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**Contract extension between
Serigraph Inc.
and
Wisconsin Department of Natural Resources**

The parties, whose signatures appear below, agree to extend the Green Tier Contract for Superior Environmental Performance between Serigraph, Inc. and the Wisconsin Department of Natural Resources for an additional five years.

IN WITNESS WHEREOF, the parties, by their signatures, shall cause the contract to be in effect until September 15, 2021.

Signed for and on behalf of:

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES



By:  Date: 9-8-16
Cathy Stepp
Secretary

Signed for and on behalf of:

Serigraph Inc.



By:  Date: 9/15/16
Sean Torinus
CEO

CONTRACT FOR SUPERIOR ENVIRONMENTAL PERFORMANCE WITH Serigraph Inc.

This Contract for Superior Environmental Performance is entered into by the State of Wisconsin through its Department of Natural Resources (WDNR) and Serigraph Inc. on August 26, 2011.

I. INTRODUCTION

- A. The State of Wisconsin is committed to providing a healthy and sustainable environment, and to protecting and enhancing the resources of the state for this generation and for generations that follow.
- B. There is a growing consensus that continuing to interact with businesses using traditional approaches is not producing the greatest environmental benefit for the investment of resources.
- C. Section 299.83 of the Wisconsin Statutes authorizes the WDNR to enter into a contract to assist the entities in achieving superior environmental performance.
- D. Serigraph Inc. ("Serigraph") has implemented an Environmental Management System (EMS), and the WDNR hereby finds that the EMS is an ISO 14,001 certified EMS and that the EMS is appropriate to the nature, scale, and environmental impacts of Serigraph's operations at each covered facility and activity within those facilities. A copy of Serigraph's EMS ISO 14,001 certification is attached as Appendix 1.
- E. Serigraph has identified each facility and activity that it intends to include under this Contract in Appendix 2.
- F. The WDNR has reviewed the proposal for superior environmental performance and has determined that the co-benefits identified in this Contract are proportional to the benefits of the superior environmental performance.

Therefore, in order to produce continuous improvement in the state's environment, economy and quality of life, the WDNR and Serigraph agree to this Contract and its terms as set forth below.

II. Overview of Work to Be Done

A. Environmental Management System

1. Serigraph agrees to provide a copy of the table of contents to its Environmental Management System ("EMS") program to the WDNR. Serigraph also agrees to provide the results of its last EMS audit within 30 days after this contract is executed by all parties. In addition, beginning January 31, 2012 and continuing until the end of this contract, Serigraph will provide, on an annual basis, any additional EMS audits which are completed as well as a list of the corrective actions taken along with the timelines for the corrective actions, and the current status of those corrective actions, and any remaining non-conformances.
2. Serigraph agrees to report the results of each management review of the EMS to the WDNR within 30 days of the review.
3. Serigraph agrees to maintain its EMS for the life of the contract and beginning January 31, 2012 shall annually provide evidence of the certification of its EMS under ISO 14000 as a result of the annual audit of the system. In the event that Serigraph chooses not to maintain the ISO certification, Serigraph will annually document that its system is functionally equivalent to ISO 14000.
4. Serigraph agrees to review its EMS at least annually, and to provide to the WDNR any new objectives that are selected.
5. If non-conformances are found during any EMS audit conducted by Serigraph, Serigraph agrees to provide to the WDNR a description of measures that will be taken to prevent future non-conformances and a timeline for addressing all non-conformances and proposed stipulated penalties if the period for correcting the non-conformance will take more than 90 days from the date of submittal of the report of the non-conformance and the proposed compliance schedule is not met. WDNR agrees it will not seek penalties for any noncompliance as long as the timeline for correction is being followed.

B. Annual Compliance Audit

1. Serigraph agrees to conduct an annual audit of compliance with EMS requirements that are applicable to the covered facilities and activities.

2. Serigraph agrees to provide the WDNR notice of any EMS compliance audit. The Department agrees that it will not seek enforcement of any noncompliance matters discovered by the Department as a result of such audit provided Serigraph complies with the reporting requirements under Wis. Stat. sec. 299.83(6m)(a). Serigraph agrees to provide the compliance audit results to the WDNR in a timely manner as set forth herein. Included in the results shall be a description of all violations and a description of corrective actions to be taken – along with a timeline for the corrective actions and a description of measures that will be taken to prevent future violations. (Any corrective actions must be completed within 90 days unless otherwise approved by the WDNR). This report shall be considered a report under Wis. Stat. § 299.83(6m)(a).
3. In the event the timeline for corrections in Section II.B. exceeds 90 days, Serigraph agrees to include proposed stipulated penalties for failure to meet the proposed compliance schedule along with the description of corrective actions and the timeline. The WDNR agrees to review the stipulated penalties proposed and either accept them or offer up other stipulated penalties. Any disputes on proposed stipulated penalties shall be resolved in accordance with Wis. Stat. sec. 299.83(6m)(c). The parties agree to use their best efforts to reach agreement on stipulated penalties, but failure to reach agreement shall not be used as grounds to terminate this contract.

C. Superior Environmental Performance

1. As part of Serigraph's application for a Tier II Contract, Serigraph has demonstrated a history of superior environmental performance. This demonstration is attached as Appendix 3.
2. In addition, Serigraph commits to implementing the measures described in Appendix 4 that are designed to produce superior environmental performance. Serigraph will provide an update to Appendix 4 on an annual basis beginning January 31, 2012 until the end of this contract.

III. Developing an Interested Persons Group

- A. Serigraph commits to maintaining an interested persons group to provide a process to increase transparency and trust in this Tier 2 contract. The interested persons group will consist of persons who live, own a business or work within a reasonable proximity to the facility(s) which is/are participating under this Contract, or who otherwise have an interest in the workings of this Contract. The

interested persons group shall also consist of at least one person who does business with Serigraph.

- B. Serigraph will meet with this group on a semi-annual basis to solicit public comments concerning participation under this Contract. A representative from Serigraph will take notes during these meetings. These notes will be compiled into minutes that summarize the information discussed at each meeting. Serigraph will review these minutes internally before providing them in draft form to the interested persons group and WDNR representatives. Interested group members will have an opportunity to approve or suggest corrections to the minutes at the next meeting. Once approved by the interested persons group, a copy of the minutes will be filed at the Serigraph offices and a copy of the minutes will be posted on a website for public viewing.
- C. The parties will review the Interested Persons Group after one year. If Serigraph has taken reasonable steps to secure participation in the Interested Persons Group, and has been unable to generate interest in this group, the parties shall consider other options, including suspending the Interested Persons Group.

IV. SPECIFIC COMMITMENTS

- A. Serigraph will submit an annual calendar year report to WDNR by March 31st of each year during the term of this contract which describes the environmental impacts from Serigraph's operation which have been reduced due to its efforts, progress on meeting environmental goals and objectives, environmental audit and compliance audit results and an estimate of the financial benefits of participating in the contract and any developments in community relations.
- B. Prior to the beginning of each reporting year, the parties will jointly agree on the specifics for what will be tracked and reported in the following year. These specifics will link to the objectives set for the year, and any corrective actions that become necessary following an audit.
- C. Notwithstanding B. above, Serigraph commits in particular, to working towards meeting its VOC reduction goal of reducing VOC emissions by 5% by weight as a ratio of production hours from the baseline year of 2007. The baseline value is 0.000266 tons VOC/hr calculated from the facility's actual 2007 VOC emissions – 26.11 tons VOC, and the facility's 2007 production hours in 2007 – 98325.51. To calculate the percentage reduction the facility will use the following equation:
[0.000266-(tons VOC emissions current year/ total production hours current year)/0.000266]x100% = % reduction

D. Serigraph will regularly communicate its environmental policy to all of its significant suppliers and contractors. Serigraph will also periodically meet with its main suppliers and customers to discuss what can be done to continue to maintain proper environmental impact and sustainability.

V. Department of Natural Resources' commitments

The WDNR finds that this Contract will provide for greater environmental protection and enhancement than would be available absent this Contract and is, by virtue of these significant benefits, in the best interest of Wisconsin and its people. The WDNR accordingly agrees that:

- A. Operational Flexibility and Co-Benefits. In order to support and further Serigraph's commitment to superior environmental performance, the parties jointly agree on the following benefits:
- Since March 15, 2006 Serigraph Inc. has been participating in Tier 1 of Green Tier and is a participant in good standing and compliant with all permit and regulatory requirements. Since Serigraph has also agreed to fulfill the requirements of Tier II including implementing environmental management commitments beyond those ordinarily required by WDNR rules, as set forth below, WDNR has agreed to issue the facility a flexible performance-based permit that meets the air pollution control permit requirements to obtain a permit under ch. NR 408, Wis. Admin. Code and Title V of the Clean Air Act. This permit provides operational flexibility for the manufacturing facility.
 - The operation flexibility written into the permit will address the following: Facility-wide emission caps, flexibility to make changes without additional permits, replacing of process line limitations with facility-wide limitations, flexibility on emission control approaches, and flexibility in designing and implementing compliance demonstration methods.
 - Plant Wide Applicability Limit – the facility will be able to construct, reconstruct, relocate, replace, or modify an emission unit or units as long as emissions remained below the cap.
 - Fuel Burning Installation Flexibility – the permit includes an advanced approval for modification or installation of future fuel burning equipment.
 - Variance from applicable RACT limits removing line by line VOC requirements replacing with facility-wide VOC emission caps.

- Allowing for shutdown of the facility's biofilter if the facility chooses to do so. The facility has flexibility to control VOC emissions by any method, biofilter, other control device, or use of low or no VOC inks.
- Allowing the facility to use approved replicable methods as a compliance approach.
- Allowing the facility to design its own compliance methods using the operational control section of the facility's EMS; and
- Allowing Serigraph to add additional equipment without additional permits and to reduce some monitoring and recordkeeping requirements for the term of the contract.

By enabling process changes and experimentation that might otherwise not be attempted, prior to this contract, Serigraph and WDNR will avoid unnecessary permit writing in consideration of traditional timelines for securing the necessary WDNR permit authorizations. (Upon signing of this contract, Serigraph will continue operations under those conditions defined in the Air Pollution Construction Permit (07-KLH-284) (Appendix 5 to this contract) and Operation Permit (# 267065670-P10).

- In exchange for the commitments to superior environmental performance, WDNR will:
 - Process and issue an air pollution control construction and operation permit, in accordance with applicable law, which is essentially akin to the draft construction and operation permit provided in Appendix 5. WDNR will waive all construction permit fees for this permit. Nothing in this permit or in this contract shall be construed to require Serigraph to continue to operate the biofilter.
 - Support issuance of the construction and operation permit and the variances contained therein in any discussions, negotiations or legal proceedings with the United States Environmental Protection Agency ("USEPA") or any other person or entity.
 - Reduce DNR's inspection frequency of Serigraph's facilities to once every 4 years unless the Department has reason to

believe that a violation is occurring. Federal inspection frequency would not be affected.

- Obtain a letter from USEPA indicating that Serigraph may operate in accord with the permit unless the variances set forth therein are denied by USEPA.
 - In addition, as long as the facility maintains its no exposure certification under Subchapter II of NR 216, Wis. Admin. Code, the facility is excluded from the requirements to obtain a WPDES stormwater permit.
- B. In exchange for Serigraph's fulfillment of their obligations under this Contract, the WDNR will not seek to bring any enforcement action, issue any order or seek any judgment related to the environmental responsibilities covered under this Contract against Serigraph. Any violations of the terms of this contract will be dealt with under Section VI.I of this Contract
- C. If Serigraph reports monitoring results (or other record-keeping results) that would trigger a notice of violation, or performs an audit of its EMS or its compliance status and discovers any violation, the WDNR shall not initiate a regulatory response to the alleged violation if the alleged violation is cured and the environmental management system is modified in such a way so that a future violation does not occur. In order to receive the benefit of this section, Serigraph must notify the WDNR of the deviation which is the basis for the alleged violation, describe the actions that will be taken to correct the alleged violation, commit to correct the alleged violation within 90 days, or if compliance cannot be achieved within 90 days propose a compliance schedules and propose stipulated penalties if the compliance schedule is not met. Additional time may be provided by agreement of the parties.
- D. If stipulated penalties are agreed to under II.B.3. the parties agree to amend this contract to include the stipulated penalties. The amendment should specify the amount, what triggers payment, the method for collecting, and who the payment shall be made to.
- E. If the problem is not completely corrected, or similar violations occur in the future, the WDNR may issue a notice of violation with or without terminating this contract. In order to determine whether a second event that would trigger a notice of violation is a continuation of an uncorrected earlier event, the WDNR shall examine the corrective actions taken by the participant and determine whether they were reasonably designed and implemented.
- F. The WDNR will provide a sector specialist and/or a unique point of contact within the agency to Serigraph during the life of this Contract.

