September 13, 2016

Neal Mohlmann, Chief

Office of Environment and Safety

U.S. Department of the Treasury

Bureau of Engraving and Printing

14th and C Streets, SW

Washington, D.C. 20228

Re: **Permit No. 6947 to Install and Operate One (1) Currency Overprinting and Packaging Equipment (COPE) Press from the Western Currency Facility (WCF)**

Dear Mr. Mohlmann:

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 obtained before any person may construct and operate a new stationary source in the District of Columbia. The application of U.S. Department of the Treasury, Bureau of Engraving and Printing (the Permittee) to construct and operate one (1) Currency Overprinting and Packaging Equipment (COPE), Dela Rue Giori, Super Orlof Currency printing line, a non-heatset, sheet-fed, letterpress printing unit, at the Bureau of Engraving and Printing, in the Main Building 1st Floor B Wing, at 14th and C Streets SW, per your application, dated October 10, 2014, is hereby granted subject to the following conditions:

*[Note: After the submission of the permit application on October 10, 2014, the Permittee requested that the permit application to be on hold until further notice. On June 23, 2016, the Permittee requested the permit application to be reactivated and be issued by November of 2016.]*

I. General Requirements:

a. The press, identified as COPE No. 023, shall be operated in compliance with the applicable air pollution control requirements of 20 DCMR.

b. This permit will expire on September 12, 2021 [20 DCMR 200.4]. If continued construction or operation after this date is desired, the owner or operator shall submit an application for renewal by June12, 2021.

c. The equipment shall be installed and operated in accordance with the application described above. If any changes are necessary, revised plans must be submitted and supplemental approval issued prior to actual construction.

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

e. 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.

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

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

h. If not already completed by the time of issuance of this permit, the Permittee shall, within 60 days of issuance of this permit, submit a revision to the facility’s pending Chapter 3 (Title V) permit application to include the requirements of this permit in the renewed Title V permit to be subsequently issued.

II. Emission Limitations:

a. Emissions of volatile organic compounds (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 IV(e), compliance with this condition may be determined on a monthly average basis. Monthly average emissions shall be calculated by determining the amount of ink used in the COPE press in a given month, in pounds, multiplying that value by the percent of the ink used that is emitted as VOC emissions per the most current valid data available (considering percent VOC content by weight of the ink and the lithographic ink VOC reduction factor), 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 0.44 pounds per press hour. Except when tested on a one-time basis in accordance with Condition IV(e), compliance with this condition may 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 press in a given month, in pounds, multiplying that by the percent VOC content by weight of the solvent, summing the values for all of the solvents used, and dividing the result by the number of hours of operation of the press. [20 DCMR 201]

c. The total annual VOC emitted from the ink and cleaning solvent as a result of operation of the press shall not exceed 1.98 tons per year. [20 DCMR 201]

d. Visible emissions shall not be emitted into the outdoor atmosphere from the printing press. [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]

III. Operational Limitations:

1. 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]
2. The Permittee shall not use, in conjunction with the press, cleaning solutions containing VOCs in excess of one of the following limits [20 DCMR 716.8]:

1. Seventy percent (70%) VOC (by weight); or

 2. Ten millimeters of mercury (10 mm Hg) at twenty degree Celsius (20o C or 68o F) of VOC composite partial pressure calculated as follows:



 where:

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

W*i*  = 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;

Mw*i* = 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

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

1. 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]
2. The leaking of any solvent or solvent-containing material from any printing unit or associated equipment is prohibited. [20 DCMR 716.22]
3. 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 DCMR716.23]
4. 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 owner 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.

IV. 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)

 and (b).

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) and (e).

1. 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) and (g). Any leaks identified as a result of this monitoring shall be repaired promptly.
2. The Permittee shall monitor and continually review and observe operational practices to ensure compliance with Condition III(f).
3. 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. 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:

1. 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)]

2. 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)]

3. 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 II(d).

V. Record Keeping Requirements:

The following information shall be maintained at the facility for a period not less than five (5) years [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 press each month;

b. Records of the mass of each ink used on the press 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 press (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:

1. inks; and

2. solvents.

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

VI. Reporting Requirements:

1. A copy of the analytical results of the ink samples taken quarterly under Condition IV(f) shall be submitted to the Department with the Permittee’s Title V semi-annual and annual reports.

b. Emissions in excess of any emission limits shall be reported by telephone, immediately upon discovery, to the Air Quality Division’s Compliance and Enforcement Branch.

c. In addition to complying with Condition VI(b) and any other reporting requirements mandated by the 20 DCMR, the owner or operator shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:

1. The name and location of the facility;

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

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

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

5. 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

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

d. Based on the information collected to comply with Condition V(f), the Permittee shall submit the total annual (calendar year basis) VOC emissions from this press as part of the annual emissions statement submitted pursuant to the requirements of Chapter 30 (Title V) permit #035, Condition E(3), and due by March 15 of each year.

e. The Permittee shall certify compliance or non-compliance with each condition of this permit as part of (or as a supplement to) the semi-annual reports and annual compliance certification required to be submitted to the Department pursuant to the Permittee’s Chapter 30 (Title V) permit #035 until such time as the requirements of this permit are included in a renewed and revised Title V permit.

If you have any questions, please me at (202) 535-1747 or Abraham T. Hagos at (202) 535-1354.

Sincerely,

Stephen S. Ours, P.E.

Chief, Permitting Branch

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