

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

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. John Crawford, Acting Deputy 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-one (21) printing units for the production of printed materials in support of the Federal Government.

As background, GPO obtained their previous Chapter 3 (Title V) permit #029 on April 24, 2000. GPO submitted a timely renewal application to the Department in 2004. However, the renewed operating permit was never issued or denied. Therefore, GPO has been operating under the 2000 Title V operating permit, in accordance with term Q(b) of the permit which provides that the existing permit will remain in force pending action on a timely-submitted renewal application.

The Department of Energy and Environment (the Department) received an updated Chapter 3 (Title V) permit application on September 11, 2018, with supplemental information received December 13, 2018. This permitting action is to address this Title V application.

The Title V permit application for the GPO listed the following sources of air emissions (excluding identified miscellaneous/ insignificant sources):

Emission Units					
Printing Equipment					
Press Group	Unit ID	Location	Press Type	Chapter 2 Permit No.	Description
Group 9	4538 & 4542	Bldg C, 2nd Fl	Non-web Letterpress	6602 & 6603 ²	Halm Jet 1-Color Envelope Press
Group 11	4632 & 4532	Bldg C, 2nd Fl	Non-web Letterpress	6604 & 6605 ²	Diamond P-18 2-Color Envelope Press
Group 40	1101	Bldg C, 2nd Fl	Non-web Coater (utilizes aqueous or UV coatings)	6266 ²	Kompac Kwik Finish Coater
Group 50	--	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	6402-A1 ¹	Heidelberg PM GTO 52-2
Group 52	1100	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	6208 ¹	Presstek 52 DI
Group 74	4493	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	6606 ¹	Heidelberg SM-102-4-P3
Group 75	4496	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	7240 ²	Heidelberg CD 102 6-Color Sheet Fed
Group 80	2376	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	6607 ¹	Ryobi 3302HA
Group 81	4219 & 4670	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	6608 & 6609 ²	Heidelberg SM-74-1
Group 82	5367	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	--	Heidelberg SM-72-2-P
Group 84	4668	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	7218 ²	Heidelberg SM-102-2-P
Group 86	3474	Bldg C, 2nd Fl	Heatset Web Offset Lithography	7226 ²	Hantscho Single Unit Web Press, controlled by Phoenix 4000 series thermal oxidizer
Group 90	6901	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	7189 ¹	Ryobi 928PF

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Press Group	Unit ID	Location	Press Type	Chapter 2 Permit No.	Description
Group 95	4507	Bldg C, 2nd Fl	Heatset Web Offset Lithography	6683 ¹	ZMR Timson T-48A, with built in oxidizer/dryer
Group 96	SID	Bldg D, 2nd Fl (SID)	Sheet-fed Non-heatset Offset Lithography	6401-A1 ¹	Heidelberg CD 102 7-Color
Group 97	SID	Bldg D, 2nd Fl (SID)	Sheet-fed Silk Screen Press with electric dryers	6682 ²	BecMar Classic General Silk Screen
Group 98	8535, 8536 & 8537	Bldg C, 4th Fl	Heatset Web Offset Lithography	7228, 7229 & 7230 ²	Hantscho Double Unit Web Press, controlled by Phoenix 7000 series thermal oxidizer with Phoenix 5000 series thermal oxidizer as back up
--	--	Bldg C, 2nd Fl	Sheet-fed Silk Screen Press with electric dryers	7225 ²	BecMar Classic General Silk Screen
--	4-Color Inkjet 1	Bldg C, 4th Fl	Web Inkjet	7234 ¹	Canon Colorstream 4-Color Inkjet Printer
--	1-Color Inkjets 1, 2, 3, & 4	Bldg C, 4th Fl	Web Inkjet	7235, 7236, 7237, & 7238 ¹	Canon Colorstream 1-Color Inkjet Printers
Emergency Generator Set					
Location		Emission Unit Identification		Chapter 2 Permit No.	
Bldg C, Power Branch		Caterpillar Model No. 3306TA generator set		230 kWe generator set powered by a 349 hp diesel- engine, installation date: 2000 (non-NSPS)	
Paint Booth					
Location		Description			Chapter 2 Permit No.
Bldg A, roof		Non-Auto Body Col-Met side down draft cross-draft Paint Booth			6600-R1 ¹

