

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

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

FROM: Abraham T. Hagos *SSO, ATH*
Environmental Engineer

SUBJECT: **U.S. Department of the Treasury, Bureau of Engraving and Printing
Permit No. 7276 to Construct and Operate a Large Examining and Printing
Equipment Printing Press (Identified as LEPE 4)**

DATE: December 31, 2019

BACKGROUND INFORMATION

A permit application to construct and operate permit a “Large Examining and Printing Equipment” (LEPE) press, at the Bureau of Engraving and Printing, Main Building, 4th Floor A Wing, at 14th and C Streets SW, was received by the Air Quality Division on October 1, 2019. The applicant is the U.S. Department of the Treasury, Bureau of Engraving and Printing (BEP). BEP has designated the new press as LEPE 4.

The permit action will be published in the DC Register on January 10, 2020. Public comments for the permit action will be solicited through February 10, 2020.

BEP has not requested that any of the materials submitted with this application be held confidential.

ESTIMATED EMISSIONS

Volatile organic compound (VOC) emissions are the only expected emissions from the LEPE 4 press. The projected maximum potential to emit (PTE) VOC from the ink and solvent are 0.17 tons per year (TPY) and 1.75 TPY respectively, for a total of approximately 1.92 TPY.

REGULATORY REVIEW

Chapter 2, Section 200: General Permit Requirements:

The printing press is a potential air pollution source because ink and solvents contain volatile organic compounds. A permit is therefore required to operate the unit pursuant to 20 DCMR 200.1 and 200.2. Operation permits are valid for five years. Upon expiration, they may be renewed to allow for the continued operation of the permitted activity. It is expected that the requirements of the resulting Chapter 2 permit will be incorporated into the facility’s Title V operating permit before renewal of this separate permit to construct and operate expires.

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

The review of the Chapter 2 permit application indicated that the proposed equipment would not

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emit any pollutants other than volatile organic compounds (VOCs). The maximum annual emission of 1.92 tons per year of VOC is less than the 25 tons per year threshold that would trigger NSR requirements for VOC. The proposed project will not generate emission in excess of the significance threshold, and therefore the project would not be considered a new major stationary source or a "major modification" as defined in 20 DCMR 299. Therefore, pursuant to 20 DCMR 204.1, a major non-attainment new source review analysis is not required.

Prevention of Significant Deterioration (PSD) (Federal program)

The project will have a potential to emit (PTE) of less than 250 tpy for all pollutants, thus this project is not subject to the PSD program (implemented by EPA).

20 DCMR Chapter 2, Section 205: New Source Performance Standards

Subsection 205.1 of 20 DCMR adopts the federal New Source Performance Standards (NSPS) as in effect on September 30, 1997. Additionally, in order to be sufficiently protective of public health pursuant to 20 DCMR 201, the Department places all current NSPS standards, if applicable, into all Chapter 2 permits issued. However, there are no applicable NSPS requirements for this equipment. Hence, no NSPS requirements are incorporated into the permit.

20 DCMR Chapter 2, Section 209: Permit Requirements for Non-Major Stationary Sources (Minor New Source Review)

The emissions of VOC are expected to be less than 5 tons per year. As such, this section is not applicable.

20 DCMR Chapter 5: Testing, Monitoring and Record keeping Requirements

Testing, monitoring and record keeping requirements, pursuant to 20 DCMR 500.1 and 502.1, have been included in the permit under Condition IV and Condition V.

20 DCMR Chapter 3: Operating Permits and Acid Rain Programs

The project is not subject to the Acid Rain Program. However, the equipment will be part of a larger facility subject to the major source operating permit program of 20 DCMR Chapter 3. As such, pursuant to 20 DCMR 301.1(a)(2), the facility must apply for the requirements of this permit to be placed into its existing Title V operating permit. This requirement is contained in Condition I(h) of the proposed permit.

Chapter 7: Volatile Organic Compounds and Hazardous Air Pollutants

The requirements of 20 DCMR 716 are applicable to this letterpress printing press.

The applicant indicated that the press does not use fountain solution; therefore, 20 DCMR 716.5, 716.13, 716.16 and 716.20 does not apply to this press.

The appropriate requirements of 20 DCMR 716 have been included throughout the permit.

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Chapter 9, Section 903: Odorous or Other Nuisance Air Pollutants

“An emission into the atmosphere of odorous or other air pollutants from any source in any quantity and of any characteristic, and duration which is, or is likely to be injurious to the public health or welfare, or which interferes with the reasonable enjoyment of life or property is prohibited [20 DCMR 903.1]” is applicable to all sources. It is contained in Condition II(e) of the permit.

RECOMMENDATIONS

The proposed project and attached permit renewal comply with all applicable federal and District air pollution control laws and regulations. Public comments for the permit action will be solicited from January 10, 2020 through February 10, 2020. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permit No. 7276 be issued in accordance with 20 DCMR 200.1 and 200.2.

SSO:ATH

