. Visible emissions shall not be emitted into the outdoor atmosphere from the printing press. [20 DCMR 107 and 606]
- C. 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]

2. Operational Limitations:

A. No fountain solution (also known as dampening solution) shall be used in

connection with the printing units in excess of five percent (5%) alcohol (by weight) in the fountain or, to achieve an equivalent level of control, any one of the following shall occur: [20 DCMR 716.6]:

- i. Reduce the on-press (as applied) alcohol content to five percent (5%) alcohol or less (by weight).
- ii. Use eight and a half percent (8.5%) alcohol or less (by weight) on-press (as-applied) in the fountain solution, provided the solution is refrigerated to less than sixty degrees Fahrenheit (60°F) or sixteen degrees Celsius (16°C); or
- iii. Use an alcohol substitute so that the on-press (as-applied) VOC content is five percent (5%) or less (by weight) as determined by EPA Method 24 and no alcohol is in the fountain solution.

B. No cleaning solutions shall be used in conjunction with the unit containing VOCs in excess of the following limits [20 DCMR 716.8(b)]:

- i. Thirty weight percent (30%) as determined by EPA method 24 by calculations based on material safety data sheets (MSDS) where the manufacturer has certified that VOC content was determined by EPA method 24; or
- ii. Ten millimeters of mercury (10 mmHg) at 20 degrees Celsius (20°C or 68°F) of VOC composite partial pressure calculated as follows:

$$Pp_c = \frac{\sum_{i=1}^n \frac{W_i \times VP_i}{MW_i}}{\frac{W_w}{MW_w} + \sum_{i=1}^n \frac{W_e}{MW_e} + \sum_{i=1}^n \frac{W_i}{MW_i}}$$

where:

Pp_c = VOC composite partial pressure at 20°C or 68°F, in mmHg;

W_i = Weight of the "i"th VOC compound, in grams, as determined by ASTM E 260-91;

W_w = Weight of water, in grams as determined by ASTM D 3792-86;

W_e = Weight of the "i"th exempt compound, in grams, as determined by ASTM E 260-91;

Mw_i = Molecular weight of the "i"th VOC compound, in grams per gram-mole (g/g-mol), as given in chemical reference literature;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 62

Mw_w = Molecular weight of water, eighteen grams per gram-mole (18 g/g-mol)

Mw_e = Molecular weight of the "i"th exempt compound, in grams per gram-mole (g/g-mol), as given in chemical reference literature; and

VP_i = Vapor pressure of the "i"th VOC compound at twenty degrees Celsius (20°C) or sixty-eight degrees Fahrenheit (68°F), in mmHg, as determined by Condition III(e)(2)(C).

C. The vapor pressure of each single component compound may be determined from ASTM D2879-86 or may be obtained from a published source approved by the District, such as the sources referenced in 40 C.F.R. § 52.741, or any of the following sources [20 DCMR 747.6]:

- i. The most recent edition of *The Vapor Pressure of Pure Substances*, Boulbik, Fried, and Hala; Elsevier Scientific Publishing Company, New York;
- ii. The most recent edition of *Perry's Chemical Engineer's Handbook*, McGraw-Hill Book Company;
- iii. The most recent edition of *CRC Handbook of Chemistry and Physics*, Chemical Rubber Publishing Company;
- iv. The most recent edition of *Lange's Handbook of Chemistry*, John Dean, editor, McGraw-Hill Book Company; or
- v. Additional sources approved by the SCAQMD or other California Air districts.

D. Condition III(e)(2)(B) does not apply to: [20 DCMR 716.10]

- i. Up to one hundred and ten gallons (110 gal.) per year (facility-wide) of cleaning solutions which meet neither Condition III(e)(2)(B)(i) or (ii); and
- ii. Cleaners used on electronic components of a press, pre-press cleaning operations (for example, platemaking), post-press cleaning operations (for example, binding), cleaning supplies (for example, detergents) used to clean the floor (other than dried ink) in the area around a press, or cleaning performed in parts washers or cold cleaners.

E. The Permittee shall ensure that cleaning solutions and shop towels used for cleaning are kept in closed containers. [20 DCMR 716.9]

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 63

- F. The Permittee shall ensure that all containers holding VOC-containing materials shall be open only when necessary and opening shall be restricted to the extent feasible. [20 DCMR 716.21]
- G. The Permittee shall not allow the leaking of any VOC or VOC-containing material from the printing unit or associated equipment. [20 DCMR 716.22]
- H. The Permittee shall not allow the storage of any VOC or VOC-containing material including waste material, in a manner that will cause or allow its evaporation into the atmosphere. [20 DCMR 716.23]
- I. To the greatest extent feasible, the Permittee shall minimize the use of VOC-containing materials by restricting wasteful usage and by replacing such materials with emulsions or other materials. [20 DCMR 716.24]
- J. The maximum average sheet feed rate, determined on a monthly basis, shall not exceed 9000 sheets per hour for any of the three presses. [20 DCMR 201]
- K. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the unit in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

3. Monitoring and Testing Requirements:

- A. The Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested [20 DCMR 502.1].
- B. The Permittee shall monitor the identities, VOC contents, and quantities of each VOC-containing material used on the equipment covered by these permits so as to ensure compliance with Conditions III(e)(2)(A) and (B) of this permit.
- C. The Permittee shall monitor the identities, VOC contents, and quantities of cleaning solutions exempt from the requirements of Condition III(e)(2)(B) pursuant to Condition III(e)(2)(D)(i) of this permit, facility-wide, to ensure that the 110 gallon limit found in Condition III(e)(2)(D)(i) of this permit is not exceeded.
- D. To show compliance with Condition III(e)(2)(B) of this permit, the Permittee shall perform one of the following:

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 64

- i. Perform testing of each cleaning solution used in accordance with EPA Reference Method 24 (40 CFR 60, Appendix A) that is to be used in the units prior to initial use and semi-annually thereafter;
 - ii. Obtain and review MSDSs for each cleaning solution used to ensure that VOC concentrations do not exceed 30% and that the MSDS values are based on EPA Reference Method 24 testing; or
 - iii. Perform testing or obtain and review accurate documentation for each cleaning solutions showing that the composite partial pressure of all VOCs contained in each solution is not greater than 10 mmHg at 10 °C. The composite partial pressure is to be calculated as described in Condition III(e)(2)(B)(ii) of this permit.
- E. At least on a quarterly basis and whenever there is a change in formulation of inks, the Permittee shall analyze samples of each ink used on the presses during that quarter to determine the weight percent VOCs in the inks. [20 DCMR 502.1]

Testing pursuant to this condition shall be performed as follows:

- i. The percentage VOC content is by weight and applies to the inks and solutions as contained in the storage of the printing unit. The VOC content does not include water. [20 DCMR 716.12(a)]
 - ii. The percentage VOC content of the inks shall be determined in accordance with Procedure B of ASTM test method D-2369-81. In lieu of testing the formulated inks and solutions, the individual components of the formulations may be calculated there from. [20 DCMR 716.12(b)]
 - iii. The percentage water content shall be determined in accordance with ASTM test method D-3792-79. [20 DCMR 716.12(c)]
- F. Unless a specific method is specified elsewhere in this permit, the VOC content of a substance shall be determined based on the MSDS of the material, EPA Reference Method 24, or any other method approved by the Department.
- G. The Permittee shall monitor the equipment, materials used, storage containers for VOCs and VOC-containing materials, and disposal procedures to ensure compliance with Condition III(e)(2)(E) through (I) and (K) of this permit.
- H. In addition to general monitoring, at least once per quarter, the Permittee shall perform a thorough inspection of the presses, press areas, associated equipment, and all solvents storage containers to ensure compliance with Condition III(e)(2)(E) through (H) of this permit. Any leaks identified as a result of this

monitoring shall be repaired promptly.

- I. The Permittee shall monitor the total number of sheets fed each month and the total number of operating hours each month. These numbers shall be used to calculate the average sheet feed rate for the month to determine compliance with Condition III(e)(2)(J) of this permit.
- J. The Permittee shall monitor the emission points for visible emissions as needed to ensure compliance with Condition III(e)(2)(B).
- K. The Permittee shall monitor the facility for compliance with the nuisance and odor requirements of Condition III(e)(1)(C).

4. Record Keeping and Reporting Requirements:

- A. The information specified in Condition III(e)(4)(B) of this permit shall be maintained by the Permittee at the facility for a period not less than five (5) years from when they were originated and shall be made available to the Department upon written or verbal request. Such records shall meet the following standards: [20 DCMR 302.1(c) (2)(B), 20 DCMR 500.8, and 20 DCMR 716.25(a)]
 - i. The records shall provide sufficient data and calculations to demonstrate clearly that the emission limitations or control requirements are met; and
 - ii. Data or information required to determine compliance with applicable limitation shall be recorded and maintained in a time frame consistent with the averaging period of the standard.
- B. The Permittee shall maintain the following records in accordance with Condition III(e)(4)(A) of this permit:
 - i. Records of the identity and VOC content of each ink, fountain solution blanket wash, cleaning solution, or other VOC-containing materials used in conjunction with the equipment each month;
 - ii. Records of the results of testing or records of the manufacturers' documentation obtained pursuant to Conditions III(e)(2)(B) and III(e)(3)(D) and (E) of this permit. Chains of custody for all samples shall be required as part of the testing records required.
 - iii. Records of the quantity of each VOC-containing materials used on the presses each month;
 - iv. Records of the total 12-month rolling VOC emissions from the equipment,

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 66

update monthly;

- v. Records of the alcohol content of any fountain solution used in connection with the printing unit sufficient to document compliance with Condition III(e)(2)(A) of this permit;
 - vi. If complying with Condition III(e)(2)(B)(ii) instead of Condition III(e)(2)(B)(i) of this permit, all information necessary to complete the calculation included in that condition for each cleaning solution used and showing compliance by that methodology as supplemented by Condition III(e)(2)(C);
 - vii. Records of any VOC leaks identified and the actions taken to correct the problem;
 - viii. Records of the results of the quarterly (or more frequent) inspections of the presses, associated equipment, and solvents storage containers performed pursuant to Condition III(e)(3)(H) of this permit. These records shall identify the inspector(s) who performed the inspections and these inspectors shall sign or initial the records to certify that they performed the complete inspection and that the records represent the results of the inspection;
 - ix. Records of the total number of sheets fed each month to each press as well as the total number of hours of operation of each press each month;
 - x. Based on the information recorded pursuant to Condition III(e)(4)(B)(ix) of this permit, the Permittee shall record, within thirty (30) days of the end of the month, the average sheet rate for each press the previous month;
 - xi. Records of all deviations from the requirements of Conditions III(e)(2)(E), (I), and (K) of this permit;
 - xii. Records, updated monthly, of the average VOC emissions per hour of press operation that month from each of the following sources:
 - a. inks; and
 - b. solvents
- (Note: these records shall be used to determine compliance with Condition III(e)(1)(A) of this permit. They shall be updated within thirty (30) days of the end of each calendar month);
- xiii. Records of all maintenance performed on the presses and associated

equipment;

xiv. Records of any visible emissions from the equipment observed during operation; and

xv. Records of any complaints or exceedances related to the odor requirements of Condition III(e)(1)(C) of this permit and the response taken by the Permittee to investigate and correct any identified problem(s).

C. The Permittee shall comply with the reporting requirements of Condition I(d)(4).

D. In addition to complying with Condition III(e)(4)(C) and any other reporting requirement mandated by 20 DCMR, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:

v. The name and location of the facility;

ii. The subject source(s) that caused the excess emissions;

iii. The time and date of the first observation of the excess emissions;

iv. The cause and estimated/expected duration of excess emissions;

v. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and

vi. The proposed corrective actions and schedule to correct the conditions causing the excess emission.

f. **Emission Unit 11- 1: Miscellaneous manual intaglio presses as follows:**

No.	Equipment Name	Description	Area	Location
113	Carver hand die stamp	Sheet-fed non-heatset, paper wipe	1	M-325-A
114	Carver hand die stamp	Sheet-fed heatset and non-heatset, paper wipe	1	M-325-A
115	Miehle 4-plate flatbed	Sheet-fed non-heatset, paper wipe	1	M-325-A
116	Cronite die stamp Hi Speed	Sheet-fed heatset and non-heatset, paper wipe	1	M-325-A
117	Hand press	Sheet-fed non-heatset, paper wipe	1	M-325-A

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 68

No.	Equipment Name	Description	Area	Location
118	Hand press	Sheet-fed non-heatset, paper wipe	1	M-325-A
119	Elephant press	Sheet-fed hand press	1	M-325-A
None	KBA Giori Mini Orloff II Research Press	Sheet-fed non-heatset cylinder wipe	R&D Center	M-100-A

1. Emissions Limitations:

- A. Emissions of VOC from the ink used on the KBA Giori Mini Orloff II Research Press (“the Research Press”) shall not exceed 0.08 pounds per hour. [20 DCMR 201]
- B. VOC emissions from any cleaning solvents used on the Research Press shall not exceed 0.21 pounds per hour. [20 DCMR 201]
- C. The total annual VOC emitted from the ink and cleaning solvents used on the Research Press shall not exceed 0.29 tons per 12-month rolling period. [20 DCMR 201 and Chapter 2 Permit 6338-R1]
- D. Visible emissions shall not exceed zero percent opacity from any of these Miscellaneous Intaglio Presses. [20 DCMR 606.1 and 20 DCMR 201]
- E. 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]

2. Operational Limitations:

- A. The VOC content of any inks used in connection with these miscellaneous intaglio presses shall not exceed the following for the relevant press and ink types [20 DCMR 710.5 and 710.9(a)]:
 - i. For heatset inks on paper wipe presses: 30% by weight;
 - ii. For non-heatset inks (except on the cylinder wipe Research Press): 5% by weight; and
 - iii. For non-heatset inks for the cylinder wipe Research Press: 12% by weight.
- B. The VOC emissions released to the atmosphere from the twelve percent (12%) VOC content by weight ink used in connection with the Research Press shall not

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 69

exceed one percent (1%) of the total weight of ink used on the presses. [20 DCMR 201]

- C. The vapor pressure of any cleaning solvent(s) used on the Research Press shall be less than 10 mmHg at 20°C. [20 DCMR 201]
- D. The VOC content of the “wiping solution” used for the Research Press shall not exceed one percent (1%) by weight. [20 DCMR 710.4, 710.8 and 710.9(a)] The remaining operations covered by Condition III(f) shall not use wiping solution.
- E. For Conditions III(f)(2)(A) and (D), compliance shall be determined consistent with the testing requirements of Condition III(f)(3)(G). [20 DCMR 710.9]
- F. The Research Press shall be operated for no more than one (1) shift [8 hours] per day, five (5) days per week two hundred fifty (250) days per year for the duration of the permit. [20 DCMR 201]
- G. The maximum ink used on the Research Press, shall not exceed 8 lbs per hour and 16,000 lbs per 12-month rolling period. [20 DCMR 201]
- H. The maximum sheet feed rate of the Research Press, shall not exceed 1,500 sheets per hour and 3,000,000 sheets per 12-month rolling period. [20 DCMR 201]
- I. The maximum solvent used on the Research Press, shall not exceed 0.0625 gallons per hour and 125 gallons per 12-month rolling period. [20 DCMR 201]
- J. Ink usage in connection with all forms of intaglio printing shall be minimized to the extent feasible by routing the inking cylinders or other techniques. [20 DCMR 710.10]
- K. All containers holding VOC containing materials shall be open only when necessary and openings shall be restricted to the extent feasible. [20 DCMR 710.12]
- L. The leaking of any solvent or solvent-containing material from any printing unit or associated equipment is prohibited. [20 DCMR 710.13]
- M. The storage or disposal of any solvent-containing material, including waste material, in a manner that will cause or allow its evaporation into the atmosphere is prohibited. [20 DCMR 710.14]
- N. To the greatest extent feasible, persons operating printing units and associated equipment shall minimize their use of VOC containing materials by restricting