Degreasers/Parts Washers			
Location	Unit Description	Degreaser Type	Chapter 2 Permit No.
Bldg A, Garage Shop	B-126 Safety Kleen Sink Parts Washer Model 16, S/N 30201378	Remote Reservoir	7117 ¹
Location	Unit Description	Degreaser Type	Chapter 2 Permit No.
Bldg C, Forklift/Truck Shop	C-142 Klamas Kleen Parts Washer (30-gallon)	Remote Reservoir	7118 ¹
Bldg C, Machine Shop	C-322 Safety-Kleen Model 81 Agitating Parts Washer (80-gallon), S/N 902236683	Immersion	7119 ¹
Bldg C, Power Branch	C-012/Machinist Branch Wel-Bilt Portable Parts Washer (20-gallon), #141226	Remote Reservoir	7120 ¹
Bldg C, Bindery Area	Portable degreaser for the bindery area	Immersion	7210 ¹
Scrap Paper Baling Systems			
Location	Description	Chapter 2 Permit No.	
Bldg A and C	Main cyclones/baling system consisting of eleven air scrap paper pick-up points from Buildings A and C routed to two cyclones that merge into vent filters on the roof, with collected paper fed to two baling systems on 1st floor of Building A.	--	
Bldg D, 2nd Fl	SID cyclone/baling system consisting of two air scrap paper pick-up points from trimming machines in Building D routed to a cyclone and vented outdoors, with collected paper fed to a baler	--	
Bldg D, 3rd Fl	SID cyclone/baling system consisting of three air scrap paper pick-up points from trimming machines in Building D routed to a cyclone and vented outdoors, with collected paper fed to a baler	--	

¹ These permit numbers are the Chapter 2 permits under which these units were previously permitted and are for reference only. The requirements of these permits have been incorporated into this Title V operating permit and these separate Chapter 2 permit numbers will no longer be maintained.

² These permit numbers were assigned to permit applications that did not result in stand-alone Chapter 2 permits being issued. These permit numbers are included here for reference purposes only.

In addition, the facility maintains the following miscellaneous/insignificant sources:

Location	Description
Bldg A, 1st Fl	Manual backup baling system consisting of manual scrap paper pick-

Location	Description
	up in Building A routed to a baghouse/dust collector that vents indoors, with collected paper fed to a baler
Bldg C, 3rd and 4th Fl	Bindery dust collector system consisting of air pick-up points from bindery machines in Building C routed to a cartridge filter dust collector and vented back indoors
Bldg C, 4th Fl	Bindery dust baghouse system consisting of air pick-up points from paper trimming operation in Building C routed to a baghouse and vented indoors
Bldg A, 2nd Fl	Carpentry shop baghouse system consisting of air pick-up points throughout the carpentry shop routed to a baghouse and vented back indoors
Bldg D, 3rd Fl	SID paper separator/briquetter system consisting of three air scrap paper pick-up points from trimming machines in Building D routed to a rotary separator screen that removes the paper to granulator that reduces paper's size and routed to cyclone, paper routed to a briquetter that compresses the paper into small hockey puck sized briquettes, air routed to cartridge filter dust collector and vented back indoors
Bldg D, 1st Fl	Baghouse 1st floor SID associated with a paper shredder that is manually fed with scrap paper, routed to baghouse and vented indoors
Bldg C, Power Branch	Three York Chillers (1850 ton), using R-134a refrigerant, installed in 2003
Bldg C, roof	Three induced draft cooling towers
Bldg B, 5th Fl	Laboratory operations that include equipment for the small scale formulation and testing of inks, coatings, and other materials related to GPO's operations
Bldg A, basement	One 2,400 gallon aboveground diesel storage tank

The following units have been either mothballed or removed from the source as determined by inspections by the Air Quality Division (AQD) of the Department and EPA:

Press Group	Location	Description
75	Bldg C, 2nd Fl	Epic Coater (affixed Press Group 75 Sheet-Fed to 6-Color Press)
83		Offset Press
83L		Offset Press
85		Offset Press
88		Offset Press
92		Offset Press

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Press Group	Location	Description
4		Letterpress Unit
6		Letterpress Unit
6S		Letterpress Unit
6L		Letterpress Unit
8		Letterpress Unit
12		Letterpress Unit
21		Letterpress Unit
22		Letterpress Unit
		Gasoline Pump

Per written comments received by AQD on June 12, 2019, from the U.S. Government Publishing Office on the prenotification draft permit 029-R1, “GPO recently decommissioned one of the printers in the Group 86 Hantscho Single Unit Web Press emission unit group. Press No. 3476 has been completely disassembled and removed from the site. This leaves only Press No. 3474 in Group 86.”

GPO is not authorized to operate any of the above mothballed or removed units. If any are to be returned to service, GPO must first obtain a permit to do so.

