April 25, 2017

Mr. Herbert Jackson, Jr.

Chief Administrative Officer

United States Government Publishing Office

732 North Capitol Street NW

Washington DC 20401

**RE: Permit No. 6683 to Operate a ZMR T-48A Web Press (Part of Press Group 95)**

Dear Mr. Jackson:

Pursuant to sections 200.1 and 200.2 of Title 20 of the District of Columbia Municipal Regulations (20 DCMR), a permit from the Department of Energy and Environment (“the Department”) shall be obtained before any person can construct and operate a new stationary source in the District of Columbia. The application of the United States Government Publishing Office (GPO) (“The Permittee”) to construct and operate one (1) ZMR T-48A heatset web offset lithographic press in Building C (also known as Building 3), as part of Press Group 95, at 732 North Capitol Street NW Washington DC, per the submitted plans and specifications received by the Department December 5, 2012 (as revised by submittals received September 26, 2014 and February 7, 2017), is hereby approved, subject to the following conditions:

I. General Requirements:

1. The press identified as ZMR T-48A web press shall be operated in compliance with the applicable air pollution control requirements of 20 DCMR.

b. This permit expires on April 24, 2022 [20DCMR 200.4]. If continued operation after this date is desired, the owner or operator shall submit a request for an extension by January 24, 2022.

c. Operation of equipment under the authority of this permit shall be considered acceptance of its terms and conditions.

1. The Permittee shall allow authorized officials of the District, upon presentation of identification, to:

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.

e. This permit shall be kept on the premises and produced upon request.

f. Failure to comply with the provisions of this permit may be grounds for suspension or revocation.[20 DCMR 202.2]

g. The Permittee shall supplement the pending Title V operating permit application as appropriate to update it for the operation of this press. [20 DCMR 301.2] This supplement shall be submitted within 180 days of the date of issuance of this permit.

II. Emission Limitations:

* 1.

a. No visible emissions shall be emitted from this equipment. [20 DCMR 201 and 20 DCMR 606.1]

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]

III. Operational Limitations:

* 1. a. No fountain solution shall be used in connection with the printing unit in excess of one and 6-tenths percent (1.6%) 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(b)]:

1. Reduce the on-press (as applied) alcohol content to one and 6-tenths percent (1.6%) alcohol or less (by weight);

2. Use three percent (3%) alcohol or less (by weight) on-press (as-applied) in the fountain solution, provided the solution is refrigerated to less than sixty degrees Fahrenheit (60oF) or sixteen degrees Celsius (16°C); or

3. 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 ten millimeters of mercury (10 mmHg) at twenty degrees Celsius (20°C) or sixty-eight degrees Fahrenheit (68°F) of VOC composite partial pressure calculated as follows [20 DCMR 716.8(a)]:

$$Pp\_{c} = \frac{\sum\_{i=1}^{n}\frac{W\_{i} x VP\_{i}}{Mw\_{i}}}{\frac{W\_{w}}{Mw\_{w}}+\sum\_{i=1}^{n}\frac{W\_{e}}{Mw\_{e}}+\sum\_{i=1}^{n}\frac{W\_{i}}{Mw\_{i}}}$$

Where:

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

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 gram-mole (g/g-mol), as given in chemical reference literature;

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

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

VPi = Vapor pressure of the “i”th VOC compound at twenty degrees Celsius (20oC) or sixty-eight degrees Fahrenheit (68°F), in mmHg, as determined by Condition III(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]:

1. The most recent edition of *The Vapor Pressure of Pure Substances*, Boulbik, Fried, and Hala; Elsevier Scientific Publishing Company, New York;

2. The most recent edition of *Perry’s Chemical Engineer’s Handbook*, McGraw-Hill Book Company;

3. The most recent edition of *CRC Handbook of Chemistry and Physics*, Chemical Rubber Publishing Company;

4. The most recent edition of *Lange’s Handbook of Chemistry*, John Dean, editor, McGraw-Hill Book Company; or

5. Additional sources approved by the SCAQMD or other California Air districts.

d. Whenever the ZMR T-48A web press is operated, the integrated afterburner shall be properly operated and remain effective. [20 DCMR 107.1] Proper and effective operation shall be demonstrated by meeting the following requirements [20 DCMR 201]:

1. Achieving at least a 90% control efficiency of emissions from the dryer; and

2. Maintaining a minimum temperature of 380°C when operating.

Adding diluent air to the exhaust gas stream for the purposes of complying with Condition III(d)(1) is prohibited.