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 70

wasteful usage and by replacing the material with emulsions or other materials.
[20 DCMR 710.15]

- O. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the units in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

3. Monitoring and Testing Requirements:

- A. The Permittee shall monitor the types, constituents, characteristics, and quantities of inks and cleaning solvents used on the presses to ensure compliance with Conditions III(f)(2)(A)-(D), (G) and (I).
- B. The Permittee shall monitor the operating hours of the Research Press to ensure compliance with Condition III(f)(2)(F).
- C. The Permittee shall monitor use of storage containers for VOC and solvent-containing materials and disposal practices for such materials to ensure compliance with Conditions III(f)(2) (K) and (M).
- D. The Permittee shall monitor the status of each press and related equipment to ensure that no leaking is occurring and that they are being operated properly to ensure compliance with Conditions III(f)(2)(L) and (N). Any leaks identified as a result of this monitoring shall be repaired promptly.
- E. The Permittee shall monitor and periodically review operational practices to ensure compliance with Conditions III(f)(2)(H) and (J).
- F. The Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]
- G. Except as specified in Condition III(f)(3)(H), at least on a quarterly basis and whenever there is a change in formulation of inks or wiping solutions, the Permittee shall analyze samples of each ink and wiping solution used on these presses during that quarter to determine the weight percent VOCs in the inks and wiping solutions. [20 DCMR 502.1 and 20 DCMR 710.9]

Compliance determinations and testing pursuant to this condition shall be performed as follows:

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 71

- i. The percentage VOC content is by weight and applies to the inks and solutions as contained in the storage wells (fountains) of the printing units, and does not include water;
 - ii. Except as specified in Condition III(f)(3)(G)(iii), the percentage VOC content of the inks shall be determined in accordance with Procedure B of test method ASTM D-2369-81; where, in lieu of testing the formulated inks and solutions, the individual components of the formulations may be tested and the VOC content of the formations may be calculated there from;
 - iii. The percentage VOC content of ultraviolet (UV) cured inks shall be determined by either methods ASTM D5403 or D7767 [20 DCMR 502.3]; and
 - iv. The percentage water content shall be determined in accordance with test method ASTM D-3792-79.
- H. Individual inks whose usage does not exceed 100 pounds in a calendar year may comply with the following in lieu of complying with the requirements of Condition III(f)(3)(G) during that calendar year [20 DCMR 502.3]:
- i. Prior to the use of any ink in this category, the Permittee shall obtain records from the manufacturer of the ink documenting the VOC content of the ink and the method(s) used to determine the VOC content;
 - ii. If the ink is used at a rate exceeding 10 pounds in a calendar year, the Permittee shall, during that calendar year, perform at least one analysis in accordance with Condition III(f)(3)(G) except that the analysis may be performed once during the year rather than quarterly;
 - iii. For all inks covered by this condition, if the method(s) used to determine the VOC content identified by the manufacturer in Condition III(f)(3)(H)(i) are not consistent with the methods specified in Condition III(f)(3)(G), or if the method cannot be obtained from the manufacturer, the Permittee shall, no more than one month after the first use of the ink, perform a one-time initial analysis of the ink in accordance with the methods specified in Condition III(f)(3)(G) to document compliance.
- I. The Permittee shall monitor the emission points for visible emissions as needed to ensure compliance with condition II(f)(1)(D).

4. Record Keeping Requirements:

A. The following information shall be maintained at the facility for a period not less than five (5) years from the date of the monitoring sample, measurement, report, or application [20 DCMR 500.8 and 20 DCMR 302.1(c)(2)(B)] and shall be made available to the Department upon written or verbal request:

- i. Records of the types, constituents, characteristics, and quantities of inks and cleaning solutions used on the press to show compliance with Conditions III(f)(2)(A) through (D), (G), and (I);
- ii. Records of VOC content, by weight, of each ink used;
- iii. Records of the chain of custody of each ink sample taken as well as the identification of any laboratory used to analyze the sample and the methods used by that laboratory to analyze the sample;
- iv. Records of the identity, VOC content, and vapor pressure of any cleaning solvents used. This information is usually contained in Safety Data Sheets (SDSs) for the products used;
- v. Records of the hours of operation of the Research Press each day, totaled monthly, and kept in a 12 month rolling sum format;
- vi. Records of the number of sheets fed in the Research Press each month, maintained in a 12-month rolling sum format;
- vii. Records, updated monthly, of the average VOC emissions per hour of Research Press operation that month from each of the following sources:
 - a. inks; and
 - b. solvents

(Note: these records shall be used to determine compliance with Conditions III(f)(1)(A) and (B) of this permit. They shall be updated within thirty (30) days of the end of each calendar month.);

B. Records, updated monthly, and maintained in a 12 month rolling sum format, of the total mass of VOCs emitted as a result of the operation of each of these miscellaneous intaglio presses (including VOCs emitted by use of inks, wiping solutions and cleaning solvents);

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 73

- C. Records of any identified leaks of solvents or solvent-containing materials along with the activities taken to repair the leak and clean up the leaked materials;
- D. Records of the maintenance performed on each press;
- E. Records of the results of any visible emissions observed pursuant to condition III(f)(3)(I). If no visible emissions were observed, no records are required; and
- F. Records of any occurrences of exceedances of the requirements of Condition III(f)(1)(E) and any odor complaints received. The Permittee shall also keep records of the actions taken to correct any identified odor exceedances.

5. Reporting Requirements:

- A. A copy of the analytical results of the ink samples taken under Condition III(f)(3)(G) shall be submitted to the Department with the Permittee's Title V semi-annual and annual reports required pursuant to Conditions I(d)(1) and (2).
- B. The Permittee shall comply with the reporting requirements of Condition I(d)(4).
- C. In addition to complying with Condition III(f)(5)(B) and any other reporting requirement mandated by 20 DCMR, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:
 - i. The name and location of the facility;
 - ii. The subject source(s) that caused the excess emissions;
 - iii. The time and date of the first observation of the excess emissions;
 - iv. The cause and estimated/expected duration of excess emissions;
 - v. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
 - vi. The proposed corrective actions and schedule to correct the conditions causing the excess emission.

g. Emission Unit 11-2: One (1) Heidelberg job press (No. 061), One (1) Kluge job press (No. 062), and Two (2) Miller SW presses (Nos. 076 and 077): Non-Heatset, Flatbed Letterpress Presses

1. Emission Limitations:

- A. Emissions of volatile organic compounds (VOC) from the ink used in the process shall not exceed 0.11 pounds per press hour. Except when tested on a one-time basis in accordance with Condition III(g)(3)(E) of this permit, compliance with this condition shall be determined on a monthly average basis. Monthly average emissions shall be calculated by determining the amount of ink used in the press in a given month, in pounds, multiplying that value by the percent of the ink used that is emitted as VOC emissions (5% based on the 95% ink VOC retention factor found in document EPA-453/R-06-002), and dividing the result by the number of hours of operation of the press that month. [20 DCMR 201]
- B. VOC emissions from any cleaning solvents used shall not exceed 0.32 pounds per hour from this group of presses. Except when tested on a one-time basis in accordance with Condition III(g)(3)(E) of this permit, compliance with this condition shall be determined on a monthly average basis. Monthly average emissions shall be calculated by determining the amount of each cleaning solvent used by the presses in a given month, in pounds, multiplying that by the percent of the solvent used that is emitted (100% of the solvent VOC content shall be assumed to be emitted except where a solvent retention factor for low vapor pressure solvents used in manual cleaning is applied in accordance with document EPA-453/R-06-002, as revised), and dividing the result by the combined number of hours of operation of the presses, where operation of any press or multiple presses during a given hour counts as a single hour of operation. [20 DCMR 201]
- C. The total annual VOC emitted from the ink and cleaning solvent as a result of operation of this group of presses shall not exceed 0.93 tons per 12-month rolling period. [20 DCMR 201]
- D. Visible emissions shall not be emitted into the outdoor atmosphere from the printing presses. [20 DCMR 107 and 606]
- E. 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]

2. Operational Limitations:

- A. The VOC content of any ink used in connection with the presses shall not be greater than thirty percent (30%) by weight. [20 DCMR 201 and 20 DCMR 716.11(d)]
- B. The Permittee shall not use, in conjunction with the presses, cleaning solutions containing VOCs in excess of one of the following limits (i.e. meeting one or the other of the listed standards will be considered compliance with this condition) [20 DCMR 716.8]:
- i. Seventy percent (70%) VOC (by weight); or
 - ii. Ten millimeters of mercury (10 mm Hg) at twenty degree Celsius (20 C or 68° F) of VOC composite partial pressure calculated as follows:

$$Pp_c = \frac{\sum_{i=1}^n (W_i)(VP_i)/Mw_i}{W_w/Mw_w + \sum_{i=1}^n W_e/Mw_e + \sum_{i=1}^n W_i/Mw_i}$$

where:

Pp_c = VOC composite partial pressure at twenty degrees Celsius (20°C) or sixty-eight degrees Fahrenheit (68° F), in mm Hg;

W_i = Weight of the "i"th VOC compound, in grams, as determined by ASTM E 260-91;

W_w = Weight of water, in grams as determined by ASTM D 3792-86;

W_e = Weight of the "i"th exempt compound, in grams, as determined by ASTM E 260-91;

Mw_i = Molecular weight of the "i"th VOC compound, in grams per g-mole, as given in chemical reference literature;

Mw_w = Molecular weight of water, eighteen grams (18 g.) per g-mole;

Mw_e = Molecular weight of the "i"th exempt compound, in grams per g-mole, as given in chemical reference literature; and

Vp_i = Vapor pressure of the "i"th VOC compound at twenty degrees Celsius (20° C) or sixty-eight degrees Fahrenheit (68° F), in mm.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 76

Hg, as determined in accordance with ASTM test method ASTM D2879-86.

- C. All containers holding VOC containing materials shall be open only when necessary and openings shall be restricted to the extent feasible. [20 DCMR 716.21]
 - D. The leaking of any solvent or solvent-containing material from any printing unit or associated equipment is prohibited. [20 DCMR 716.22]
 - E. The storage or disposal of any solvent-containing material, including waste material, in a manner that will cause or allow its evaporation into the atmosphere is prohibited. [20 DCMR 716.23]
 - F. To the greatest extent feasible, persons operating printing units and associated equipment shall minimize their use of VOC containing materials by restricting wasteful usage and by replacing the material with emulsions or other materials. [20 DCMR 716.24]
 - G. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the units in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
3. Monitoring and Testing Requirements:
- A. The Permittee shall monitor the types, constituents, characteristics, and quantities of inks and cleaning solvents used on the presses to ensure compliance with Conditions III(g)(2)(A) and (B) of this permit.
 - B. The Permittee shall monitor use of storage containers for VOC and solvent-containing material and disposal practices for such materials to ensure compliance with Conditions III(g)(2)(C) and (E) of this permit.
 - C. The Permittee shall monitor the status of the presses and related equipment to ensure that no leaking is occurring and that they are being operated properly to ensure compliance with Conditions III(g)(2)(D) and (G) of this permit. Any leaks identified as a result of this monitoring shall be repaired promptly.
 - D. The Permittee shall monitor and continually review and observe operational practices to ensure compliance with Condition III(g)(2)(F) of this permit.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 77

- E. The Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]
- F. Except as specified in Condition III(g)(3)(G), at least on a quarterly basis and whenever there is a change in formulation of inks, the Permittee shall analyze samples of each ink used on the presses during that quarter to determine the weight percent VOCs in the inks. [20 DCMR 502.1]

Compliance determinations and testing pursuant to this condition shall be performed as follows:

- i. The percentage VOC content is by weight and applies to the inks and solutions as contained in the storage of the printing unit. The VOC content does not include water. [20 DCMR 716.12(a)]
 - ii. Except as specified in Condition III(g)(3)(F)(iii), the percentage VOC content of the inks shall be determined in accordance with Procedure B of ASTM test method D-2369-81. In lieu of testing the formulated inks and solutions, the individual components of the formulations may be calculated there from. [20 DCMR 716.12(b)]
 - iii. The percentage VOC content of ultraviolet (UV) cured inks shall be determined by either methods ASTM D5403 or D7767. [20 DCMR 502.3]
 - iv. The percentage water content shall be determined in accordance with ASTM test method D-3792-79. [20 DCMR 716.12(c)]
- G. Individual inks whose usage does not exceed 100 pounds in a calendar year may comply with the following in lieu of complying with the requirements of Condition III(g)(3)(F) during that calendar year [20 DCMR 502.3]:
- i. Prior to the use of any ink in this category, the Permittee shall obtain records from the manufacturer of the ink documenting the VOC content of the ink and the method(s) used to determine the VOC content;
 - ii. If the ink is used at a rate exceeding 10 pounds in a calendar year, the Permittee shall, during that calendar year, perform at least one analysis in accordance with Condition III(g)(3)(F) except that the analysis may be performed once during the year rather than quarterly;
 - iii. For all inks covered by this condition, if the method(s) used to determine the VOC content identified by the manufacturer in Condition III(g)(3)(G)(i) are not consistent with the methods specified in Condition III(g)(3)(F), or if the method cannot be obtained from the manufacturer, the Permittee shall, no

more than one month after the first use of the ink, perform a one-time initial analysis of the ink in accordance with the methods specified in Condition III(g)(3)(F) to document compliance.

H. The Permittee shall monitor the emission points for visible emissions as needed to ensure compliance with Condition III(g)(1)(D).