EMISSIONS SUMMARY:

Plant-wide Emissions Summary (tons per year)	
<u>Pollutant</u>	<u>Potential Emissions</u>
Oxides of Sulfur (SO _x)	0.26
Oxides of Nitrogen (NO _x)	16.99
Particulate Matter (PM/PM10)*	31.44
Volatile Organic Compounds (VOCs)**	88.09
Carbon Monoxide (CO)	12.58
Total Hazardous Air Pollutants (HAPs)	9.09

* Includes SID cyclone/baling system and Main cyclones/baling system, in addition to those units included in the original calculations provided with the Title V application.

** Includes VOCs from five Web Inkjet presses, paint booth, tank and five parts washers, in addition to those units included in the original calculations provided with the Title V application.

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

This facility has the potential to emit (PTE) approximately 88.09 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 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 that 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, record keeping, and reporting requirements authorized under 20 DCMR 500.1.

The draft Title V 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 Permit that is enforceable by the District but is not federally enforceable is identified in the Title V permit as such with an asterisk.

It should also be noted that this permit will be issued to include updated requirements established pursuant to 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:

This facility has been found to be subject to the requirements of the following regulations, except as noted in the discussion below:

Federal and District Enforceable:

- 20 DCMR Chapter 1 - General Rules
- 20 DCMR Chapter 2 - General and Non-Attainment Area Permits
- 20 DCMR Chapter 3 - Operating Permits and Acid Rain Programs
- 20 DCMR 500 - Records and Reports
- 20 DCMR 502 - Sampling, Tests, and Measurements
- 20 DCMR 600 - Fuel-Burning Particulate Emission
- 20 DCMR 603 - Particulate Process Emissions
- 20 DCMR 604 - Open Burning
- 20 DCMR 605 - Control of Fugitive Dust
- 20 DCMR 606 - Visible Emissions
- 20 DCMR 700 - Miscellaneous Volatile Organic Compounds (VOC)
- 20 DCMR 716 - Offset Lithography and Letterpress Printing
- 20 DCMR 764 - Solvent Cleaning-Cold Cleaning
- 20 DCMR 774 - Architectural and Industrial Maintenance Coatings
- 20 DCMR 800 - Control of Asbestos
- 20 DCMR 801 - Sulfur Contents of Fuel Oils
- 40 CFR 51.212, 52.12, 52.30, 60.11, and 61.12 - Credible Evidence
- 40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for

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Reciprocating Internal Combustion Engines (NESHAP for RICE)

40 CFR 82, Subpart G - Protection of Stratospheric Ozone (Federally enforceable only except through Title V) *(Note: Air Quality Division [AQD] did not make a positive determination that this regulation was applicable to the facility, but included it as a standard requirement in the permit.)*

40 CFR 82, Subpart H - Halon Emissions Reduction (Federally enforceable only except through Title V) *(Note: AQD did not make a positive determination that this regulation was applicable to the facility, but included it as a standard requirement in the permit)*

District Enforceable Only:

20 DCMR 402 – Chemical Accident Prevention *(Note: AQD did not make a positive determination that this regulation was applicable to the facility, but included it as a standard requirement in the permit.)*

20 DCMR 900 - Engine Idling

20 DCMR 901 - Vehicular Exhaust Emissions

20 DCMR 902 - Lead Content of Gasoline

20 DCMR 903 - Odorous or Other Nuisance Air Pollutants

Facility-Wide Regulation Review

Compliance Assurance Monitoring (CAM) [40 CFR 64]:

A Compliance Assurance Monitoring Plan (CAM) does not apply to the emission units at GPO that are covered by the draft Title V permit. The individual “pollutant-specific emissions units” at the facility do not have the potential to emit, pre-control, at or above the major source threshold for any pollutant; therefore none of the units meet the criteria for CAM applicability.

Greenhouse Gas (GHG) Requirements:

Because Chapter 3 (Title V) was triggered by other pollutants, no evaluation was made to determine if the facility would trigger Title V applicability under the GHG Tailoring Rule. No modifications have been made to the source that would trigger PSD applicability under the GHG Tailoring Rule. Other than this requirement, there are no other applicable requirements related to GHGs at this time, therefore none were included in the permit.

20 DCMR Chapter 2 – General and Non-Attainment Area Permits:

All printing presses, parts washers, the paint booth, the main cyclones/baling system, SID cyclone/baling systems and the stationary engine are subject to Chapter 2 permitting requirements, regardless of size. As such, all of the significant units at the facility are subject to Chapter 2 permitting requirements.

