

GOVERNMENT OF THE DISTRICT OF COLUMBIA

District Department of the Environment



CHAPTER 2 TECHNICAL MEMORANDUM

TO: File

THROUGH: Stephen S. Ours, P.E. *SSO*
Chief, Permitting Branch

FROM: Abraham T. Hagos *ATH For ATH*
Environmental Engineer

**SUBJECT: Bureau of Engraving and Printing (BEP)
Permit Numbers 6706 & 6707
Permit to Operate Two Presses (#5 and #6 also known as #'s 601 and
602) Super Orlof Intaglio II, Sheet Fed, Non-Heatset, Intaglio
Cylinder-Wipe Currency Presses**

DATE: May 6, 2013

BACKGROUND INFORMATION

Permit (#6339) to operate Two Super Orlof Intaglio II, Non Heatset Intaglio Sheet-Fed, Non-Heatset, Intaglio Cylinder-Wipe Currency presses was issued on April 22, 2010. As required by Condition I(g) of permit 6339, BEP submitted forms to the Department to add the two presses to BEP's Title V Permit application on September 24, 2010.

Due to the Department's delayed review of the Title V permit application, permit #6339 will expire on April 21, 2013. BEP's Title V permit has not been issued and the requirements of permit #6339 have not yet been included in the Title V permit.

The Department intends to re-issue permit #6339 as two separate permits, one for each press, as permit #6706 for press number 601 and permit #6707 for press number 602.

The permit action will be published in the DC Register on May 10, 2013. Public comments for the permit action will be solicited through May 20, 2013.

Due to the Department's delayed review of the request for extension, while the public notice was occurring, the applicant was informed that a 30-day extension to operate under



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**U.S. Department of the Treasury, Bureau of Engraving and Printing
Permits #6706 and #6707 to Operate Two Super Orlof Intaglio II, Sheet Fed, Non-Heatset, Intaglio Cylinder-Wipe Currency Presses (Nos. 601 and 602)**

May 6, 2013

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permit (#6339) was approved, though a letter did not go out prior to permit expiration. To address this, a letter documenting the verbal extension, along with an extension through the end of the public notice period will be issued on May 10, 2013 pursuant to 20 DCMR 200.3.

Subsequently, it is expected that permits to operate will be issued on or about June 11, 2013 pursuant to DCMR 200.2, assuming that no public comments are received. If public comments are received, they will be addressed prior to any final permit issuance decision.

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

REGULATORY REVIEW

The applicant stated that the permit to operate the two presses will expire April 22, 2013. The emission estimates in the application are unchanged from the original application. Actual emissions from these presses have been below the limits set in permit #6339.

Since permit #6339 was issued in 2010, the primary regulation governing intaglio presses in the District, 20 DCMR 710, was updated. The attached proposed permit document has been modified from the previous version to reflect the regulatory revisions. There have also been a few additional updates to monitoring, testing, record keeping and reporting requirements to address these changes and make the permit more enforceable.

RECOMMENDATIONS

The application to operate the two presses and the attached operating permit comply with all applicable federal and District air pollution control laws and regulations.

Public comments for the permit actions will be solicited from May 10, 2013 through June 10, 2013. AQD will resolve any comments received before issuing the permits, and if no comments are received, I recommend that permit Nos. 6706 and 6707 be issued in accordance with 20 DCMR 200.2.

ATH/SSO