4. Record Keeping Requirements:

The following information shall be maintained at the facility for a period not less than five (5) years from the time the information is collected [20 DCMR 302.1(c)(2)(B) and 20 DCMR 716.25] and shall be made available to the Department upon written or verbal request:

- A. Records of the identity and volume of each cleaning solvents used on the presses each month;
- B. Records of the mass of each ink used on the presses each month;
- C. Records of the VOC content, by weight, of each ink used.
- D. Records of the chain of custody of each ink sample taken as well as the identification of any laboratory used to analyze the sample and the methods used by that laboratory.
- E. Records of the identity and vapor pressure of any cleaning solvents used. This information is usually contained in Material Safety Data Sheets (MSDSs) for the products used.
- F. Records, updated monthly, of the total mass of VOCs emitted as a result of the operation of the presses (including VOCs emitted by use of inks and cleaning solvents);
- G. Records, updated monthly, of the average VOC emissions per hour of press operation that month from each of the following sources:
 - i. inks; and
 - ii. solvents

(Note: these records shall be used to determine compliance with Conditions III(g)(1)(A) and (B) of this permit. They shall be updated within thirty (30) days of the end of each calendar month.);

H. Records of the maintenance performed on the presses.

5. Reporting Requirements:

- A. A copy of the analytical results of the ink samples taken under Condition III(g)(3)(F) of this permit shall be submitted to the Department with the Permittee's Title V semi-annual and annual reports required pursuant to Conditions I(d)(1) and (2).
- B. The Permittee shall comply with the reporting requirements of Condition I(d)(4).
- C. In addition to complying with Condition III(f)(5)(B) and any other reporting requirement mandated by 20 DCMR, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:
 - i. The name and location of the facility;
 - ii. The subject source(s) that caused the excess emissions;
 - iii. The time and date of the first observation of the excess emissions;
 - iv. The cause and estimated/expected duration of excess emissions;
 - v. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
 - vi. The proposed corrective actions and schedule to correct the conditions causing the excess emission.

h. Emission Unit ID 11-3: Four (4) Sheet-Fed Non-Heatset Offset Lithographic Presses: One (1) Ryobi 3302M Press (No. 034), One (1) Heidelberg Speedmaster Press (No. 044), One GTO Heidelberg Press, and One (1) Komori 5 Color Press

1. Emission Limitations:

- A. The maximum annual emissions of VOC resulting from the operation of the Komori 5 Color press shall not exceed 0.97 tons per 12-month rolling period.
- B. The maximum annual emissions of volatile organic compounds (VOC) resulting from the operation of each of the other three (3) non-heat offset lithographic presses shall not exceed 1.34 tons per 12-month rolling period.

- C. Visible emissions shall not be emitted into the outdoor atmosphere from the presses. [20 DCMR 606.1]
- D. 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]

2. Operational Limitations:

- A. The Permittee shall not use, in conjunction with these printing presses, cleaning solutions containing VOCs in excess of ten millimeters of mercury (10 mm Hg) at twenty degree Celsius (20° C or 68° F) of VOC composite partial pressure calculated as follows [20 DCMR 716.8]:

$$Pp_c = \frac{\sum_{i=1}^n (W_i)(VP_i)/Mw_i}{W_w/Mw_w + \sum_{i=1}^n W_e/Mw_e + \sum_{i=1}^n W_i/Mw_i}$$

where:

- Ppc = VOC composite partial pressure at twenty degrees Celsius (20°C) or sixty-eight degrees Fahrenheit (68° F), in mm Hg;
- Wi = Weight of the "i"th VOC compound, in grams, as determined by ASTM E 260-91;
- Ww = Weight of water, in grams as determined by ASTM D 3792-86;
- We = Weight of the "i"th exempt compound, in grams, as determined by ASTM E 260-91;
- Mwi = Molecular weight of the "i"th VOC compound, in grams per g-mole, as given in chemical reference literature;
- Mww = Molecular weight of water, eighteen grams (18 g.) per g-mole;
- Mwe = Molecular weight of the "i"th exempt compound, in grams per g-mole, as given in chemical reference literature; and
- Vpi = Vapor pressure of the "i"th VOC compound at twenty degrees Celsius (20° C) or sixty-eight degrees Fahrenheit (68° F), in mm. Hg, as determined in accordance with ASTM test method ASTM D2879-86.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 81

- B. The Permittee shall not utilize fountain solution in conjunction with these presses in excess of five percent (5%) alcohol (by weight) in the fountain, or to achieve an equivalent level of control, any one of the following shall occur [20 DCMR 716.6(c)]:
- i. Reduce the on-press (as-applied) alcohol content to five percent (5%) alcohol or less (by weight);
 - ii. Use eight and half percent (8.5%) alcohol or less (by weight) on-press (as-applied) in the fountain solution, provided the solution is refrigerated to less than sixty degree Fahrenheit (60° F) or sixteen degree Celsius (16° C); or
 - iii. Use an alcohol substitute so that the on-press (as applied) VOC content is five percent (5%) or less (by weight) as determined by EPA Method 24 and no alcohol is in the fountain solution.]
- C. All containers holding VOC containing materials shall be open only when necessary and openings shall be restricted to the extent feasible. [20 DCMR 716.21]
- D. Cleaning solutions and shop towels used for cleaning shall be kept in closed containers. [20 DCMR 716.9]
- E. The leaking of any solvent or solvent-containing material from any printing unit or associated equipment is prohibited. [20 DCMR 716.22]
- F. The storage or disposal of any solvent-containing material, including waste material, in a manner that will cause or allow its evaporation into the atmosphere is prohibited. [20 DCMR 716.23]
- G. To the greatest extent feasible, persons operating printing unit and associated equipment shall minimize their use of VOC containing materials by restricting wasteful usage and by replacing the material with emulsions or other materials. [20 DCMR 716.24]
- H. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the units in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

3. Monitoring and Testing Requirements:

- A. The Permittee shall monitor the types, constituents, characteristics, and quantities of inks, cleaning solvents, and fountain solutions used on the presses to ensure compliance with Conditions III(h)(2)(A) and (B).
- B. To show compliance with Condition III(h)(2)(A), the Permittee shall perform one of the following:
 - i. Perform testing of each cleaning solution used in accordance with EPA Reference Method 24 (40 CFR 60, Appendix A) that is to be used in the unit prior to initial use and semi-annually thereafter; or
 - ii. Perform testing or obtain and review accurate documentation for each cleaning solution showing that the composite partial pressure of all VOC's contained in each solution is not greater than 10 mm Hg at 20° C. The composite partial pressure is to be calculated pursuant to the equation in Condition III(h)(2)(A).
- C. The Permittee shall monitor the use of storage containers for VOC and solvents-containing materials to ensure compliance with Condition III(h)(2)(C).
- D. The Permittee shall monitor the use of cleaning solutions and shop towels to ensure compliance with Condition III(h)(2)(D).
- E. The Permittee shall monitor the status of the each press and associated equipment to ensure that no leaking is occurring and that they are being properly operated to ensure compliance with Condition III(h)(2)(E). Any leaks identified shall be repaired promptly.
- F. In addition to general monitoring, at least once per quarter, the Permittee shall perform a thorough inspection of the press, associated equipment, and all solvent storage containers to ensure compliance with Conditions III(h)(2)(E) and (H). Any leaks identified shall be repaired promptly.
- G. Except as specified in Condition III(h)(3)(H), at least on a quarterly basis and whenever there is a change in formulation of inks, the Permittee shall analyze samples of each ink used on the presses during that quarter to determine the weight percent VOCs in the inks. [20 DCMR 502.1]

Compliance determinations and testing pursuant to this condition shall be performed as follows:

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 83

- i. The percentage VOC content is by weight and applies to the inks and solutions as contained in the storage of the printing unit. The VOC content does not include water. [20 DCMR 716.12(a)]
 - ii. Except as specified in Condition III(h)(3)(G)(iii), the percentage VOC content of the inks shall be determined in accordance with Procedure B of ASTM test method D-2369-81. In lieu of testing the formulated inks and solutions, the individual components of the formulations may be calculated there from. [20 DCMR 716.12(b)]
 - iii. The percentage VOC content of ultraviolet (UV) cured inks shall be determined by either methods ASTM D5403 or D7767. [20 DCMR 502.3]
 - iv. The percentage water content shall be determined in accordance with ASTM test method D-3792-79. [20 DCMR 716.12(c)]
- H. Individual inks whose usage does not exceed 100 pounds in a calendar year may comply with the following in lieu of complying with the requirements of Condition III(h)(3)(G) during that calendar year [20 DCMR 502.3]:
- i. Prior to the use of any ink in this category, the Permittee shall obtain records from the manufacturer of the ink documenting the VOC content of the ink and the method(s) used to determine the VOC content;
 - ii. If the ink is used at a rate exceeding 10 pounds in a calendar year, the Permittee shall, during that calendar year, perform at least one analysis in accordance with Condition III(h)(3)(G) except that the analysis may be performed once during the year rather than quarterly;
 - iii. For all inks covered by this condition, if the method(s) used to determine the VOC content identified by the manufacturer in Condition III(h)(3)(H)(i) are not consistent with the methods specified in Condition III(h)(3)(G), or if the method cannot be obtained from the manufacturer, the Permittee shall, no more than one month after the first use of the ink, perform a one-time initial analysis of the ink in accordance with the methods specified in Condition III(h)(3)(G) to document compliance.
- I. The Permittee shall monitor the emission points for visible emissions as needed to ensure compliance with Condition III(h)(1)(C).
- J. The Permittee shall monitor the facility for compliance with the nuisance and odor requirements of Condition III(h)(1)(D).

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 84

K. The Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]

4. Record Keeping Requirements:

The following information shall be maintained at the facility for a period not less than five (5) years from the time the information is collected [20 DCMR 302.1(c)(2)(B) and 20 DCMR 716.25] and shall be made available to the Department upon written or verbal request:

- A. The Permittee shall maintained records of the types, constituents, characteristics, and quantities of inks, cleaning solutions, and dampening solutions used on each of these presses to show compliance with Conditions III(h)(2)(A) and (B).
- B. The Permittee shall maintain records of the results of testing or the records of the manufacturers' documentation obtained pursuant to Conditions III(h)(2)(A) and III(h)(3)(B), (G), and (H). Chains of custody for all samples shall be required as part of the testing records required.
- C. The Permittee shall maintain records of any leaks identified pursuant to Conditions III(h)(3)(C) as well as the actions taken to halt any leaking identified.
- D. The Permittee shall maintain records of the results of the quarterly (or more frequent) inspections of the press, associated equipment, and solvent storage containers performed pursuant to Condition III(h)(3)(D). These records shall identify the inspector(s) who performed the inspections and these inspectors shall sign or initial the records to certify that they performed the complete inspection and that the records represent the results of the inspection.
- E. The Permittee shall keep records of any occurrences of visible emissions from the emission points of these units as well as any actions taken to correct the problem.
- F. The Permittee shall keep records of any occurrences of exceedances of the requirements of Condition III(h)(1)(D) and any odor complaints received. The Permittee shall also keep records of the actions taken to correct any identified odor or nuisance pollutant exceedances.
- G. The Permittee shall keep records, updated monthly, of the average VOC emissions per hour of press operation that month from each of the following sources:
 - i. inks; and
 - ii. solvents

(Note: these records shall be used to determine compliance with Conditions III(h)(1)(A) and (B) of this permit. They shall be updated within thirty (30) days of the end of each calendar month.)

- H. The Permittee shall keep records of the total emissions of VOC from operation of the press on a monthly and 12-month rolling basis to document compliance with Condition III(h)(1)(A) and (B).
- I. The Permittee shall keep records of the maintenance performed on the presses and associated equipment.
- J. The Permittee shall keep records of the results of any testing required pursuant to Condition III(h)(3)(K).

5. Reporting Requirements:

- A. A copy of the most recent analytical results of the ink, cleaning solvent, and fountain solution samples or other documentation kept pursuant to Condition III(h)(4)(B) shall be submitted to the Department with the Permittee's Title V semi-annual and annual reports, required pursuant to Conditions I(d)(1) and (2), for the inks used during the reporting period.
- B. The Permittee shall comply with the reporting requirements of Condition I(d)(4).
- C. In addition to complying with Condition III(f)(5)(B) and any other reporting requirement mandated by 20 DCMR, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:
 - i. The name and location of the facility;
 - ii. The subject source(s) that caused the excess emissions;
 - iii. The time and date of the first observation of the excess emissions;
 - iv. The cause and estimated/expected duration of excess emissions;
 - v. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
 - vi. The proposed corrective actions and schedule to correct the conditions causing the excess emission.

i. Emission Unit ID 11-5 – Paint Booth at the Paint Shop

1. Emission Limits:

- A. No person shall discharge into the atmosphere more than fifteen (15) pounds of 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. [20 DCMR 700.2]
- B. 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]
- C. Visible emissions shall not be emitted into the outdoor atmosphere from the paint spray booth. [20 DCMR 107 and 606]

2. Operational Limitations:

- A. No chemical strippers containing methylene chloride (MeCl) shall be used for paint stripping at the facility. [20 DCMR 201]
- B. Adhesives, sealants, adhesive primers, or sealant primers shall not be used in the equipment unless they meet the following requirements [20 DCMR 201, 20 DCMR 744.2, and 20 DCMR 745.1] :
 - i. They are contact adhesives sold or supplied by the manufacturer in containers containing a net volume of one gallon or less;
 - ii. They are plastic cement welding adhesives (any adhesive intended by the manufacturer for use to dissolve the surface of plastic to form a bond between mating surfaces) with VOC content not exceeding 400 g/L for ABS welding, 490 g/L for CPVC welding, 510 g/L for PVC welding, or 510 g/L for other plastic cement welding;
 - iii. They are other adhesives, sealants, adhesive primers, or sealant primers sold or supplied by the manufacturer or supplier in containers with a net volume of sixteen (16) fluid ounces or less, or a net weight of one pound or less; or
 - iv. The adhesive, sealant, adhesive primer, or sealant primer has received written approval from the Department for use in the equipment and complies with the requirements of 20 DCMR 743-749, as applicable.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 87

- C. Mobile equipment, as defined in 20 DCMR 799, shall not be coated in this paint booth. [20 DCMR 201]
- D. The exhaust stack shall have a minimum height of 15 feet and at least 5 feet above the roof level. [20 DCMR 201]
- E. The coatings applied shall primarily be by one or more of the following methods [20 DCMR 201]:
 - i. Powder coating;
 - ii. Hand-held, non-refillable aerosol containers;
 - iii. Non-atomizing application technology (paint brushes, rollers, hand wiping, flow coating, dip coating, touch-up markers, or marking pens); or
 - iv. Other non-atomizing application technology approved by the Department to not be covered by 40 CFR 63, Subpart HHHHHH or another regulation not addressed in this permit.
- F. If spray guns are used [20 DCMR 201]:
 - i. The coatings used shall not contain any compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd); and
 - ii. Cleaning of spray guns shall be performed in enclosed, recycling spray gun cleaning equipment. This equipment shall be kept closed when not in use.
- G. The paint spray booth shall meet the following specifications [20 DCMR 201]:
 - i. The unit shall be fitted with a type of filter technology that is demonstrated to achieve at least ninety eight-percent (98%) capture of paint overspray.
 - ii. The exhaust filters shall be replaced as specified by manufacturers' specifications.
 - iii. The unit shall be constructed with a full roof and must be ventilated at negative pressure so that air is drawn into the front opening any openings in the booth walls.
 - iv. The unit shall be maintained and operated at all times in accordance with manufacturer's recommendations.
- H. The Permittee shall comply with the following housekeeping and pollution prevention measures [20 DCMR 201]:

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 88

- i. Store fresh and used coatings, solvent, and cleaning solvents in non-absorbent, non-leaking containers;
 - ii. Close all repairing and refinishing coating containers at all times except when filling, emptying, or in active use;
 - iii. Store cloth and paper, or other absorbent applicators, moistened with coatings, solvents, or cleaning solvents in closed, non-absorbent, non-leaking containers; and
 - iv. Minimize spills during the handling and transfer of coatings, solvents, and cleaning solvents.
- I. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the spray painting equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [20 DCMR 201]

3. Monitoring and Testing:

- A. The Permittee shall monitor the contents of any chemical strippers used at the facility to ensure that they do not contain MeCl.
- B. The Permittee shall track the quantity and VOC content of all paints and coatings used at the facility, as applied, to ensure compliance with Condition III(i)(1)(A). If applied, unadulterated, as the coating is obtained from the manufacturer, documentation provided by the manufacturer may be used to determine the VOC content.

