

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

**FACT SHEET AND STATEMENT OF BASIS
FOR PROPOSED PERMITTING ACTION
UNDER 20 DCMR 300 (TITLE V OPERATING PERMIT PROGRAM)**

This “Fact Sheet and Statement of Basis” has been prepared pursuant to 20 DCMR 303.1(c) and 40 CFR 70.7(a)(5).

PERMIT NO. 035-R1

APPLICANT AND PERMITTEE:

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

FACILITY LOCATION:

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

FACILITY DESCRIPTION:

The Bureau of Engraving and Printing (BEP) is a printer of United States currency and other government securities covered by Standard Industrial Classification (SIC) 2759, Commercial Printing, Not Elsewhere Classified, and NAICS Code 323111, Commercial Printing (except Screen and Books).

As background, BEP obtained their first Chapter 3 (Title V) permit #035 on August 27, 2001. BEP submitted a timely renewal application to the Department on February 27, 2006. However, the renewed operating permit was never issued or denied. Therefore, BEP has been operating under the 2001 Title V operating permit, in accordance with term Q.b. of the permit which provides that the existing permit will remain in force pending action on a timely-submitted renewal application.

On March 24, 2014 BEP submitted a revised renewal operating permit application that was originally submitted on February 2, 2006. On May 27, 2014 the Department informed BEP by a letter that the renewal operating permit application was reviewed and found incomplete with one key item relating to the emergency generator sets missing. BEP was asked to revise the application.

On July 16, 2015 BEP submitted a revised Title V operating permit application however, per the Department’s correspondence with BEP, based on the quantity of changes and modifications that

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occurred at the facility since the submittal of the renewal Title V application in 2006 through July 16, 2015, the Department requested that BEP submit an updated Title V application.

BEP submitted an updated application package on June 14, 2016. The application package includes forms for all of the equipment at the facility covered under its existing Title V permit and the changes made to the machinery and operation at the facility since the issuance of the previous Title V operating permit. This permitting action is to address this Title V application.

The following are the new emission units included in the application:

1. Two Simultan presses;
2. Four Super Orlof Intaglio (SOI) presses;
3. New Nickel and Chromium Electroplating Lines;
4. Mini Orlof II Intaglio Test Press;
5. Two Emergency Generators;
6. Large Examining and Printing Equipment (LEPE) press;
7. One Komori Non-heatset Offset press; and
8. Non-Heatset Offset Lithographic press.

The following are the units that have been removed from the facility that are in the current effective Title V permit:

1. Eight Giori I-8 non-heatset intaglio presses (Unit No. 02);
2. One Andreotti Rotogravure press (Unit No. 03);
3. Four web heatset offset Goebel book forming flexo/lithographic presses and associated thermal oxidizer (Unit Nos. 04 and 04-TO);
4. One Giori web heatset intaglio heatset offset press and associated thermal oxidizer (Unit Nos. 06 and 06-TO);
5. Three Goebel book forming letter set presses and associated baghouse (Unit Nos. 083 and 08-BH-A);
6. One incinerator with a heat recovery boiler and one associated baghouse (Unit Nos. 12-1 and 12-BH-WBF);
7. One chromium electroplating line (Unit No. 13-2-Cr);
8. One nickel electroplating line (Unit No. 13-3-Ni); and
9. Three AA/Image Jamie 1000 coilers and three Huck Co. coilers and one associated baghouse (Unit Nos. 14-2 and 14-2BH).

The Department of the Treasury, Bureau of Engraving and Printing is located at 14th and C Streets, Washington, DC. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, and fifty-two (52) weeks per year.

The facility consists of the following sources of air emissions (excluding identified miscellaneous/insignificant sources):

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Emission Units				
Emission Unit ID	Equipment No., Area	Emission Unit Name	Ch. 2 Permit ¹	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 A-300-M, Installed 1987

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Emission Units				
Emission Unit ID	Equipment No., Area	Emission Unit Name	Ch. 2 Permit¹	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

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Emission Units				
Emission Unit ID	Equipment No., Area	Emission Unit Name	Ch. 2 Permit¹	Description
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
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

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Emission Units				
Emission Unit ID	Equipment No., Area	Emission Unit Name	Ch. 2 Permit¹	Description
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
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 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.

