


GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Department of Energy and Environment

**CHAPTER 2 TECHNICAL SUPPORT MEMORANDUM**

TO: File

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

SUBJECT: **U.S. Government Publishing Office (GPO)  
Permit Nos. 7117 through 7120 and 7210 to Operate Five Cold Solvent  
Degreasing Units**

DATE: May 17, 2018

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***BACKGROUND INFORMATION***

A series of permit applications to operate five cold solvent degreasers (cold cleaning machines) at the U.S. Government Publishing Office (GPO), located at 732 North Capitol Street NW, Washington DC, were received on May 2, 2016. All five of these units were already in existence at the facility, but had not previously been permitted, as required by 20 DCMR 200. Over approximately the next two years, the Air Quality Division (AQD) of the Department of Energy and Environment (DOEE) worked with GPO to properly classify these units and to determine how they were covered by the District's cold cleaning machine regulations. On May 10, 2017, representatives of AQD met with representatives of GPO at the facility to discuss the degreasers. During the course of that meeting, two additional, small, portable degreasing units were identified in a cabinet in the bindery section of the facility bringing the total number of degreasing units at the facility to seven.

After further research, on May 3, 2018, Stephen Ours of AQD visited the GPO facility and met with Lonny Beal and James Hodges of GPO and Michael Danielson, a contractor for GPO. The status of regulatory interpretation was finalized during that meeting. Additionally, the status of the seven degreasers was further discussed.

Following the May 3, 2018 meeting, on the same day, Mr. Beal notified Mr. Ours by email that one of the portable bindery degreasers was not required and would be not be retained at the site. The second bindery degrease would be needed in rare instances, so Mr. Beal indicated that GPO would submit a permit application for the unit. The email also indicated that the SID parts washer, for which an application had been submitted on May 2, 2016, was being taken out of service. Mr. Beal confirmed in a follow-up email on May 4, 2018, that the application for the SID parts washer was being withdrawn.

On May 17, 2018, a permit application was received by AQD for the remaining bindery area portable degreaser.

The permits being proposed in this permitting action address all five of the cold cleaning

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machines at the GPO facility. The units are described in the table below.

<b>Permit No.</b>	<b>Unit Description</b>	<b>Degreaser Type</b>	<b>Application Receipt Date</b>
7117	Garage Shop B-126 Safety Kleen Sink Parts Washer Model 16, S/N 30201378	Remote Reservoir	5/2/2016
7118	Forklift/Truck Shop C-142 Klamas Kleen Parts Washer (30-gallon)	Remote Reservoir	5/2/2016
7119	Machine Shop C-322 Safety-Kleen Model 81 Agitating Parts Washer (80-gallon), S/N 902236683	Immersion	5/2/2016
7120	Power Shop C-012/Machinist Branch Wel-Bilt Portable Parts Washer (20-gallon), #141226	Remote Reservoir	5/2/2016
7210	Portable degreaser for the bindery area	Immersion	5/17/2018

The permit action will be published in the D.C. Register on June 1, 2018. Public comments for the permit action will be solicited through July 2, 2018.

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

### ***REGULATORY REVIEW***

#### **20 DCMR Chapter 2, Section 200: General Permit Requirements:**

The cold cleaning machines are potential air pollution sources for volatile organic compounds. Thus Chapter 2 permits are required.

#### **20 DCMR Chapter 7, Section 764: Solvent Cleaning – Cold Cleaning**

The solvent cleaning control requirements of 20 DCMR 764 are applicable to these cold cleaning machines. The operational requirements of this regulation are found in Conditions III(a) through (e) of the permit document. The facility must monitor the site for compliance per Conditions IV(a) and (b).

In several cases, notes have been added in italics within the permit to clarify how certain regulatory conditions apply to specific units at the facility. Two of the three remote reservoir units do not have drain designs that allow the drain systems to qualify as effective idling mode covers. As such, other covers must be employed during idling of the equipment. Also, neither of the two immersion type units have freeboard ratios of 0.75 or greater. As such, cleaning operations such as scrubbing or spraying cannot occur in these units with the lids open; rather the lids must act as working mode covers and be kept closed except when parts are being placed into or being removed from the machines.

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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. This requirement is contained in Condition II(a) of the permits.

40 CFR 63, Subpart T: National Emission Standards for Halogenated Solvent Cleaning

The applicant does not intend to use any of the hazardous air pollutant (HAP) solvents covered by the halogenated solvent cleaning NESHAP. As such, this regulation is not applicable. To ensure that this remains the case, Condition II(b) has been added to the permit to clarify that these solvents must not be used in the degreaser units.

***RECOMMENDATIONS***

The applications to operate the five cold cleaning machines and the requirements of the draft operating permit comply with all applicable federal and District air pollution control laws and regulations.

Public comments for the permit action will be solicited from June 1, 2018 through July 2, 2018. AQD will resolve any comments received before taking final action on the permit applications. If no comments are received, I recommend that the permits be promptly issued in accordance with 20 DCMR 200.2.

SSO

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