

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

**FACT SHEET AND STATEMENT OF BASIS
FOR PROPOSED PERMITTING ACTION
UNDER 20 DCMR 300 (TITLE V-OPERATING PERMIT PROGRAM)**

This “Fact Sheet and Statement of Basis” has been prepared pursuant to 20 DCMR 303.1(c) and 40 CFR 70.7(a)(5).

PERMIT NO: 029-R1-A3

APPLICANT AND PERMITTEE:

U.S. Government Publishing Office
732 N. Capitol Street NW
Washington DC 20401

FACILITY LOCATION:

732 N. Capitol Street NW
Washington DC 20401

RESPONSIBLE OFFICIAL

Mr. Hugh N. Halpern, Director

FACILITY DESCRIPTION:

The U.S. Government Publishing Office (GPO) (formerly known as the U.S. Government Printing Office) provides miscellaneous publishing operations (Standard Industrial Classification (SIC) code 2741, North American Industry Classification System (NAICS) code 511199), including twenty-nine (29) printing units for the production of printed materials in support of the Federal Government. GPO obtained modified Final Title V Permit No. 029-R1-A2 on December 28, 2020.

Previously, a Chapter 2 permit application package to construct and operate one (1) Canon Colorstream 4-Color Inkjet Printer and four (4) Canon Colorstream 1-Color Inkjet Printers, in Building C, on the fourth floor at 732 N. Capitol Street NW, was received by AQD on November 7, 2018. These printers obtained Chapter 2 Permit Nos. 7234, 7235, 7236, 7237, and 7238 on February 26, 2019. These permits were incorporated into Title V Permit 029-R1, issued October 29, 2019.

However, during a routine review of records, GPO’s Environmental Program discovered that a sixth inkjet printer (Canon VarioPrint i200 4-Color Sheet-fed Inkjet Printer) was installed during the installation of the five other printers. The sixth printer was not part of the original project scope but was installed along with the other inkjets as part of a scope revision that was concurrent with the installation of the equipment. Hereafter, these printers are considered one project.

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To address the installation of the sixth printer, GPO submitted a permit application package to construct and operate one (1) Canon VarioPrint i200 4-Color Sheet-fed Inkjet Printer as part of press group 69, in Building C, on the fourth floor at 732 N. Capitol Street NW. This application was received by the Air Quality Division (“AQD”) of the Department of Energy and Environment (“DOEE” or “the Department”) on January 13, 2021. The associated fee payment was received March 4, 2021.

Although a separate Chapter 2 permit number (No. 7299) has been assigned for tracking purposes, AQD decided that the most efficient approach to permitting this additional unit would be to permit the unit directly into the Title V permit as a combined Chapter 2 and Chapter 3 (Title V) permitting action, rather than issuing a separate Chapter 2 permit first. This permitting action is therefore addressing both Chapter 2 and Chapter 3 requirements and procedures and no separate permit will be issued under No. 7299.

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

It should be noted that this significant permit modification action only opens portions of the permit as follows:

1. The equipment list at the beginning of Condition III is being modified to reflect the addition of the Canon VarioPrint i200 4-Color Inkjet Printer and press group 69 as identification for the other inkjet printers; and
2. Condition III(d) is being updated to incorporate the Canon VarioPrint i200 4-Color Inkjet Printer and press group 69 as identification for the other inkjet printers.

All other conditions of the permit remain unchanged. There will be no extension to the existing Title V permit expiration date. The applicant will still need to apply for a renewal of the Title V permit at least six months before that expiration date.

EMISSIONS SUMMARY:

The following table shows the effect of the Canon VarioPrint i200 4-Color Inkjet Printer addition on the potential to emit (PTE) of the project in tons per year:

Criteria Pollutants	Potential Emissions of five printers	Potential Emissions of sixth printer	Potential Emissions from Project
Volatile Organic Compounds (VOC)	3.6	1.2	4.8
Total Hazardous Air Pollutants (HAPs)	3.2	0.00	3.2

As a result of the addition of this sixth printer, the facility-wide VOC emissions are expected to increase from 88.03 tons per year to 89.23 tons per year. The sixth printer is not expected to emit any other pollutants.

