TECHNICAL SUPPORT MEMORANDUM

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

FROM: Abraham T. Hagos
Environmental Engineer

SUBJECT: Department of the Treasury, Bureau of Engraving and Printing
Permit No. 6574-R1
Permit to Operate a Large Examining and Printing Equipment (LEPE) Press

DATE: June 1, 2015

BACKGROUND INFORMATION

A permit renewal application for permit No. 6574 to operate a Large Examining and Printing Equipment (LEPE) press (formerly known as the Super Currency Overprinting and Packaging Equipment (SCOPE) press), at the Department of the Treasury, Bureau of Engraving and Printing, in the Main Building 4th Floor A wing, at 14th and C Streets SW, was received by the Air Quality Division on February 25, 2015. The applicant is the Department of the Treasury, Bureau of Engraving and Printing (BEP).

The permit action will be published in the DC Register on June 12, 2015. Public comments for the permit action will be solicited through July 13, 2015.

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

BEP obtained two permits (Nos. 6574 and 6575) to construct and operate two (2) new Super Currency Overprinting and Packaging Equipment (SCOPE) presses, identified as SCOPE numbers 1 and 3, Dela Rue Giori, Super Orlof Currency printing line, non-heatset, sheet-fed, letterpress presses, at the Bureau of Engraving and Printing, in the Main Building 1st Floor B wing, (#1) at 14th and C Streets, SW, in June 1, 2012. Only one unit was installed (later identified as LEPE3). It was also installed in the Main Building 4th Floor A wing instead of the originally permitted location. Permit 6575 was never used and BEP is not asking that it be renewed.
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TECHNICAL INFORMATION

The equipment covered by this permit is a single letterpress printing press. The activities at this location include printing United States of America (USA) currency. The applicant will use 5% by weight volatile organic compound (VOC) content of ink and solvents that comply with 20 DCMR 716.

REGULATORY REVIEW

Chapter 2, Section 200: General Permit Requirements:
The printing press is a stationary unit with the potential to emit air pollution because ink and solvents used on the equipment contain volatile organic compounds. Thus a chapter 2 permit is required.

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 these two presses do not use fountain solution; therefore, 20 DCMR 716.5, 716.13, 716.16 and 716.20 do not apply to this press.

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

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(c) of the permit.

RECOMMENDATIONS

The proposed renewal application 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 June 12 through July 13, 2015. AQD will resolve any comments received before issuing the permit, and if no comments are received, I recommend that permit (#6574-R1) be issued in accordance with 20 DCMR 200.2.

SSO:ATH