Whenever such information is not available from the manufacturer or whenever a paint or coating is not applied as obtained from the manufacturer, the following method shall be used to determine the VOC content:

The mass of VOC per combined volume of VOC and coating solids, less water and exempt compounds shall be calculated, in pounds per gallon, by the following equation. To convert from grams per liter to pounds per gallon (lb/gal), multiply the result (VOC content) by 8.345×10^{-3} (lb/gal/g/l):

$$VOC = \frac{(W_v - W_w - W_{cc})}{(V - V_w - V_{cc})}$$

where:

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 89

- VOC = VOC content in grams per liter (g/l) of coating less water and non-VOC solvents;
- W_v = Mass of total volatiles, in grams;
- W_w = Mass of water, in grams;
- W_{ec} = Mass of exempt compounds, in grams;
- V = Volume of coating, in liters;
- V_w = Volume of water, in liters; and
- V_{ec} = Volume of exempt compounds, in liters; and

- C. The Permittee shall maintain an awareness of the area to ensure that the odor and nuisance air pollutant requirements of Condition III(i)(1)(B) are met.
- D. The Permittee shall monitor the emission point from the spray booth to ensure that the requirements of Condition III(i)(1)(C) are met.
- E. The Permittee shall monitor the material safety data sheets or other paint, coating, adhesive, sealant, adhesive primer, or sealant primer specification sheets to ensure compliance with Conditions III(i)(2)(B) and (F).
- F. The Permittee shall monitor the types of spray booth filters purchased and their replacement dates to ensure that all filters used meet the requirements of Conditions III(i)(2)(G)(i) and (ii).
- G. The Permittee shall monitor the maintenance and operational status of the spray booth and the activities performed in the spray booth and at the facility to ensure compliance with the requirements of Conditions III(i)(2)(C), (E), (F), (H), and (I).

4. Record Keeping Requirements:

The Permittee shall maintain the following records for not less than five years from the date of each record. [20 DCMR 500.8]

- A. The Permittee shall maintain records of the types of chemical paint strippers used at the facility as well as their chemical make-up to document compliance with Condition III(i)(2)(A).
- B. The Permittee shall maintain records of the quantity, type, and VOC content of all paints and refinishing coatings used at the facility, as applied.
- C. Based on the monitoring and calculations required under Condition III(i)(3)(B) and the records kept under Condition III(i)(4)(B), the Permittee shall determine and keep records of the VOCs emitted from this equipment, in combination with similar VOC emitting equipment at the facility to ensure compliance with Condition III(i)(1)(A).

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 90

- D. The Permittee shall maintain records of the type(s) and target hazardous air pollutant (HAP) contents of coatings used in any spray guns to document compliance with Condition III(i)(2)(F)(i).
- E. The Permittee shall maintain records of the specifications and replacement dates of spray booth filters to document compliance with Condition III(i)(2)(G).
- F. The Permittee shall maintain records of all maintenance performed on the spray booth.
- G. The Permittee shall maintain records of any deviations from the requirements of Conditions II and III of this Permit.

5. Reporting Requirements:

None in addition to Condition I(d)

j. **Emission Unit ID 12-1: Two Emergency Generator Sets: Two (2) 1,000 kWe (1495 hp) MTU Onsite Standby Energy, Model No. 1000-XC6DT2 emergency generator sets powered by 1,495 hp diesel-fired engines, subject to NSPS (40 CFR 60) Subpart III, installed November 2010 at the Freight Building**

1. Emission Limitation:

- A. Emissions from each unit shall not exceed those in the following table, as measured according to the procedures set forth in 40 CFR 89, Subpart E for NMHC, NO_x, and CO and 40 CFR 89.112(c) for PM. [40 CFR 60.4205(b), 40 CFR 60.4202(a), and 40 CFR 89.112(a)-(c)]

Pollutant Emission Limits (g/kW-hr)		
NMHC+NO _x	CO	PM
6.4	3.5	0.20

- B. Visible emissions shall not be emitted into the outdoor atmosphere from these generators, except that discharges not exceeding forty percent (40%) opacity (unaveraged) shall be permitted for two (2) minutes in any sixty (60) minute period and for an aggregate of twelve (12) minutes in any twenty-four hour (24 hr.) period during start-up, cleaning, adjustment of combustion controls, or malfunction of the equipment [20 DCMR 606.1]

Note that 20 DCMR 606 is subject to an EPA-issued call for a State Implementation Plan (SIP) revision (known as a "SIP call") requiring the District to revise 20 DCMR 606. See "State Implementation Plans: Response to Petition for Rulemaking; Restatement and Update of EPA's SSM Policy Applicable to SIPs; Findings of Substantial Inadequacy; and SIP Calls To Amend

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 91

Provisions Applying to Excess Emissions During Periods of Startup, Shutdown and Malfunction”, 80 Fed. Reg. 33840 (June 12, 2015). It is likely that this federal action will result in changes to the requirements of 20 DCMR 606. Any such changes, once finalized in the DCMR, will supersede the language of Condition III(j)(1)(B) as stated above.

- C. In addition to Condition III(j)(1)(B), exhaust opacity, measured and calculated as set forth in 40 CFR 86, Subpart I, shall not exceed [40 CFR 60.4205(b), 40 CFR 60.4202(a), and 40 CFR 89.113]:
- i. 20 percent during the acceleration mode;
 - ii. 15 percent during the lugging mode;
 - iii. 40 percent during the peaks in either the acceleration or lugging modes. *Note that this condition is streamlined with the requirements of 20 DCMR 606.1.*
- D. 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]

2. Operational Limitations:

- A. Each emergency generator set shall not be operated in excess of 500 hours in any given 12 month period. If operation beyond 500 hours is desired, the Permittee shall submit an application to amend this permit to comply with the conditions of 20 DCMR 805 and shall obtain the Department's approval of such application prior to initiating such operation.
- B. With the exceptions specified in Condition III(j)(2)(C), the emergency generators shall be operated only during emergencies resulting from electrical power outages due to: a failure of the electrical grid; on-site disaster; local equipment failure; or public service emergencies such as flood, fire, natural disaster, or severe weather conditions. (e.g. hurricane, tornado, blizzard, etc.) [20 DCMR 201]
- C. Each of the emergency generators may be operated for the purpose of maintenance checks and readiness testing, for a period not to exceed one hundred (100) hours per calendar year as specified in Conditions III(j)(2)(C)(i) and (ii) below. Any such operation shall be considered as part of the 500 hours allowed under Condition III(j)(2)(A) above. [40 CFR 60.4211(f)]
- i. The emergency generator may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 92

federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. [40 CFR 60.4211(f)(2)(i) and DCMR 201]; and

- ii. The emergency generator may be operated for up fifty (50) hours per calendar year in non-emergency situations, subject to the following conditions [40 CFR 60.4211(f)(3) and 20 DCMR 201]:
 - a. Any such operations shall be counted as part of the 100 hours per calendar year for maintenance and testing as provided in Condition III(j)(2)(C);
 - b. These 50 hours of non-emergency operations per calendar year cannot be used for peak shaving, or as part of any program to supply power to generate income for the facility as part of a financial arrangement with another entity;
 - c. All operations prohibited under Condition III(j)(2)(F) are also prohibited under this condition; and
 - d. All operations of the emergency generator resulting from a deviation in voltage or frequency from the electric provider to the premises shall be considered non-emergency operation and counted as part of this 50 hour per calendar year allowance.
- D. The emergency generators shall fire only diesel fuel that contains a maximum sulfur content of 15 ppm (0.0015% by weight) and either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. [40 CFR 60.4207(b)]
- E. The emergency generators shall be operated and maintained in accordance with the recommendations of the equipment manufacturer. [40 CFR 60.4211(a)(1) and 20 DCMR 201]
- F. The emergency generators shall not be operated in conjunction with a voluntary demand-reduction program or any other interruptible power supply arrangement with a utility, other market participant, or system operator. [20 DCMR 201]
- G. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the unit in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 93

operating and maintenance procedures, and inspection of the source. [20 DCMR 201]

3. Monitoring and Testing Requirements:

- A. The Permittee shall monitor the date, time, duration, and reason for each emergency generator startup to ensure compliance with Condition III(j)(2)(A), (B), (C) and (F). [20 DCMR 302.1(c)(1)(B) and 20 DCMR 500.2]
- B. In order to ensure compliance with Condition III(j)(2)(A), the Permittee shall monitor the total hours of operation each month with the use of a properly functioning, non-resettable hour metering device.
- C. The Permittee shall monitor and/or test for the sulfur content in diesel fuel/No. 2 fuel oil obtained for use in these generator engines, in accordance with Condition I(d)(2)(B)(ii) to ensure compliance with Condition III(j)(2)(D) of this permit. [20 DCMR 500.2, 502.3, and 502.6]
- D. The Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]

4. Record Keeping Requirements:

- A. For each generator set, the following information shall be recorded, initialed (except records generated automatically by an electronic system), and maintained in a log at the facility for a period not less than five (5) years from the date each record is obtained [20 DCMR 302.1(c)(2)(B) and 20 DCMR 500.8]:
 - i. The date, time, duration, and reason for each start-up of the emergency generator, including the following specific information:
 1. If the unit is operated in non-emergency situations pursuant to Condition III(j)(2)(C)(ii), the specific purpose for each operation period must be recorded; and
 2. If the unit is operated for emergency purposes, what classified the operation as emergency.
 - ii. The total hours of operation for each month and the cumulative 12-month rolling period shall be calculated and recorded by the end of each calendar month for the previous calendar month and the 12-month period ending at the end of that previous month;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 94

- iii. The total hours of operation for maintenance checks and readiness testing pursuant to Condition III(j)(2)(C) each month, recorded within 30 days of the end of each calendar month, and totaled for each calendar year by January 30 of each year for the previous calendar year;
 - iv. The total hours of operation each calendar year for non-emergency purposes pursuant to Condition III(j)(2)(C)(ii);
 - v. Records of the maintenance performed on the unit *[Note that these records must be sufficient to show that the Permittee is complying with the requirements of Condition III(j)(2)(E)]*;
 - vi. Records of the results of any visible emissions monitoring performed;
 - vii. Records of the occurrence and duration of each malfunction of operation; and
 - viii. Records of the actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunction process and air pollution control and monitoring equipment to its normal or usual manner of operation.
 - ix. Records of fuel usage for the units on a monthly and annual basis.
- B. The Permittee shall maintain a copy of each emergency generator's manufacturer's maintenance and operating recommendations at the facility.
 - C. The Permittee shall comply with the requirements of Condition I(d)(2)(B)(ii) to ensure compliance with Condition III(j)(2)(D) of this permit.
 - D. For each unit, the Permittee shall maintain a copy of the EPA Certificate of Conformity at the facility at all times. [20 DCMR 500.1]
- k. **Emission Unit ID 12-2 Emergency Fire Pump: One (1) 97 kWe (130 hp) Emergency Fire Pump, Patterson model No. 8x8 MI centrifugal pump for fire suppression powered by a 130 hp diesel-fired engine located at the Main Building, Room 019 Main, Steam Tunnel**
1. Emission Limitations:
 - A. Visible emissions shall not be emitted into the outdoor atmosphere from this fire pump, except that discharges not exceeding forty percent (40%) opacity (unaveraged) shall be permitted for two (2) minutes in any sixty (60) minute period and for an aggregate of twelve (12) minutes in any twenty-four hour (24

hr.) period during start-up, cleaning, adjustment of combustion controls, or malfunction of the equipment [20 DCMR 606.1]

Note that 20 DCMR 606 is subject to an EPA-issued call for a State Implementation Plan (SIP) revision (known as a "SIP call") requiring the District to revise 20 DCMR 606. See "State Implementation Plans: Response to Petition for Rulemaking; Restatement and Update of EPA's SSM Policy Applicable to SIPs; Findings of Substantial Inadequacy; and SIP Calls To Amend Provisions Applying to Excess Emissions During Periods of Startup, Shutdown and Malfunction", 80 Fed. Reg. 33840 (June 12, 2015). It is likely that this federal action will result in changes to the requirements of 20 DCMR 606. Any such changes, once finalized in the DCMR, will supersede the language of Condition III(k)(1)(A) as stated above.

- B. 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]

2. Operational Limitations:

- A. The fire pump shall be operated for fewer than 500 hours in any given 12 month period. If operation beyond 500 hours is desired, the Permittee shall submit an application to amend this permit to comply with the conditions of 20 DCMR 805 and shall obtain the Department's approval of such application prior to initiating such operation. [20 DCMR 201]
- B. With the exceptions specified in Condition III(k)(2)(C), the fire pump shall be operated only during fire emergencies. [20 DCMR 201]
- C. The fire pump may be operated for the purpose of maintenance checks and readiness testing for a period not to exceed one hundred (100) hours per calendar year, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Any such operation shall be considered as part of the 500 hours allowed under Condition III(k)(2)(A) above. [20 DCMR 201 and 40 CFR 63.6640(f)(2)(i)]
- D. The Permittee shall purchase only diesel fuel that contains a maximum sulfur content of 15 ppm (0.0015% by weight) for use in the fire pump. [20 DCMR 201]
- E. The fire pump shall be operated and maintained in accordance with the manufacturer's emission-related written instructions or the Permittee shall develop and implement a written maintenance plan consistent with industry

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 96

standards for similar models if manufacturer instructions are unavailable. Any Permittee-developed maintenance plan must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6625(e), 40 CFR 63.6640(a), 40 CFR 63, Subpart ZZZZ, Table 6, and 20 DCMR 201]

F. In addition to the requirements of Condition III(k)(2)(E), the following maintenance activities shall be performed on the schedules specified [40 CFR 63.6603(a), 40 CFR 63.6640(a), and 40 CFR 60, Subpart ZZZZ, Table 2d]:

- i. Change oil and filter every 500 hours of operation or annually, whichever comes first, except that sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) in order to extend this specified oil change requirement. If such an oil analysis program is to be used, the plan shall be submitted to the Department for review at the time of its establishment;
- ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

G. The Permittee shall minimize the generator engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63.6625(h)]

H. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, maintain and operate the unit in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by this permit and 40 CFR 63, Subpart ZZZZ have been achieved. Determination of whether acceptable operating procedures are being used will be based on information available to the Department and the EPA Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, review of operation and maintenance records, and inspection of the source. [20 DCMR 201 and 40 CFR 63.6605]

3. Monitoring and Testing Requirements:

A. The Permittee shall monitor the date, time, duration, and reason for the fire pump startup to ensure compliance with Conditions III(k)(2)(A), (B), and (C).