Many of the units at the facility have been installed since the previous Title V permit was issued on April 24, 2000. Many of these newer units have been issued Chapter 2 permits, but many have not. The Chapter 2 permits that have been issued are being incorporated into this Title V permit as part of this renewal action. In some cases, AQD is using Chapter 2 authority to update

the requirements of these Chapter 2 permits, where this is appropriate. For those newer units that have not been issued Chapter 2 permits, rather than issuing separate Chapter 2 permits and then incorporating their requirements into the Title V permit, the Department is using Chapter 2 authority to establish the requirements directly in the Title V permit via this permitting action. GPO has submitted Chapter 2 permit applications (separate from the Title V application) for most of the units subject to Chapter 2 permitting, but that have not been issued Chapter 2 permits. These applications have been assigned Chapter 2 permit numbers, despite the fact that no permits were actually issued. These assigned numbers have been documented in the Title V permit for historical reference purposes.

See the table at the beginning of Condition III of the permit that has also been reproduced in the “Facility Description” section of this Fact Sheet and Statement of Basis, above. The footnotes in the “Chapter 2 Permit No.” column differentiate between those permits that were issued and those that just had numbers assigned to applications. Those Chapter 2 permits listed as having been issued are being incorporated into the permit. Those listed as not having been issued are having the permit requirements established in the Title V permit directly, using Chapter 2 authority.

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 5 – Source Monitoring and Testing:

Throughout the permit, appropriate monitoring, testing, and record keeping requirements have been established to ensure that all emission and operational limits in the permit are enforceable as a practical matter. These requirements are established under the authority of Chapter 5.

Emission Unit-Specific Regulation Review

All Printing Presses

There are six types of presses operated by GPO as listed in the following table:

Press Type
Sheet-fed Silk Screen Press with electric dryers
Sheet-fed Non-heatset Offset Lithography
Non-web Letterpress
Non-web Coater (utilizes aqueous or UV coatings)
Heatset Web Offset Lithography
Web Inkjet

Each of these types of printing presses has specific rules applicable as evaluated below.

- (a) 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, because the facility does not operate a publication rotogravure printing press as defined in 40 CFR 60.431.
- (b) 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, because the facility does not operate a rotogravure printing line used to print or coat flexible vinyl or urethane products as defined in 40 CFR 60.581.
- (c) 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, because the facility does 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.
- (d) 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, because the facility does not operate publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses as defined in 40 CFR 63.822.
- (e) 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, because 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.
- (f) 20 DCMR 205 – New Source Performance Standards
There are no NSPS subparts applicable to these printing presses as discussed above.

- (g) 20 DCMR 606 – Visible Emissions
No significant amount of particulate matter is expected to result from operation of these printing presses. As a result, the visible emission requirements of 20 DCMR 606 have been included in Conditions III(a), (b), (c), and (d), 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.
- (h) 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.
- (i) 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.
- (j) 20 DCMR 715 – Major Source and Case-By-Case Reasonably Available Control Technology (RACT):
The requirements of 20 DCMR 715 do not apply to any of the presses because other control technique guidelines apply or the potential to emit of the units within the same category of presses and regulated under the same section is less than 25 tpy.
- (k) 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.
- (l) 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.
- (m) 20 DCMR 1404: Emission Standards for the Printing and Publishing Industry:
The requirements of 40 CFR 63, Subpart KK are not applicable to the presses as discussed above. Therefore, 20 DCMR 1404 is not applicable to these units.

Heatset Web Offset Lithography

Press Group	Unit ID	Location	Press Type	Description
Group 86	3474	Bldg C, 2nd Fl	Heatset Web Offset Lithography	Hantscho Single Unit Web Press, controlled by Phoenix 4000 series thermal oxidizer
Group 95	4507	Bldg C, 2nd Fl	Heatset Web Offset Lithography	ZMR Timson T-48A, with built in oxidizer/dryer
Group 98	8535, 8536 & 8537	Bldg C, 4th Fl	Heatset Web Offset Lithography	Hantscho Double Unit, controlled by Phoenix 7000 series thermal oxidizer with Phoenix 5000 series thermal oxidizer as back up

- (a) 20 DCMR 107 is applicable to the heatset web offset units because all have control equipment installed. These control devices shall remain operative or effective, and shall not be removed.
- (b) 20 DCMR 700 is not applicable to the Heatset Web Offset Lithography presses because the presses are subject to 20 DCMR 716.
- (c) 20 DCMR 716 is applicable to the Heatset Web Offset Lithography presses because the presses are offset lithography printing operations at a source with the theoretical potential to emit twenty-five (25) or more tons per year of VOCs. The requirements of this regulation are incorporated throughout Condition III(a) of the permit for these units.