- G. The WDNR authorizes the use of the Green Tier logo on written materials promoting the covered facility(s) or activities in accordance with the Green Tier Style Guide.
- H. If the air pollution control construction and operation permit referenced in Section V.A. above is not issued in a form substantially identical to Appendix 4 or if such permit and/or any of the variances referenced herein is denied, modified if vetoed by USEPA or is challenged by USEPA or any other person or entity and as a result of such challenge is modified, suspended, revoked or denied then, at the option of Serigraph, this contract may be terminated by Serigraph. Whether the permit is “substantially identical” to Appendix 4 as referenced above is a determination which is solely within Serigraph’s discretion.

VI. General Provisions

- A. Definitions. As used in this Contract:
 - “State” and “State of Wisconsin” means the State of Wisconsin, acting through the Department of Natural Resources.
 - “WDNR” means the Wisconsin Department of Natural Resources.
 - “Serigraph” means Serigraph, Inc., a Delaware corporation with its principal office located at 3801 East Decorah Road, West Bend, Wisconsin 53095.
- B. Enforcement. This contract is governed by Wisconsin law. The parties agree that it may be enforced as a contract by (a) the Attorney General (for Wisconsin) and (b) Serigraph, acting through its authorized representatives in the Circuit Court in Washington County, Wisconsin. The commitments made in this Contract may be specifically enforced and the court may also order any other appropriate remedy consistent with law. The parties acknowledge that they are subject to the personal jurisdiction of Washington County Circuit Court for the purposes of enforcing this Contract. The parties consent to the jurisdiction of Washington County Circuit Court for the purposes of enforcing the commitments under this Contract.
- C. All agreements and covenants contained herein are severable, and in the event any of them shall be held invalid by any competent court, this Contract shall be interpreted as if such invalid agreements or covenants were not contained herein.

- D. This Contract intends to parallel, to the extent possible, the timing laid out in any existing permits.
- E. Amendment. This Contract may be amended only in writing by the principals to this agreement or their successors. An Amendment of this Contract may require an additional public notice requirement after the parties have negotiated the new language. If the Amendment is largely a technical amendment, no additional public notice will be required. If the Amendment contains substantive additions to, or changes to the Contract, the parties agree that the WDNR will provide an additional public notice and may provide an additional public information meeting.
- F. Construction. This Contract will be binding on the parties and their respective successors and assigns, and is not intended to confer any rights or remedies upon any other persons. Except as otherwise provided in this Contract, nothing herein shall be construed to impose a duty of obligation on Serigraph to make any additional agreements with or concessions to any other governmental or regulatory body.
- G. Activities Covered Under this Contract. With the exception of those requirements identified in Section V.A. (Operational Flexibility and Co-benefits), or eliminated or modified in the air permit mentioned therein (Attachment4) Serigraph commits to abide by all current applicable environmental requirements. Any provisions of permits or approvals covered by this Contract that are not specifically superseded in Section V.A. or which are not intended to be addressed in the air permit issued pursuant to Section V.A. shall remain in effect. The Company also commits to abide by all future applicable environmental requirements in accordance with applicable law including any and all exemptions, variances or deviations allowed by such law.
- H. Access to Records. Subject to any legally recognized privilege and reasonable notice, the WDNR will be permitted access during office hours to inspect and copy all documents and other records that are in the possession or under the control of Serigraph which may be necessary to verify compliance with the contract.

- I. Termination. If Serigraph fails to fulfill its obligations under this Contract in a timely or proper manner, or violates any of its provisions, the WDNR shall have the right to terminate this Contract by giving thirty (30) days written notice of termination, specifying the alleged violations, and the effective date of the termination. It shall not be terminated if, upon receipt of the notice, Serigraph promptly cures the alleged violation prior to the end of the thirty (30) day period. Serigraph reserves the right to appeal any decision of the WDNR pursuant to this paragraph as provided for under Ch. 227, Wis. Stats., or any other applicable law. Notwithstanding this provision, Serigraph may seek to directly enforce this contract in the Circuit Court for Washington County in accordance with Section VI.B.

If the State fails to fulfill its obligations under this Contract in a timely or proper manner, or violates any of its provisions, Serigraph shall have the right to terminate this Contract by giving thirty (30) days written notice of termination, specifying the alleged violations, and the effective date of the termination. It shall not be terminated if, upon receipt of the notice, the State promptly cures the alleged violation prior to the end of the thirty (30) day period.

If this Contract is terminated by either party, the WDNR shall provide a reasonable time, not to exceed 180 days, for Serigraph to fill out the necessary paperwork and request any required permits, licenses or other approvals. However, during this time, Serigraph may not seek protection under the Contract or existing law for any activity that causes substantial harm to public health or the environment or that presents an imminent threat to public health or the environment.

- J. Remedies. The parties agree that the following remedies shall be used to address violations of this contract, or violations of environmental laws or rules that are covered under this Contract. The parties also agree that the use of this section shall be preferable to terminating the Contract, and pursuing Serigraph under state law or rule.

For a violation of any requirement of this Contract, Serigraph agrees to provide at least \$500 to fund an environmental restoration or acquisition project in the community in which the covered facility or activity operates.

- K. Term of Contract and Action Period. This Contract will remain in effect for five (5) years. The Contract may be extended for periods of up to five (5) years with the approval of the parties.

- L. Identifying Point of Contact. The parties agree to provide a point of contact within their respective organizations for this Contract. That point of contact shall be identified to the other party by letter, and if that point of contact changes, a new point of contact shall be identified by letter.

- M. Warranty of Authority. Each of the persons signing below represent and warrant that he has the authority to execute this Contract on behalf of the party for which he signs.

Contract for Superior Environmental Performance
with
Serigraph Inc.
and
Wisconsin Department of Natural Resources

IN WITNESS WHEREOF, the parties by their signatures shall cause this Contract to be in effect until August 25, 2016.

Signed for and on behalf of: STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES



By: /s/ Cathy Stepp Date: 08/26/2011
Cathy Stepp
Secretary

Signed for and on behalf of: Serigraph Inc.



By: /s/ Sean Torinus Date: 08/26/2011
Sean Torinus
CEO

APPENDIX 1

Copy of Serigraph's EMS ISO14001 Certification

APPENDIX 2

Facility Description

Serigraph Inc is a printing company located on 100 acres in rural West Bend, Wisconsin. The property contains two manufacturing facilities surrounded by 74 acres of restored prairie elements. Each facility is individual in its customer base and printing methods.

The Specialty Graphics Division located at 3701 E. Decorah Road, produces printed advertising material for the Point of Purchase (POP) sector. The print substrate is primarily plastic using various methods of lithographic non-heat set offset presses and digital printing presses. Currently the facility has 4 non-heat set offset presses and 2 digital printing presses.

The second facility houses the Industrial Graphics Group, sales, and executive offices. This facility is located at 3801 E Decorah Road with customers from the automotive, medical and appliance industry. The facility currently contains 24 silk screening presses, of which 18 are located in a Class 100,000 clean room environment which is ducted to a state of the art EPA biofiltration system. This system removes 85-95 percent of the volatile organic compounds and hazardous air pollutants from the printing process. The facility also currently houses 12 gas fired batch ovens which are used to dry the print material during the printing process.

The facility utilizes a closed loop hot water system for process and comfort heating control. The boiler system currently consisting of six natural gas fired boilers is controlled through a building management system to ensure precise temperature optimization and energy management.

Both facilities are often required to move or change printing equipment on short notice to respond to customer demands.

APPENDIX 3
Summary of Serigraph's History of
Superior Environmental Performance

Overview of Company Operations

Serigraph Inc. ("Serigraph") prints, forms and molds decorative components for the Original Equipment Manufacturers (OEM) and Point-of-Purchase (POP) advertising industries. It has a wide range of very demanding global customers.

The Company's products range from graphics for the instrument cluster in a car to the control panel on a dishwasher to promotional displays advertising sandwiches and soft drinks in a fast-food store.

Serigraph's basic technologies revolve around a variety of printing processes, including silkscreen, offset and digital printing, as well as many other methods of adding decorative effects for products and stores. Serigraph is considered a "high tech" printer.

Environmental Excellence Performance

Serigraph Inc. has maintained a steadfast commitment to the environment. Significant efforts have been made to reduce the emission of Volatile Organic Compounds (VOCs) over time. VOC-free UV inks are now used for screen printing and offset printing on plastic substrates whenever customer specifications allow. Serigraph's unique bio-filtration system that uses bacteria that "eat" VOCs at 85%-95% efficiency and was the first system of its kind to convert 25 compounds simultaneously. Since 2000, over 207 tons of VOCs have been prevented from being discharged into the air. This has helped improve air quality in southeastern Wisconsin by reducing ozone levels. Serigraph also has reduced VOC emissions over the years by reducing conventional ink usage 57% and increasing VOC-free UV ink usage 104%.

Serigraph operates a corporate-wide recycling program that resulted in recycling 2.2 and 1.8 million pounds of plastic and paper in 2008 and 2009 respectively. Almost 65 tons of scrap metal was recycled, as well, over that period. Packaging materials are reused whenever possible by pulling masking from sheeted polycarbonate and using it as packaging filler, instead of shipping it to a landfill.

Serigraph has won numerous environmental awards over the years. The most recent is the Gold level of the American Printer's 2008 Environmental Excellence Award for technical innovations in the printing industry. In 2003 Serigraph was the recipient of the Wisconsin Department of Natural Resource's Partners for Clean Air award and also a recipient of the Wisconsin Manufacturers and Commerce's Business Friends of the Environment award.

Serigraph also became certified to ISO 14001:2004 in December, 2008 in its continuous improvement journey towards sustainability.

Serigraph has also committed itself to reducing energy consumption if possible. As an example, energy reduction opportunities were recognized during the development of the Significant Environmental Aspect objectives, therefore a project was initiated and completed in which 330 metal halide lamps were replaced with energy efficient fluorescent lamps.

Lighting kWh	(16,214,904 * .08)	1,297,192
kWh Savings per year	(1,297,192 * .22)	285,382

This projected resulted in a savings of \$285,382 kilowatt hours per year does not include the reduced air conditioning needed to cool the plant due to lower bulb operating temperature. The impact on the environment is important since electrical power generation is a significant source of air pollution and green house gases.

This process of continuous improvement will keep Serigraph at the leading edge of being an environmentally-friendly company that pursues operational excellence in every aspect of its business.

APPENDIX 4
Environmental Policy

At the beginning of each year, the Vice President of Quality and Compliance reviews existing Environmental Aspects (EA) and Environmental Impacts (EI), and if necessary, identify and evaluate new EAs. As existing EAs are eliminated or controlled to a reasonable level, new EAs are added. As a living document, it is not intended to evaluate all EAs at its onset, but to add to the Environmental Management System (EMS) activity list on an ongoing basis based on feasibility and resources available. Projects may extend over multiple years, but shall still have an annual milestone. An annual report includes achievements and shortfalls, if any and the reasons for those shortfalls. The Environmental Aspects and Impact Sheets for 2010 are attached as Attachment A.