- B. In order to ensure compliance with Condition III(k)(2)(A), the Permittee shall monitor the total hours of operation of the fire pump each month, either with the use of a properly functioning, non-resettable hour metering device or by tracking the sum of the duration of each instance of operation each month to ensure compliance with Condition III(k)(2)(A) of this permit.
- C. The Permittee shall monitor and/or test for the sulfur content in diesel fuel/No. 2 fuel oil obtained for use in the fire pump engine, in accordance with Condition I(d)(2)(B)(ii) to ensure compliance with Condition III(k)(2)(D) of this permit. [20 DCMR 500.2, 502.3, and 502.6]
- D. The Permittee shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]

4. Record Keeping Requirements:

- A. The following information shall be recorded, initialed (except records generated automatically by an electronic system), and maintained in a log book at the facility for a period not less than five (5) years from the date the information is obtained [20 DCMR 500.8, 20 DCMR 302.1(c)(2)(B), 40 CFR 63.6660, 40 CFR 66.6655, and 40 CFR 63.10(b)]:
 - i. The date, time, duration, and reason for each start-up of the fire pump;
 - ii. The total hours of operation for each month and the cumulative 12-month rolling period shall be calculated and recorded by the end of each calendar month for the previous calendar month and the 12-month period ending at the end of that previous month;
 - iii. The total hours of operation for maintenance checks and readiness testing pursuant to Condition III(k)(2)(C) each month, recorded within 30 days of the end of each calendar month, and totaled for each calendar year by January 30 of each year for the previous calendar year;
 - iv. Records of the maintenance performed on the unit [*Note that these records must be sufficient to document that the Permittee is complying with the requirements of Conditions III(k)(2)(E) and (F)*];
 - v. Records of the results of any visible emissions monitoring performed;
 - vi. Records of the occurrence and duration of each malfunction of operation;
 - vii. Records of the actions taken during periods of malfunction to minimize emissions, including corrective actions to restore malfunction process and air

pollution control and monitoring equipment to its normal or usual manner of operation; and

viii. Records of fuel usage for the unit on a monthly and annual basis.

- B. The Permittee shall maintain a copy of the fire pump's manufacturer's maintenance and operating recommendations at the facility. If such documentation is unavailable, the Permittee shall maintain documentation of the industry standards to which the unit is being maintained.
- C. The Permittee shall comply with the requirements of Condition I(d)(2)(B)(ii) to ensure compliance with Condition III(k)(2)(D) of this permit.

I. Emission Unit ID 13-4 - Chrome Plating Line: One Hard Chromium Electroplating Line for Intaglio Printing Plate Manufacture, in the Main Building Room D200M.

The equipment covered by Condition III(l) includes three chromium plating baths and rectifiers, three wash sinks, two working and mounting tables and three de-chroming and de-greasing tanks. Each chromium plating bath has one packed bed scrubber (PWS1500) mounted on it. The three scrubber ducts lead into the shared composite mesh pad scrubber (CMP6900). The three de-chrome/de-grease tanks are also tied in to the composite mesh pad scrubber (6900 CMP). Each of the three rectifiers can operate either a plating tank or a dechrome/degreasing tank, but not both simultaneously.

1. Emission Limitations:

- A. Because the facility is considered an existing small, hard chromium electroplating facility under the conditions of this permit, during tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the open surface hard chromium electroplating tanks by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.015 mg/dscm (6.6×10^{-6} gr/dscf). [40 CFR 63.342(c)(1)(ii)]
- B. The maximum chromium emissions from the operation of the chrome plating line shall not exceed 0.00020 lb/hr and 0.00087 ton/yr. [40 CFR 63.344(e)(3)] *Note that this is the site specific "allowable mass emission rate of the system" (AMR_{sys}) determined by the method specified in 40 CFR 63.344(e)(3) expressed in English (also known as American Engineering System) units.*
- C. The maximum sulfuric acid emissions from the operation of the chrome/plating line shall not exceed 0.0019 lb/hr and 0.0083 ton/yr. [20 DCMR 201 and Chapter 2 permit No. 6378]

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 99

- D. Visible emissions shall not exceed zero percent opacity from the chrome plating line for the manufacture of intaglio printing plates. [20 DCMR 201 and 20 DCMR 606]
 - E. 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]
2. Operational Limitations:
- A. The Permittee shall establish and maintain its status as a small hard chromium electroplating facility by limiting operations to ensure that the cumulative rectifier capacity, on a 12-month rolling basis, does not equal or exceed 60 million amp-hours per 12-month rolling basis. [40 CFR 63.342(c)(3)(i)]
 - B. The chrome plating line shall not exceed a plate production rate of 1 plate/bath/hour and 8,760 chrome plates/bath per calendar year. [20 DCMR 201]
 - C. The differential pressure across the three stages of the composite mesh pad system (in aggregate) shall be maintained between 8 and 40 mmH₂O and shall be monitored at least once each day of operation. [40 CFR 63.343(c)(1)(i) and (ii) and 40 CFR 63.343(c)(3)]
 - D. The following operation and maintenance practices and standards are applicable to the facility: [40 CFR 63.342(f)(1) and (2)]
 - i. Operation and maintenance practices:
 - 1. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices;
 - 2. Malfunctions shall be corrected as soon as practicable after their occurrence;
 - 3. Operation and maintenance requirements established pursuant to section 112 of the federal Clean Air Act are enforceable independent of emissions or other requirements in relevant standards.
 - ii. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Department and the Administrator of the U.S. Environmental Protection Agency (EPA), which

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 100

may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source;

iii. Based on the results of a determination made under Condition III(I)(2)(D)(ii) of this permit, the Director or the Administrator of EPA may require that the Permittee make changes to the operation and maintenance plan required by Condition III(I)(2)(E) of this permit. Revisions may be required if the Director or the Administrator of EPA finds that the plan:

1. Does not address a malfunction that has occurred;
2. Fails to provide for the proper operation of the affected source, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or
3. Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

E. Operation and maintenance plan: [40 CFR Part 63.342(f)(3), 40 CFR 63.343(a)(8), and 20 DCMR 500.1]

i. The Permittee shall maintain and implement an operation and maintenance plan at the site. The plan shall be incorporated by reference into the Permittee's Title V permit. The plan shall include the following elements:

1. The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device [including the composite mesh-pad (CMP) and the packed-bed scrubber (PBS) systems], and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment;
2. For sources using an add-on control device or monitoring equipment to comply with 40 CFR part 63 subpart N, the plan shall incorporate the operation and maintenance practices for that device or monitoring equipment, as follows (for a combined PBS/CMP system):
 - A. Visually inspect the device to ensure that there is proper drainage, no chronic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device at least once per calendar quarter;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 101

- B. Visually inspect the back portion of the mesh pad closest to the fan to ensure that there is no breakthrough of chromic acid mist at least once per quarter;
 - C. Visually inspect the ductwork from the tank to the control device to ensure that there are no leaks at least once per quarter; and
 - D. Perform a washdown of the composite mesh pads in accordance with the manufacturer's recommendations as recommended by the manufacturer.
3. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
 4. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions;
 5. The plan shall include housekeeping procedures, as specified in the following table:

For:	The Permittee must:	At this minimum frequency:
1. Any substance used in an affected chromium electroplating or chromium anodizing tank that contains hexavalent chromium.	(a) Store the substance in a closed container in an enclosed storage area or building; and	At all times except when transferring the substance to and from the container.
	(b) Use a closed container when transporting the substance from the enclosed storage area.	Whenever transporting substance, except when transferring the substance to and from the container.
2. Each affected tank, to minimize spills of bath solution that result from dragout. Note: This measure does not require the return of the contaminated bath solution to the tank. This requirement applies only as the parts are removed from the tank. Once away from the tank area, any spilled solution must be handled in accordance with Item 4 of these housekeeping measures.	(a) Install drip trays that collect and return to the tank any bath solution that drips or drains from parts as the parts are removed from the tank; or	Prior to operating the tank.
	(b) Contain and return to the tank any bath solution that drains or drips from the parts as the parts are removed from the tank; or	Whenever removing parts from an affected tank.
	(c) Collect and treat in an onsite wastewater treatment plant any bath solution that drains or drips from parts as the parts are removed from the tank.	Whenever removing parts from an affected tank.
3. Each spraying operation for removing excess chromic acid from parts removed from, and occurring over, an affected tank.	Install a splash guard to minimize overspray during spraying operations and to ensure that any excess hexavalent chromium laden liquid captured by the splash guard is returned to the affected	Prior to any such spraying operation.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 102

For:	The Permittee must:	At this minimum frequency:
	chromium electroplating or anodizing tank.	
4. Each operation that involves the handling or use of any substance used in an affected chromium electroplating or chromium anodizing tank that contains hexavalent chromium.	Begin clean up, or otherwise contain, all spills of the substance. Note: substances that fall or flow into drop trays, pans, sumps, or other containment areas are not considered spills.	Within 1 hour of the spill.
5. Surfaces within the enclosed storage area, open floor area, walkways around affected tanks contaminated with hexavalent chromium from an affected chromium electroplating or chromium anodizing tank.	(a) Clean the surfaces using one or more of the following methods: HEPA vacuuming; Hand-wiping with a damp cloth; Wet mopping; Hose down or rinse with potable water that is collected in a wastewater collection system; Other cleaning method approved by the Department; OR	At least once every 7 days if one or more chromium electroplating or chromium anodizing tanks were used, or at least after every 40 hours of operating time of one or more affected chromium electroplating tanks, whichever is later.
	(b) Apply a non-toxic chemical dust suppressant to the surfaces.	According to manufacturer's recommendations.
6. All buffing, grinding, or polishing operations that are located in the same room as chromium electroplating or chromium anodizing operations.	Separate the operation from any affected electroplating or anodizing operation by installing a physical barrier; the barrier may take the form of plastic strip curtains.	Prior to beginning the buffing, grinding, or polishing operation.
7. All chromium or chromium-containing wastes generated from housekeeping activities.	Store, dispose, recover, or recycle the wastes using practices that do not lead to fugitive dust and in accordance with hazardous waste requirements.	At all times.

- ii. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the Permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.
- iii. Recordkeeping associated with the operation and maintenance plan is identified in Condition III(1)(4) of this permit [40 CFR 63.346]. Reporting associated with the operation and maintenance plan is identified in Condition III(1)(5) of this permit [40 CFR 63.347 (g) and (h)].
- iv. If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by Condition III(1)(2)(E)(i) of this permit, the Permittee shall record the actions taken for that event and shall report by phone to the Department and EPA such actions within 2 working days after commencing

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 103

actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the owner or operator makes alternative reporting arrangements, in advance, with the Administrator of EPA. Such letters shall be sent to EPA with copies sent to the Department.

- v. The Permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Department or EPA for the life of the affected source or until the source is no longer subject to the provisions of 40 CFR part 63 subpart N. In addition, if the operation and maintenance plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Department or EPA for a period of 5 years after each revision to the plan.
 - vi. To satisfy the requirements of Condition III(1)(2)(E) of this permit, the Permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of Condition III(1)(2)(E) of this permit.
- F. The standards in this permit that apply to chromic acid baths shall not be met by using a reducing agent to change the form of chromium from hexavalent to trivalent. [40 CFR 63.342(g)]
- G. At all times, the Permittee must operate and maintain any affected source (covered by 40 CFR 63, Subpart N), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR 63.342(a) and 20 DCMR 201]

3. Monitoring, Testing, and Compliance Demonstration Requirements:

- A. The Permittee shall install (if not already installed) and maintain a non-resettable amp-hr meter on each of the rectifiers and monitor at least monthly to ensure that the 12-month rolling actual rectifier capacity is less than 60 million amp-hours. [40 CFR 63.342(c)(3)(i)(B)]
- B. At least once during the term of this permit, the Permittee shall perform EPA reference methods 8 (40 CFR 60, Appendix A) and 306 or 306A (40 CFR 63, Appendix A) to determine compliance with Condition III(1)(1)(A), (B) and (C) and shall follow the procedures below and furnish the Department with a written report of the results of such performance tests in accordance with the following requirements [20 DCMR 502 and 40 CFR 63.344(a), (b),(c) and (d)]

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 104

- i. A test protocol shall be submitted to the following address a minimum of thirty (30) days in advance of the proposed test date. The test shall be conducted in accordance with Federal and District requirements.

Chief, Compliance and Enforcement Branch
Department of Energy and Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington DC 20002

- ii. The test protocol shall be approved by the Department prior to initiating any testing. Upon approval of the test protocol, the Company shall finalize the test date with the assigned inspector in the Permitting and Enforcement Branch. The Department must have the opportunity to observe the test for the results to be considered for acceptance.
- iii. The final results of the testing shall be submitted to the Department within sixty (60) days of the test completion. A copy of the test report shall be submitted to the address in Condition III(1)(3)(B)(i) of this permit
- iv. The final report of the results shall include the emissions test report (including raw data from the test) as well as a summary of the test results and a statement of compliance or non-compliance with permit conditions to be considered valid. The summary of results and statement of compliance or non-compliance shall contain the following information:
 1. A brief process description;
 2. Sampling location description(s);
 3. A description of sampling and analytical procedures and any modifications to standard procedures;
 4. A statement that the Permittee has reviewed the report from the emissions testing firm and agrees with the findings.
 5. Summary of results with respect to each permit condition.
 6. Statement of compliance or non-compliance with each permit condition.
- v. The results must demonstrate to the Department's satisfaction that the emission unit is operating in compliance with the applicable regulations and conditions of this permit; if the final report of the test results shows non-

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 105

compliance the Permittee shall propose corrective action(s). Failure to demonstrate compliance through the test may result in enforcement action.

- C. In addition to the requirements of Condition III(1)(3)(B) of this permit, the Permittee shall document the test report as follow. [40 CFR 63 Subpart 63.344(a)]
- i. A brief process description;
 - ii. Sampling location description(s);
 - iii. A description of sampling and analytical procedures and any modifications to standard procedures;
 - iv. Test results;
 - v. Quality assurance procedures and results;
 - vi. Records of operating conditions during test, preparation of standards, and calibration procedures;
 - vii. Raw data sheets for field sampling and field and laboratory analysis;
 - viii. Documentation of calculations; and
 - ix. Any other information required by the test method.
- D. The Permittee shall conduct the performance test as follows so that the test results can be used to demonstrate compliance: [40 CFR 63.344(b) and (c) and 20 DCMR 502]
- i. The test methods and procedures identified in Condition III(1)(3)(B) of this permit shall be used during the performance test;
 - ii. The sampling time and sample volume for each run of Methods 306 and 306A, Appendix A of 40 CFR 63, shall be at least 120 minutes and 1.70 dscm (60 DSCF), respectively;
 - iii. The performance test must be conducted under representative operating conditions for the source;
 - iv. The performance test report must contain the elements required by Condition III(1)(3)(C) of this permit; and

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 106

- v. The Permittee shall obtain sufficient data from the performance test to confirm the operating value(s) that correspond to compliance with the standards, as required for continuous compliance monitoring under 40 CFR Part 63.343(c) and Condition III(l)(2)(D) of this permit .
- E. The Permittee shall derive the mass emission rate of the system and use the following procedures to determine compliance with the applicable emission limitations in Conditions III(l)(1)(A) and (B): [40 CFR 63.344(e)(3)]
- i. Calculate the cross-sectional area of each inlet duct (i.e., uptakes from each hood) including those not affected by the standard (40 CFR 63, Subpart N);
 - ii. Determine the total sample time per test run by dividing the total inlet area from all tanks connected to the control system by the total inlet area for all ducts associated with affected sources, and then multiply this number by 2 hours. The calculated time is the minimum sample time required per test run;
 - iii. Perform Method 306 or 306A testing and calculate an outlet mass emission rate;
 - iv. Determine the total ventilation rate from the affected sources (VR_{inlet}) by using the following equation:

$$VR_{tot} \times IDA_i / \Sigma IA_{total} = VR_{inlet}$$

Where:

VR_{tot} = the average total ventilation rate in dscm/min for the three test runs as determine at the outlet by means of the Method 306 or 306A testing;

IDA_i = the total inlet area for all ducts associated with affected sources;

ΣIA_{total} = the sum of all inlet duct area from both affected and non-affected sources; and

VR_{inlet} = is the total ventilation rate from all inlet ducts associated with affected sources.