In addition, the facility maintains the following miscellaneous/insignificant sources. Note that other insignificant activities were listed in the Title V permit application, but were determined to be non-emitting or so trivial as to not require inclusion in the permit:

1. 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;
2. Printing support operations, fugitive emissions from ink reconstitution/mill, ink jet, roller recovery, engraving
3. Carpentry shop operations;
4. Masonry shop operations;
5. Electric shop operations;
6. Plumbing shop operations;
7. Sheet metal shop operations;
8. Electro-machinist shop operations;

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

EMISSIONS SUMMARY:

The following is an estimate of overall potential emissions from the facility:

FACILITY-WIDE EMISSIONS SUMMARY [TONS PER YEAR]	
Pollutants	Potential Emissions
Sulfur Dioxide (SO ₂)	0.03
Oxides of Nitrogen (NO _x)	7.07
Total Particulate Matter (PM Total)	2.39
Volatile Organic Compounds (VOC)	82.28
Carbon Monoxide (CO)	0.60
Total Hazardous Air Pollutants	3.68

BASIS OF 20 DCMR CHAPTER 3 (TITLE V) APPLICABILITY:

BEP has the potential to emit (PTE) approximately 82.28 tons per year (TPY) of VOC. This exceeds the major source threshold for VOC in the District of Columbia of 25 TPY. Because potential emissions of VOC exceed the major source threshold, pursuant to 20 DCMR 300.1(a), the source is subject to Chapter 3 (Title V) and must obtain an operating permit in accordance with that regulation and Title V of the federal Clean Air Act.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS:

The conditions contained in the draft Title V operating permit are based on underlying requirements of 20 DCMR as well as various federal regulations promulgated pursuant to the federal Clean Air Act. The regulations that are the basis of each condition are cited in the

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operating permit, except that conditions added to make another condition, with a direct underlying regulation, enforceable as a practical matter may, in some cases, not have a specific citation. These latter, un-cited conditions generally consist of monitoring, record keeping, and reporting requirements authorized under 20 DCMR 500.1.

The draft Title V permit has been developed to incorporate the requirements of all applicable requirements as defined in 20 DCMR 399.1 along with additional conditions necessary to make all such requirements enforceable as a practical matter.

Any condition of the draft Title V operating permit that is enforceable by the District but is not federally-enforceable is identified in the Title V permit as such with an asterisk.

It should also be noted that this operating permit is being issued pursuant to the District's authority under 20 DCMR Chapter 2 as well as Chapter 3 (Title V). When the permit is issued for public review, the public notice will reflect this fact.

REGULATORY REVIEW:

This facility has been found to be subject to the requirements of the following regulations (except as specified in the discussion below):

Federal and District Enforceable:

20 DCMR Chapter 1 - General Rules

20 DCMR Chapter 2 - General and Non-Attainment Area Permits

20 DCMR Chapter 3 - Operating Permits and Acid Rain Programs

20 DCMR 500 - Records and Reports

20 DCMR 502 - Sampling, Tests, and Measurements.

20 DCMR 600 - Fuel-Burning Particulate Emission.

20 DCMR 604 - Open Burning

20 DCMR 605 - Control of Fugitive Dust

20 DCMR 606 - Visible Emissions

20 DCMR 700 - Miscellaneous Volatile Organic Compounds (VOC)

20 DCMR 774 - Architectural and Industrial Maintenance Coatings

20 DCMR 800 - Control of Asbestos

20 DCMR 801 - Sulfur Contents of Fuel Oils

20 DCMR 805 - Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen

40 CFR 51.212, 52.12, 52.30, 60.11, and 61.12 - Credible Evidence

40 CFR 60, Subpart QQ - National Emission Standards for the Graphic Arts Industry (*Does not apply to BEP, as BEP does not have publication rotogravure printing presses.*)

40 CFR 60 Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing (*Does not apply to BEP as the facility does not have rotogravure printing presses at this time.*)