1. Serigraph Inc. will achieve continual improvement by developing and reviewing environmental performance indicators similar to those provided in Attachment A.
2. Serigraph shall endeavor to:
 - a. Maximize the efficient use of raw materials
 - b. Manage its waste products in a responsible manner
3. Serigraph shall maintain compliance with applicable legal requirements and with other requirements which are subscribed to that relate to its environmental aspects.
4. Serigraph Inc. shall communicate this policy to all interested parties as needed.
5. Serigraph Inc. shall adopt the approach of pollution prevention instead of detection.

Environmental GOALS / One Year Objectives

Env Impact & Aspects	ITEM #	Goals (Compare to 2007-2009 Avg)	Program	Technology	Financial	Legal Requirement 1= No 2=Yes	Priority (TxFL)	Due	Responsibility	Status	Legal / Regulatory Requirement(s)	Measurement (Compare to 2007-2009 Avg)
Screen Reclaim, Printing, Ink Room - VOC Reduction	1	Reduce VOC and air toxic emissions by 5% as a ratio of Production Hours	Plan new programs with UV inks	4	3	1	12	04/30/10	Dan Haas		SARA Title 313; DNR Air Permit NR 407, NR 423	Reduce VOC and air toxic emissions by 5% as a ratio of Production Hours
			Ensure new inks do not exceed VOC limits					Ongoing	Al H			
VOC reduction; reduce scrap material	2	Reduce scrap as a percent of cost by 5% from FY 2006 levels	Use FTQ action plans to target programs	3	5	1	15	01/30/10	N Leifeld		SARA Title 313, DNR Air Permit NR 407	Reduce scrap as a percent of cost by 5% from FY 2006 levels
			Use FTQ action plans to target OEM programs					01/30/10	N Leifeld			
Screen reclaim - VOC reduction	3	Reduce ratio of pounds of solvent used per sq in of mesh	Work with production to stress importance of conserving wipes and solvents and testing new wipes	4	3	1	12	02/20/10	N Leifeld		DNR Air Permit NR 407; NR 422	Reduce ratio of pounds of solvent used per sq in of mesh by 5%
Voluntary	4	Reduce power consumption as a ratio to production hours by 5%	Access electrical and gas usage and develop options	5	5	1	25	12/31/10	Scott W		None; Reduce GHG emissions	Reduce power consumption as a ratio to production hours by 5%
Screen Reclaim, Printing, Ink Room - VOC Reduction	5	Reduce pounds of disposable wipes per production hours by 5%	Try different wipes / change practices to reduce usage and reduce a source of waste to the environment	3	3	1	9	12/31/10	Scott W		NR 600	Reduce pounds of disposable wipes per production hours by 5%
Reduce scrap and hazardous material	6	Reduce Pounds of Hazardous Materials as a ratio to production hours by 5%	Reduce scrap, try different wipes, change practices	5	2	1	10	12/31/10	Scott W		NR 600	Reduce Pounds of Hazardous Materials as a ratio to production hours by 5%

APPENDIX 5

Copy of Air Pollution Control Permit

**PERFORMANCE-BASED PERMIT
AIR POLLUTION CONTROL CONSTRUCTION PERMIT**

EI FACILITY NO: 267065260

CONSTRUCTION PERMIT NO.: 07-KLH-284

TYPE:

Construction Permit for: Operations in Tables A, B, C, D, and ZZZ and implementation of a Plant-wide Applicability Limit

In compliance with the provisions of a Green Tier Contract, Chapters 285, and 299, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code,

Name of Source: Serigraph, Inc. - Plant 2

Street Address: 3801 Decorah Road,
West Bend, Washington County, Wisconsin

Responsible Official, & Title: Nicholas C. Leifeld, Director of Quality and Compliance

is authorized to modify the facility to operate under a plant-wide applicability limitation and to construct, modify, reconstruct, or replace fuel burning units and other equipment, and to operate the facility in conformity with the conditions herein. The authority to construct, modify, replace and/or reconstruct any process covered in this Construction Permit expires **sixty (60) months** from the date of issuance. This approved period to construct, modify, replace and/or reconstruct may be extended for up to 18 months upon request for cause, prior to expiration, unless otherwise specified by this construction permit. The conditions of this construction permit are permanent unless suspended or revoked and may only be revised through a revision of the construction permit or through the issuance of a new construction permit. [ss. 285.60(1), and 299.83, Wis. Stats.]

This authorization requires compliance by the permit holder with the emission limitations, monitoring requirements and other terms and conditions set forth in Parts I through VI hereof.

Dated at Madison, Wisconsin _____ August 26, 2011 _____

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
by the Secretary

By _____
Cathy Stepp
Secretary of the Department of Natural
Resources

**Part I
APPLICABLE LIMITATIONS AND SPECIFIC CONDITIONS**

A. Total Facility Emissions

Pollutant	a. Limitations	b. Compliance Demonstration Requirements	c. Recordkeeping and Monitoring Requirements
<p>1. Volatile Organic Compounds and Federally Regulated Hazardous Air Pollutants</p>	<p>(1) Plant-Wide Applicability Limitation (PAL) - VOC The permit holder may not emit more than 100 tons volatile organic compounds in any 12 consecutive month period from this facility.¹ [07-KLH-284, s. 285.65(7), Wis. Stats., and s. NR 408.11(7)(a), Wis. Adm. Code.]</p> <p>(2) Plant-Wide Applicability Limitation (PAL) - HAP (a) The permit holder may not emit more than 9.9 tons of any single federally regulated hazardous air pollutant in any 12 consecutive month period from this facility. [07-KLH-284 and ss. NR 405.18(6)(a), Wis. Adm. Code, 285.65(7) and 299.83, Wis. Stats.]</p>	<p>(1) Within 30 days of the end of the calendar month, for the previous month, the permit holder shall calculate the monthly emissions of volatile organic compounds (VOC) and federally regulated hazardous air pollutants (HAP) from the facility including emissions from printing operations and associated wash and solvent usage, fugitive industrial cleaning operations, screen reclaim, and any other sources of VOC and HAP at the facility. [07-KLH-284 and s. 299.83, Wis. Stats., and s. NR 408.11(7)(f), Wis. Adm. Code.]</p> <p>(2) PAL Monitoring Requirements - The monitoring system implemented by the permit holder shall accurately determine plant-wide emissions of the PAL regulated air contaminants in terms of mass per unit of time. Any monitoring system authorized for use in the PAL permit shall be based on sound science and meet generally acceptable scientific procedures for data quality and manipulation. Acceptable monitoring methods are described below and in I.ZZZ.7. [07-KLH-284 and s. NR 408.11(12), Wis. Adm. Code.]</p> <p>(3) Emissions of VOC and HAP shall be calculated to demonstrate compliance with the PAL based on data gathered using the approach listed below or any of the alternate approaches listed in I.ZZZ.7. [07-KLH-284 and ss. NR 408.11(7)(g), and NR 408.11(12)(a) and (b), Wis. Adm. Code.]:</p> <p>Mass Balance Monitoring Approach When using a mass balance approach, all the following shall be done: [s. NR 408.11(12)(c), Wis. Adm. Code.]</p> <p>(a) Provide a demonstrated means of validating the published VOC or HAP content that is contained in or created by all materials used in or at the emissions unit.</p> <p>(b) Assume that the emissions unit emits all the VOC or HAP that is contained in or created by any raw material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process.</p>	<p>(1) Records for Annual Emissions Determination - The permit holder shall maintain records necessary to determine the rolling annual sum of VOC and HAP emissions from the facility on a monthly basis. Though daily calculations are not required by the permit, records shall meet the requirements of Part III of this permit and shall be retained for at least 5 years from the date of the record. At a minimum, records shall include:</p> <p>(a) All calculations methods used to determine emissions</p> <p>(b) USEPA Method 24A results, Material Safety Data Sheets, or an equivalent document provided by the ink/coating supplier for each ink or coating used at this facility. The documents shall contain sufficient information to calculate the VOC and HAP content in the units necessary to determine compliance. Where the documents differ, the Method 24A results shall govern;</p> <p>(c) The amount of inks, solvents, coatings cleaning solvents or other materials used;</p> <p>(d) The amounts and types of fuels used. [07-KLH-284 and 408.11(7)(h), Wis. Adm. Code.]</p>

¹ This limit is more stringent than the emission limit calculated in s. NR 408.11(7)(a) and is requested by the facility because of its status as a Tier 2 facility and its desire to show that potential emissions will not increase significantly under this permit.

A. Total Facility Emissions

Pollutant	a. Limitation	b. Compliance Demonstration	c. Recordkeeping and Monitoring Requirements
<p>1. Volatile Organic Compounds Continued...</p>	<p>(b) The permit holder may not emit more than 24.9 tons all federally regulated hazardous air pollutants combined in any 12 consecutive month period from the facility. [07-KLH-284 and ss. 285.65(7) and 299.83, Wis. Stats.]</p>	<p>(c) Where the vendor of a material or fuel publishes a range of VOC or HAP content from the material, use the highest value of the range to calculate the emissions unless the department determines there is site specific data or a site specific monitoring program to support another content within the range.</p> <p>(4) Calculation Procedures - Emissions shall be calculated as follows or, when approved by the Department, the permit holder may use an Approved Replicable Method to calculate emissions provided that the methods are based on sound science and meet generally acceptable scientific procedures for data quality and manipulation. Emissions calculations performed under this section shall include all emissions units covered by each PAL established in I.A.1.a.1.(1) and (2). [07-KLH-284 and s. NR 408.11(7)(f), Wis. Adm. Code.]</p> <p>(a) Printing Operations All Printing Operations including screen, offset, pad, digital, and Screen Reclaim Calculations: Emissions calculations during normal operations</p> $EM_M = \text{sum} [C_x U_x (1 - CE)]^2$ <p>Where:</p> <p>EM_M = total monthly emissions of VOC or HAP in kilograms (pounds) from all coatings, inks or other VOC or HAP emitting material used;</p> <p>C_x = the VOC or HAP content of material x, in percent by weight</p> <p>U_x = the amount of material x, as applied, during any month, in pounds or kilograms</p> <p>X = identifies the individual materials</p> <p>CE = 80% for the biofilter or the overall control efficiency including capture efficiency established for an alternative control device during department approved stack testing (see I.ZZZ.7). Where the equipment is not controlled, CE=0</p> <p>If the facility uses a control device to reduce VOC or HAP emissions, the permit holder shall perform stacktesting within 180 days of start up of the control device to establish a control efficiency. If total enclosure is not used, testing on capture efficiency will also be performed within 180 days of start up of the control device. The department may require additional stacktesting to ensure continual compliance. The control device shall meet the requirements in I.B.1.b.(2) and (3).</p>	<p>(2) Unit Inventory - The permit holder shall maintain on site a list of emissions units that emit VOC and HAP including screen presses, offset presses, pad printers, screen reclaim, solvent cleaning and other significant units³. This list shall be reviewed and updated at least annually or upon replacements, removal, or additions of equipment. [07-KLH-284 and s. NR 439.04, Wis. Adm. Code.]</p> <p>(3) The Permit holder shall monitor and record control device parameters as required under I.B.1.c.(3) [ss. NR 439.04, and 408.11(12), Wis. Adm. Code.]</p> <p>(4) Methodologies established as Approved Replicable Methods shall address but not be limited to addressing, use of appropriate VOC retention factors, control device maintenance, monitoring material usage, and capture efficiencies. [07-KLH-284 and ss. NR 408.11(13), and 439.04, Wis. Adm. Code.]</p> <p>(5) Calculation procedures including Approved Replicable Methods used to calculate emissions shall be included in</p>

² This equation assumes 100% capture of all production equipment which is the current situation at this facility.

³ A significant emission unit is an emission unit with maximum theoretical emissions that are equal to or exceed the levels listed in Table 3 of ch. NR 407, Wis. Adm. Code.

