

GOVERNMENT OF THE DISTRICT OF COLUMBIA

Department of Energy and Environment

CHAPTER 2 TECHNICAL MEMORANDUM

TO: File

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

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

**SUBJECT: Bureau of Engraving and Printing (BEP)
Permit Nos. 6581-R1 and 6582-R1
Permits to Operate Two Section 9 Presses (Nos. 1 and 2 also known as Nos.
901 and 902, respectively) Super Orlof Intaglio II, Sheet Fed, Non-Heatset,
Intaglio Cylinder-Wipe Currency Presses**

DATE: November 24, 2015

BACKGROUND INFORMATION

Permit Nos. 6581 and 6582 to operate two Super Orlof Intaglio II, non-heatset, intaglio sheet-fed, cylinder-wipe currency presses was issued on June 5, 2012.

The U.S. Department of the Treasury, Bureau of Engraving and Printing (BEP) submitted permit applications, dated March 4, 2015, to modify the terms of the Chapter 2 permits for the two presses. The requested modification is to require the use of lower VOC solvents for manual cleaning as well as in the press' automatic plate wash units that were not previously used. The VOC concentration in the new solvent will not exceed fifty percent (50%) by weight. BEP submitted these applications in follow-up to longer term testing with a particular lower VOC solvent, LO-VO WASH 50, that BEP conducted on SOI and I-10 intaglio currency presses under a test agreement with the Department. The new solvent requirements reduce the hourly solvent VOC emissions and annual potential to emit from the SOI presses. They also reduce the allowable maximum vapor pressure of the solvent from 10 mmHg to 5 mmHg, per the testing agreement. Simultaneously, under a separate permitting action, permits are being proposed for the facility's four I-10 presses to use the same cleaning solvent. In the case of the I-10 presses, this will result in increased emissions. The ink use rates and ink VOC emission limits, are unchanged from the prior permits.

The Department intends to re-issue permit Nos. 6581 and 6582 as permit #6581-R1 for press number 901 and permit #6582-R1 for press number 902. This reissuance will incorporate the requested changes as well as renew the permits.

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U.S. Department of the Treasury, Bureau of Engraving and Printing

Permit Nos. 6581-R1 and 6582-R1 to Operate Two Super Orlof Intaglio II, Sheet Fed, Non-Heatset, Intaglio Cylinder-Wipe Currency Presses Nos. 901 and 902

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The permit action will be published in the DC Register on December 4, 2015. Public comments for the permit action will be solicited through January 4, 2016.

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

REGULATORY REVIEW

The emission estimates in the application are unchanged from the original application, except that the overall VOC emissions from the two units are being reduced by approximately 12%. Actual emissions from these presses are below the limits set in permit Nos. 6581 and 6582. No regulation was adopted nor modified since the issuance of the previous versions of the permit that has any effect on the requirements in the updated permit Nos. 6581-R1 and 6582-R1.

RECOMMENDATIONS

The application to operate the two presses and the attached operating permit comply with all applicable federal and District air pollution control laws and regulations.

Public comments for the permit actions will be solicited from December 4, 2015 through January 4, 2016. AQD will resolve any comments received before issuing the permits, and if no comments are received, I recommend that permit Nos. 6581-R1 and 6582-R1 be issued in accordance with 20 DCMR 200.2, as proposed.

SSO:ATH

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