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- 40 CFR 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, applies to the diesel fueled emergency generators and the requirements of this Subpart are included in the permit
- 40 CFR 63, Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Paints and Allied Manufacturing (*Does not apply to BEP; see the discussion below.*)
- 40 CFR 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (*Does not apply to BEP; see the discussion below*)
- 40 CFR 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operation at Area Source (*Does not apply to BEP; see the discussion below.*)
- 40 CFR 63, Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants Area Source standards for Plating and Polishing Operation
- 40 CFR 63, Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks
- 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating the Printing and Publishing Industries (*Does not apply to BEP – the subpart only covers major sources of HAPs; BEP is not a major source of HAPs.*)
- 40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (NESHAP for RICE),
- 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (*Does not apply to BEP as the facility does not operate rotogravure or wide-web flexographic printing presses*)
- 40 CFR 82, Subpart G - Protection of Stratospheric Ozone (federally enforceable only except through Title V) (*Note: The Air Quality Division (AQD) did not make a positive determination that this regulation was applicable to the facility, but included it as a standard requirement in the permit.*)
- 40 CFR 82, Subpart H - Halon Emissions Reduction (federally enforceable only except through Title V) (*Note: AQD did not make a positive determination that this regulation was applicable to the facility, but included it as a standard requirement in the permit.*)

District Enforceable Only:

- 20 DCMR 402 - Chemical Accident Prevention (*Note: AQD did not make a positive determination that this regulation was applicable to the facility, but included it as a standard requirement in the permit.*)
- 20 DCMR 900 - Engine idling.
- 20 DCMR 901 - Vehicular exhaust emissions.
- 20 DCMR 902 - Lead Content of Gasoline.
- 20 DCMR 903 - Odorous or other nuisance air pollutants.

Discussion of Specific Regulations:

Note that more detailed regulatory analyses are available for individual emission units permitted

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under the Chapter 2 permitting program since the 2001 Title V permit in the technical support memoranda issued in conjunction with the Chapter 2 permits.

20 DCMR 603 and 20 DCMR Chapter 6, Appendix 6-1 – Particulate Process Emissions

These sections are applicable to the Central Trim System (CTS) with associated baghouse and the ink mill with associated RotoClone. Section 603.1 establishes limits of 0.03 grains per dscf of exhaust gas as well as referencing Appendix 6-1. Appendix 6-1 was used to develop a 1.50 pound per hour particulate matter limit for the CTS based on the 400 lb/hr average material processing rate identified by BEP on AQD Form V.8. Similarly, based on the 140 lb/hr average material usage on AQD Form V.8 for the ink solids handling system, a limit of 0.62 lb/hr of particulate matter was established. These requirements have been placed in the permit.

Chapter 7 - Volatile Organic Compounds

20 DCMR 710 - Intaglio, Flexographic, and Rotogravure Printing

This section applies to all intaglio presses at the facility; there are no flexographic or rotogravure presses installed at the facility. In accordance with this section, BEP is required to limit the VOC content of the wiping solution and the inks associated with the printing units per sections 20 DCMR 710.4, 710.5 and 710.8. Also, BEP is required to prohibit the leaking of solvents or solvent-containing materials from any printing unit (section 20 DCMR 710.13) and prohibit the evaporation of solvent-containing materials during the process of storage and disposal (section 20 DCMR 710.14). These requirements are incorporated in the BEP's Title V permit.

Applicability of this section is also addressed in the various technical support memoranda issued in conjunction with Chapter 2 permits for intaglio printing equipment installed since the 2001 Title V permit.

20 DCMR 716 - Offset Lithography and Letterpress Printing

BEP has the potential to emit more than 25 tpy of VOC and therefore, the offset lithographic printing presses must operate in compliance with 20 DCMR 716. Per 20 DCMR 716.6, BEP is required to limit the alcohol content of dampening solutions for heatset offset web presses to 1.6% or less, or use alcohol-free dampening solutions with a total VOC concentration of 5% or less. BEP is also required to limit the vapor pressure of the cleaning solvents used on offset lithographic presses to 10 mm Hg at 20⁰ Celsius per 20 DCMR 716.8. 20 DCMR 716.8 also sets limits which apply to the letterpress printing units that are installed at BEP, including the COPE, LEPE and Flatbed presses. BEP is required to limit the VOC concentration of cleaning solvents used on letterpresses to 70%, or to limit the vapor pressure of the cleaning solvents used to 10 mm Hg at 20⁰ Celsius. Limits for ink VOC concentrations for offset lithographic and letterpress printing are specified at 20 DCMR 716.11.