A. Total Facility Emissions

Pollutant	a. Limitation	b. Compliance Demonstration	c. Recordkeeping and Monitoring Requirements
		<p>(b) Combustion Unit Calculations: including emissions from burning fuel in heating units, air make up units, curing ovens and other units that combust fuel:</p> <p>(i) The permit holder shall calculate VOC and HAP emissions from fuel combustion using emission factors published by USEPA or site specific emission factors approved by the department multiplied by an appropriate fuel or energy throughput.</p> <p>(ii) In lieu of calculating emissions as laid out in (i), the permit holder may, for any unit combusting natural gas and propane with a maximum heat input capacity less than 10 mmBtu/hr, estimate VOC emissions by assigning a total emission value of 0.5 tons VOC per year per combustion unit.</p> <p>(c) Fugitive cleaning solvent calculations: Emissions of fugitive VOC or HAP from industrial solvent cleaning operations may be made using a mass balance including the amount of each cleaning solvent used each month, and the VOC and HAP content of the cleaning solvent. Unused solvent shipped off site and solvent recovered from towels or rags may be subtracted from the emissions as long as it is quantifiable.</p> <p>(d) Rags: The owner or operator may account for emissions reductions of VOC and/or HAP from any rag distillation system, centrifuge system or other similar purpose equipment, or solvent recovery program which minimizes solvent evaporation from the clean up solvent rags for all operations in the facility, the permittee shall. [s. 285.65(8), Wis. Stats.]</p> <p>(5) The annual emissions shall be based on a 12-month rolling total by summing the emissions calculated from each of the previous 12 consecutive months. Calculations shall be made by the end of each calendar month for the previous 12-month period. [07-KLH-284 and s. NR 408.11(7)(f), Wis. Adm. Code.]</p> <p>(6) When demonstrating compliance with the PAL, the permit holder shall also include any VOC or HAP emitted from startups, shutdowns, and malfunctions. [07-KLH-284 and s. NR 408.11(7)(d), Wis. Adm. Code.]</p> <p>(7) All data (such as control efficiencies, capture efficiencies, retention factors, and VOC and HAP contents of inks and solvents) used to establish the VOC and HAP emission levels shall be re-validated through performance testing or other scientifically valid means approved by the department. The testing, shall occur at least once every 5 years after the issuance of the PAL. [s. NR 408.11(12)(i), Wis. Adm. Code.]</p>	<p>the training plan required under the facility’s EMS to ensure responsible personnel are adequately trained in how to calculate emissions. [07-KLH-284 and ss. NR 408.11(13), and 439.04, Wis. Adm. Code.]</p> <p>(6) Rags In order to count emissions reductions from a Rag Program, the permittee shall maintain written records of emissions and the recovery of solvents from this system, or a solvent recovery program with an outside vendor. [s. 285.65(8), Wis. Stats.]</p>

B. Printing Operations

Pollutant	a. Limitations	b. Compliance Demonstration Requirements	c. Recordkeeping and Monitoring Requirements
<p>1. Volatile Organic Compounds emissions – Variance from ss. NR 422.142, 422.143, 422.145, and 424.03(2), Wis. Adm. Code.</p>	<p>(1) Upon issuance of this permit, ss. NR 422.142, 422.143, 422.145, and 424.03(2) do not apply to printing operations at this facility. ⁴ [ss. NR 436.05, Wis. Adm. Code, and 299.83, Wis. Stats.]</p> <p>(2) The permit holder shall identify as a significant environmental aspect in its EMS VOC emissions from printing operations including screen reclamation. [ss. 285.65(7) and 299.83, Wis. Stats.]</p> <p>(3) Within the first two years after issuance of this permit the permit holder shall include reductions in emissions from printing operations including screen reclamation in at least one of its environmental management programs established under its EMS. ⁵ [s. NR 436.05(2), and ss. 285.65(7), and 299.83, Wis. Stats.]</p>	<p>(1) The permit holder shall document any emission reductions achieved with respect to the 2004 baseline year under the environmental management program implemented as required in I.B.1.a.(3) [s. NR 439.04, Wis. Adm. Code.]</p> <p>(2) If a control device will be used to reduce emissions from printing operations, the permit holder shall establish parameters that may be monitored to demonstrate a control efficiency and ranges within which such parameters must be kept in order to assure continuous compliance. The permit holder shall operate the control device within the established operation parameter ranges. [s. NR 407.09(4)(a)1., Wis. Adm. Code]</p> <p>(3) The permit holder shall conduct emission testing consistent with s. NR 439.07 and s. NR 439.075, Wis. Adm. Code, to demonstrate the VOC and/or HAP emission control efficiency as follows: [s. 285.65(7), Wis. Stats., and NR 407.09(4)(a)1., Wis. Adm. Code]</p> <p>(a) For any control device reducing VOC or HAP emissions and that is necessary to meet an applicable limit or if the control efficiency is used in the emissions calculations under I.A.1.b., periodic testing shall be conducted within 180 days of start up of any device installed after issuance of this permit and, for existing and new devices, every 60 months within 90 days of the anniversary date of the previous test. The DNR may request more frequent testing for a control device if emissions are within 80% of the emission cap or an applicable emission limit or if required by s. NR 439.075.</p> <p>(b) All tests shall be conducted at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level that is approved by the Department in writing.</p>	<p>(1) The permit holder shall make available upon request its most recently updated list of significant environmental aspects identified under its EMS. [s. NR 439.04, Wis. Adm. Code.]</p> <p>(2) The permit holder shall maintain records as necessary to document the following: [ss. NR 439.04 and NR 439.055, Wis. Adm. Code.]</p> <p>(a) emissions reductions achieved through the environmental management program established under I.B.1.a.(3).</p> <p>(b) total annual VOC and HAP emissions from all printing operations including screen reclamation combined.</p> <p>(c) Records shall meet the requirements of Part III of this permit.</p> <p>(3) When a control device is used to control VOC and/or HAP emissions the permit holder shall monitor and record the parameters established as required in I.B.1.b.(2). [s. NR 407.09(1)(c)1.b., Wis. Adm. Code.]</p>

⁴ Upon issuance of this permit, the facility is granted variance from ss. NR 422.142, 422.143, 422.145, and 424.03(2), Wis. Adm. Code, per s. NR 436.05, Wis. Adm. Code.

⁵ The facility has committed to emissions reductions from printing operations as part of its commitment to superior environmental improvement. Requiring the facility to include VOCs as a significant environmental aspect in the facility EMS ensures that VOC emissions reductions will be included in objective and targets and Environmental Management Programs developed by the facility. As an incentive for these improvements, the facility is granted variance from ss. 422.142, 422.143, NR 422.145, and NR 424.03(2), Wis. Adm. Code.

C. Fugitive Industrial Cleaning Operations

Pollutant	a. Limitations	b. Compliance Demonstration Requirements	c. Recordkeeping and Monitoring Requirements
<p>1. Volatile Organic Compounds: Variance from s. NR 423.035, and 423.037 Wis. Adm. Code.</p>	<p>(1) Upon issuance of this permit, ss. NR 423.035, and 423.037, Wis. Adm. Code do not apply to industrial cleaning operations at this facility⁶. [ss. NR 436.05, Wis. Adm. Code, and 299.83, Wis. Stats., and 07-KLH-284]</p> <p>(2) The facility shall identify as a significant environmental aspect in its EMS, VOC emissions from solvent cleaning operations. [ss. 285.65(7) and 299.83, Wis. Stats and 07-KLH-284]</p> <p>(3) Within the first two years after issuance of this permit the facility shall include proposed reductions in emissions from solvent cleaning operations in at least one of its environmental management programs established under its EMS.⁷ [s. NR 436.05(2), and ss. 285.65(7), and 299.83, Wis. Stats. and 07-KLH-284]</p>	<p>(1) The permit holder shall document any emission reductions achieved with respect to the 2004 baseline year under the environmental management program implemented as required in I.C.1.a.(3) [s. NR 439.04, Wis. Adm. Code, and 07-KLH-284]</p>	<p>(1) The permit holder shall make available upon request its most recently updated list of significant environmental aspects identified under its EMS. [s. NR 439.04, Wis. Adm. Code, and 07-KLH-284]</p> <p>(2) The permit holder shall maintain records as necessary to document emissions reductions achieved through the environmental management program established under I.C.1.a.(3). Records shall meet the requirements of Part III of this permit. [ss. NR 439.04 and NR 439.055, Wis. Adm. Code, and 07-KLH-284]</p>

⁶ Upon issuance of this permit the facility is granted variance from ss. NR 423.035 and 423.037, Wis. Adm. Code, per s. NR 436.05, Wis. Adm. Code.

⁷ The facility has committed to emissions reductions of solvent cleaning operations as part of its commitment to superior environmental improvement. Requiring the facility to include VOCs as a significant aspect in the facility EMS ensures that VOC emissions reductions will be included in objective and targets and Environmental Management Programs developed by the facility. As an incentive for these improvements, the facility is granted variance from ss. NR 423.035 and 423.037, Wis. Adm. Code. The facility wide emission cap ensures that emissions from solvent cleaning will not be greater than the levels allowed under the rule.

D. Miscellaneous Fuel Combustion Units

Pollutant	a. Limitations	b. Compliance Demonstration Requirements	c. Recordkeeping and Monitoring Requirements
<p>1. Particulate matter, volatile organic compounds, carbon monoxide, sulfur dioxide, nitrogen oxides and lead</p>	<p>(1) The particulate matter emissions from combustion units at the facility shall meet the following emission limits: [ss. NR 415.06, Wis. Adm. Code, and 285.65(3), Wis. Stats.]</p> <p>(a) 0.15 lb PM per million Btu heat input to each stack</p> <p>(b) The combined emissions of particulate matter from all heat combustion units combined at this facility may not exceed 0.5 lb/hr.⁸</p> <p>(2) The permit holder may not cause or allow emissions from combustion units at this facility of shade or density greater than number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code]</p> <p>(3) Advanced Approval</p> <p>The permit holder may construct, reconstruct, relocate, modify, or replace, combustion units without the need for additional construction or operation permitting as long as the following conditions are met. This authority expires 60 months after issuance of this permit unless extended: . [07-KLH-284 and ss. 285.65(4) and 299.83, Wis. Stats.]</p>	<p>(1) Except as provided in (2) below, only natural gas, or propane, may be used in current and future combustion units at this facility¹¹. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code.]</p> <p>(2) Alternative Fuel Use – Variance from ch. NR 406, Wis. Adm. Code.</p> <p>The facility may use a fuel other than natural gas or propane without first obtaining a construction permit or permit revision, if the alternative fuel use is part of the objectives and targets established in the facility’s EMS or if use of the fuel is part of an environmental management program established in the EMS to further superior environmental performance and, as long as the requirements in (3) below are met. [s. NR 439.04, Wis. Adm. Code and 299.83, Wis. Stats.]</p> <p>(3) An alternate fuel other than natural gas or propane may only be used if the permit holder demonstrates that emissions from the combustion of the new fuel meet ambient air quality standards and that the requirements of ch. NR 445 , Wis. Adm. Code, are met as follows:</p>	<p>(1) Records for Annual Emissions Determination</p> <p>The permit holder shall maintain records as necessary to determine the following: [ss. NR 408.11(12), and 439.04(1)(d), Wis. Adm. Code.]</p> <p>(a) The total maximum rated heat input capacity of all combustion units combined</p> <p>(b) The types and amounts of fuels used</p> <p>(c) The annual emission rate of each pollutant emitted from the fuel combustion units</p> <p>(d) When an alternate fuel is used, information demonstrating that air quality standards are met as allowed under I.D.1.b.(3). Records shall meet the requirements of Part III of this permit.</p> <p>(2) Unit Inventory</p> <p>The permit holder shall maintain on site a list of all combustion units, their heat input capacities and the types of fuels that are combusted in them. This list shall be reviewed and updated at least annually or upon replacements, removal, or additions of fuel combustion equipment. [s. NR 439.04, Wis. Adm. Code.]</p> <p>(3) Whenever an alternate fuel is used, the permit holder shall keep records that show the following: [s. NR 439.04, Wis. Adm. Code.]</p> <p>(a)(i) Objective and target which contains the alternative fuel use and</p> <p>(ii) Conformity with the procedures for establishing</p>

⁸ This limitation is included to ensure that air quality standards for particulate matter emissions will be attained and maintained. Using AP-42 emission factor of 7.6 lb PM per million cubic feet of gas, at maximum fuel combustion rates, maximum theoretical emissions of particulate matter from all fuel combustion units and stacks combined at this facility are well below 0.5 lb/hr.

