

Air Program Fact Sheet 4 • Registration Permit for Printers Type C Registration Permits for Printers

November 2007



WHAT IS A “REGISTRATION PERMIT FOR PRINTERS”?

A registration permit is a standardized permit for use by facilities with low actual annual emissions. The Registration Permit for Printers contains standard requirements that apply to the printing industry and is available only to printing facilities with low actual emissions.

WHAT ARE THE BENEFITS OF THE REGISTRATION PERMIT FOR PRINTERS?

- Flexibility to construct, modify, or replace equipment without obtaining a construction permit as long as the facility continues to comply with all conditions of the registration permit after the change.
- “Generic” organic compound limitations for process lines that allow the printer to elect the appropriate permit conditions to meet the requirements of ch. NR 424 that replace the case-by-case review and approval process by the department.
- Less frequent and less prescriptive monitoring and recordkeeping requirements.
- Swift DNR permit decisions—15 days or less.
- Simplified permit applications and permitting process.
- Lower administrative costs—no construction permits, permit renewals, or revisions.

WHO CAN GET ONE?

- Printing facilities whose actual annual emissions are, and will remain, less than 25% of the major source threshold for all criteria pollutants (except for lead emissions, which will be limited to 0.5 tons per year) and less than 50% of the major source threshold for federally regulated hazardous air pollutants. **Table 1** contains the emission limitations for the Registration Permit for Printers in Wisconsin.

Table 1: Printers’ Registration Permit Emission Limits*	
Pollutant	Actual Emissions
Particulate Matter or PM10	• 25 tons/year for attainment areas
Volatile Organic Compounds	• 25 tons/year for attainment and marginal or moderate nonattainment areas
Nitrogen Oxides	• 25 tons/year
Sulfur Dioxide	• 25 tons/year
Carbon Monoxide	• 25 tons/year for attainment and moderate nonattainment areas
Lead	• 0.5 tons/year
Section 112(b) Hazardous Air Pollutants	• 5 tons/year for any <i>single</i> pollutant • 12.5 tons/year for a <i>combination</i> of all pollutants

*The emission levels associated with 25% or 50% of major source threshold may change if an attainment area is designated as nonattainment or if a nonattainment area has its classification changed.

- The facility must be one of the following types of printer: non-heatset offset lithographic, heatset web offset lithographic, gravure or flexographic, screen presses, digital, or letterpresses. Printing may not be an ancillary operation. For the purposes of the permit, a printer is any facility that identifies a *primary* Standard Industrial Classification (SIC) Code of 23, 26, or 27 or a *primary* North American Industry Classification System (NAICS) code of 32311x or 5111x for operations at the facility.

OTHER ELIGIBILITY CRITERIA:

- Combustion units used at the facility may burn only natural gas, propane or distillate fuel oil containing 0.05% sulfur by weight or less.
- Particulate matter may only be emitted by the facility from insignificant emission units¹, heatset web offset presses, and combustion units.

See Table 2 on page 3 for a list of emission units not subject to the stack requirements or particulate matter restriction.

Air Program Fact Sheet 4 • Registration Permit for Printers

- Facilities with heatset web offset presses or facilities combusting distillate fuel oil must meet the following two stack requirements:
 - All stacks, except those serving insignificant emission units, must have vertical, unobstructed exhaust points.
 - All stacks, except those serving insignificant emission units, must be at least as tall as the surrounding buildings².
- Facility must have control efficiencies equal to, or greater than, the efficiencies in the registration permit.³
- Facility cannot be required to have a case-by-case determination by the department of best available control technology (BACT) or lowest achievable emission rate (LAER) determinations for ch. NR 445 hazardous air contaminants.
- A facility's existing permits must be revocable by the department. For most businesses, this will be possible.

WHAT REQUIREMENTS ARE IN THE PERMIT?

- Facility emissions may not exceed the emission limits in Table 1.
- Annual recordkeeping of production/usage data necessary to calculate emissions.
- Operation and maintenance of all air pollution control devices and associated monitoring equipment.
- Recordkeeping requirements for pollution control device operating parameters.
- Organic compound limitations for process lines (s. NR 424.03(2) or (3), Wis. Adm. Code).
- Must meet all other state (NR 400 – NR 499) and federal air pollution requirements that apply to the facility.
- Facility must submit annual compliance certification/monitoring report and report emissions to the air emission inventory (AEI) each year.

IS THERE A DOWNSIDE TO A REGISTRATION PERMIT?

Yes. The permit does not list all the federal and state air pollution requirements that apply to a facility. It is up to the permitted facility to determine what these are. However, the Printers Environmental Compliance Assistance Workbook and Self-Certification Checklist that are part of DNR's Environmental Results Program project are available to help facilities determine what their applicable requirements are and how to comply with them.

NEXT STEPS

Interested printers that already have air permits should now use the Revocation Form to request that the DNR review their existing permits to ensure that the permits can be revoked. DNR will notify each facility if all of its permits can be revoked. If they cannot be revoked, the facility is not eligible for a Registration Permit for Printers. The Revocation Form is available at <http://dnr.wi.gov/air/permits/streamlining/regpermits.html>.

Download the application worksheet and application guide. Fill out the worksheet and then use it to complete the on-line application to apply for coverage under the Type C Registration Permit for Printers. DNR has 15 days to review each application and either grant or deny coverage or ask for more information.

