CHAPTER 2 TECHNICAL SUPPORT MEMORANDUM

TO: File

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

FROM: Abraham Hagos ATH
Environmental Engineer

SUBJECT: Klumer Printing DBA Sir Speedy Printing
Permit No. 6536 for A.B. Dick Company Model No. 9995, Non-Heatset Sheet-Fed Off-Set Color Printing Press

DATE: May 24, 2017

BACKGROUND INFORMATION

On August 17, 2011, the Air Quality Division ("AQD") of the Department of Energy and Environment ("DOEE" or "the Department") received an application from Klumer Printing DBA Sir Speedy Printing to operate one (1) A.B. Dick Company Model No. 9995 non-heatset sheet-fed offset color printing press, located at 2001 L Street NW. At the time, the facility was under new ownership and this application replaced an earlier application that had not been acted upon that had been submitted by Navidco Inc. T/A Impress Printing on June 15, 2009. The August 17, 2011 application was incomplete. AQD tried to contact the facility through phone calls and left several messages to the contact personnel, but made no progress. Recently, AQD wanted to close inactive file applications but, decided to visit the site before closing the files.

On May 5, 2017, Tunde Adebona and Abraham Hagos went for a site visit to Klumer Printing DBA Sir Speedy Printing. At the site we met Mr. Michael Klugerman, Owner. The facility was open for business but the press was not in operation. Mr. Klugerman told us that his facility is open for business but does not use that much ink and solvent. He said, the maximum ink and solvent that he uses per year are 100 lbs of ink and 20 gallons of solvent.

We told him that he needs a permit to operate the press. His previous application was incomplete and we provided him a copy of AQD permit application to construct/operate process equipment. He completed the permit application and submitted it to us. It was logged in as received on May 8, 2017.

The Company has not requested that any of the information submitted to the Department be held confidential pursuant to 20 DCMR 106.

TECHNICAL INFORMATION

The press to be permitted is one (1) A.B. Dick Company Model No. 9995, Non-Heatset Sheet-Fed Off-Set Color Printing Press. It operates one (1) shift per day, five (5) days per week, and two hundred sixty (260) days per year, on average. The applicant estimated that the press' maximum annual emissions would be 0.076 TPY of VOC based on maximum annual usage of 100 pounds of ink and 20 gallons per year of blanket wash.

REGULATORY REVIEW

In developing this permit, the following regulations were evaluated for applicability.

20 DCMR Chapter 2, Section 200: General Permit Requirements
Pursuant to 20 DCMR 200.1 and 200.2, because the equipment is a stationary source that has the potential to emit air pollutants, a permit from the Department must be obtained to install and operate the equipment. The equipment was originally installed without the required permit; however this permitting action will address this deficiency.

20 DCMR Chapter 2, Section 204: Permit Requirements for Sources Affecting Non-Attainment Areas
The emissions of VOCs from the equipment (estimated 0.076 tons per year) are well below the definition of "significant", therefore, the requirements of this section are not applicable.

20 DCMR Chapter 2, Section 205: New Source Performance Standards
There are no NSPS subparts applicable to this printing press.

20 DCMR Chapter 2, Section 209: Permit Requirements for Non-Major Stationary Sources (Minor New Source Review)
This equipment was installed well before the applicability date (January 1, 2014) of this regulation. In addition, the potential emissions of VOCs (0.076 TPY) are well below the 5 TPY threshold for applicability of this regulation. As such, the requirements of this regulation are not applicable.

20 DCMR Chapter 6: Particulates
No significant amount of particulate matter is expected to result from construction or operation of this equipment. As a result, the visible emission requirements of 20 DCMR 606 have been included in Condition II(a), but no other particulate matter requirements have been included in the permit. However, because any visible emissions from this type of source would be an indication of improper operation of the equipment, the language of this requirement was made more stringent to not allow any visible emissions from the equipment. This modification was made pursuant to authority under 20 DCMR 201.

20 DCMR Chapter 7: Volatile Organic Compounds and Hazardous Air Pollutants
20 DCMR 716 is applicable to all lithographic printing operations. The requirements of this section are included throughout the proposed permit.

The offset lithography printing operation has been calculated to have a potential to emit less than 25 TPY of VOC. As such, 20 DCMR 716.8(a) is not applicable. Based on the applicant's estimates of maximum ink and solvent use, the facility could potentially be exempt from 20 DCMR 716.8(b) as well (an estimated average 12.7 pounds per month as compared to the threshold of applicability of 15 pounds of actual emissions per month). However, it is possible that they could exceed 15 pounds of actual emissions on a given high-usage month. Also, based on safety data sheets (SDSs) provided by the applicant, they already use solvents in compliance with 20 DCMR 716.8(b) (1.4 mmHg vapor pressure as compared to the limit of 10 mmHg vapor pressure), therefore, the requirements of 20 DCMR 716.8(b) were applied to the equipment in the permit and, in addition to citing 20 DCMR 716.8(b), 20 DCMR 201 was cited as the authority for the condition.

20 DCMR 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 can be found in Condition II(b) of the permit.

40 CFR 63 – National Emission Standards for Hazardous Air Pollutants for Source Categories
The potential to emit HAPs, if any, is far below the threshold required to trigger Part 63 NESHAPs applicable to this lithographic press, based on the low usage of inks and solvents. Two NESHAPs were considered for applicability, but found to not be applicable:

1. 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. The facility is not a major source of HAPs, so this subpart is not applicable to them.

2. 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry – This regulation does not apply to this unit as it is not a rotogravure or wide-web flexographic printing press.

RECOMMENDATIONS

The proposed project and attached permit comply with all applicable federal and District air pollution control laws and regulations.

The application and draft permit will be posted for public review in the D.C. Register and on the DOEE website on June 2, 2017 and will be available for public comment through July 3, 2017. If no public comments are received, it is recommended that permit No. 6536 be issued. If comments are submitted or a hearing is requested, AQD will consider all comments before determining whether it is appropriate to issue the permit as drafted.

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