D. Miscellaneous Fuel Combustion Units

Pollutant	a. Limitations	b. Compliance Demonstration Requirements	c. Recordkeeping and Monitoring Requirements
	<p>(a) the total heat input capacity of all existing and proposed combustion units combined does not exceed 49.1 mmBtu/hr.⁹</p> <p>(b) the proposed project does not subject the combustion unit to a new emission limitation under the new source performance standards or a national emission standard for hazardous air pollutants under ss. 111 or 112 of the Clean Air Act, excluding ss. 112(d)(5) and 112(r).</p> <p>(c) Except as allowed under D.1.b.(2), only natural gas or propane may be used to fire new combustion units¹⁰</p>	<p>(a) demonstrate that maximum controlled emissions of criteria pollutants and hazardous air contaminants, when using the new fuel are less than inclusion levels listed in Table 3 of ch. NR 407, for each pollutant emitted; or</p> <p>(b) For each pollutant emitted at rates equal to or exceeding the value listed in table 3 of ch. NR 407, Wis. Adm. Code, provide air quality modeling results that show the ambient air quality standards and acceptable ambient air concentrations are met at the maximum controlled emission rate of the pollutant</p> <p>(c) Use of the new fuel may not subject the unit to a <u>new</u> standard or regulation under s. 111 and 112 of the act, excluding ss. 112(d)(5) and 112(r). [s. 285.65(3), Wis. Stats., and s. NR 439.09(4)(a)3.b., Wis. Adm. Code.]</p>	<p>objectives and targets.</p> <p>Or</p> <p>(b) How and why the fuel use needs to be included in an environmental management program.</p> <p>Records may include meeting minutes, calculations or other written records.</p>

⁹ This cap on total Btu of equipment is equivalent to adding exempt fuel burning equipment under s. NR 406.04(1)(a), Wis. Adm. Code.

¹⁰ The requirements in I.D.1.a.(3)(a) and (b) along with I.D.1.b.(1) (2) and (3) ensure that the impact of new or modified fuel burning equipment would not exceed the impact of equipment added that is exempt from construction permitting per s. NR 406.04(1)(a), Wis. Adm. Code.

¹¹ Because natural gas and propane are clean burning fuels, they will not cause a violation of emissions limitations when operated according to manufacturer’s specification.

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
<p>1. Compliance Certification and Monitoring Reports</p>	<p>(1) Except as allowed in (3) below, the permit holder shall submit periodic monitoring reports. [s. NR 407.09(1)(c)3., Wis. Adm. Code]</p> <p>(2) Except as allowed in (3) below, the permit holder shall submit periodic certification of compliance. [s. NR 407.09(4)(a)3., Wis. Adm. Code]</p> <p>(3) The report of audit results submitted to the department in compliance with s. 299.83(6m)(a), Wis. Stats., to fulfill the annual environmental compliance audit commitment required in s. 299.83(5)(c)3., may be submitted in lieu of the reports required in (1) and (2) above if the audit results contain the information required in I.ZZZ.1.b.(1)(a)-(d). [s. 299.83, Wis. Stats.]</p> <p>(4) The records required under this permit shall be retained for at least five (5) years and shall be made available to department personnel upon request during normal business hours. [s. NR 439.04, s. NR 439.05, Wis. Adm. Code]</p>	<p>(1) Except as provided in (3) below, the permit holder shall submit a monitoring report which contains the results of monitoring or a summary of monitoring results required by this permit to the Department every 6 months. [ss. NR 407.09(1)(c)3., NR 408.11(14), and NR 439.03(1)(b), Wis. Adm. Code]</p> <p>(a) The time periods to be addressed by the submittal January 1 to June 30 and July 1 to December 31.</p> <p>(b) The report shall be submitted to the Wisconsin Dept. of Natural Resources, Waukesha Service Center, 141 NW Barstow St, Room 180, Waukesha, WI 53188, within 60 days after the end of each reporting period.</p> <p>(c) All deviations from and exceedances of applicable requirements shall be clearly identified in the submittal.</p> <p>(d) Each submittal shall be certified by a responsible official as to the truth, accuracy and completeness of the report.</p> <p>(e) The content of the submittal is described in item D. of Part VI of the permit.</p> <p>(f) In addition to the information described in (e) above, the report shall also include the following:</p> <p>(i) The name of the owner and operator and the permit number</p> <p>(ii) Total annual emissions in tons/yr based on a 12-month rolling total for each month in the reporting period</p> <p>(iii) All data relied upon including any quality assurance or quality control data, in calculating the monthly and annual PAL regulated air contaminant emissions.</p> <p>(iv) A list of any emissions units modified or added to the major stationary source during the preceding 6-month period.</p> <p>(2) Except as provided in (3) below, the permit holder shall submit an annual certification of compliance with the requirements of this permit to the Wisconsin Dept. of Natural Resources, 141 NW Barstow St, Room 180, Waukesha, WI 53188 and to Compliance Data – Wisconsin, Air and Radiation Division, US EPA, 77 W. Jackson Street, Chicago, IL 60604.</p> <p>(a) The time period to be addressed by the report is January 1 to December 31 of the preceding year.</p> <p>(b) The report shall be submitted to the Wisconsin Department of Natural Resources and the US EPA within 60 days after the end of each reporting period.</p> <p>(c) The information included in the report shall comply with the requirements of Part VI, Section N of this permit.</p> <p>(d) Each report shall be certified by a responsible official as to the truth, accuracy and completeness of the report. [ss. NR 407.09(4)(a)3. & NR 439.03(1)(c), Wis. Adm. Code]</p>

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
		<p>(3) The annual compliance audit and reporting done under s. 299.83(5)(c)3., Wis. Stats., may be submitted in lieu of the reports and certification required under (1) and (2) above. [s. 299.83, Wis. Stats.]</p>
<p>2. Malfunction Prevention and Abatement Plans</p>	<p>(1) A malfunction prevention and abatement plan shall be prepared and followed for the plant. The facility may use procedures established in the operation control portion of its EMS to meet this requirement. [ss. NR 439.11, Wis. Adm. Code, and 299.83, Wis. Stats.]</p> <p>(2) All air pollution control equipment shall be operated and maintained in conformance with good engineering practices (i.e. operated and maintained according to manufacturer's specifications and directions) to minimize the possibility for the exceedance of any emission limitations. [s. NR 439.11(4), Wis. Adm. Code]</p>	<p>(1) The malfunction prevention and abatement plan shall be developed to prevent, detect and correct malfunctions or equipment failures which may cause any applicable emissions limitation to be violated or which may cause air pollution. [s. NR 439.11(1), Wis. Adm. Code]</p> <p>(2) This malfunction prevention and abatement plan shall include installation, maintenance and routine calibration procedures for the process monitoring and control equipment instrumentation. This plan shall require an instrumentation calibration at the frequency specified by the manufacturer, yearly or at a frequency based on good engineering practice as established by operational history, whichever is more frequent. Inspection and calibration shall also be conducted whenever instrumentation anomalies are noted. [ss. NR 407.09(1)(c)1.c., NR 439.055(4) and s. NR 439.11, Wis. Adm. Code]</p> <p>(3) The malfunction prevention and abatement plan shall require a copy of the operation and maintenance manual for the control equipment to be maintained on site. The plan shall contain all of the elements in s. NR 439.11(1)(a) – (h), Wis. Adm. Code. [s. NR 439.11, Wis. Adm. Code]</p>

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
<p>3. Plant-wide Applicability Limit (PAL) requirements.</p>	<p>(1) Construction/Modification under the PAL The permit holder may construct, reconstruct, relocate, modify, or replace, screen presses , flexographic presses, pad printers, offset presses, or other types of printing units and associated cleaning operations or other equipment that emits VOC and HAP without first obtaining a construction permit under chs. NR 408 and 406, Wis. Adm. Code, or an operation permit revision under ch. NR 407, Wis. Adm. Code, as long as all the following are met [07-KLH-284 and ss. 285.65(7), and 299.83, Wis. Stats., and ss. NR 408.11(1)(c), and 406.04(1f), Wis. Adm. Code.]:</p> <p>(a) actual emissions of volatile organic compounds and federally regulated hazardous air pollutants from the existing facility plus the projected actual emissions from any new or modified project do not exceed the PAL levels established in this I.A1. or I.A.2. of this permit.</p> <p>(b) the actual emissions of VOCs from any new emission unit¹² may not exceed 24.9 tons per year.¹³</p> <p>(c) any projected actual/actual increase in air pollutants emitted by the new or modified equipment other than VOCs does not exceed the levels specified in ss. NR 406.04(2)(b), (c), (cm), (d), and (f), Wis. Adm. Code, and 299.83, Wis. Stats.</p> <p>(d) the construction, reconstruction, replacement, relocation, or modification does not trigger new requirements under sections 111 or 112 of the Clean Air Act with the exception of ss. 112(d)(5) and 112(r).</p> <p>(e) For equipment added after the date of issuance of this permit, the permit holder shall evaluate additions of new equipment and any changes in the method of operation of existing equipment to ensure that the project conforms to the objectives and targets established in the facility’s EMS.</p> <p>(2) Increasing a PAL during the PAL effective Period – The department may increase a PAL level only if the permit holder complies with all the provision of s. NR 408.11(11), Wis. Adm. Code. [s. NR 408.11(11), Wis. Adm. Code.]</p>	<p>(1) The permit holder shall keep records or notes to show that constructed, reconstructed, relocated, modified or replaced equipment meets the requirements of I.ZZZ.3.(1) [s. NR 439.04(1)(d), Wis. Adm. Code.]</p> <p>(2) Prior to operating new equipment added under this section, the permit holder shall calculate the expected actual annual VOC and HAP emissions from the existing facility plus the new equipment to ensure that the applicable emission cap will continue to be met. Use methodologies established under I.A.1. [07-KLH-284 and s. NR 439.04, Wis. Adm. Code.]</p> <p>(3) The permit holder shall update its equipment inventory every time equipment is added or replaced. [07-KLH-284 and s. NR 439.04, Wis. Adm. Code.]</p> <p>(4) Records shall be kept that demonstrate that additions of new equipment or changes to the method of operation of existing equipment were evaluated and conform to the objectives and targets established in the facility EMS. [07-KLH-284 and s. NR 439.04, Wis. Adm. Code.]</p> <p>(5) Keep records of the calculations performed under sections I.A.1.b. [07-KLH-284 and s. NR 439.04, Wis. Adm. Code.]</p>
<p>4. Renewal of the PAL</p>	<p>(1) The permit holder shall submit an application to renew the PAL at least 6 months but not more than 18 months prior to expiration of the PAL. The application shall contain all of the information required in s. NR 408.11(10)(c), Wis. Adm. Code. [07-KLH-284 and s. NR 408.11(10)(b), Wis. Adm. Code.]</p> <p>(2) If the permit holder chooses to let the PAL expire, then the permit holder is subject to the</p>	<p>(1) Submit required documents to Wisconsin Department of Natural Resources, Southeast Region Air Program 141 NW Barstow St, Room 180, Waukesha, WI 53188. [s. NR 407.09(1)(f)5., Wis. Adm. Code.]</p>

¹² A new emissions unit means a new emissions unit as defined in s. NR 408.02(13)(a), Wis. Adm. Code.

¹³ This condition establishes a potential to emit for new equipment so that it can meet the exemption criteria in s. NR 406.04(1f), Wis. Adm. Code.

