May 6, 2014

Neal Mohlmann, Chief

Office of Environment and Safety

Bureau of Engraving and Printing

U.S. Department of Treasury

14th and C Streets, SW

Washington, DC 20228

**RE: Permit (#6338-R1) to Operate One KBA-GIORI Mini Orlof Intaglio II, Non-Heatset Intaglio Sheet-Fed Research Press.**

Dear Mr. Mohlmann:

Pursuant to section 200.2 of Title 20 of the District of Columbia Municipal Regulations (20 DCMR), a permit from the District Department of the Environment (the Department) shall be obtained before any person can operate a stationary source in the District of Columbia. The application of the Bureau of Engraving and Printing (“BEP” or “the Permittee”) to operate one (1) KBN-GIORI Mini Orlof Intaglio II, non-heatset, intaglio sheet-fed research press at the BEP Facility, locate at 14th and C Streets SW, at the 1st Floor, A-Wing, Main Building (PDC), Washington DC, per the submitted plans and specifications, received on September 19, 2013, are hereby approved, subject to the following conditions:

I. General Requirements:

a. The KBN-GIORI Mini Orlof Intaglio II, non-heatset, intaglio sheet-fed research press shall be maintained and operated in accordance with the air pollution control requirements of 20 DCMR.

b. This permit expires on May 5, 2019 [20 DCMR 200.4]. If continued operation after this date is desired, the owner or operator shall submit a renewal application by February 5, 2019.

c. Operation of equipment under the authority of this permit shall be considered acceptance of its terms and conditions.

d. The Permittee shall allow authorized officials of the District, upon presentation of identification, to:

1. Enter upon the Permittee’s premises where a source or emission unit is located, an emissions related activity is conducted, or where records required by this permit are kept;

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of this permit;

3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

4. Sample or monitor, at reasonable times, any substance or parameter for the purpose of assuring compliance with this permit or any applicable requirement.

e. This permit shall be kept on the premises and produced upon request.

1. Failure to comply with the provisions of this permit may be grounds for suspension or revocation. [20 DCMR 202.2]
2. If not already completed by the time of issuance of this permit, the applicant shall, within 45 days of issuance of this permit, submit a revision to the facility’s pending Chapter 3 (Title V) permit application to include the requirements of this permit in the renewed Title V permit to be subsequently issued.
3. This permit supercedes permit #6338-O, dated December 22, 2010.

II. Emission Limitations:

a. Emissions of volatile organic compounds (VOC) from the ink used in the process shall not exceed 0.08 pounds per hour.

b. VOC emissions from any cleaning solvents used shall not exceed 0.21 pounds per hour.

c. The total annual VOC emitted from the ink and cleaning solvent as a result of operation of the press shall not exceed 0.29 tons per year.

d. Visible emissions shall not exceed zero percent opacity from the press. [20 DCMR 606.1 and 20 DCMR 201]

e. 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]

III. Operational Limitations:

1. The VOC content of any ink used in connection with the press shall not be greater than twelve percent (12%) by weight. [20 DCMR 710.4, 710.5, and 710.9(a)]

b. The VOC emissions released to the atmosphere from the twelve percent (12%) VOC content by weight ink used in connection with the press shall not exceed one percent (1%) of the 12% VOC content ink by weight. [20 DCMR 201]

1. The vapor pressure of any cleaning solvent(s) used on this press shall be less than 10 mmHg at 20oC. [20 DCMR 201]
2. The VOC content of the “wiping solution” shall not exceed one percent (1%) by weight. [20 DCMR 710.4, 710.8(b) and 710.9(a)]
3. For Conditions III (a) and (d), compliance shall be determined consistent with the testing requirements of Condition IV(g). [20 DCMR 710.9]
4. The research press shall be operated for no more than one (1) shift [8 hours] per day, five (5) days per week two hundred fifty (250) days per year for the duration of the permit. [20 DCMR 201]

g. The maximum ink used in the research press, shall not exceed 8 lbs per hour and 16,000 lbs per 12 month rolling period. [20 DCMR 201]

h. The maximum sheet feed rate, shall not exceed 1,500 sheets per hour and 3,000,000 sheets per 12 month rolling period. [20 DCMR 201]

i. The maximum solvent used in the research press, shall not exceed 0.0625 gallons per hour and 125 gallons per year. [20 DCMR 201]

j. Ink usage in connection with all forms of intaglio printing shall be minimized to the extent feasible by routing the inking cylinders or other techniques. [20 DCMR 710.10]

k. All containers holding VOC containing materials shall be open only when necessary and openings shall be restricted to the extent feasible. [20 DCMR 710.12]

l. The leaking of any solvent or solvent-containing material from any printing unit or associated equipment is prohibited. [20 DCMR 710.13]

m. The storage or disposal of any solvent-containing material, including waste material, in a manner that will cause or allow its evaporation into the atmosphere is prohibited. [20 DCMR 710.14]

n. To the greatest extent feasible, persons operating printing units and associated equipment shall minimize their use of VOC containing materials by restricting wasteful usage and by replacing the material with emulsions or other materials. [20 DCMR 710.15]

o. At all times, including periods of startup, shutdown, and malfunction, the owner shall, to the extent practicable, maintain and operate the units in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

IV. Monitoring and Testing Requirements:

a. BEP shall monitor the types, constituents, characteristics, and quantities of inks and cleaning solvents used on the press to ensure compliance with Conditions III(a)-(d), (g) and (i).

b. BEP shall monitor the operating hours of the press to ensure compliance with Conditions III(f).