AQD has determined that Section 716.16 and the related Section 716.20 are not applicable to these units because the pre-control potential to emit from each heatset web offset lithography printing press is less than 25 tons per year of VOC. It should be noted that AQD evaluated whether this was intended to apply to all presses in this category in combination or each individual press, since the regulatory language refers to an “individual heatset web offset lithography printing operation” <emphasis added>, where “printing operation” is defined in 20 DCMR 799 as: “each operation used in connection with printing, including, but not limited to, the printing itself, lithographic varnish and coating operations, ink manufacture, ink mixing, preparing, and packaging the printed products and disposal of the waste”. In order to clarify what was meant, AQD referred to the text of the CTG that was being adopted at the time of the last update of Section 716.16. Section VI.A of the “Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing” [EPA 453/R-06-002, September 2006] is clear that it only recommends control for an individual unit with the potential to emit greater than 25 tons per year of VOC. In particular it states: “We believe that control of a press that is above the 25 tpy threshold will generally be cost effective. Control of a press that is

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below the 25 tpy threshold, presses used for book printing, and presses with maximum web width of 22 inches or less will generally not be cost effective.” AQD determined, based on this CTG, that the regulatory language intended the threshold to apply for each individual press, rather than all of the presses as a group. Note also that this interpretation is consistent with that applied when Chapter 2 permit 6683 was issued on April 26, 2017 for the Group 95 ZMR T-48A web press that is part of this group of presses.

Sheet-fed Non-heatset Offset Lithography

Press Group	Unit ID	Location	Press Type	Description
Group 50	--	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	Heidelberg PM GTO 52-2
Group 52	1100	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	Presstek 52 DI
Group 74	4493	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	Heidelberg SM-102-4-P3
Group 75	4496	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	Heidelberg CD 102 6-Color Sheet Fed
Group 80	2376	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	Ryobi 3302HA
Group 81	4219 & 4670	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	Heidelberg SM-74-1
Group 82	5367	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	Heidelberg SM-72-2-P
Group 84	4668	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	Heidelberg SM-102-2-P
Group 90	6901	Bldg C, 2nd Fl	Sheet-fed Non-heatset Offset Lithography	Ryobi 928PF
Group 96	SID	Bldg D, 2nd Fl (SID)	Sheet-fed Non-heatset Offset Lithography	Heidelberg CD 102 7-Color

- (a) 20 DCMR 700 is not applicable to the Sheet-fed Non-heatset Offset Lithography presses because the presses are subject to 20 DCMR 716.
- (b) 20 DCMR 716 is applicable to the Sheet-fed Non-heatset Offset Lithography presses because the presses make up an offset lithography printing operation with the theoretical potential to emit, as a group, twenty-five (25) or more tons per year of VOCs (see Section 716.1(a)). The requirements of this regulation are incorporated throughout Condition III(b) of the permit for these units.

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Non-web Letterpress Units

Press Group	Unit ID	Location	Press Type	Description
Group 9	4538 & 4542	Bldg C, 2nd Fl	Non-web Letterpress	Halm Jet 1-Color Envelope Press
Group 11	4632 & 4532	Bldg C, 2nd Fl	Non-web Letterpress	Diamond P-18 2-Color Envelope Press

- (a) 20 DCMR 700 is not applicable to the Non-web Letterpress units because the presses are subject to 20 DCMR 716.
- (b) 20 DCMR 716 is applicable to the Non-web Letterpress units in a limited fashion. It was determined that the letterpress units, as a group, do not have the potential to emit greater than fifteen pounds per day (15 lb/day) of VOC on a monthly average basis, before consideration of controls. Although conclusive information is not available for letterpress units in the past, it appears likely that they never, as a group, exceeded this threshold. As such, this letterpress printing operation is subject to Section 716.1(c), which requires only compliance with Section 716.25(b), a record keeping requirement to ensure that the 15 lb/day monthly average basis threshold is not exceeded. The Title V permit has been written to limit emissions from these four units, as a group, to below 15 lb/day (see Condition III(c)(1)(A), and has incorporated the Section 716.25(b) record keeping language into Condition III(c)(4)(A).