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
	<p>requirements of I.ZZZ.5. below. [07-KLH-284 and s. NR 408.11(7)(e), Wis. Adm. Code.]</p> <p>(3) Upon renewal, the PAL shall be reestablished at the levels equal to the PAL levels established in I.A.1.a.(1) and (2). Or, if requested by the permit holder, the PAL may be adjusted to one of the following levels in (a) or (b) as long as the adjusted PAL levels do not exceed the PAL levels established in I.A.1.a.(1) and (2): [07-KLH-284, s. NR 408.11(10)(d) and s. 299.83, Wis. Stats.]</p> <p>(a) the facility’s potential to emit VOCs at the time of PAL renewal.</p> <p>(b) A level determined by the permit holder to fulfill the objectives and targets of the facility’s EMS.</p> <p>As long as the facility remains in good standing with Tier 2 of the Green Tier Program, the Department agrees to use the discretion allowed under ss. NR 408.11(10)(d)(1) and (2) and 405.18(10)(d)1. and 2., Wis. Adm. Code, and not require adjustment of the PAL at renewal unless new laws or other new legal requirements require reopening the PAL.</p>	
<p>5. Expiration of the PAL</p>	<p>(1) The PAL becomes effective upon issuance of this permit and expires 10 years after the effective date unless the permit holder applies to renew the PAL in accordance with I.ZZZ.4 before the PAL expires. [07-KLH-284 and ss. NR 408.11(7)(b) and (c), Wis. Adm. Code.]</p> <p>(2) If the permit holder chooses to let the PAL expire or if the permit holder is no longer eligible for the PAL or if the permit holder no longer wishes to operate under the PAL the permit holder shall, prior to PAL expiration, submit an application for a construction permit under s. NR 406.035, Wis. Adm. Code, and an operation permit revision under s. NR 407.13, Wis. Adm. Code. containing the following: [s. NR 408.11(9), Wis. Adm. Code, 07-KLH-284 and s. 299.83, Wis. Stats.]</p> <p>(a) A proposed allowable emission limitation, as a 12-month rolling average, for each emission unit or group of emission units that distributes the PAL allowable emissions among each emission unit that existed under the PAL. As long as the facility remains in good standing with Tier 2 of the Green Tier Program, the Department agrees to redistribute emissions as proposed by Serigraph in a redistribution plan required under 408.11(9)(a)1.</p> <p>(b) The permit holder shall comply with the terms and conditions of the PAL until a construction permit and a revised operation permit are issued by the Department. The Wisconsin Department of Natural Resources will issue any necessary air pollution control permits within 120 days of submittal of a complete application.</p>	<p>(1) Submit reallocation request and permit applications to the Wisconsin Department of Natural Resources, Southeast Region Air Program 141 NW Barstow St, Room 180, Waukesha, WI 53188. [s. NR 407.09(1)(f)5., Wis. Adm. Code.]</p>

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
<p>6. Stack Testing</p>	<p>(1) Whenever compliance emission testing is performed, the following reference test methods shall be used. When approved in writing, an equivalent test method may be substituted for the reference test method:</p> <p>(a) <u>Reference Test Method for Printing Inks and Related Coating Emissions</u>: Whenever compliance emission testing is performed, the appropriate US EPA Method; 24 or 24A shall be used. [s. NR 439.06(3)(b), Wis. Adm. Code]</p> <p>(b) <u>Reference Test Method for Carbon Monoxide Emissions</u>: Whenever compliance emission testing is performed, the appropriate US EPA Method; 10, 10A or 10B shall be used. [s. NR 439.06(4)(a), Wis. Adm. Code]</p> <p>(c) <u>Reference Test Method for Lead Emissions</u>: Whenever compliance emission testing is performed, US EPA Method 12 shall be used. [s. NR 439.06(5), Wis. Adm. Code]</p> <p>(d) <u>Reference Test Method for Nitrogen Compound Emissions</u>: Whenever compliance emission testing is performed, the appropriate US EPA Method; 7, 7A, 7B, 7C, 7D or 7E shall be used. [s. NR 439.06(6)(a), Wis. Adm. Code]</p> <p>(e) <u>Reference Test Method for Total Reduced Sulfur Compounds</u>: Whenever compliance emission testing is performed, the appropriate US EPA Method; 15, 15A, 16, 16A, or 16B shall be used. [s. NR 439.06(7)(a), Wis. Adm. Code]</p> <p>(f) <u>Reference Test Method for Hazardous Air Pollutant Emissions</u>: Whenever emissions testing for hazardous air pollutants is performed, USEPA Method 311 shall be used. [s. NR 439.06(8), Wis. Adm. Code]</p> <p>(g) <u>Reference Test Method for Particulate Matter Emissions</u>: Whenever compliance emissions testing is performed, the following USEPA Methods shall be used:</p> <p>(i) USEPA Method 5 for non-condensable particulate matter and</p> <p>(ii) USEPA Method 202 for condensable particulate matter. [s. NR 439.06(9)(a)1., Wis. Adm. Code.]</p> <p>(2) All testing shall be performed with the emissions unit operating at capacity or as close to capacity as practicable and in accordance with approved procedures. If operation at capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(3) If the biofilter will be used to control VOC or HAP emissions, the permittee shall conduct periodic emission testing consistent with s. NR 439.07 and s. NR 439.075, Wis. Adm. Code, to demonstrate compliance with the VOC emission control efficiency requirement as follows:</p>	<p>(1) The Department shall be informed at least 20 working days prior to any stack testing, so a Department representative can witness the testing. At the time of notification, a compliance emission test plan shall also be submitted to the Department for approval. When approved in writing, an equivalent test method may be substituted for the reference test method. The notification and test plan shall be submitted to the Wisconsin Department of Natural Resources. [s. NR 439.07(2), Wis. Adm. Code]</p> <p>(2) Two copies of the report on any compliance emission tests shall be submitted to the Department for evaluation within 60 days following the completion of tests. [s. NR 439.07(9), Wis. Adm. Code]</p>

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
	<p>(a) The testing shall be conducted every 60 months, within 90 days of the anniversary date of receipt of this determination while operating at 100% capacity.</p> <p>(b) If operation at 100% capacity is not feasible, the source shall operate at a capacity level that is approved by the Department in writing.</p> <p>(c) The Department shall be informed in writing at least 20 working days prior to any emission testing so a Department representative can witness the testing. At the time of notification an emission test plan shall also be submitted to the Department for approval.</p> <p>(d) If the compliance emission tests cannot be conducted by the dates required in this condition, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test(s);</p>	
<p>7. Alternate Monitoring Approaches allowed for compliance demonstration with PAL</p>	<p>(1) The following alternate monitoring approaches are allowed for calculating emissions of VOCs and HAPs under the PAL conditions in I.A.1. [07-KLH-284 and ss. NR 408.11(7)(g), and 408.11(12)(a), (b), , Wis. Adm. Code.]:</p> <p>(a) Emission factors from the following sources as approved by the Department: emission factors derived from the most recent stack test performed in accordance with I.ZZZ.6.a. and b., or AP-42, FIRE, or another source approved by the Department, if stack testing data is not available. When using emission factors to calculate VOCs from printing operations or solvents, all the following shall be done:</p> <p>(i) Adjust all emission factors, if appropriate, to account for the degree of uncertainty or limitations in the factors’ development.</p> <p>(ii) Operate the emissions unit within the designated range of use for the emission factor, if applicable.</p> <p>(iii) If technically practicable, for a significant emissions unit that relies on an emission factor to calculate VOC emissions, conduct validation testing to determine a site-specific emission factor within 6 months of permit issuance and at least once every 5 years unless the department determines that such testing is not required.¹⁴</p> <p>(b) Continuous emissions monitoring system (CEMS) as defined in s. NR 408.02, Wis. Adm. Code, that does both of the following:</p> <p>(i) Complies with applicable performance specifications found in 40 CFR part 60 Appendix B incorporated by reference in s. NR 484.04(21), Wis. Adm. Code.</p> <p>(ii) Samples analyzes and records data at least every 15 minutes or at an other less frequent</p>	<p>(1) If the permit holder uses approved replicable methods other than the equation listed in I.A.1.b.(3)(a), then written documentation of the methodology used shall be kept on site. [07-KLH-284 and s. 439.04(1)(d), Wis. Adm. Code.]</p> <p>(2) If stacktesting is performed to allow use of an alternate control efficiency or control device under I.B.1.b.(3), the stacktesting requirements of I.ZZZ.6., shall be followed. [07-KLH-284 and s. NR 439.04, Wis. Adm. Code.]</p> <p>(3) If a monitoring system is being used to calculate emissions and it fails to collect data on VOC emissions from an emission unit, during any period of time, the permit holder shall record and report maximum potential emissions without considering enforceable emission limitations or operational restrictions for that time period. [07-KLH-284 and s. NR</p>

¹⁴ At the time of issuance of this permit, the facility is not required to do validation testing for any site-specific emission factors. This condition applies to new site specific factors that might be developed as allowed by this permit, after the date of issuance of this permit.

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
	<p>interval approved by the department while the emissions unit is operating.</p> <p>(c) Continuous parameter monitoring system (CPMS) or predictive emissions monitoring system (PEMS) as defined in s. NR 408.02, Wis. Adm. Code, that does both of the following:</p> <ul style="list-style-type: none"> (i) Is based on current site-specific data demonstrating a correlation between the monitored parameters and the VOC emissions across the range of operations of the emissions unit. (ii) Samples, analyzes and records data at least every 15 minutes or at another less frequent interval approved by the department while the emissions unit is operating. <p>(d) Other Approved Replicable Methods that can be used determine the emissions accurately as approved by the Department.</p> <p>(2) If emissions are determined based on a stack test derived emission factor under (1)(a)(iii) above or a control efficiency of a control device, the following conditions shall be met:</p> <ul style="list-style-type: none"> (a) When a stack test indicates a higher emission factor or lower control efficiency than currently in use, it must be used to calculate emissions from the date the stack test was conducted forward. (b) When a stack test indicates a lower emission factor or a higher control efficiency and the permit holder submits a written request to the department to use the new data, its use may commence 45 days after Department’s receipt of the applicant’s written request only if the Department does not object, in writing, to the use of the new emission factor. [s. NR 407.09(4)(a)1., Wis. Adm. Code] 	<p>408.11(12)(g), Wis. Adm. Code].</p>

Part II – Performance Based Applicability

A. The facility has entered into a Participation Contract under Tier 2 of Wisconsin’s Green Tier Program pursuant to s. 299.83, Wis. Stats. This contract contains certain commitments by the facility to establish and maintain an Environmental Management System, undertake certain operational requirements, and perform compliance auditing. This permit is based in part on these commitments. Thus, if the facility does not substantially comply with the Green Tier 2 Participation Contract, this permit may be suspended, modified or revoked pursuant to s. 285.67, Wis. Stats. and ss. NR 406.11, 407.14, and 407.15, Wis. Adm. Code.

B. Under the contract, the permit holder is to demonstrate compliance with the participation contract requirements in II.A. above by doing all of the following: [ss. 299.83(5)(c), and 285.65(7), Wis. Stats.]

1. demonstrating that it has implemented an environmental management system.
2. having an outside environmental auditor approved by the department conduct an annual environmental management system audit.
3. annually conducting, or having another person conduct, an audit of compliance with environmental requirements.

C. Under the contract, the annual report submitted by the permit holder to assure compliance with the participation contract requirements is to include the following information: [ss. 299.83(3)(d), 299.83(5)(c), and 285.65(7), Wis. Stats.]

1. the results of Environmental Management Programs (EMPs) including progress towards goals.
2. the results of the environmental management system audit.
3. the results of the compliance audit.

Part III – Operational Control

A. Environmental Management Plans and other plans and procedures established in this Facility’s EMS for the purpose of demonstrating compliance with the Specific Limitations in Section I., shall be made available for public inspection. This applies only to the plans and procedures established to demonstrate compliance with the permit limitations. Other parts of the facility’s EMS may be kept confidential as necessary to, among other things, protect trade secrets and/or business competitiveness.