Per 20 DCMR 716.14 and 716.16 BEP is required to reduce the VOC emissions from any offset lithography printing heatset ovens by a minimum of ninety percent by using a control device or limit the emissions to 20 ppm by volume. These sections apply to the web heatset press 043, which has a catalytic afterburner. 20 DCMR 716.20 requires monitoring the temperature of the

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control device using a continuous recorder and demonstrating the capture efficiency of the oven to be one hundred percent using an air flow direction measuring device. Other sections of this chapter, like restricting the wasteful usage of VOC containing materials, controlling leaks, and restricting the storage or disposal of VOC containing materials, are applicable to the units at the facility. These requirements are already incorporated in BEP's Title V permit.

New Source Performance Standards (NSPS) [40 CFR 60]:

NSPS apply to this facility as the following analyses and applicability determinations indicate:

40 CFR 60 Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines applies to the diesel fueled emergency generators which were installed in the Freight Building at the facility in 2010. The engine manufacturer has certified that the engines comply with the emission standards for new nonroad CI engines at 40 CFR Part 60.4202 for all pollutants, and BEP must maintain copies of these certifications to show compliance with 40 CFR Part 60.4205(b) and 60.4211(c). Per 40 CFR part 60.4207, BEP is required to use diesel fuel that meets the requirements of 40 CFR part 80.510(b) for nonroad diesel fuel, and under 40 CFR Part 60.4209, the engines are required to non-resettable hour meters. 40 CFR Part 60.4211(e) limits operation of each emergency engine for maintenance checks and readiness testing to less than 100 hours per year. All these requirements are included in the BEP's Title V permit.

40 CFR 60, Subpart QQ - Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing – This regulation does not apply to BEP since the only rotogravure press was removed in 2006 and no more new rotogravure units have been added to the to the facility.

40 CFR 60 Subpart FFF- Standards of Performance for Flexible Vinyl and Urethane Coating and Printing - This regulation does not apply to BEP since does not print or coat flexible vinyl or urethane products with rotogravure presses; the only Rotogravure press was removed in 2006 and no new rotogravure units have been added to the facility.

National Emission Standards for Hazardous Air Pollutants (NESHAP) [40 CFR 63]
NESHAPs apply to this facility as the following analyses and applicability determinations indicate:

40 CFR 63 Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source Standards for Paints and Allied Products Manufacturing – This NESHAP potentially applies to BEP since BEP manufactures small quantities of ink as a support process. However, the specific HAPs targeted by this Subpart (Benzene, Methylene, Chloride, or compounds of chromium, Cadmium, Lead and/or Nickel) are not constituents of the ink that are manufactured at BEP, and they are not used in this process. As a result, BEP is not subject to this Subpart.

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40 CFR 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operation at Area Source – This NESHAP is not applicable to BEP as BEP performs no paint stripping using methylene chloride, it does not spray apply coatings to motor vehicles or mobile equipment, and it does not spray coatings with the target HAPs listed in the regulation. To ensure that this regulation is not triggered, requirements have been added to the permit specifically disallowing any of these three types of painting operations.

40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating – This NESHAP only applies to facilities that are major sources of HAPs. BEP is not a major source of HAPs, so this subpart is not applicable to them.

40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry – This regulation does not apply to BEP as the facility does not operate rotogravure or wide-web flexographic printing presses.

40 CFR 63, Subpart N - National Emission Standards for Chromium Emission from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks - applies to BEP, as BEP performs chromium electroplating. BEP has requested a Federally enforceable permit limit of 60 million ampere hours per year to establish and maintain itself as a small hard chromium electroplating facility as specified in Condition III(1)(2)(B) of the permit. The requirements of Subpart N were incorporated into Chapter 2 Permit No. 6378, issued June 26, 2015, the conditions of which have been transferred into this Title V permit. A technical support memo was issued by the Department on April 28, 2015 which further discusses the applicability of this regulation and the requirements placed in the Chapter 2 permit, and hence this Title V permit.