- v. Establish the allowable mass emission rate of the system (AMR_{sys}) in milligrams of total chromium per hour (mg/hr) using the following equation:

$$\Sigma VR_{inlet} \times EL \times 60 \text{ minutes/hour} = AMR_{sys}$$

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 107

Where:

ΣVR_{inlet} = the total ventilation rate in dscm/min from the affected sources;

EL = the applicable emission limitation from Condition III(1)(1)(a) in mg/dscm.

- vi. The allowable mass emission rate (AMR_{sys}) calculated from Condition III(1)(3)(E)(v) must be equal to or more than the outlet three-run average mass emission rate determined from Method 306 or 306A testing in order for the source to be in compliance with the standard.

F. All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the affected source are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system. [40 CFR 63.344(d)(2) and (5)]

- i. Specifications for differential pressure measurement devices used to measure pressure drop across a control system shall be in accordance with manufacturer's accuracy specifications. [40 CFR 63.344(d)(2)(ii)]

ii. The Permittee shall establish the pressure drop in accordance with the following guidelines: [40 CFR 63.344(d)(5)]

1. Pressure taps shall be installed on the front side of the first mesh pad and the back side of the last mesh pad within the control system.

2. Pressure taps shall be sited at locations that are:

A. Free from plug gage as possible and away from any flow disturbances such as cyclonic demisters; and

B. Situated such that no air infiltration at the measurement site will occur that could bias the measurement.

3. Pressure taps shall be constructed of either polyethylene, polybutylene, or other nonreactive materials.

4. Nonreactive plastic tubing shall be used to connect the pressure taps to the device used to measure pressure drop.

5. Any of the following pressure gauges can be used to monitor pressure drop: a magnehelic gauge, and inclined manometer, or a "U" tube manometer.
6. Prior to connecting any pressure lines to the pressure gauge(s), each gauge should be zeroed. No calibration of the pressure gauges is required.

4. Record Keeping Requirements:

The information specified below shall be maintained by the Permittee at the facility for a period not less than five (5) years from when they were originated and shall be made available to the Department upon written or verbal request: [20 DCMR 302.1(c)(2)(B), 40 CFR 63.346 and 20 DCMR 500.8]

- A. Records of the monthly and 12-month rolling actual cumulative rectifier capacity, measured in amp-hours. The actual cumulative rectifier capacity for the previous 12-month rolling period shall be tabulated monthly by adding the capacity for the current month to the capacities for the previous 11 months;
- B. Records of the number of chrome plates produced each month, and totaled each calendar year;
- C. Records of the results of daily pressure drop monitoring across the composite mesh pad scrubber, including the date and time the data are collected, as well as any actions taken to correct any deviations from the allowable pressure range specified in Condition III(1)(2)(C) of this permit;
- D. Inspection records for the add-on pollution control device and monitoring equipment to document that the inspection and maintenance required by the work practice standards of Conditions III(1)(2)(D), (E), and (F) of this permit are have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;
- E. Records of all maintenance performed on the chrome plating line, the add-on air pollution control devices, and monitoring equipment, except routine housekeeping practices;
- F. Records of the occurrence, duration, and cause of each malfunction of process, add-on air pollution control, and monitoring equipment;
- G. Records of action taken during periods of malfunction to minimize emissions in accordance with Conditions III(1)(2)(D)(i) and III(1)(2)(G) of this permit,

including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation;

- H. Other records, which may take the form of checklist, necessary to demonstrate consistency with the provisions of operation and maintenance plan required by Conditions III(1)(2)(E) of this permit;
- I. Test reports documenting results of all performance tests, including all information required in the sections of this permit requiring such tests;
- J. All measurements as may be necessary to determine the conditions of performance tests; including measurements necessary to determine compliance with the special compliance procedures of Condition III(1)(3)(E) of this permit;
- K. The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on pollution control, or monitoring equipment;
- L. The total process operating time of the plating tanks each month, also totaled for each calendar year of operations;
- M. Records of any occurrences of visible emissions from the emission points of the plating line as well as any actions taken to correct the problem;
- N. Records of any occurrences of exceedances of the requirements of Condition III(1)(1)(E) of this permit and any odor complaints received. The Permittee shall also keep records of the actions taken to correct any identified odor or nuisance pollutant exceedances; and
- O. A copy of any Initial Notification and Notification of Compliance Status that the Permittee submitted and all documentation supporting those notifications.

5. Notification and Reporting Requirements:

- A. The Permittee shall submit summary reports (ongoing compliance status report) to the Administrator of the U.S. Environmental Protection Agency (EPA) and the Department to document the ongoing compliance status of the equipment covered by this permit. [40 CFR 63.347(h) and 20 DCMR 500.1] The report shall contain the information identified in Section III(1)(5)(D) of this permit. The report shall be completed annually, except as provided in Section III(1)(5)(B) and (C) of this permit. The reports shall be submitted on the following schedule:

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 110

- i. The annual ongoing compliance status reports shall be submitted as supplements to the annual compliance certification reports required by the facility's Chapter 3 (Title V) permit to the EPA Administrator and the Department;
 - ii. If semi-annual ongoing status reports are required pursuant to Condition III(1)(5)(B), they shall be submitted as supplements to the semi-annual reports required by the facility's Chapter 3 (Title V) permit;
 - iii. If still more frequent ongoing status reports are required pursuant to Condition III(1)(5)(B) of this permit, they shall be submitted on a schedule designated by the EPA Administrator or the Department.
- B. The frequency of the submittal of this supplemental report may be increased by the EPA Administrator or the Department in accordance with 40 CFR 63.347(h)(2).
- C. If the Permittee is required to submit ongoing compliance status reports on a semi-annual (or more frequent) basis, the frequency of ongoing compliance status reports may be reduced in accordance with the procedures set forth in 40 CFR 63.347(h)(3).
- D. The ongoing compliance status reports shall contain the following information [40 CFR 63.347(h)(1) and (g)(3)]:
- i. The company name and address of the affected source;
 - ii. An identification of the operating parameter that is monitored for compliance determination as required by Condition III(1)(2)(C);
 - iii. The relevant emission limitation for the affected source, and the operating parameter value or range of values that correspond to compliance with this emission limitation as specified in the notification of compliance status previously submitted to EPA and as revised by this permit;
 - iv. The beginning and ending dates of the reporting period;
 - v. A description of the type of process performed in the affected source;
 - vi. The total operating time of the affected source during the reporting period;
 - vii. The actual cumulative rectifier capacity expended during the reporting period on a month-by-month basis;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 111

- viii. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during the reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
 - ix. A certification by a responsible official, as defined in 40 CFR 63.2, that the work practice standards specified in Conditions III(1)(2)(D) and (E) of this permit were followed in accordance with the operation and maintenance plan for the source;
 - x. If the operation and maintenance plan was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by Condition III(1)(2)(E)(iv) documenting that the operation and maintenance plan was not followed;
 - xi. A description of any changes in monitoring, processes, or controls since the last reporting period;
 - xii. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of the actions taken by the Permittee during a malfunction of an affected source to minimize emissions in accordance with Condition III(1)(2)(G), including actions taken to correct a malfunction;
 - xiii. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and
 - xiv. The date of the report.
- E. The Permittee shall comply with the reporting requirements of Condition I(d)(4).
- F. In addition to complying with Condition III(1)(5)(A) through (E) and any other reporting requirements mandated by the 20 DCMR, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:
- i. The name and location of the facility;
 - ii. The subject source(s) that caused the excess emissions;

- iii. The time and date of the first observation of the excess emissions;
- iv. The cause and estimated/expected duration of excess emissions;
- v. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and
- vi. The proposed corrective actions and schedule to correct the conditions causing the excess emission.

m. Emission Unit ID 13-5: Nickel Plating Line: Nickel Electroforming/plating Line for Intaglio Printing Plate Manufacturing, in the Main Building Room D200M.

The equipment covered by Condition III(m) includes the following components: a wet packed bed scrubber (PBS 15000) control device connected to six (6) nickel electroforming tanks, two (2) comby sprays, two (2) reserve filtering and decanting tanks, three (3) wash sinks, six (6) rectifiers and two (2) working and mounting tables.

1. Emission Limitations:

- A. The maximum nickel emissions from the operation of the nickel electroforming/plating line for the manufacture of intaglio printing plates shall not exceed $3.6E-04$ lb/hr and 0.002 ton/yr. [20 DCMR 201]
- B. The maximum sulfuric acid emissions from the operation of the nickel electroforming/plating line for the manufacture of intaglio printing plates shall not exceed $1.9E-03$ lb/hr and 0.0083 ton/yr. [20 DCMR 201]
- C. Visible emissions shall not exceed zero percent opacity from the nickel electroforming/plating line for the manufacture of intaglio printing plates. [20 DCMR 201 and 20 DCMR 606.1]
- D. 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]

2. Operational Limitations:

- A. The Permittee must capture and exhaust emissions from the affected tank to the packed bed scrubber as follows: [40 CFR 63.11507(a)(2)(i) and (ii)]

- iii. Optimize the design of barrels, racks, and minimizing dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
 - iv. Use tank covers, if already owned and available at the facility, whenever practicable.
 - v. Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
 - vi. Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
 - vii. Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
 - viii. Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
 - ix. Perform general good house-keeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
 - x. Minimize spills and overflow of tanks, as practicable.
 - xi. Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
 - xii. Perform regular inspections to identify leaks and other opportunities for pollution prevention.
- E. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the unit in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

3. Monitoring, Testing, and Compliance Demonstration Requirements:

- A. At least once during the term of this permit, the Permittee must perform EPA test methods 8 and 29 on the nickel electroforming/plating to determine compliance

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 115

with Condition III(m)(1)(A) and (B) of this permit and shall follow the procedures below and furnish the Department with a written report of the results of such performance tests in accordance with the following requirements [20 DCMR 502]:

- i. A test protocol shall be submitted to the following address a minimum of thirty (30) days in advance of the proposed test date. The test shall be conducted in accordance with Federal and District requirements:

Chief, Compliance and Enforcement Branch
Department of Energy and Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington DC 20002

- ii. The test protocol shall be approved by the Department prior to initiating any testing. Upon approval of the test protocol, the Company shall finalize the test date with the assigned inspector in the Permitting and Enforcement Branch. The Department must have the opportunity to observe the test for the results to be considered for acceptance.
- iii. The final results of the testing shall be submitted to the Department within sixty (60) days of the test completion. A copy of the test report shall be submitted to the address in Condition III(m)(3)(A)(i) of this permit.
- iv. The final report of the results shall include the emissions test report (including raw data from the test) as well as a summary of the test results and a statement of compliance or non-compliance with permit conditions to be considered valid. The summary of results and statement of compliance or non-compliance shall contain the following information:
 1. A statement that the Permittee has reviewed the report from the emissions testing firm and agrees with the findings.
 2. Summary of results with respect to each permit condition.
 3. Statement of compliance or non-compliance with each permit condition.
- v. The results must demonstrate to the Department's satisfaction that the emission unit is operating in compliance with the applicable regulations and conditions of this permit; if the final report of the test results shows non-compliance the Permittee shall propose corrective action(s). Failure to demonstrate compliance through the test may result in enforcement action.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 116

- B. The Permittee must demonstrate initial compliance according to 40 CFR 63.11508 (c)(2)(i) through (v) as follows:
- i. The Permittee must install a control system designed to capture emissions from the affected tank and exhaust them to a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator.
 - ii. The Permittee must state in the Notification of Compliance Status that the Permittee has installed the control system according the manufacture's specifications and instructions.
 - iii. The Permittee must implement the applicable management practices specified in Condition III(m)(2)(D) of this permit as practicable.
 - iv. The Permittee must state in the Permittee's Notification of Compliance Status that the Permittee has implemented the applicable management practices specified in Condition III(m)(2)(D) of this permit as practicable.
 - v. The Permittee must follow the manufacturer's specifications and operating instructions for the control systems at all times.
- C. To demonstrate continuous compliance with the applicable management practices and equipment standards specified in this permit and 40 CFR 63, Subpart WWWW, the Permittee must satisfy the following requirements: [20 DCMR 107.1 and 40 CFR 63.11508 (d)(1), (2), (4), (6) and (8)]
- i. The Permittee must always operate and maintain the Nickel Plating including air pollution control equipment. The control equipment shall remain operative or effective and shall not be removed. [20 DCMR 107.1 and 40 CFR 63.11508(d)(1)]
 - ii. The Permittee must prepare an annual compliance certification according to the requirements specified in Condition III(m)(5)(C) and keep it in a readily-accessible location for inspector review [40 CFR 63.11508(d)(2)].
 - iii. The Permittee must demonstrate continuous compliance of the control system as follows: [40 CFR 63.11508(d)(4)]
 1. The Permittee must operate and maintain the control system according to the manufacturer's specifications and instructions.
 2. Following any malfunction or failure of the capture or control devices to operate properly, The Permittee must take immediate corrective action to

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 117

return the equipment to normal operation according to the manufacturer's specifications and operating instructions.

