

Date: August 30, 2021

Subject: Reminders for **Printing Facilities** Covered by Registration Permits

Dear Registration Permit Holder:

Your business operation is currently covered by a Registration Operation Permit issued by the Department of Natural Resources (DNR) Air Program. The DNR's Small Business Environmental Assistance Program (SBEAP) and the Air Program work together on providing services and assistance to small businesses. This email is provided as a general resource for facility contacts; if current on all requirements, there is no action required in response to this information. Copies of this and previous reminder emails are available [online](#) in PDF format.

### **Revised ROP-C**

For those facilities covered by the Type C ROP, the DNR recently issued a revision of the ROP-C. Printing facilities covered by either the Type A or Type B ROP may have the option of transferring coverage if the revised Type C ROP now is a better fit for your operation.

All printing facilities covered by ROP-C are subject to the [final permit](#). Some of the more significant changes include:

- **March 1** is the deadline for the annual permit compliance certification and monitoring summary report.
- **RACT requirements** listed in **Table 2** were revised to match current requirements in chapter [NR 422](#) of the Wisconsin Administrative Code, including the revised rules for lithographic printing.
- Permit conditions related to the **air quality modeling analysis** were clarified.

To refresh your memory about the ROP-C, watch the webinar recorded in November 2020 by Great Lake Graphics Association, PRINTING United Alliance, and DNR: <https://youtu.be/UjcXa28HNdw>

### **Volatile Organic Compounds (VOC) control requirements**

Printing facilities are responsible for proper handling of ink, solvents or mixtures, by taking precautions to prevent spills or other release to the environment. A printer subject to any section in NR 422.14 to NR 422.145 of the Wisconsin Administrative Code shall meet those requirements. See **RACT applicability** below for more details.

Facilities not subject to any section from NR 422.14 to NR 422.145 must control VOC emissions by meeting one of the following:

- Apply 85% overall control of organic compounds by using air pollution control devices.
- Adopt the **Lowest Achievable Control Techniques** and operating practices (**LACT**) conditions included in the Registration Permit (more details included below).
- Elect to meet the control requirements in any section from NR 422.14 to 422.145 which applies to the appropriate printing operation.

Printing facilities subject to, or electing to, meet a RACT limit must meet those requirements any time the presses are operating.

### **RACT applicability**

Printing operations are activities regulated in chapters [NR 422.14 to NR 422.145](#) of the Wisconsin Administrative Code. These regulations, also known as Reasonably Available Control Technology or RACT, require printing process specific VOC controls or emission limits. Some of these regulations only apply in certain counties.

- Learn more about Printer VOC Rule applicability in the flowchart [AM-588](#).
- For questions on RACT rules, contact the [Registration Permit Coordinator](#).

### **LACT requirements**

A facility with a **process line** emitting **more than 15 pounds per day of VOC** must either control emissions by 85 percent or demonstrate LACT. Ordinarily, LACT is a site-specific determination and conditions established by

DNR are included in a facility's permit. Instead of individual determinations, the ROP includes an emissions cap on **each process line of 10 tons of VOC** per year.

- To use the ROP LACT, keep records of VOC emissions from **each organic process line** to demonstrate compliance with the emissions cap.
- For an explanation of LACT requirements, review information under Part II, Question 8 in the ROP-C Application Guide ([AM-582](#)) or Question 1 in the [ROP A](#) or [ROP B](#) application guides.
- The organic process rule in NR 424 is explained in more detail in the publication [AM-478](#).

### Recordkeeping requirements

Printing facilities shall maintain records which demonstrate compliance with applicable emission limitations and operating requirements. Any facility claiming to be exempt from an emission limitation or other requirement shall maintain records adequate to support each exemption claim. The following records are typically required:

- name of ink/solvent,
- VOC content in pounds VOC per gallon, or grams VOC per liter, from Safety Data Sheet (SDS) or Product/Technical Data Sheet from supplier
- amount of material used each day, in pounds or gallons,
- monitoring data from any control device,
- maintenance log of any control device.

Each ROP and s. [NR 439.04](#) of the Wisconsin Administrative Code contain specific recordkeeping requirements.

### Calibration of monitoring equipment

All instruments used for measuring equipment operational variables (e.g., pressure drop, temperature, air flow) shall be **calibrated annually** or at a frequency based on good engineering practice as established by operational history, whichever is more frequent. Calibration records shall be retained for a period of **5 years** or for such other period as may be specified by the department.

- Calibrate data transmitters.
- Thermocouple replacement can substitute for calibration of the device.
- Equipment inspections, maintenance and calibration schedule shall be included in a Malfunction Prevention and Abatement Plan.

### Restricted Use Reciprocating Internal Combustion Engines (RICE)

Emergency electric generators, or emergency engines, are now defined in Wisconsin Administrative Code under the term [Restricted Use RICE](#). Restricted use RICE are exempt from needing a construction permit under s. NR 406.04(1)(w), Wis. Adm. Code. Following rule changes effective in fall 2020, applicability of the RICE NSPS subparts IIII or JJJJ no longer disqualifies the engine from other permit exemptions. As long as an engine is certified to meet the applicable RICE NSPS, it may be considered for exemption.

### Keep Facility Contacts Up to Date

To receive these and other communications from DNR, it is important to maintain current contact information for facility roles within the Air Reporting System.

- To update the Responsible Official information, follow the instructions on [Notifying the Air Program about Facility Changes](#) webpage.
- For all **other air contacts**, facilities can update **any new information** (Name, Title, Phone, Email, etc.) through the [DNR Switchboard](#).
- Consider **creating a dedicated e-mail address** like EHS@xyzcompany.com or Compliance@xyzcompany.com or some type of group email that allow multiple people to access the messages. This can help ensure the company receives regulatory information, billing, and other notifications when staffing changes occur.

### Questions

- Questions about **compliance requirements** can be directed to the air compliance inspector. Use the [air permit search tool](#) to find your facility, then under "DNR Air Contacts," look for the staff listed as "DNR Compliance Engineer."
- **General questions about ROPs** can be directed to the [Registration Program Coordinator](#).

- **Other questions** can be directed to the SBEAP at [DNRsmallbusiness@wisconsin.gov](mailto:DNRsmallbusiness@wisconsin.gov) or 855-889-3021.