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

f. The Permittee shall ensure that 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]

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 or disposal 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. At all times, including periods of startup, shutdown, and malfunction, the owner 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.

IV. Monitoring and Testing Requirements:

a. At least once during the term of this permit, the Permittee shall conduct performance testing on the press and related afterburner to determine compliance with the minimum destruction efficiency requirement of Condition III(d)(1). The Permittee shall furnish the Department with a written report of the results of such performance test 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

Air Quality Division

Department of Energy and Environment

1200 First Street NE, 5th Floor

Washington, DC 20002

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 Compliance 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(a)(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 the permit condition.

D. Statement of compliance or non-compliance with each permit condition.

5. 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.

b. In addition to complying with Condition IV(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].

c. The Permittee shall monitor the identities, VOC contents, and quantities of each VOC-containing material used on the equipment covered by this permit so as to ensure compliance with Conditions III(a) and (b).

d. 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 in advance by the Department.

1. The Permittee shall monitor the equipment, materials used, storage containers for VOCs and VOC-containing materials, and disposal procedures to ensure compliance with Conditions III(e) through (j).
2. The Permittee shall continuously monitor the afterburner temperature during operation of the press equipment as follows:

1. A temperature sensor that has been properly maintained and calibrated in accordance with the manufacturer’s specifications shall be maintained on the equipment at all times;

2. An interlock shall be maintained on the press equipment such that whenever the temperature of the afterburner drops below 380°C, the press the oven and press shall be automatically shut down;

3. In addition to the automatic monitoring, the press operators shall maintain general awareness of the operating temperature of the afterburner to identify any failures of the interlock system; and

4. At least once per day that the press is operated, the Permittee shall observe and record the afterburner temperature in accordance with Condition V(b)(11).

V. Record Keeping Requirements:

a. The information specified in Condition V(b) shall be maintained by the Permittee at the facility for a period not less than five (5) years from when each record was 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)]

1. The records shall provide sufficient data and calculations to demonstrate clearly that the emission limitations or control requirements are met; and

2. Data or information required to determine compliance with an 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 V(a):

1. Records of the identity and VOC content of each ink, fountain solution, blanket wash, cleaning solution, or other VOC-containing material used in conjunction with the equipment each month;

2. Records of the quantity of each VOC-containing material used on the presses each month;

3. Records of the total 12-month rolling VOC emissions from the equipment, updated monthly;

4. Records of the alcohol content of any fountain solution used in connection with the printing unit sufficient to document compliance with Condition III(a).

5. All information necessary to complete the calculation included in Condition III(b)(2) for each cleaning solution used and showing compliance by that methodology as supplemented by Condition III(c);

6. Records of any VOC leaks identified and the actions taken to correct the problem;

7. Records of all deviations from the requirements of Conditions III (e), (f), and (h);

8. Records of all maintenance performed on the presses;

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

10. Records of any complaints or exceedances related to the odor requirements of Condition II(b) and the response taken by the Permittee to investigate and correct any identified problem(s);

11. Records documenting that, at least once per day that the press is operated, the Permittee has recorded in a permanently bound logbook or in an electronic system, the temperature at which the afterburner is operating, in order to confirm and document proper operation of the interlock required under Condition II(f)(2);

12. Records of any shutdowns of the press resulting from temperature deviations pursuant to Condition III(f)(2) along with records of the actions taken to prevent a recurrence of the temperature deviation; and

13. Records of any other afterburner temperature deviations identified by general monitoring [Conditions IV(f)(3) and (4)] that did not result in shutdown of the press, along with records of the actions taken to prevent a recurrence of the temperature deviation, and actions taken to correct the problem with the interlock required under Condition II(f)(2).

VI. Reporting Requirements [20 DCMR 200.8]:

a. The Permittee shall immediately report to the Department, by telephone, 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)]

b. The Permittee shall furnish to the Department, upon receipt of a written request and within a reasonable time, any information that the Department may request 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 to the Department copies of records required to be kept by the permit. [20 DCMR 302.1(g)(5)]

c. The Permittee shall include the conditions of this permit in each semi-annual and annual compliance certification submitted to the Department pursuant to Chapter 3 permit #029.

d. All reports required pursuant to this permit shall be submitted to:

Chief, Compliance and Enforcement Branch

Department of Energy and Environment

Air Quality Division

1200 First Street NE, 5th Floor

Washington, DC 20002

If you have any questions, please me at (202) 535-1747 or Emily Chimiak at (202) 535-2273.

Sincerely,

Stephen S. Ours, P.E.

Chief, Permitting Branch

Air Quality Division