FOR MORE INFORMATION

- For more information on registration permits and to download this fact sheet, see: <http://dnr.wi.gov/air/permits/streamlining/regpermits.html>

² Surrounding buildings include all buildings located within a circle around the building with the stack, the radius of which is 5 times the height of the building.

³ See Table 3 on page 4 for a listing of the pollution control device efficiencies.

Air Program Fact Sheet 4 • Registration Permit for Printers

- Registration Permit Contact Person: Kristin Hart (608)273-5605, Kristin.Hart@wisconsin.gov
- For more information on the Printers Environmental Results Program, see:
<http://commerce.wi.gov/BD/BD-CA-ERP.html>

TABLE 2 : INSIGNIFICANT EMISSION UNITS OR ACTIVITIES

<ol style="list-style-type: none"> 1. Convenience space heating units with heat input capacity of less than 5 million Btu per hour that burn gaseous fuels, liquid fuels or wood 2. Convenience water heating 3. Maintenance of grounds, equipment and buildings, including lawn care, pest control, grinding, cutting, welding, painting, woodworking, general repairs and cleaning, but not including use of organic compounds as clean-up solvents 4. Boiler, turbine, generator, heating and air conditioning maintenance 5. Pollution control equipment maintenance 6. Internal combustion engines used for warehousing and material transport, forklifts and courier vehicles, front end loaders, graders and trucks, carts and maintenance trucks 7. Fire control equipment 8. Janitorial activities 9. Office activities 10. Fuel oil storage tanks with a capacity of 10,000 gallons or less 11. Stockpiled contaminated soils 12. Demineralization and oxygen scavenging of water for boilers. 13. Purging of natural gas lines. 14. Particulate matter from natural gas combustion in press dryers, control device, and other heating units so long as fuel usage or heat input capacity caps in Attachment 1 are met. 15. Aerosol cans 16. Pad printing 17. Pre-press equipment, such as: photo-processing, typesetting, or image-setting equipment; 	<ol style="list-style-type: none"> 18. Proofing systems utilizing water-based, ink jet, dry toner, or dye sublimation or proof press designed to evaluate product quality; 19. Plate-making equipment or screen preparation activities utilizing water-based developing solutions; 20. Equipment used to make blueprints. 21. Cold cleaning manual parts washers with less than 10 square feet of surface area. 22. Dry toner or other digital presses that apply water-based inks. 23. Substrate finishing activities which involve paper folding, cutting, folding, trimming, die cutting, embossing, foil stamping, drilling, saddle stitching, sewing, perfect binding, vacuum forming or other activities that do not generate VOCs and whose particulate emissions are vented inside the facility. 24. Adhesive application activity involving hot melt, extrusion, catalyzed solvent-less, or water-based adhesives. 25. Pneumatic system for collecting paper/film/paperboard scrap from cutting operations. 26. Any emission unit, operation, or activity that has, for each air contaminant, maximum controlled emissions that are less than the level specified in Table 3 of ch. NR 407, Wis. Adm. Code. Multiple emissions units, operations, or activities that perform identical or similar functions shall be combined for the purposes of this determination. 27. If the maximum controlled emissions of any air contaminants listed in Table 3 of ch. NR 407, Wis. Adm. Code, from all emission units, operations or activities at a facility are less than 5 times the level specified in Table 3, for those air contaminants, any emission unit operation or activity that emits only those air contaminants.
---	---

Air Program Fact Sheet 4 • Registration Permit for Printers

Table 3: Air Pollution Control Device Efficiencies						
Control Device	Control Efficiency (Total Enclosure)			Control Efficiency (Hood)		
	PM	PM ₁₀ and PHAP	VOC and VHAP	PM	PM ₁₀ and PHAP	VOC and VHAP
Low efficiency cyclone	40%	20%	-	32%	16%	-
Medium efficiency cyclone	60%	40%	-	48%	32%	-
High efficiency cyclone	80%	60%	-	64%	48%	-
Wall filters (including paint overspray filters and rotary drum filters)	95%	95%	-	76%	76%	-
Fabric filters and HEPA filters (e.g., baghouse, cartridge collectors)	98%	92%	-	78%	73%	-
Thermal oxidizers	-	-	90%	-	-	76%
Catalytic oxidizers	-	-	90%	-	-	76%
Condenser	-	-	70%	-	-	56%
Biofilter	-	-	80%	-	-	64%

* VHAP = Volatile hazardous air pollutant, PHAP = Particulate hazardous air pollutant

DISCLAIMER —This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. This guidance does not establish or affect legal rights or obligations and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Department of Natural Resources. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.

The Wisconsin Department of Natural Resources provides equal opportunity in employment, programs, services and functions under an Affirmative Action Plan. If you have any questions, please write to Equal Opportunity Office, Department of Interior, Washington, DC 20240. This publication is available in alternative format (large print, Braille, audio tape, etc.) upon request. Please contact the Bureau of Air Management, phone 608-266-7718, for more information.



Wisconsin Department of Natural Resources
 Bureau of Air Management
 Box 7921- AM/7
 Madison, WI 53707
 PHONE 608-266-7718 • FAX 608-267-0560
 PUB AM-379 2007