1. BEP shall monitor use of storage containers for VOC and solvent-containing materials and disposal practices for such materials to ensure compliance with Conditions III (k) and (m).
2. BEP shall monitor the status of the press and related equipment to ensure that no leaking is occurring and that they are being operated properly to ensure compliance with Conditions III(l) and (n). Any leaks identified as a result of this monitoring shall be repaired promptly.
3. BEP shall monitor and periodically review operational practices to ensure compliance with Conditions III(h) and (j).
4. BEP shall conduct and allow the Department access to conduct tests of air pollution emissions from any source as requested. [20 DCMR 502.1]
5. At least on a quarterly basis and whenever there is a change in formulation of inks or wiping solutions, BEP shall analyze samples of each ink used on the press during that quarter to determine the weight percent VOCs in the inks and wiping solutions. [20 DCMR 502.1 and 20 DCMR 710.9]

Compliance determinations and testing pursuant to this condition shall be performed as follows:

1. The percentage VOC content is by weight and applies to the inks and solutions as contained in the storage wells (fountains) of the printing unit, and does not include water;

2. The percentage VOC content of the inks shall be determined in accordance with Procedure B of test method ASTM D-2369-81; where, in lieu of testing the formulated inks and solutions, the individual components of the formulations may be tested and the VOC content of the formations may be calculated there from; and

3. The percentage water content shall be determined in accordance with test method ASTM D-3792-79.

h. BEP shall monitor the emission points for visible emissions as needed to ensure compliance with condition II(d).

V. Record Keeping Requirements:

The following information shall be maintained at the facility for a period not less than five (5) years from the date of the monitoring sample, measurement, report, or application [20 DCMR 500.8 and 20 DCMR 302.1(c)(2)(B)] and shall be made available to the Department upon written or verbal request:

a. Records of the types, constituents, characteristics, and quantities of inks and cleaning solutions used on the press to show compliance with Conditions III(a) through (d), (g), and (i);

b. Records of VOC content, by weight, of each ink used;

c. Records of the chain of custody of each ink sample taken as well as the identification of any laboratory used to analyze the sample and the methods used by that laboratory to analyze the sample;

d. Records of the identity and vapor pressure of any cleaning solvents used. This information is usually contained in Material Safety Data Sheets (MSDSs) for the products used;

e. Records of the hours of operation of the press each day, totaled monthly, and kept in a 12 month rolling sum format;

f. Records of the number of sheets fed each month, maintained in a 12-month rolling sum format;

g. Records, updated monthly, of the average VOC emissions per hour of press operation that month from each of the following sources:

1. inks; and

2. solvents.

(Note: these records shall be used to determine compliance with Conditions II(a) and (b) of this permit. They shall be updated within thirty (30) days of the end of each calendar month.);

h. Records, updated monthly, and maintained in a 12 month rolling sum format, of the total mass of VOCs emitted as a result of the operation of the press (including VOCs emitted by use of inks, wiping solutions and cleaning solvents);

i. Records of any identified leaks of solvents or solvent-containing materials along with the activities taken to repair the leak and clean up the leaked materials;

j. Records of the maintenance performed on the press;

k. Records of the results of any visible emissions observed pursuant to condition IV(h). If no visible emissions were observed, no records are required; and

l. Records of any occurrences of exceedances of the requirements of Condition II(e) and any odor complaints received. The Permittee shall also keep records of the actions taken to correct any identified odor exceedances.

VI. Reporting Requirements:

a. A copy of the analytical results of the ink samples taken quarterly under Condition IV(g) shall be submitted to the Department with the BEP Title V semi-annual and annual reports.

b. Emissions in excess of any emission limits shall be reported by telephone, immediately upon discovery, to the Air Quality Division’s Compliance and Enforcement Branch.

c. In addition to complying with Condition VI(b) and any other reporting requirements mandated in 20 DCMR, the owner or operator shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department in writing with the following information:

1. The name and location of the facility;

2. The subject source(s) that caused the excess emissions;

3. The time and date of the first observation of the excess emissions;

4. The cause and estimated/expected duration of excess emissions;

5. For sources subject to numerical emission limitations, the estimated rate of emissions (expressed in the units of the applicable emission limitation) and the operating data and calculations used in determining the magnitude of the excess emissions; and

6. The proposed corrective actions and schedule to correct the conditions causing the excess emission.

If you have any questions, please call me at (202) 535-1747 or Abraham T. Hagos at (202) 535-1354.

Sincerely,

Stephen S. Ours, P.E.

Chief, Permitting Branch

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