3. The Permittee must state in the annual certification that the Permittee has operated and maintained the control system according to the manufacturer's specifications and instructions.
 4. The Permittee must record the results of all control system inspections, deviations from proper operation, and any corrective action taken.
 5. The Permittee must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.
- iv. The Permittee must demonstrate continuous compliance regarding operating the affected tank with a cover as follows: [40 CFR 63.11508(d)(6) and 20 DCMR 201]
1. The Permittee must operate the tank with the cover in place at least 95 percent of the electrolytic process operating time.
 2. The Permittee must either:
 - A. Record the times that the tank is operated and the times that the tank is covered on a daily basis, or
 - B. Ensure that the electrolytic process cannot operate when tank covers are open. If this latter option for compliance with this requirement is chosen, the Permittee shall perform a test at least twice per year (with the tests approximately six months apart) to ensure that the automatic shut-down system is operational.
 3. The Permittee must state in the annual certification that the Permittee has operated the tank with the cover in place at least 95 percent of the electrolytic process time.
- v. The Permittee must demonstrate continuous compliance as follows: [40 CFR 63.11508(d)(8)]
1. The Permittee must implement the practices found in Condition III(m)(2)(E) of this permit during all times that the affected tank or process is in operation.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 119

- C. The Permittee shall maintain a log of the dates and results of inspections performed pursuant to Condition III(m)(3)(E) of this permit and records of any deficiencies identified pursuant to Conditions III(m)(3)(D) and (E) of this permit as well as the actions taken to correct any identified deficiencies. These records shall identify the personnel/inspector(s) who performed the inspections who shall sign or initial the records to certify that they performed the complete inspection and that the records represent the results of the inspection.
- D. The Permittee shall record the total number of plates and nickel dies produced per each bath as well as the total number of hours of operation of the nickel electroforming and plating line each month and each year.
- E. The Permittee shall keep records of any occurrences of visible emissions from the emission points of the nickel electroforming and plating line as well as any actions taken to correct the problem.
- F. The Permittee shall keep records of any occurrences of exceedances of the requirements of Condition III(m)(1)(D) of this permit and any odor complaints received. The Permittee shall also keep records of the actions taken to correct any identified odor or nuisance pollutant exceedances.
- G. The Permittee shall keep records of the maintenance performed on the nickel electroforming and plating line and associated equipment.
- H. Permittee shall keep the records specified in 40 CFR 63.11509(e)(1) through (3) as follows:
 - i. A copy of any Initial Notification and Notification of Compliance Status that the Permittee submitted and all documentation supporting those notifications.
 - ii. The occurrence and duration of each startup, shutdown, or malfunction of operation of the nickel electroforming and plating line when such startup or shutdown causes the source to exceed any applicable emission limitation.
 - iii. The occurrence and duration of each malfunction of operation or process equipment or the required air pollution control and monitoring equipment.
 - iv. All required maintenance performed on the air pollution control and monitoring equipment.
 - v. The records required to show continuous compliance with each management practice and equipment standard that applies to the equipment, as specified in III(m)(3)(C) of this permit.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 120

- I. The Permittee shall keep records of the date, time, and results of all testing performed pursuant to Condition III(m)(3)(C)(iv)(2)(B) of this permit.

5. Notification and Reporting Requirements:

- A. If the Permittee makes a change to the following items (as compared to the previously submitted Notification of Compliance Status) that does not result in a deviation, the Permittee shall submit an amended Notification of Compliance Status within 30 days of making the change: [40 CFR 63.11509(b)(3)]
 - i. List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources;
 - ii. Description of the capture and emission control systems used to comply with the applicable equipment standards; or
 - iii. Statement by the Permittee of the affected source as to whether the source is in compliance with the applicable standards or other requirements.
- B. The Permittee shall prepare an annual compliance certification report according to Conditions III(m)(5)(B)(i) through (v) of this permit. Unless requested by the Department or required to be submitted under a different regulatory or permit requirement, these reports do not need to be submitted unless a deviation from the requirements of any of the permit conditions of this permit has occurred during the reporting year, in which case, the annual compliance report shall be submitted along with the deviation report. [40 CFR 63.11509(c)(2), (4), (6), and (7)]
 - i. The Permittee must state that it has operated and maintained the control system according to the manufacturer's specifications and instructions.
 - ii. The Permittee must state that the Permittee has operated the tank with the cover in place at least 95 percent of the electrolytic process time.
 - iii. The Permittee must state that you implemented the applicable management practices in Condition III(m)(3)(D) of this permit as practicable.
 - iv. Each annual compliance report shall be prepared no later than January 31 of each year immediately following the reporting period and kept in a readily-accessible location for inspector review.
 - v. If a deviation has occurred during the year, each annual compliance report shall be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 121

- C. Any deviations from the compliance requirements specified in this permit that occurred during a calendar year shall be submitted (postmarked or delivered), along with the annual compliance certification report, no later than January 31 of the year immediately following the calendar year reporting period. [40 CFR 63.11509(d)]
- D. All reports and certifications required to be submitted pursuant to Conditions III(m)(5)(A) through (C) of this permit shall be submitted to both of the following addresses:

Chief, Compliance and Enforcement Branch
Department of Energy and Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington DC 20002

and

U.S. Environmental Protection Agency, Region III
Attn: Director, Air Protection Division
1650 Arch Street
Philadelphia, PA 19103

- E. The Permittee shall comply with the reporting requirements of Condition I(d)(4).
- F. In addition to complying with Conditions III(m)(5)(A) through (E) and any other reporting requirements mandated by the 20 DCMR, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:
- i. The name and location of the facility;
 - ii. The subject source(s) that caused the excess emissions;
 - iii. The time and date of the first observation of the excess emissions;
 - iv. The cause and estimated/expected duration of excess emissions;
 - v. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and

- vi. The proposed corrective actions and schedule to correct the conditions causing the excess emission.

n. **Emission Unit ID 14-CTS: Central Trim System (CTS)** collects the trim from all paper processing sections in the Main Building. The processing sections that are tied into the CTS include: 3B Trim Chopper (1); A200 Currency Exam (9) and #076 Trim Chopper (9); A170 Currency Exam (2) and #76 Trim Chopper (1). The CTS consists of two identical systems, each consisting of a cyclone, a Marin 203-101 continuous baler, and a Mactiflo 4MTF80 baghouse. After collection, the trim is fed to the cyclone of the Central Trim System, which feeds the Marin 203-101 Continuous Automatic Baler. The cyclone exhausts through the Mactiflo 4MTF80 baghouse, where the particulate matter is collected. This two systems provide complete redundancy to ensure that the equipment feeding the CTS can be operated with proper controls at any time.

1. **Emission Limitations:**

- A. Emissions of dust shall be minimized in accordance with the requirements of 20 DCMR 605 and the "Operational Limitations" of this permit (Condition III(n)(2)).
- B. The emission of fugitive dust to the outdoor atmosphere from the CTS is prohibited. [20 DCMR 605.2]
- C. The discharge of total suspended particulate matter into the atmosphere from the CTS shall not exceed either of the following: [20 DCMR 603.1 and 20 DCMR Chapter 6, Appendix 6-1]
 - i. Three hundredths (0.03) grains per dry standard cubic foot of the exhaust; and
 - ii. 1.50 pounds per hour.
- D. Visible emissions shall not be emitted from the CTS. [20 DCMR 201 and 20 DCMR 606.1]
- E. 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]

2. **Operational Limitations:**

- A. Except where Condition III(n)(2)(I) is invoked, the CTS shall be operated only when one of the Mactiflo 4MTF80 baghouse dust collectors is concurrently operated and controlling emissions. [20 DCMR 201]

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 123

- B. Except where Condition III(n)(2)(I) is invoked, all dust captured from the processing sections tied to the CTS must be vented through one of the dust collector, fabric filter baghouse units. [20 DCMR 201]
- C. Each Mactiflo 4MTF80 baghouse dust collector shall maintain a 99.9% efficiency whenever dust is being vented to it. [20 DCMR 201] *Note that compliance with this requirement will be assumed if the manufacture's specifications for the filters being used document that they will meet this standard and all maintenance and operational requirements of the manufacturer's specifications and this permit are being met, unless other credible evidence of a violation is identified.*
- D. The proper operation of the Mactiflo 4MTF80 baghouse dust collectors shall be demonstrated when the differential pressure across the bags maintained between 0.20 and 4.0 inches of water. An alternate operating differential pressure range may be established administratively if such a range is justified by the Permittee based on emission testing results and/or monitoring results and is approved by the Department in writing. Any such range shall consist of a minimum level sufficient to ensure that the bags have not failed and a maximum level to ensure that bags are not blinded. A photohelic pressure gauge shall be used to monitor the pressure drop. [20 DCMR 201]
- E. A set of replacement parts for the dust collectors, as recommended by the equipment manufacturers, shall be kept on site at all times, including a set of at least ten replacement bags. [20 DCMR 201]
- F. The Permittee shall take reasonable precautions to minimize the emission of any fugitive dust into the outdoor atmosphere. [20 DCMR 605.1]:
- G. The CTS and associated processing sections and dust control equipment shall be operated and maintained in accordance with the recommendations of the equipment manufacturers. [20 DCMR 201]
- H. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the CTS in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [20 DCMR 606.3]
- I. As an alternative to operating the baghouse dust collectors, the Permittee may establish an alternative control method that achieves an equal or better level of control and/or allows the ink mill and associated ink solids handling to be

reclassified as an insignificant activity under Condition IV of this permit. Any such plan shall be approved in writing by the Department either via a permit issued pursuant to 20 DCMR 200 or a determination that such a permit is not required. [20 DCMR 201] If such a project is implemented, the Permittee shall apply, within twelve (12) months of the date of the approval, for a modification to this Title V permit.

3. Monitoring and Testing Requirements:

- A. The Permittee shall monitor the differential pressure across the baghouse filters to ensure compliance with Condition III(n)(2)(D).
- B. At least once per month, during operation of the CTS, the Permittee shall conduct visual observations of the emissions from the exhaust outlet. Visible observations shall be performed from each baghouse line operated that month. If visible emissions of fugitive dust or smoke are observed in excess of the limits specified in Conditions III(n)(1)(B), (C) or (D), prompt action shall be taken to correct the problem. Operations shall not continue (except as necessary for troubleshooting purposes) if such exceedances are observable, until such time as the problem has been addressed and the equipment has been returned to compliance.
- C. The Permittee shall monitor any odor emitted from the facility and take any actions necessary to ensure compliance with Condition III(n)(1)(E).
- D. The Permittee shall monitor the conditions at the site and take any actions necessary to ensure compliance with the requirements of Condition III(n)(2)(E), (F), and (H).
- E. Whenever the CTS is in operation, the Permittee shall monitor to ensure that the appropriate dust collector is in use to ensure compliance with Conditions III(n)(2)(A) and (B).
- F. At least once during the term of this permit, the Permittee shall perform emission testing in accordance with the following procedures and requirements to determine compliance with Condition III(n)(1)(C) of this permit:
 - i. EPA Reference Method 5 (found 40 CFR 60, Appendix A) shall be used;
 - ii. Each test shall consist of three test runs whose results shall be averaged to determine the results of the testing program;
 - iii. Testing shall be performed for each cyclone/baghouse line to determine if both lines are operating in compliance;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 125

- iv. Testing shall be performed while the equipment feeding dust to the baghouses are operating at or near maximum capacity to maximize dust loading (except as specified in Condition III(n)(3)(F)(v);
- v. If at least 85% of the maximum capacity of the equipment cannot be achieved during the testing, the Permittee shall maximize operations to the extent possible and the capacities achieved shall be adopted as operational limitations on the equipment until such time as emission testing has been performed at a higher rate; and
- vi. Differential pressure across the baghouse being tested shall be monitored and recorded throughout the testing program.

This testing may be waived if, prior to the deadline for performing this testing, the emission outlet from this equipment is re-directed to vent into the building and a Chapter 3 permit amendment request has been submitted to reclassify the equipment as an insignificant activity to be moved to Condition IV of this permit. Prior to re-directing the equipment to vent into the building, if the control device is to be modified or replaced, the Permittee shall either obtain concurrence in writing from the Department that no permit is required pursuant to 20 DCMR 200 or obtain a permit pursuant to that section.

- G. The emission testing required pursuant to Condition III(n)(3)(F) shall be performed and reported to the Department in accordance with the following requirements [20 DCMR 502]:
 - i. One (1) original copy of the test protocol shall be submitted to the following address a minimum of thirty (30) days in advance of the proposed test date. The test shall be conducted in accordance with federal and District requirements.

Chief, Compliance and Enforcement Branch
Department of Energy and Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington, DC 20002
 - ii. The test protocol shall be approved by the Department prior to initiating any testing. Upon approval of the test protocol, the Company shall finalize the test date with the assigned inspector in the Compliance and Enforcement Branch. The Department must have the opportunity to observe the test for the results to be considered for acceptance.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 126

- iii. The final results of the testing shall be submitted to the Department within sixty (60) days of the test completion. One (1) original test report shall be submitted to the address in Condition III(n)(3)(G)(i) above.
- iv. The final report of the results shall include the emissions test report (including raw data from the test) as well as a summary of the test results and a statement of compliance or non-compliance with permit conditions to be considered valid. The summary of results and statement of compliance or non-compliance shall contain the following information:
 1. A statement that the Permittee has reviewed the report from the emissions testing firm and agrees with the findings;
 2. Permit number(s) and condition(s) which are the basis for the compliance evaluation;
 3. Summary of results with respect to each permit condition; and
 4. Statement of compliance or non-compliance with each permit condition.
- v. The results must demonstrate to the Department's satisfaction that the emission unit is operating in compliance with the applicable regulations and conditions of this permit; if the final report of the test results shows non-compliance the Permittee shall propose corrective action(s). Failure to demonstrate compliance through the test may result in enforcement action.

4. Record Keeping Requirements:

The following information shall be recorded, and maintained in a log at the facility and made available when requested, for a period of not less than five years from the date that each record is recorded. [20 DCMR 500.8]

- A. At least once each day, during operation of the CTS, the Permittee shall read and record in a log, the differential pressure measured across the Mactiflo 4MTF80 baghouse dust collector to ensure compliance with the operational requirements of Conditions III(n)(2)(A), (B), and (D) of this permit. The particular baghouse in operation shall be noted. If the CTS is not operating on a given day, this shall be so noted in the log, in lieu of recording the differential pressure.
- B. The Permittee shall keep a record of all deviations from the pressure drop requirements of Condition III(n)(2)(D) and the actions taken to correct each identified deviation.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 127

- C. The Permittee shall maintain a record of all maintenance performed on the unit to document compliance with Condition III(n)(2)(G).
- D. The Permittee shall maintain a copy of the fabric filter baghouse manufacturers' maintenance and operating recommendations and make such available to Department inspectors upon request.
- E. The Permittee shall maintain a copy of the specifications for the bags used in each baghouse to document compliance with Condition III(n)(2)(C).
- F. The Permittee shall keep a record of the dates, results, and personnel performing all visible emissions monitoring performed pursuant to Condition III(n)(3)(B).
- G. The Permittee shall keep records of all odors identified pursuant to Condition III(n)(3)(C) and the actions taken to correct them.
- H. The Permittee shall keep records of any fugitive dust exceedances identified pursuant to Condition III(n)(3)(D) and the actions taken to correct them.
- I. The Permittee shall maintain records of the results of all emissions testing obtained pursuant to the requirements of Conditions III(n)(3)(F) and (G) and Condition I(a)(6) of this permit.

5. Reporting Requirements:

None in addition to Condition I(d)

- o. **Emission Unit ID 15: Ink Solids Handling with associated RotoClone Wet Dust Collector:** Exhaust from the ink mill's dust collection hoods and bucket washer slots is collected and controlled by the RotoClone, an American Air Filter (AAF) RotoClone wet centrifugal dust collector, Model No. 20, Type W, Arrangement A.

The dust laden air enters the RotoClone where it is subject to a fine water spray. The water and dust, being heavier than air, impinge on the blade of the impeller and then are directed into the water cone by the special blade design and the centrifugal force of the rotating impeller. The slurry drains from the unit through the sludge chute to the expansion chamber. The impeller imparts energy to the clean air which being lighter than the water and dust is discharged in front of the water cone and continues on to the clean air outlet.

1. Emission Limitations:

- A. Emissions of dust shall be minimized in accordance with the requirements of 20 DCMR 605 and the "Operational Limitations" of this permit (Condition III(o)(2)).

