

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment

CHAPTER 2 TECHNICAL SUPPORT MEMORANDUM

TO: File

THROUGH: Stephen S. Ours, P.E.
Chief, Permitting Branch, Air Quality Division

FROM: Afewerki Birhane
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SUBJECT: United States Government Publishing Office
Permit No. 7432 for a Komori LC-1232 12-Color Sheet-Fed Non-Heatset Offset
Printing Press

DATE: November 25, 2025

BACKGROUND INFORMATION

On September 30, 2025, the Air Quality Division (AQD) of the Department of Energy and Environment ("DOEE" or "the Department") received an application from the United States Government Publishing Office (GPO) to install a Komori LC-1232 12-color sheet-fed non-heatset offset printing press at the GPO facility located at 732 N Capitol Street NW.

The applicant requested that portions of the application be held confidential citing 20 DCMR 101 and Title 18, Section 1905 of the United States Code, commonly known as the Trade Secrets Act. The applicant provided a redacted version of the application for public release and a confidential version of the application for full Department review. The permit and this memorandum do not incorporate any of the redacted information.

TECHNICAL INFORMATION

The press to be permitted is a Komori LC-1232 12-color sheet-fed non-heatset offset printing press.

Based on the emission calculations provided by the facility, this press has the potential to emit 11.97 tons per year (TPY) of volatile organic compounds (VOCs) and 0.02 TPY of hazardous air pollutants (HAPs). The applicant has requested that this 11.97 TPY limit on VOCs be established as a federally enforceable permit condition.

REGULATORY REVIEW

In developing this permit, the following regulations were evaluated for applicability.

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20 DCMR Chapter 2, Section 200: General Permit Requirements

Pursuant to 20 DCMR 200.1 and 200.2, because the equipment 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 proposing to cause a “significant” increase in emissions as a result of the press (the potential to emit 11.97 TPY of VOCs is well below the 25 TPY value meeting the definition of "significant" for VOCs), 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, as discussed below.

20 DCMR Chapter 2, Section 209: Permit Requirements for Non-Major Stationary Sources (Minor New Source Review)

The potential emissions 11.97 TPY of VOCs is above the 5 TPY threshold for applicability of this regulation. Since the requirements of this regulation are applicable, GPO (applicant) is required to perform an analysis to determine how this proposed installation compares with similar installations and to perform a top-down analysis of emission control options and evaluate their technical and economic feasibility. The applicant performed this analysis and included it in the application as attachment E. The conclusion was that it was appropriate to establish a maximum VOC emission limit of 11.97 tons in any 12-consecutive-month period and to require that the unit be operated using good design and operating practices. These requirements have been incorporated into the permit.

20 DCMR Chapter 3: Operating Permits and Acid Rain Programs

As discussed above, the facility has the potential to emit greater than the major source threshold of VOCs. As such, the facility already has a Title V permit (No. 029-R1-A4). Condition I(g) of the attached permit requires that GPO apply to have the Title V permit amended to incorporate the requirements of this permit within 12 months of issuance of the permit. Additionally, the record keeping requirements in the permit have been extended to five years from the three-year standard required elsewhere as Chapter 3 requires this longer retention schedule. Also, per Condition VI(b), GPO will be required to report threats to public health, safety, and the environment and emissions exceedances in a manner consistent with Title V permit requirements.

20 DCMR Chapter 6: Particulates

No significant amount of particulate matter is expected to result from construction or operation of this equipment. Nonetheless, the visible emission requirements of 20 DCMR 606 have been included in Condition II(b). 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

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modification was made pursuant to authority under 20 DCMR 201.

Additionally, this regulation establishes certain operational, maintenance, and training requirements which have been incorporated into Conditions III(i), (j), and (k). Record keeping requirements are incorporated into Condition V and specifically Conditions V(c)(15) and (16).

20 DCMR Chapter 7: Volatile Organic Compounds and Hazardous Air Pollutants

20 DCMR 716 is applicable to all lithographic printing operations. The requirements of this section are included throughout the proposed permit, but especially significantly throughout the operating conditions of Condition III. Appropriate monitoring, testing, record keeping, and reporting requirements have been included in subsequent sections of the permit to make those requirements enforceable as a practical matter.

It should be noted that the “offset lithography printing operation” (all offset lithography presses at the site in combination) has been calculated to have a “theoretical potential to emit” (see 20 DCMR 716.1(a) and 20 DCMR 715.1) of well over 25 TPY of VOC. As such, 20 DCMR 716.8(a) is applicable rather than 716.8(b). As a result, GPO must use only cleaning solutions with VOC composite partial pressure of less than 10 mmHg at 20°C. They do not have the alternative option of using cleaning solutions up to 70% by weight VOCs. This requirement is included in the permit.

It should also be noted that the exemption from the fountain solution requirement in 20 DCMR 716.6 found in 20 DCMR 716.7 does not apply as the press is a sheet-fed press with a maximum size greater than 11 inches by 17 inches per the equipment specifications and the total fountain solution reservoir exceeds one gallon in volume (see Daryl Kosturock email to Stephen Ours, dated November 25, 2025).

Because the unit is a lithographic press, 20 DCMR 710 is not applicable. Because 20 DCMR 716 is applicable, 20 DCMR 700 is not applicable.

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 II(b) of the permit. The affirmative defense provision of 20 DCMR 903.13(b) has also been incorporated into Condition II(c). The requirements to develop an odor control plan (OCP) do not apply to this facility at this time.

40 CFR 60 – New Source Performance Standards (NSPS)

No NSPSs were found to be applicable. One was considered as follows, but not found to be applicable.

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40 CFR Part 60, Subpart QQ – Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing - This press does not meet the definition of rotogravure printing and is not subject to Subpart QQ.

40 CFR 63 – National Emission Standards for Hazardous Air Pollutants for Source Categories

The potential to emit HAPs from this press (0.02 TPY) is lower than the threshold required to trigger Part 63 NESHAPs applicable to a lithographic press. NESHAPs were considered for applicability, but found to not be applicable:

1. 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating – This NESHAP only applies to facilities that are major sources of HAPs. GPO is not a major source of HAPs, so this subpart is not applicable to them.
2. 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry – This regulation does not apply to this unit as it is not a rotogravure or wide-web flexographic printing press.

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.

RECOMMENDATIONS

The proposed project and attached permit comply with all applicable federal and District air pollution control laws and regulations (except as discussed above with regard to the installation and operation of the equipment without a permit).

The permit action for the printing press will be published in the DC Register and on DOEE's website on December 5, 2025. Public comments for the permit action will be solicited from December 5, 2025, through January 5, 2026. Additionally, during that time, any person may request a public hearing on this subject. A public hearing will not be held unless requested. If public comments are received, they will be reviewed and addressed before any final action is taken on the permit application document. If no adverse comments are received, I recommend that permit No. 7432 be issued in accordance with 20 DCMR 200 promptly following the end of the public comment period.

SSO/AB