40 CFR 63, Subpart WWWW - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Plating and Polishing Operations, applies to the nickel plating line at BEP. Per this Subpart, BEP controls the nickel plating emissions with packed bed scrubbers. These scrubbers are required to be operated according to the manufacturer's specifications and to comply with the management practices found in 40 CFR 63.11507(g), as applicable. Chapter 2 Permit No. 6377 was issued to BEP on February 9, 2015 to cover this equipment. A more thorough evaluation of the requirements applicable to the nickel plating line is found in the November 6, 2014 "Chapter 2 Technical Support Memorandum" as well as in the Title V permit application update dated June 14, 2016. The requirements of the Chapter 2 permit have been transferred into the Title V permit.

40 CFR 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories – This regulation does not apply to BEP as they are not "primarily engaged" in operations in any of the nine source categories listed in 40 CFR 63.11514(a).

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40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines applies to each existing, new, or reconstructed stationary reciprocating internal combustion engine (RICE) located at a major or area source of hazardous air pollutants (HAP). A stationary RICE is considered existing if its construction commenced before June 12, 2006. The diesel fire pump at BEP was constructed prior to 2006 (constructed in 1996) and therefore is categorized as an existing stationary compression ignition engine at an area source of HAPs emissions. This unit is not exempted under 40 CFR 63.6585(f) as it does not meet the definitions of existing residential, commercial, or institutional emergency stationary RICE located at an area source of HAP emissions. The facility's NAICS code, 323111, is specifically listed as not meeting these definitions in EPA's August 9, 2010 "Guidance Regarding Definition of Residential, Commercial, and Institutional Emergency Stationary RICE in the NESHAP for Stationary RICE". As such, the requirements of this regulation have been applied to the emergency fire pump.

It should also be noted that this regulation applies to the two emergency generator sets at the facility, but because they are considered "new stationary RICE" under the rule, their only requirements are to comply with 40 CFR 60, Subpart IIII.

40 CFR 64 - Compliance Assurance Monitoring (CAM):

CAM regulations apply to pollutant-specific emission units at a major source that have pre-control emissions greater than the Title V major source thresholds and use a control device to achieve compliance. None of the emission units with control devices have potential pre-controlled emissions in excess of any major source threshold at BEP. Therefore CAM does not apply. See also the discussion of applicability of CAM in the June 14, 2016 Title V permit application update submitted by BEP.

Greenhouse Gas (GHG) Requirements:

Because Chapter 3 (Title V) was triggered by other pollutants, no evaluation was made to determine if the facility would trigger Title V applicability under the GHG Tailoring Rule. No modifications have been made to the source that would trigger Prevention of Significant Deterioration (PSD) applicability under the GHG Tailoring Rule (which has been overturned by the U.S. Supreme Court in any case). Other than this requirement, there are no other applicable requirements related to GHGs at this time; therefore none were included in the permit.

20 DCMR Chapter 2 Permits:

The Air Quality Division (AQD) of the Department is using Chapter 2 authority to update other permit requirements where applicable. As such, this draft Title V permit will be issued for public notice pursuant to both Chapter 2 and Chapter 3 public notice requirements. The requirements of the following permits, issued under the authority of 20 DCMR Chapter 2 since the previous Title V permit was issued in 2001, have been incorporated into the draft Title V permit and updated where appropriate (See also the previous table listing emission units for more information about the covered units.):