BASIS OF 20 DCMR CHAPTER 3 (TITLE V) APPLICABILITY:

This facility has the potential to emit (PTE) approximately 89.23 tons per year (TPY) of VOC. This exceeds the major source threshold for VOC in the District of Columbia of 25 TPY. Because potential emissions of VOC exceed the major source threshold, pursuant to 20 DCMR 300.1(a), the source is subject to Chapter 3 (Title V) and must obtain an operating permit in accordance with that regulation and Title V of the federal Clean Air Act.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS:

The conditions contained in the draft Title V operating permit are based on underlying requirements of 20 DCMR as well as various federal regulations promulgated pursuant to the federal Clean Air Act. The regulations that are the basis of each condition are cited in the permit, except those conditions added to make another condition, with a direct underlying regulation, enforceable as a practical matter may, in some cases, not have a specific citation. These latter, un-cited conditions generally consist of monitoring, recordkeeping, and reporting requirements authorized under 20 DCMR 500.1.

The draft Title V operating permit has been developed to incorporate the requirements of all applicable requirements as defined in 20 DCMR 399.1 along with additional conditions necessary to make all such requirements enforceable as a practical matter.

Any condition of the draft Title V operating permit that is enforceable by the District but is not federally-enforceable is identified in the draft Title V operating permit as such with an asterisk.

It should also be noted that this permit is being issued pursuant to the District's authority under 20 DCMR Chapter 2 as well as Chapter 3. When the permit is issued for public review, the public notice will reflect this fact.

REGULATORY REVIEW:

In developing this permit modification, 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 Canon VarioPrint i200 4-Color Inkjet Printer 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.

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

Because the facility is not significantly increasing potential emissions as a result of the presses

(the potential to emit VOCs of 4.8 tons per year (TPY) from the six presses, combined, is well below the 25 TPY value meeting the definition of “significant”), 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 regulation applies to each emission unit individually. The potential emissions of VOCs from the Canon VarioPrint i200 4-Color Inkjet Printer (1.2 TPY) are below the 5 TPY threshold for applicability of this regulation. No HAPs or other pollutants are to be emitted from this press. As such, the requirements of this regulation are not applicable.

20 DCMR Chapter 3: Operating Permits and Acid Rain Programs

Please see the discussion above in the section entitled “Basis of 20 DCMR Chapter 3 (Title V) Applicability” for a discussion of the applicability of Chapter 3 to the facility. The acid rain portions of this chapter are not applicable to the facility.

20 DCMR Chapter 6: Particulates

No significant amount of particulate matter is expected to result from operation of this equipment. As a result, the visible emission requirements of 20 DCMR 606 have been included in Condition III(d)(1)(B), 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 more stringent limit was made pursuant to authority under 20 DCMR 201.

20 DCMR 700 – Miscellaneous Volatile Organic Compounds (VOCS):

20 DCMR 700 is applicable to the inkjet presses because the presses are not subject to subsequent sections of Chapter 7. Pursuant to 20 DCMR 700.2, no person shall discharge into the atmosphere more than fifteen (15) pounds of volatile organic compound (VOC) emissions in any one (1) day, nor more than three pounds (3 lb.) in any one (1) hour, from any combination of articles, machines, units, equipment, or other contrivances at a facility, unless the uncontrolled VOC emissions are reduced by at least ninety percent (90%) overall capture and control efficiency. The requirements of this regulation are incorporated into Condition III(d)(1)(A) of the permit for these units. Monitoring is included in Conditions III(d)(3). Record keeping requirements are included in Condition III(d)(4). Note that Condition III(d) references all equipment at the facility emitting VOCs, but not subject to any section of 20 DCMR 701 through 778 and thus subject to 20 DCMR 700, in aggregate. This requirement is a facility-wide requirement, not a unit-by-unit requirement.

20 DCMR 710 – Intaglio, Flexographic, and Rotogravure Printing:

20 DCMR 710 is not applicable to any of the presses since the source does not operate any intaglio, flexographic or rotogravure printing presses.

20 DCMR 714 – Control Techniques Guidelines (CTGs):

20 DCMR 714 is not applicable to any of the presses since the source does not operate any of the source categories (Miscellaneous Metal Product and Plastic Parts Surface Coatings, Large Appliance Coatings, and Metal Furniture Coatings) specified in 20 DCMR 714.

20 DCMR 715 – Major Source and Case-By-Case Reasonably Available Control Technology (RACT):

AQD is applying the default RACT standards in 20 DCMR 700 in lieu of a case-by-case RACT determination in accordance with 20 DCMR 715. These units would currently be aggregated with the two screen printing units and the Kompac Kwik Finish Coater at the facility for aggregated compliance with 20 DCMR 700. AQD believes that this would be at least as stringent as any case-by-case RACT standard developed under 20 DCMR 715.

20 DCMR 716 – Offset Lithography and Letterpress Printing:

20 DCMR 716 is not applicable to the inkjet presses because the presses do not constitute an offset lithography or letterpress printing operation.