B. Environmental Management Plans and other plans and procedures established under the Operational Control section of the Facility’s EMS may be used to demonstrate compliance with the applicable requirements listed in Part I of this permit if the plans address, at a minimum, the following elements:

1. DESIGNATION of the applicable requirement.
2. MONITORING that will be performed and frequency of monitoring that will be done to demonstrate compliance with the requirements in Part I
3. RECORDS and frequency of records that will be kept to demonstrate compliance with the requirements in Part I
4. REPORTING that will be done as required by the applicable requirement or the permit including the prompt reporting of deviations from and exceedances of permit terms and conditions in accordance with Part IV.
5. TESTING including a reference test method and any required or planned compliance testing that will be performed along with the frequency such testing that will be performed.
6. COMPLIANCE METHODS for each applicable limitation.

C. The Department has examined the reporting recordkeeping, monitoring, and testing requirements contained in Wis. Adm. Code chs. NR 400-499 and has determined that compliance with the requirements in the permit shall constitute compliance with all such

requirements in Wis. Adm. Code, NR 400-499. This statement does not prevent state and local authorities from using any credible evidence to determine compliance with an applicable limitation or requirement in accord with 40 CFR sections 52.12(c), 60.11(g), and 61.12(e) in effect on the date of issuance of this permit.

D. The permit holder may not be required to undergo any permit revision procedures to implement changes to Environmental Management System's Operational Control Section affecting permit compliance demonstration methods because such updates are a requirement of 299.83, Wis. Stats and Green Tier 2 Participation Contract dated August 26, 2011.

Part IV – Other General Conditions

A. DUTY TO COMPLY

1. The permit holder has the duty to comply with all conditions of the permit. Any noncompliance with the operation permit constitutes a violation of the statutes and is grounds for enforcement action; for permit suspension, revocation or revision; or for denial of a permit renewal application except as laid out in B. below and in s. 299.83(6m)(d), Wis. Stats.
2. It is not a defense for a permit holder in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the permit.
3. The permit may be revised, revoked or suspended for cause under this chapter. The filing of a request by the permit holder for a permit revision or for revocation, or the filing of notification of planned changes under s. NR 407.025 or of anticipated noncompliance, does not stay any permit condition.
4. The permit does not convey any property rights of any sort, or any exclusive privilege.
5. The permit holder shall furnish to the department, within a reasonable time specified by the department, any information that the department may reasonably request in writing to determine whether cause exists to revise, revoke or suspend the permit or to determine compliance with the permit. Upon request, the permit holder shall also furnish to the department copies of records required to be kept pursuant to the permit.

B. DEFERMENT OF CIVIL ENFORCEMENT If the facility finds an instance of noncompliance, the DNR will defer civil enforcement in accordance with the requirements in 299.83(6m)(d), Wis. Stats.

C. SEVERABILITY: In the event of a successful challenge to any portion of the permit, all other portions of the permit remain valid and effective.

Part V. Public Involvement

The permit holder shall publish annually a public notice and/or issue a press release informing the public that information on the facility's EMS is available upon request.

Part VI General Permit Conditions For Direct Stationary Sources

A. Scope.

This permit is valid only for the structure, building, facility, equipment or operation specifically identified herein. All emissions authorized hereby shall be in compliance with the terms and conditions of Parts I and II of this permit. [s. 285.60(7), Wis. Stats.]

B. Emissions Prohibited.

Unless the Department has approved an exception under s. NR 436.03(2), or this permit no person may cause, allow, or permit emissions of any air contaminant into the ambient air in excess of the limits set in chs. NR 400 to 499, Wis. Adm. Code. [s. NR 436.03(1), Wis. Adm. Code]

C. General Emission Limits.

C.1. Applicable to Insignificant Emissions Units.

The following general emission limitations may apply to one or more of the insignificant emission units identified in the preamble of this permit. It is the permit holder's responsibility to comply with these requirements, if they do apply. Insignificant emission units typically are associated with inconsequential environmental impacts and present little potential for violations of these generally applicable requirements. If there were no observed, documented or known instances of noncompliance, certification of compliance is appropriate. Testing or monitoring to assure compliance is not required by this permit.

- C.1.a. Section NR 415.05, Wis. Adm. Code – Particulate emission limits for processes;
- C.1.b. Section NR 415.06, Wis. Adm. Code – Particulate emission limits for fuel burning installations;
- C.1.c. Section NR 415.07, Wis. Adm. Code – Particulate emission limits for incinerators;
- C.1.d. Section NR 423.03, Wis. Adm. Code – Solvent metal cleaning;
- C.1.e. Section NR 485.05, Wis. Adm. Code – Visible emission limits for motor vehicles, internal combustion engines and mobile sources; and
- C.1.f. Section NR 485.055, Wis. Adm. Code – Particulate emission limit for gasoline and diesel internal combustion engines.

C.2. Applicable to Significant and Insignificant Emissions Units.

The following general emission limitations may apply to both significant and insignificant emission units. It is the permit holder's responsibility to comply with these requirements, if they apply. Testing or monitoring to assure compliance with these general emission limits is not required by this permit.

For each significant emission unit, if a more specific emission limit is included in Part I of this permit for any of the pollutants listed below, then compliance with that more specific limit will constitute compliance with the general emission limit. If a more specific limit is not included in Part I of this permit, then that pollutant was determined to be insignificant for that emission unit.

For insignificant emission units, if there were no observed, documented or known instances of non-compliance, certification of compliance is appropriate.

- C.2.a. No person may cause, allow, or permit particulate matter to be emitted into the ambient air which substantially contributes to exceeding of an air standard, or creates air pollution. [s. NR 415.03, Wis. Adm. Code]
- C.2.b. No person may cause, allow, or permit any materials to be handled, transported, or stored without taking precautions to prevent particulate matter from becoming airborne. Nor may a person allow a structure, a parking lot, or a road to be used, constructed, altered, repaired, sand blasted or demolished without taking such precautions. Such precautions shall include, but not be limited to the following [s. NR 415.04, Wis. Adm. Code]:
 - C.2.b.(1) Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, or construction operations.
 - C.2.b.(2) Application of asphalt, oil, water, suitable chemicals, or plastic covering on dirt roads, material stockpiles, and other surfaces which can create airborne dust, provided such application does not create a hydrocarbon, odor, or water pollution problem.
 - C.2.b.(3) Installation and use of hoods, fans and air cleaning devices to enclose and vent the areas where dusty materials are handled.
 - C.2.b.(4) Covering or securing of materials likely to become airborne while being moved on public roads, railroads, or navigable waters.
 - C.2.b.(5) Conduct of agricultural practices such as tilling of land or application of fertilizers in such manner as not to create air pollution.
 - C.2.b.(6) The paving or maintenance of roadway areas so as not to create air pollution.

- C.2.c. No person may cause, allow or permit emission of sulfur or sulfur compounds into the ambient air which substantially contribute to the exceeding of an air standard or cause air pollution. [s. NR 417.03, Wis. Adm. Code]
- C.2.d. No person may cause, allow or permit organic compound emissions into the ambient air which substantially contribute to the exceeding of an air standard or cause air pollution. No person may cause, allow or permit organic compounds to be used or handled without using good operating practices and taking reasonable precautions to prevent the spillage, escape or emission of organic compounds, solvents or mixtures. [s. NR 419.03, Wis. Adm. Code]
- C.2.e. No person may cause, allow or permit the disposal of more than 5.7 liters (1.5 gallons) of any liquid Volatile Organic Compound (VOC) waste, or of any liquid, semisolid or solid waste materials containing more than 5.7 liters (1.5 gallons) of any VOC, in any one day from a facility in a manner that would permit their evaporation into the ambient air during the ozone season. This includes, but is not limited to, the disposal of VOC which must be removed from VOC control devices so as to maintain the control devices at their required operating efficiency. Disposal during the ozone season shall be by methods approved by the Department, such as incineration, recovery for reuse, or transfer in closed containers to an acceptable disposal facility, such that the quantity of VOC which evaporates into the ambient air does not exceed 15% (by weight) or 5.7 liters (1.5 gallons) in any one day, whichever is larger. [s. NR 419.04, Wis. Adm. Code]
- C.2.f. No person may cause, allow or permit emissions of carbon monoxide to the ambient air which substantially contribute to the exceeding of an air standard or cause air pollution. [s. NR 426.03, Wis. Adm. Code].
- C.2.g. No person may cause, allow or permit emissions into the ambient air of lead or lead compounds which substantially contribute to the exceeding of an air standard or air increment, or which create air pollution. [s. NR 427.025, Wis. Adm. Code]
- C.2.h. No person may cause, allow, or permit nitrogen oxides or nitrogen compounds to be emitted to the ambient air which substantially contribute to the exceeding of an air standard or cause air pollution. [s. NR 428.03, Wis. Adm. Code]
- C.2.i. No person may cause, allow or permit emission into the ambient air of any substance or combination of substances in such quantities that an objectionable odor is determined to result unless preventive measures satisfactory to the Department are taken to abate or control such emission. [s. NR 429.03(1), Wis. Adm. Code*]
- C.2.j. Open burning is prohibited except as provided in s. NR 429.04, Wis. Adm. Code. [s. NR 429.04, Wis. Adm. Code*]
- C.2.k. No person may cause, allow or permit emissions into the ambient air from any direct or portable source in excess of one of the limits specified in ch. NR 431, Wis. Adm. Code. Where the presence of uncombined water is the only reason for failure to meet the requirements of ch. NR 431, Wis. Adm. Code, such failure is not a violation of the chapter. [s. NR 431.03, Wis. Adm. Code]
- C.2.l. When the Department requires instrumentation to monitor the operation of air pollution control equipment, or to monitor source performance, the instrument shall measure operational variables with the following accuracy: [ss. NR 439.055(3) and NR 407.09(1)(c)1.c., Wis. Adm. Code]
- C.2.l.(1) The temperature monitoring device shall have an accuracy of 0.5% of the temperature being measured in degrees Fahrenheit or $\pm 5^{\circ}\text{F}$ of the temperature being measured, or the equivalent in degrees Celsius (centigrade), whichever is greater.
- C.2.l.(2) The pressure drop monitoring device shall be accurate to within 5% of the pressure drop being measured or within ± 1 inch of water column, whichever is greater.
- C.2.l.(3) The current, voltage, flow or pH monitoring device shall be accurate to within 5% of the specific variable being measured.
- C.2.m. All instruments used for measuring source or air pollution control equipment operational variables shall be calibrated yearly or at a frequency based on good engineering practice as established by operational history, whichever is more frequent. [ss. NR 439.055(4) and NR 407.09(1)(c)1.c., Wis. Adm. Code]
- C.2.n. No person may cause, allow, or permit emissions into the ambient air of any hazardous substance in such quantity, concentration, or duration as to be injurious to human health, plant or animal life unless the purpose of that emission is for the control of plant or animal life. Hazardous substances include, but are not limited to, hazardous air contaminants listed in Tables A to C of s. NR 445.07, Wis. Adm. Code. [s. NR 445.03, Wis. Adm. Code*]

C.2.o. Chapter NR 447, Wis. Adm. Code, applies to all air contaminant sources which may emit asbestos, to their owners and operators and to any person whose action causes the emission of asbestos to the ambient air, including demolition and renovation activities. Chapter NR 447, Wis. Adm. Code, establishes emission limitations for asbestos air contaminant sources, establishes procedures to be followed when working with asbestos materials and contains additional reporting and record keeping requirements for owners or operators of asbestos air contaminant sources in order to protect air quality. [ch. NR 447, Wis. Adm. Code]

C.2.p. Accidental Release Prevention Requirements.

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates:

C.2.p.(1) June 21, 1999;

C.2.p.(2) Three years after the date on which a regulated substance is first listed under 40 CFR 68.130; or

C.2.p.(3) The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR Part 68.10]

D. Reporting Requirements.

D.1. The Department shall be notified of the following events:

<u>Event</u>	<u>Timing</u>
D.1.a. Hazardous substance air spill.	Immediate call: 1-800-943-0003
D.1.b. Malfunction or other unscheduled event which causes or may cause any emission limitation to be exceeded (except certain visible emission limit exceedances by a continuous emission monitor - see s. NR 439.03(4)(a)2., Wis. Adm. Code.).	Notification by next business day of any such event at the source which is not reported in advance to the Department. Report the cause and duration of the exceedance, the period of time considered necessary for correction, and measures taken to minimize emissions during the period.
D.1.c. Deviation from any other condition specified in this permit.	Notification by next business day identifying the deviation, cause, duration and steps taken to prevent recurrence.

