



What has the DNR done to simplify the air permit process for printers?

The Department of Natural Resources (DNR) has developed General Air Permits for Printers to offer standard permitting requirements for the printing industry. These permits offer simplified, industry-specific application forms, a streamlined review process and consistent requirements for any printing operation meeting the eligibility requirements.

What types of printing facilities are covered by the General Permits?

The General Permits for Printers can be used by the following printing operations:

- Digital
- Lithographic heatset (web) offset
- Lithographic non-heatset web
- Lithographic non-heatset sheetfed
- Screen

Please note that there are separate permits for each of these printing types, so you may need more than one general permit. There are also separate permits for each of three source types under federal rules—minor, synthetic minor and major. If your facility does other types of printing or printing-related activities, you may still need a traditional air permit that would cover anything in your facility not eligible for a general permit.

What are the benefits of General Permits for Printers?

- **Easy to understand.** The permit applications are written in language familiar to printers.
- **Easy to get.** Printer-specific application form with simplified questions
- **Fast.** By statute, DNR must make a decision on a general permit application within 15 days of receiving the application. As a result, construction of new presses or the modification of an existing press may occur much faster than with traditional individual permits.
- **Offers operational flexibility.** Additional permitting for some modifications, such as adding printing operations or converting to ultraviolet curing, is usually not required. Printing operations with a general permit can install new equipment or modify existing equipment without the delay of first getting a construction permit as long as the equipment and total emissions meet the requirements of the general permit.
- **No negotiation.** The requirements in the permits are standard across the printing industry and clearly identified so there is no guessing as to what is required.
- **Consistency.** Permits issued for comparable sources in Wisconsin will contain similar requirements.

Do you need a construction or operation permit? Some scenarios.

- If your facility is covered by current air permits and you are not making immediate changes, you can switch to the General Operation Permit (GOP) if your existing permit conditions do not conflict with those in the GOP. You can make changes to the on-site printing operations covered by the GOP (without

Air Program Fact Sheet • General Permits for Printers

getting a construction permit) as long as the operations continue to comply with the conditions of the GOP.

- If you are constructing new printing operations that meet the emissions limits in the table below, you can use the General Construction Permit (GCP). Your facility would later have the option of converting to a GOP for operation of the new equipment or including the conditions of the GCP in a traditional operation permit.
- If your facility's current operation permit has conditions that are more restrictive than those in the GOP, you can use the GCP to bridge a conversion to a GOP. Your facility can be granted a GCP that allows the modification while the existing permit restrictions are modified or revoked. The DNR can then grant the GOP.
- If your facility is covered under a GOP and modifies its operations so that they would no longer meet the requirements of your current GOP, the GCP may be used for the transition (such as moving from a minor to synthetic minor source status under federal rules). A different GOP could then be issued after the modification.

What are the other eligibility requirements?

The General Air Permits for Printers are available to printing operations that can meet the criteria below in addition to the standard requirements. Printing operations that are required to obtain a construction permit must meet the emission limits identified in the following table.

Printing operations that are converting existing operation permits may still have to comply with some of the conditions of their current permits. In that case, your facility would continue to have a traditional air permit for special conditions applicable to equipment and activities covered by the general permits.

Emission limits within General Permits for Printers in Wisconsin

Printers' General Construction Permit Emission Limits	
Pollutant	Emission Limits
Volatile Organic Compounds (VOCs)	<ul style="list-style-type: none"> • 100 tons/year for facilities classified as minor under chs. NR 405 or 408, Wis. Adm. Code • 40 tons/year for facilities classified as major under NR 405 or 408 • 10 tons/year for digital printing operations
Section 112(b) Hazardous Air Pollutants (HAPs)	<ul style="list-style-type: none"> • 10 tons/year for any <i>single</i> pollutant • 25 tons/year for a <i>combination</i> of all pollutants
Printers' General Operation Permit Emission Limits	
Pollutant	Emission Limitations
Volatile Organic Compounds (VOCs)	<ul style="list-style-type: none"> • Facility emissions may not exceed 100 tons/year for facilities classified at minor under NR 407 • 10 tons/year for digital printing operations • Modifications or new construction under the GOP may not exceed <ul style="list-style-type: none"> ▪ 100 tons/year for facilities classified as minor under NR 405 or 408 ▪ 40 tons/year for facilities classified as major under NR 405 or 408 • Previous operational limits may still apply
Section 112(b) Hazardous Air Pollutants (HAPs)	<ul style="list-style-type: none"> • 10 tons/year for any <i>single</i> pollutant • 25 tons/year for a <i>combination</i> of all pollutants • Previous operation limits may still apply

Air Program Fact Sheet • General Permits for Printers

What requirements are in the permit?

- Emissions may not exceed the limits in the table above.
- 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.
- Lithographic and screen press operations must meet Reasonably Available Control Technology (RACT) requirements (found in ch. NR 422, Wis. Adm. Code), which are detailed in the respective permits.

Is there a downside to a general permit?

Yes, you should consider the following requirements before applying for a General Air Permit.

- The covered equipment must operate as a minor source for Federal Hazardous Air Pollutants (HAPs), which means that the emissions of a single HAP must remain below 10 tons per year and below 25 tons per year for all HAPs combined.
- The GCP can only be used for projects that have emissions of less than 100 tons per year if the facility is a minor source and 40 tons per year if the facility is a major source under federal rules.
- For each type of digital printing unit, the permitted operations may not cause the total VOC emissions from all digital printing units of that type, including associated operations, to exceed 10 tons per year.
- In some cases your facility may still need traditional air permits to cover some operations and activities.

How do I get the permit or additional information?

- First, consider whether you will want a permit for construction, operation or both. Look at the list of press types covered by the general permits and consider whether you will need multiple permits, and/or whether you have equipment or activities that will not be covered by a general permit. Knowing this information will help speed up your application process.
- Visit <http://dnr.wi.gov/air/permits/downloads.htm> for instructions and application forms.
- Contact David Panofsky at (608)267-2016 or david.panofsky@wisconsin.gov to learn more and start the permit application process.

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-380 2007