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- Permit No. 6338-R1 – Research press issued May 30, 2014
- Permit No. 6373-R1 – Operate simultan , sheet fed, two sided, eight plate cylinder, non-heatset lithographic printing press #310 issued October 29, 2014
- Permit No. 6374-R1 – Operate simultan , sheet fed, two sided, eight plate cylinder, non-heatset lithographic printing press #903 (Note: An in-line continuous inkjet printer, also known as the “Parvis system”, was installed on this press in 2013 for a pilot test; it remains on the press but is not permitted to operate.) issued October 29, 2014
- Permit No. 6377 – Operate a nickel electroplating line, issued February 9, 2015
- Permit No. 6378 – Operate a hard chromium electroplating line, issued June 26, 2015
- Permit No. 6404-R1 – Operate 1000 kW diesel emergency generator Set #1, issued August 13, 2014
- Permit No. 6405-R1– Operate 1000 kW diesel emergency generator Set #2, issued August 13, 2014
- Permit No. 6574 – Operate (LEPE) Letterpress (formerly SCOPE #1), issued July 14, 2015
- Permit No. 6581-R1 – Operate Super Orlof Intaglio Press #901 includes request to use LOVO50 solvent, issued June 6, 2016
- Permit No. 6582 – Operate Super Orlof Intaglio Press #902 includes request to Use LOVO50 solvent, issued June 6, 2016
- Permit No. 6589-R1 – Operate Komori 5 Color Sheetfed Non-Heatset Offset press, issued June 6, 2016
- Permit No. 6706-R1 – Operate KBA Giori Super Orlof Intaglio II (SOI) Press #601, issued June 6, 2016
- Permit No. 6707-R1 – Operate KBA Giori Super Orlof Intaglio II (SOI) Press #602, issued June 6, 2016
- Permit No. 6739 – Operate simultan , sheet fed, two sided, eight plate cylinder, non-heatset lithographic printing press #203, issued October 29, 2014
- Permit No. 6947 – Install and Operate COPE press (from Western Currency Facility), issued September 13, 2016
- Permit No. 6974 – Install and Operate I-10 Press #201, issued January 13, 2016
- Permit No. 6975 – Install and Operate I-10 Press #202, issued January 13, 2016
- Permit No. 6976 – Install and Operate I-10 Press #110, issued January 13, 2016
- Permit No. 6977– Install and Operate I-10 Press #210, issued January 13, 2016

AQD is also using Chapter 2 authority to place unpermitted units which should have previously obtained Chapter 2 permits, but did not, directly into the draft Title V permit, along with appropriate requirements established pursuant to Chapter 2. Additionally, AQD is using Chapter 2 authority to update other permit requirements. As such, this draft Title V permit will be issued for public notice pursuant to both Chapter 2 and Chapter 3 (Title V) public notice requirements.

COMPLIANCE HISTORY:

The applicant was subject to an enforcement action by AQD on December 31, 2009. BEP was

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cited for the following air quality violations:

- Failure to operate thermal oxidizers as required while operating Section 2 and Section 10 equipment;
- Failure to timely report thermal oxidizer shutdowns.

In response, on December 10, 2010 the Parties entered into a settlement agreement under the oversight of the District of Columbia Office of Administrative Hearings. The agreement:

- Reduced the fine to ten thousand dollars (\$10,000.00) in lieu of the assessed seventeen thousand dollars (\$17,000.00);
- Allowed BEP to remove thermal oxidizers 05-TO and 02-FB-TO; and
- Specified that the agreement would remain in effect until BEP is issued a renewal Title V operating permit. The Parties requested that the Court retain jurisdiction over this matter until that time.

At the time of this writing, the only remaining item to be completed from the agreement is issuance of BEP's Title V renewal permit.

In addition to this outstanding action, EPA issued a formal administrative order on August 3, 2015 assessing a penalty of \$14,870 for late notification to EPA of the actual startup date of three hard chromium electroplating tanks and late initial notification to EPA for six nickel electroforming/electroplating tanks.

COMMENT PERIOD:

Beginning Date: October 13, 2017

Ending Date: November 13, 2017

All written comments should be addressed to the following individual and office:

Stephen S. Ours, P.E., Chief, Permitting Branch
Department of Energy and Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington DC 20002

PROCEDURE FOR REQUESTING PUBLIC HEARING:

During public comment period any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to

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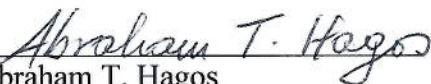
be raised in the hearing. The Department shall grant such a request if it is deemed appropriate. The venue, date, and time for any public hearing shall be announced in the District Register and a daily newspaper.

POINT OF CONTACT FOR INQUIRIES:

Abraham Hagos, Environmental Engineer
Department of Energy and Environment
Air Quality Division
1200 First Street NE 5th Floor
Washington, DC 20002
(202) 724-7778


REVIEWS:

Prepared by:


Abraham T. Hagos
Environmental Engineer

SSOATH

Approved by:


Stephen S. Ours, P.E.
Chief, Permitting Branch