20 DCMR 770 – Miscellaneous Industrial Solvent Cleaning Operations:

Pursuant to 20 DCMR 770.9(h), products used to clean resin, coating, ink, and adhesive mixing, molding, and application equipment, are not subject to 20 DCMR 770. Therefore, 20 DCMR 770 is not applicable to any of the presses.

20 DCMR 771 – Miscellaneous Cleaning and VOC Materials Handling Standards:

20 DCMR 771 is not applicable to the presses because the presses do not apply coatings, inks, or adhesives to flexible packaging nor are the units subject to 20 DCMR 770 as discussed above. Therefore, 20 DCMR 771 is not applicable to these units.

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 III(d)(1)(C) of the permit.

20 DCMR 1404: Emission Standards for the Printing and Publishing Industry:

The requirements of 40 CFR 63, Subpart KK (adopted by reference in 20 DCMR 1404) are not applicable to the presses as discussed below. Therefore, 20 DCMR 1404 is not applicable to these units.

New Source Performance Standard (NSPS) for Graphic Arts Industry: Publication Rotogravure Printing:

The requirements of the New Source Performance Standard (NSPS) for Graphic Arts Industry: Publication Rotogravure Printing, 40 CFR 60, Subpart QQ, are not included for the printing presses, since these units do not constitute a publication rotogravure printing press as defined in 40 CFR 60.431.

New Source Performance Standard (NSPS) for Flexible Vinyl and Urethane Coating and Printing:

The requirements of the New Source Performance Standard (NSPS) for Flexible Vinyl and Urethane Coating and Printing, 40 CFR 60, Subpart FFF, are not included for the printing presses, since these units do not constitute a rotogravure printing line used to print or coat flexible vinyl or urethane products as defined in 40 CFR 60.581.

New Source Performance Standard (NSPS) for Polymeric Coating of Supporting Substrates Facilities:

The requirements of the New Source Performance Standard (NSPS) for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV, are not included for the printing presses, since these units do not operate a coating operation or any onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates as defined in 40 CFR 60.741 where polymeric coating of supporting substrates is defined as a web coating process that applies elastomers, polymers, or prepolymers to a supporting web other than paper, plastic film, metallic foil, or metal coil.

National Emission Standards for Hazardous Air Pollutants for Printing and Publishing Industry:

The requirements of the National Emission Standards for Hazardous Air Pollutants for Printing and Publishing Industry, 40 CFR 63, Subpart KK, are not included for the printing presses, since these units do not constitute publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses, as defined in 40 CFR 63.822.

National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating:

The requirements of the National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating, 40 CFR 63, Subpart JJJJ, are not included for the printing presses, since the source is not a major source of HAPs. This subpart applies to each new and existing facility that is a major source of HAP, as defined in §63.2, at which web coating lines are operated.

40 CFR 64 – Compliance Assurance Monitoring (CAM)

This regulation is not applicable to this equipment pursuant to 40 CFR 64.2(a)(3). In order for 40 CFR 64 to be applicable, the unit must be subject to an emission limitation or standard, use a control device to achieve compliance with it, and pre-control device emissions from the unit must exceed the major source threshold for the controlled pollutant. In this case, no control device is used to achieve compliance. Therefore, 40 CFR 64 is not applicable.

COMPLIANCE HISTORY:

The applicant has not been subject to enforcement actions by AQD in the past three years. One enforcement action taken by EPA is listed in EPA's Enforcement and Compliance History Online (ECHO) database. This action covered violations of the Title V permit and the stationary refrigeration regulations as well as non-air quality violations.

COMMENT PERIOD:

Beginning Date: April 9, 2021
Ending Date: May 10, 2021

All written comments should be addressed to the following individual and office:

Stephen S. Ours, P.E.
Chief, Permitting Branch
Department of Energy and Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington DC 20002

PROCEDURE FOR REQUESTING PUBLIC HEARING:

During the public comment period, any interested person may submit written comments on the draft Title V permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The District shall grant such a request if it is deemed appropriate. The venue, date, and time for any public hearing shall be announced in the District Register and a daily newspaper.

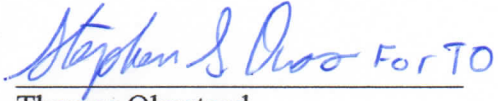
POINT OF CONTACT FOR INQUIRIES:

Thomas Olmstead
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1200 First Street NE, 5th Floor
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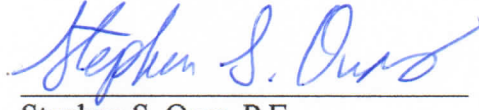
REVIEWS:

Prepared by:

 For TO

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Approved by:



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

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