Sheet-fed Silk Screen Presses with Electric Dryers

Press Group	Unit ID	Location	Press Type	Description
Group 97	SID	Bldg D, 2nd Fl (SID)	Sheet-fed Silk Screen Press with electric dryers	BecMar Classic General Silk Screen
--	--	Bldg C, 2nd Fl	Sheet-fed Silk Screen Press with electric dryers	BecMar Classic General Silk Screen

- (a) 20 DCMR 700 is applicable to the Silk Screen 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 throughout Condition III(d) of the permit for these units. Note that other equipment at the facility also must comply with 20 DCMR 700, and the

emissions of all such equipment must be summed to ensure compliance. This has been stated in the permit language (see Condition III(d)(1)(A)).

- (b) 20 DCMR 716 is not applicable to the Silk Screen Presses because the presses are not offset lithography or letterpress printing operations.

Non-web Coater (utilizes aqueous or UV coatings)

Press Group	Unit ID	Location	Press Type	Description
Group 40	1101	Bldg C, 2nd Fl	Non-web Coater (utilizes aqueous or UV coatings)	Kompac Kwik Finish Coater

- (a) 20 DCMR 700 is applicable to the Non-web Coater because the press is 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 throughout Condition III(d) of the permit for this unit. Note that other equipment at the facility also must comply with 20 DCMR 700, and the emissions of all such equipment must be summed to ensure compliance. This has been stated in the permit language (see Condition III(d)(1)(A)).
- (b) 20 DCMR 716 is not applicable to the Non-web Coater because the press is not an offset lithography or letterpress printing operation. The Non-web Coater operates similarly to a letterpress, except that a full coating is applied to a sheet. The Non-web Coater is a roll to roll aqueous coater with fewer rollers than a letter press. There are no inks or fountain solutions used. Coatings protect the printed image and ensure a trouble-free processing, while also providing a high-value finish and may add valuable properties, such as barrier effects or heat-resistance.

Web Inkjet Presses

Press Group	Unit ID	Location	Press Type	Description
--	1-Color Inkjets 1, 2, 3, & 4	Bldg C, 4th Fl	Web Inkjet	Canon Colorstream 1-Color Inkjet Printers
--	4-Color Inkjet 1	Bldg C, 4th Fl	Web Inkjet	Canon Colorstream 4-Color Inkjet Printer

- (a) 20 DCMR 700 is applicable to the Web 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 throughout Condition III(d) of the permit for these units. Note that other equipment at the facility also must comply with 20 DCMR 700, and the emissions of all such equipment must be summed to ensure compliance. This has been stated in the permit language (see Condition III(d)(1)(A)).

- (b) 20 DCMR 716 is not applicable to the Web Inkjet presses because the presses are not an offset lithography or letterpress printing operation.

Emergency Generator

Location	Emission Unit Identification	Description
Bldg C, Power Branch	Caterpillar Model No. 3306TA generator set	230 kWe generator set powered by a 349 hp diesel- engine, installation date: 2000 (non-NSPS)

20 DCMR 801 – Sulfur Content of Fuel Oils:

This regulation limits fuel oil sulfur content to 1% by weight in all circumstances. There are more stringent requirements for commercial fuel oil, but the only portion of 20 DCMR 801 applicable to the emergency engines is the 1% sulfur content limit. This requirement is streamlined with the more stringent requirements found in 40 CFR 63.6604(b) for non-NSPS engines.

20 DCMR 805 – Reasonably Available Control Technology for Major Stationary Sources of the Oxides of Nitrogen:

The requirements of 20 DCMR 805 do not apply to the source. Pursuant to 20 DCMR 805.1(c)(2), the requirements of 20 DCMR 805 do not apply if “emergency standby engines operated less than five hundred (500) hours during any consecutive twelve (12) month period.” The emergency generator has an operation limit of less than 500 hours listed in Condition III(e)(2)(A) of the permit.

40 CFR 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines:

The engine of the diesel emergency generator set at the facility is not subject to 40 CFR 60, Subpart IIII because 40 CFR 60, Subpart IIII applies to stationary compression ignition internal combustion engines (CI-ICE) that: 1) commenced construction after July 11, 2005 and were manufactured after April 1, 2006, or 2) were modified or reconstructed after July 11, 2005. The engine was manufactured before April 1, 2006. The unit was installed at the facility in 2000.

40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Engines
This subpart does not apply to this facility because this facility only includes a compression ignition (diesel) engine.

40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (NESHAP for RICE):

40 CFR 63, Subpart ZZZZ applies to stationary reciprocating internal combustion engines (RICE) at major or area sources of HAP emissions to regulate/monitor HAPs such as acetaldehyde, acrolein, benzene, toluene, xylene, cadmium, chromium, lead, etc., through surrogate compounds such as formaldehyde, CO and/or VOC.