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 128

- B. The emission of fugitive dust to the outdoor atmosphere from the ink mill and RotoClone system is prohibited. [20 DCMR 605.2]
- C. The discharge of total suspended particulate matter into the atmosphere from the ink solids handling system shall not exceed either of the following: [20 DCMR 603.1 and 20 DCMR Chapter 6, Appendix 6-1]
 - i. Three hundredths (0.03) grains per dry standard cubic foot of the exhaust; and
 - ii. 0.62 pounds per hour.
- D. Visible emissions shall not be emitted from the ink solids handling system. [20 DCMR 201 and 20 DCMR 606.1]
- E. 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]

2. Operational Limitations:

- A. Except where Condition III(o)(2)(F) is invoked, the ink mill and associated ink solids handling shall only be operated when the American Air Filter (AAF) RotoClone wet centrifugal collector is properly operating and all dust captured from the ink mill and associated ink solids handling is being vented through the RotoClone. [20 DCMR 201]
- B. Except where Condition III(o)(2)(F) is invoked, the RotoClone wet centrifugal collector shall maintain a 90% efficiency. Except where emission testing is required pursuant to Condition I(a)(6) or other credible evidence is available, the RotoClone will be considered to be meeting this standard whenever water is being circulated through the system at a rate of at least 4.5 gallons per minute (gpm) with a minimum water pressure of 40 pounds per square inch (gauge pressure) (psig). [20 DCMR 201]
- C. The Permittee shall take reasonable precautions to minimize the emission of any fugitive dust into the outdoor atmosphere. [20 DCMR 605.1]
- D. The RotoClone wet centrifugal collector shall be operated and maintained in accordance with the recommendations of the equipment manufacturers.
- E. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the RotoClone wet centrifugal collector in a manner consistent with good air pollution control

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 129

practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [20 DCMR 606.3]

- F. As an alternative to operating the RotoClone wet centrifugal collector, the Permittee may establish an alternative control method that achieves an equal or better level of control and/or allows the ink mill and associated ink solids handling to be reclassified as an insignificant activity under Condition IV of this permit. Any such plan shall be approved in writing by the Department either via a permit issued pursuant to 20 DCMR 200 or a determination that such a permit is not required. [20 DCMR 201] If such a project is implemented, the Permittee shall apply, within twelve (12) months of the date of the approval, for a modification to this Title V permit.

3. Monitoring and Testing Requirements:

- A. The Permittee shall monitor the water flow rate and water pressure to ensure compliance with Condition III(o)(2)(B).
- B. At least once per month, during operation of the RotoClone wet centrifugal collector, the Permittee shall conduct visual observations of the emissions from the plant. If visible emissions of fugitive dust or smoke are observed in excess of the limits specified in Conditions III(o)(1)(A), (B) or (D), prompt action shall be taken to correct the problem. Operations shall not continue (except as necessary for troubleshooting purposes) if such exceedances are observable, until such time as the problem has been addressed and the equipment has been returned to compliance.
- C. The Permittee shall monitor any odor emitted from the facility and take any actions necessary to ensure compliance with Condition III(o)(1)(E).
- D. The Permittee shall monitor the conditions at the site and take any actions necessary to ensure compliance with the fugitive dust requirements of Conditions III(o)(2)(C) and (F).
- E. Whenever the ink mill or associated ink solids handling is in operation, the Permittee shall monitor the dust collector to ensure that it is operating properly to assist in ensuring compliance with Condition III(o)(2)(A).
- F. At least once during the term of this permit, the Permittee shall perform emission testing in accordance with the following procedures and requirements to determine compliance with Condition III(o)(1)(C) of this permit:

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 130

- i. EPA Reference Method 5 (found 40 CFR 60, Appendix A) shall be used;
- ii. Each test shall consist of three test runs whose results shall be averaged to determine the results of the testing program;
- iii. Testing shall be performed while the ink mill is operating at or near maximum capacity to maximize dust loading (except as specified in Condition III(o)(3)(F)(iv));
- iv. If at least 85% of the maximum capacity of the equipment cannot be achieved during the testing, the Permittee shall maximize operations to the extent possible and the capacities achieved shall be adopted as operational limitations on the equipment until such time as emission testing has been performed at a higher rate.

This testing may be waived if, prior to the deadline for performing this testing, the emission outlet from this equipment is re-directed to vent into the building and a Chapter 3 permit amendment request has been submitted to reclassify the equipment as an insignificant activity to be moved to Condition IV of this permit. Prior to re-directing the equipment to vent into the building, if the control device is to be modified or replaced, the Permittee shall either obtain concurrence in writing from the Department that no permit is required pursuant to 20 DCMR 200 or obtain a permit pursuant to that section.

G. The emission testing required pursuant to Condition III(o)(3)(F) shall be performed and reported to the Department in accordance with the following requirements [20 DCMR 502]:

- i. One (1) original copy of the test protocol shall be submitted to the following address a minimum of thirty (30) days in advance of the proposed test date. The test shall be conducted in accordance with federal and District requirements.

Chief, Compliance and Enforcement Branch
Department of Energy and Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington, DC 20002

- ii. The test protocol shall be approved by the Department prior to initiating any testing. Upon approval of the test protocol, the Company shall finalize the test date with the assigned inspector in the Compliance and Enforcement Branch. The Department must have the opportunity to observe the test for the results to be considered for acceptance.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 131

- iii. The final results of the testing shall be submitted to the Department within sixty (60) days of the test completion. One (1) original test report shall be submitted to the address in Condition III(n)(3)(G)(i) above.
- iv. The final report of the results shall include the emissions test report (including raw data from the test) as well as a summary of the test results and a statement of compliance or non-compliance with permit conditions to be considered valid. The summary of results and statement of compliance or non-compliance shall contain the following information:
 1. A statement that the Permittee has reviewed the report from the emissions testing firm and agrees with the findings;
 2. Permit number(s) and condition(s) which are the basis for the compliance evaluation;
 3. Summary of results with respect to each permit condition; and
 4. Statement of compliance or non-compliance with each permit condition.
- v. The results must demonstrate to the Department's satisfaction that the emission unit is operating in compliance with the applicable regulations and conditions of this permit; if the final report of the test results shows non-compliance the Permittee shall propose corrective action(s). Failure to demonstrate compliance through the test may result in enforcement action.

4. Record Keeping Requirements:

The following information shall be recorded, and maintained in a log at the facility and made available when requested, for a period of not less than five years from the date that each record is recorded. [20 DCMR 500.8]

- A. The Permittee shall record in a log the volumetric flow rate of water circulating through the RotoClone in gpm as well as the water pressure in psig at least once per calendar quarter, during operation of the equipment to ensure compliance with Condition III(o)(2)(B). If no operations of the ink mill or associated ink solids handling occur in a given quarter, this shall be so noted, in lieu of recording water flow rate and pressure.
- B. The Permittee shall keep a record of all deviations from the water flow rate and pressure requirements of Condition III(o)(2)(B) and the actions taken to correct each identified deviation.

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 132

- D. The Permittee shall maintain a record of all maintenance performed on the unit to document compliance with Condition III(o)(2)(D).
- E. The Permittee shall maintain a copy of the American Air Filter (AAF) RotoClone wet centrifugal collector manufacturer's maintenance and operating recommendations and make such available to the Department upon request.
- F. The Permittee shall keep a record of the results of all visible emissions monitoring performed pursuant to Condition III(o)(3)(B).
- H. The Permittee shall keep records of all odors identified pursuant to Condition III(o)(3)(C) and the actions taken to correct them.
- I. The Permittee shall keep records of any fugitive dust exceedances identified pursuant to Condition III(o)(3)(D) and the actions taken to correct them.
- J. The Permittee shall maintain records of the results of all emissions testing obtained pursuant to the requirements of Conditions III(o)(3)(F) and(G) and Condition I(a)(6) of this permit.

5. Reporting Requirements:

None in addition to Condition I(d)

IV. Miscellaneous/Insignificant Activities

- a. The Department does not consider the "miscellaneous activities" (also commonly known as "insignificant activities") listed in Condition IV(d) to be significant sources. However, they are subject to the General Permit Requirements (Condition I) and Facility-Wide Permit Requirements (Condition II) of this permit as well as the conditions specified below for each unit type. [See EPA White Paper, Wegman, July 10, 1995]
- b. Emissions from the miscellaneous activities must be reasonably estimated, and the Permittee shall report the estimated emissions, as well as the specifics of the method(s) of estimation, in the annual emission statement required by Condition I(d)(2)(C) of this permit. [20 DCMR 500]
- c. The Permittee shall maintain an inventory of the miscellaneous/insignificant activities listed in Condition IV of this permit and shall submit a current copy of this inventory to the Department annually with the annual Title V certification report.
- d. The following activities are subject to Condition IV(a), (b), and (c) as well as the conditions specified below (where applicable):

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 133

1. Miscellaneous VOC emissions from equipment insignificant activities listed in Condition IV(d)(2) through (21) shall meet the following requirements:

A. Emission Limitations:

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 (3) pounds 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. [20 DCMR 700.2]

B. Monitoring and Record Keeping

Unless another monitoring and record keeping approach is approved by the Department, the Permittee shall maintain daily records of solvent usage in the listed equipment and subtract out recovered waste solvent to determine daily VOC emissions from the equipment. Such records shall be made available to the Department upon verbal or written request. These records shall be totaled for purposes of reporting annual emissions in accordance with Condition IV(b).

2. Miscellaneous chemical use and miscellaneous cleaning sources including the following:
 - Several small laboratory fume hoods and laboratory fugitive emissions;
 - Photoengraving;
 - Bench-scale laboratory equipment used for physical or chemical analysis (not including aforementioned laboratory fume hoods or vents);
 - Design and engraving of master proofs and dies for intaglio printing;
 - Janitorial services and consumer use of janitorial products;
 - Manufacture of PVC coated rollers for inking in and wiping tests;
 - Calibration and maintenance of laboratory equipment or other analytical equipment;
 - Storage of inks and raw materials, which must be stored in closed containers;
 - Storage, drum preparation, and QC testing of hazardous and non-hazardous wastes; and
 - Miscellaneous clean-up operations;
3. Printing support operations, fugitive emissions from ink reconstitution/mill, ink jet, roller recovery, engraving
4. Carpentry shop operations;
5. Masonry shop operations;

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 134

6. Electric shop operations;
7. Plumbing shop operations;
8. Sheet metal shop operations;
9. Electro-machinist shop operations;
10. Machine shop operations;
11. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emissions of HAP metals;
12. Laser trimmers which shall use dust collection equipment to minimize fugitive dust emissions;
13. Processing, testing, inspection, and shredding of paper inside building in facilities with no externally ducted emissions point;
14. Processing of photographic films for proofs and offset printing;
15. Degreasing equipment using only solvents with zero VOC content as measured by EPA reference method 24;
16. Mixing of concrete;
17. Pretreatment of wastewater from electroplating operations;
18. Pretreatment of Dalmar wiping solution from printing processes;
19. Firing range where only lead-free bullets shall be used;
20. Cooling towers;
21. Natural gas-fired fuel burning equipment with heat input ratings less than 5 MMBTU/hr, including natural gas-fired kitchen equipment.

A. Emission Limitations:

- i. Particulate matter emissions from each unit with a heat input rating less than or equal to 3.5 MMBTU/hr shall not exceed 0.13 pounds per MMBTU. [20 DCMR 600.1]

- ii. Particulate matter emissions from each unit with a heat input rating greater than 3.5 MMBTU/hr and less than 5 MMBTU/hr shall determine its particulate matter limit (to the nearest hundredth of a pound per MMBTU) from the following equation:

$$E = 0.17455 \times H - 0.23522$$

Where:

E = the allowable emissions in pounds per MMBTU of heat input and

H = the heat input of the unit in MMBTU/hr

- iii. The Permittee is deemed to have complied with Conditions IV(d)(12)(A)(i) and (ii) by complying with the operational limits specified in Condition IV(d)(12)(B)(i) and (ii) below, unless other credible evidence of a violation of this limit is identified. [20 DCMR 600.1]

B. Operational Limits:

- i. The fuel burning equipment shall fire natural gas only. [20 DCMR 201]
- ii. The fuel burning equipment shall be operated at all times in a manner consistent with the manufacturer's specifications for the equipment or to industry standards for such equipment, if such specifications are not available for the specific equipment at the facility. [20 DCMR 201.1]

C. Monitoring and Testing Requirements:

- i. The Department reserves the right to require the Permittee to conduct performance tests on any or all of these units for any reasonable purpose, in accordance with Condition I(a)(6). If such testing is required, the Permittee shall furnish the Department with a written report of the results of such performance tests in accordance with the following requirements [20 DCMR 502]:
 1. One (1) original test protocol shall be submitted to the following address a minimum of thirty (30) days in advance of the proposed test date. The test shall be conducted in accordance with Federal and District requirements.

Chief, Compliance and Enforcement Branch
Department of Energy and Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington DC 20002

U.S. Department of the Treasury, Bureau of Engraving and Printing

Draft Title V Renewal Permit No. 035- R1

October 13, 2017

Page 136

2. The test protocol shall be approved by the Department prior to initiating any testing. Upon approval of the test protocol, the Company shall finalize the test date with the assigned inspector in the Permitting and Enforcement Branch. The Department must have the opportunity to observe the test for the results to be considered for acceptance.
3. The final results of the testing shall be submitted to the Department within sixty (60) days of the test completion. One (1) original test report shall be submitted to the address in Condition IV(d)(12)(C)(i)(1) above.
4. The final report of the results shall include the emissions test report (including raw data from the test) as well as a summary of the test results and a statement of compliance or non-compliance with permit conditions to be considered valid. The summary of results and statement of compliance or non-compliance shall contain the following information:
 - a. A statement that the Permittee has reviewed the report from the emissions testing firm and agrees with the findings.
 - b. Permit number(s) and condition(s) which are the basis for the compliance evaluation.
 - c. Summary of results with respect to each permit condition.
 - d. Statements of compliance or non-compliance with each permit condition.
5. The results must demonstrate to the District's satisfaction that the emission unit is operating in compliance with the applicable regulations and conditions of this permit; if the final report of the test results shows non-compliance the Permittee shall propose corrective action(s). Failure to demonstrate compliance through the test may result in enforcement action.
 - iii. The Permittee shall monitor fuel use to collect data on the quantity of natural gas used to assist with compliance with Condition IV(b).

D. Record Keeping Requirements:

- i. The Permittee shall maintain records of the amount of fuel used in each unit each month. Note that where multiple units of this type are served by a single fuel meter, fuel usage may be aggregated where appropriate. These data shall be maintained in a rolling twelve month sum format.
- ii. The Permittee shall maintain a copy of the manufacturer's maintenance and

operating recommendations for the units covered by this permit section, at the facility. If such documentation is unavailable, the Permittee shall maintain documentation of the industry standards to which the unit is being maintained.

E. Reporting Requirements:

None in addition to those specified in Condition I(d) and IV(b) and (c).

V. Permit Shield

No permit shield is granted. [20 DCMR 302.6]

VI. Compliance Schedule

- a. The Permittee shall continue to comply with all applicable requirements. [20 DCMR 301.3(h)(3)(A)]
- b. The Permittee shall meet, in a timely manner, all applicable requirements that become effective during the term of this permit, including, but not limited to, any new air quality regulations and any specific compliance schedules adopted in response to any enforcement action taken against the Permittee by the Department or EPA. [20 DCMR 301.3(h)(3)(B)]