A facility that emits or has the potential to emit 10 TPY of any single HAP or 25 TPY of any combination of HAPs, is consider a major source. Any source that is not a major source is an area source. Because this facility does not have the potential to emit more than 10 TPY of a single HAP or an aggregate of more than 25 TPY of total HAPs, it is an area source. Therefore the area source NESHAP requirements of Subpart ZZZZ are applicable to this facility.

Subpart ZZZZ is applicable to new or reconstructed diesel compression ignition (CI) engines at this facility, where “new” is defined as those engines that are manufactured or reconstructed after June 12, 2006. “Existing” CI engines are also covered by this regulation. The one diesel engine associated with the generator set at the facility falls into this “existing” category. The requirements of this regulation are incorporated throughout Condition III(e) of the permit.

Paint Booth

Location	Description
Bldg A, roof	Non-Auto Body Col-Met side down draft cross-draft Paint Booth

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

The requirements of 20 DCMR 700 were included in the permit. Because the facility will not be performing activities regulated by other sections of Chapter 7, such as mobile equipment repair and refinishing, most activities occurring in this unit will be regulated under this section. Many of the monitoring and record keeping requirements in the permit are designed to document compliance with this section. Note that other equipment at the facility also must comply with 20 DCMR 700, and the emissions of all such equipment must be summed to ensure compliance. This has been stated in the permit language (see Condition III(f)(1)(A)).

20 DCMR 714 – Control Techniques Guidelines (CTGs):

20 DCMR 714 is not applicable to these units since the source does not operate any of the source categories (Miscellaneous Metal Product and Plastic Parts Surface Coatings, Large Appliance Coatings, Metal Furniture Coatings) specified in 20 DCMR 714. The paint booth is used primarily for painting wooden pieces such as desks and cabinets. The facility is not a

manufacturing facility.

40 CFR 60, Subpart EE – New Source Performance Standard for Surface Coating of Metal Furniture:

This subpart does not apply to this unit because the source uses less than 3,842 liters of coating (as applied) per year (see 40 CFR 60.310(c)) and keeps purchase or inventory records or other data necessary to substantiate annual coating usage shall be exempt from all other provisions of this subpart. See Condition III(f)(2)(J) of the permit for this limitation. These records shall be maintained at the source for a period of at least 2 years per the regulation, but the five year retention requirement of 20 DCMR 302.1(c)(2)(B) contained in the permit supersedes this requirement as it is more stringent.

40 CFR 63, Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources:

This subpart does not apply to this facility because the paint booth does not perform paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), autobody refinishing operations, or spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP. The paint booth is used primarily for painting wooden pieces such as desks and cabinets.

Parts Washers (Degreasers)

Location	Unit Description	Degreaser Type
Bldg A, Garage Shop	B-126 Safety Kleen Sink Parts Washer Model 16, S/N 30201378	Remote Reservoir
Bldg C, Forklift/Truck Shop	C-142 Klamas Kleen Parts Washer (30-gallon)	Remote Reservoir
Bldg C, Machine Shop	C-322 Safety-Kleen Model 81 Agitating Parts Washer (80-gallon), S/N 902236683	Immersion
Bldg C, Power Branch	C-012/Machinist Branch Wel-Bilt Portable Parts Washer (20-gallon), #141226	Remote Reservoir
Bldg C, Bindery Area	Portable degreaser for the bindery area	Immersion

20 DCMR 764 – Solvent Cleaning-Cold Cleaning:

The solvent cleaning control requirements apply to the parts washers. The operational requirements of this regulation are found in Condition III(g) of the permit document.

20 DCMR 770– Miscellaneous Industrial Solvent Cleaning Operations:

Pursuant to 20 DCMR 770.9(a), the subsections 770.1 through 770.8 shall not apply on or after January 1, 2012 to any person who owns, operates, or leases any cold cleaning machine subject to 20 DCMR 764. As such, this section establishes no requirements for the cold cleaning machines.

20 DCMR 771– Miscellaneous Cleaning and VOC Materials Handling Standards:
 Pursuant to 20 DCMR 771.1(a), on or after January 1, 2012, any person who owns, operates, or leases any solvent cleaning operation subject to §770 shall be subject to §§ 771 through 771.4(a). As discussed above, 20 DCMR 770 does not apply to the source, thus 20 DCMR 771 also does not apply.

40 CFR 63, Subpart T—National Emission Standards for Halogenated Solvent Cleaning:
 This subpart does not apply to the parts washers because the units do not use any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. Condition III(g)(1)(B) has been included in the permit to ensure that they do not trigger the applicability of this regulation.

Particulate Process Emission Units

20 DCMR 603 and 20 DCMR Chapter 6, Appendix 6-1 – Particulate Process Emissions:
 These sections are applicable to the following:

Location	Description
Bldg A and C	Main cyclones/baling system consisting of eleven air scrap paper pick-up points from Buildings A and C routed to two cyclones that merge into vent filters on the roof, with collected paper fed to two baling systems on 1st floor of Building A.
Bldg D, 2nd Fl	SID cyclone/baling system consisting of two air scrap paper pick-up points from trimming machines in Building D routed to a cyclone and vented outdoors, with collected paper fed to a baler
Bldg D, 3rd Fl	SID cyclone/baling system consisting of three air scrap paper pick-up points from trimming machines in Building D routed to a cyclone and vented outdoors, with collected paper fed to a baler

Section 603.1 establishes limits of 0.03 grains per dscf of exhaust gas as well as referencing Appendix 6-1. Appendix 6-1 was used to develop a 4.81 pounds per hour particulate matter limit for the main cyclones/baling system based on the 2,674 lb/hr average material processing rate identified by GPO in the unit calculations. Similarly, based on the 249.57 lb/hr average material processing rate identified by GPO in the unit calculations for each of the two SID cyclone/baling systems, a limit of 1.03 pounds per hour of particulate matter was established. These requirements have been placed in the permit in Condition III(h)(1)(C).

20 DCMR 603 – Particulate Process Emissions:
 The requirements of 20 DCMR 603 are not included in the permit for the following units:

Location	Description
Bldg A, 1st Fl	Manual backup baling system consisting of manual scrap paper pick-up in Building A routed to a baghouse/dust collector that vents indoors, with collected paper fed to a baler
Bldg C, 3rd and 4th Fl	Bindery dust collector system consisting of air pick-up points from bindery machines in Building C routed to a cartridge filter dust collector and vented back indoors
Bldg C, 4th Fl	Bindery dust baghouse system consisting of air pick-up points from paper trimming operation in Building C routed to a baghouse and vented indoors
Bldg A, 2nd Fl	Carpentry shop baghouse system consisting of air pick-up points throughout the carpentry shop routed to a baghouse and vented back indoors
Bldg D, 3rd Fl	SID paper separator/briquetter system consisting of three air scrap paper pick-up points from trimming machines in Building D routed to a rotary separator screen that removes the paper to granulator that reduces paper's size and routed to cyclone, paper routed to a briquetter that compresses the paper into small hockey puck sized briquettes, air routed to cartridge filter dust collector and vented back indoors
Bldg D, 1st Fl	Baghouse 1st floor SID associated with a paper shredder that is manually fed with scrap paper, routed to baghouse and vented indoors

These units vent indoors. However, the permit establishes that all captured dust emissions shall be controlled by an exhaust system attached to a control device which collects the particulates into a bin and vents within the building. Additionally, the control device unit shall be maintained in accordance with the recommendations of the manufacturer. See Condition IV(d)(2).

Tank

Location	Description
Bldg A, basement	One 2,400 gallon aboveground diesel storage tank

20 DCMR 701 – Storage of Petroleum Products:

The requirements of 20 DCMR 701 do not apply to the source because the storage vessel located at the source has a capacity less than 40,000 gallons.

40 CFR 60, Subparts K, Ka, and Kb – Standards for Storage Vessels for Petroleum Liquids or Volatile Organic Liquids:

The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids or Volatile Organic Liquids (40 CFR 60, Subparts K, Ka, and Kb) do not apply to this facility for the storage vessel located at the source because for the purposes of Subparts K, Ka, and Kb the storage vessel at the source has a capacity less than 151,412 liters (40,000 gallons)

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for petroleum liquids or a capacity less than or equal to 75 cubic meters (m³) for volatile organic liquids as specified in 40 CFR 60, Subparts K, Ka, and Kb.

COMPLIANCE HISTORY:

The applicant has not been subject to enforcement actions by AQD in the past three years. No air quality violations have been identified by the Compliance and Enforcement Branch over the last three years. No air quality violations are listed in the three year compliance status summary in EPA's Enforcement and Compliance History Online (ECHO) database.

COMMENT PERIOD:

Beginning Date: September 13, 2019
Ending Date: October 15, 2019

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
Environmental Engineer
Department of Energy and Environment
Air Quality Division
1200 First Street NE, 5th Floor
Washington, DC 20002
(202) 535-2273

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REVIEWS:

Prepared by:



Thomas Olmstead
Environmental Engineer

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Approved by:



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

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