[ss. 285.65(10) and 292.11(2), Wis. Stats., and s. NR 439.03(4)*, Wis. Adm. Code]

D.2. Persons possessing or controlling a hazardous substance shall immediately notify the Department of any hazardous emission not in conformity with a permit or allowed by the Department under chs. NR 400 to 499. Notice shall be given as required by s. 292.11, Stats., and ch. NR 706.

<u>Event</u>	<u>Timing</u>
D.2.a. Hazardous substance air spill	Immediate call: 1-800-943-0003

[s. 292.11(2), Wis. Stats., and s. NR 445.08, Wis. Adm. Code*]

D.3. The permit holder shall report to the Department, in advance, schedules for planned shutdown and startup of air pollution control equipment and the measures to be taken to minimize the down time of the control equipment while the source is operating. Scheduled maintenance or any other scheduled event, including startup, shutdown or soot blowing procedures which have been approved by the Department under s. NR 436.03(2)(b), which causes an emission limit to be exceeded shall also be reported in advance to the Department. Advance reporting pursuant to this permit condition does not relieve any person from the duty to comply with any applicable emission limitations. Emissions in excess of the limits set in chs. NR 400-499, Wis. Adm. Code, may be allowed when the emissions are temporary and due to scheduled maintenance, startup or shutdown of

operations carried out in accord with a plan and schedule approved by the Department. [s. NR 436.03(2)(b) and NR 439.03(6), Wis. Adm. Code]

D.4. The permit holder shall furnish to the Department, within a reasonable time specified by the Department, any information that the Department may request in writing to determine whether cause exists to revise, revoke or suspend this permit or to determine compliance with this permit. Upon request, the permit holder shall also furnish to the Department copies of records required to be kept pursuant to this permit. [s. NR 407.09(1)(f)5., Wis. Adm. Code]

D.5. The permit holder shall submit the results of monitoring required by the permit to the Department according to the schedule established in Part I of this permit. Any such report shall clearly identify all instances of deviations from permit requirements. All such reports shall be signed by the responsible official for the source. [s. 285.17(2), Wis. Stats., and s. NR 439.03(1)(b), Wis. Adm. Code]

D.6. Each report required under s. NR 439.03, Wis. Adm. Code, shall be certified by a responsible official as to its truth, accuracy and completeness. This certification and any other certification required under ch. NR 439 shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. [s. NR 439.03(10), Wis. Adm. Code*]

D.7. Except for information determined to be confidential under s. 285.70(2), Wis. Stats., any information or reports obtained by the Department in the administration of ss. 285.01 to 285.87 and 299.15, Wis. Stats., will be available for public inspection at the offices of the Department. [s. 285.70(1), Wis. Stats.]

D.8. All certifications made under s. NR 439.03, Wis. Adm. Code, and all material statements and representations made in any report or notice required by this operation permit shall be truthful. [s. NR 439.03(11), Wis. Adm. Code*]

D.9. Any document required under this permit and submitted to the Department, including reports, shall contain a certification by a responsible official that meets the requirements of s. NR 407.05(4)(j), Wis. Adm. Code. [s. NR 407.09(4)(a)1., Wis. Adm. Code]

E. Right of Entry and Inspection.

The permit holder shall allow authorized representatives of the Department to enter upon the permit holder's premises, to have access to and examine any record relating to emissions or required to be kept, and to make any inspection necessary to ascertain compliance with air pollution control laws and the terms of this permit. The Department may, for the purpose of determining a source's compliance with applicable requirements, sample or monitor at reasonable times production materials or other substances or operational parameters. [ss. 285.13 and 285.19, Wis. Stats., and s. NR 439.05, Wis. Adm. Code]

F. Malfunction Prevention and Abatement Plans.

The owner or operator of any direct or portable source which may emit hazardous substances or emits more than 15 pounds in any day or 3 pounds in any hour of any air contaminant for which emission limits have been adopted shall prepare a written malfunction prevention and abatement plan to prevent, detect, and correct malfunctions or equipment failures which may cause any applicable emission limitation to be violated or which may cause air pollution. Any such plan shall be carried out by the owner or operator. The plan shall be updated at least every 5 years. The Department may require the plan to be submitted for review and approval. [s. NR 439.11, Wis. Adm. Code*]

G. Emission Control Action Plan.

For source(s) covered by this permit which emit 0.25 tons or more per day of any air contaminant for which air standards have been adopted, the permit holder shall prepare an emission control action program, consistent with good industrial practice and safe operating procedures, for reducing the emission of air contaminants into the outdoor atmosphere during periods of an air pollution alert, air pollution warning or air pollution emergency declared under s. NR 493.03(2), Wis. Adm. Code. The emission control action program shall be in writing, available on the premises and is subject to review and approval by the Department on request. [s. NR 493.04, Wis. Adm. Code*]

H. Change in Ownership or Control.

In the event of a change in ownership or operational control of a source, the permit holder shall file a written request for an

administrative permit revision in accordance with s. NR 407.11, Wis. Adm. Code. The request should include a written agreement between the current and new owner or operator which sets forth a specific date for transfer of permit responsibility, coverage and liability. If the Department determines that no other change in this permit is necessary, this permit may be revised according to the administrative revision procedures in s. NR 407.11, Wis. Adm. Code. [s. NR 407.11(3)(a), Wis. Adm. Code]

I. Permit Flexibility, Revision, Suspension, and Revocation.

- I.1. Changes to the source which are not modifications and changes in permit content are regulated under the permit flexibility provisions of s. 285.60(4m), Wis. Stats., and s. NR 407.025, Wis. Adm. Code, and the permit revision provisions in ss. NR 407.11, NR 407.12, NR 407.13, NR 407.14, and NR 407.16, Wis. Adm. Code.
- I.2. An operation permit may be suspended or revoked, in whole or in part, for cause. [ss. NR 407.09(1)(f)3. and NR 407.15, Wis. Adm. Code.]

J. Construction, Reconstruction, Replacement, Relocation or Modification.

- J.1. Unless the replacement is authorized by this permit or is exempt under s. NR 406.04, Wis. Adm. Code, replacement of the source(s) covered by this permit is prohibited. [s. 285.60(1)(a), Wis. Stats.]
- J.2. No person may commence construction, reconstruction, replacement, relocation or modification of a stationary source unless the person has a construction permit for the source or unless the source is exempt from the requirement to obtain a permit under s. 285.60(5), Wis. Stats., or under ch. NR 406, Wis. Adm. Code, or Green Tier 2 Participation Contract signed August 26, 2011, under s. 299.83(6)(j), Wis. Stats.. Applications for the construction permit shall be submitted on forms which are available from the Department at its Madison headquarters and district offices. [s. 285.60(1)(a), Wis. Stats.]

Note: The address of the Madison headquarters is: Wisconsin Department of Natural Resources, Bureau of Air Management, PO Box 7921, Madison, WI 53707. Attention: Permit Application Forms.

- J.3. For new or modified sources for which no construction permit is required, the application for an operation permit revision shall be filed before the source commences construction or modification if terms or conditions of the operation permit must be changed to allow operation of the new or modified source. [s. NR 407.04, Wis. Adm. Code]

K. Circumvention.

- K.1. The installation or use of any article, machine, equipment, process, or method which conceals an emission which would otherwise constitute a violation of an applicable rule is prohibited unless written approval has been obtained from the Department. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance and the unnecessary separation of an operation into parts to avoid coverage by a rule that applies only to operations larger than a specified size. [s. NR 439.10, Wis. Adm. Code]
- K.2. No one may render inaccurate any monitoring device or method required under ch. NR 439, Wis. Adm. Code, or in this permit. [s. NR 439.03(12), Wis. Adm. Code*]
- K.3. No person may knowingly falsify, tamper with, render inaccurate or fail to install any monitoring device or method required to be maintained or followed under the Clean Air Act. [Clean Air Act s. 113(c)(2)(C); 42 USC 7413(c)(2)(C), s. 285.65(13), Wis. Stats.]

L. Civil/Criminal Liability.

- L.1. Nothing in this permit shall be construed to relieve the permit holder from civil and/or criminal penalties under ss. 285.87 and 299.15, Wis. Stats., for violation of the terms or conditions of this permit, or for violation of ss. 285.01 to 285.87, 292.11(2) and 299.15, Wis. Stats., or of any rule or any special order issued under those sections except where the operation permit shield provisions of s. 285.62(10)(b), Wis. Stats., are applicable. [s. 285.62(10)(b), Wis. Stats.]
- L.2. The permit holder has the duty to comply with all conditions of the permit. Any noncompliance with this permit constitutes a violation of the Wisconsin statutes, the federal clean air act, or both, and is grounds for enforcement action; for permit suspension, revocation or revision; or, if allowed under s. 285.62(6), Wis. Stats., for denial of a permit renewal application. [ss. NR 407.14, NR 407.15, and NR 407.09(1)(f)1., Wis. Adm. Code, s. 285.60(7), Wis. Stats. and 42 USC 7661a]

L.3. The following items are provided per s. NR 407.09(1)(d) and (f), Wis. Adm. Code:

- L.3.a. It is not a defense for a permit holder in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with this permit. [s. NR 407.09(1)(f)2., Wis. Adm. Code]
- L.3.b. The filing of a request by the permit holder for a permit revision or revocation, or the filing of a notification of planned changes under s. NR 407.025, Wis. Adm. Code, or of anticipated noncompliance, does not stay any permit condition. [s. NR 407.09(1)(f)3., Wis. Adm. Code]
- L.3.c. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege, nor does it authorize any injury to private property or any invasion of personal rights. [s. NR 407.09(1)(f)4., Wis. Adm. Code]
- L.3.d. The provisions of this permit are severable. In the event of a successful challenge to any portion of the permit, all other portions of the permit remain valid and effective. [s. NR 407.09(1)(d), Wis. Adm. Code]

M. Recordkeeping Requirements.

M.1. The permit holder shall maintain the following records, per s. NR 439.04, Wis. Adm. Code:

M.1.a. Records of all sampling, testing and monitoring conducted or required under this permit. Records of sampling, testing or monitoring shall include the following:

M.1.a.(1) The date, monitoring site and time and duration of sampling, testing, monitoring or measurements.

M.1.a.(2) The dates the analyses were performed.

M.1.a.(3) The company or entity that performed the analysis.

M.1.a.(4) The analytical techniques or methods used, including supporting information such as calibration and maintenance records of all original recording charts for continuous monitoring instrumentation including emissions or equipment monitors.

M.1.a.(5) The results of the analyses.

M.1.a.(6) The relevant operating conditions that existed at the time of sampling, testing, monitoring or measurement.

M.1.b. Records detailing all malfunctions which cause any applicable emission limitation to be exceeded, including logs to document the implementation of the plan required under s. NR 439.11, Wis. Adm. Code;

M.1.c. Records detailing all activities specified in any compliance schedule approved by the Department under chs. NR 400 to 499, Wis. Adm. Code; and

M.1.d. Any other records relating to the emission of air contaminants which may be requested in writing by the Department.

M.2. *For each hazardous air contaminant emitted determined as laid out in s. NR 406.04(3), Wis. Adm. Code, the owner or operator of a source constructed or last modified prior to July 1, 2004, with non-exempt, potential to emit emissions of the hazardous air contaminant less than or equal to the applicable threshold in column (c), (d), (e), or (f) of Table A, B or C of s. NR 445.07 shall maintain records in accordance with s. NR 439.04(1) and (2) starting no later than June 30, 2007..[s. NR 445.08(6)(b), Wis. Adm. Code]

The records shall list the hazardous air contaminants in Tables A, B, and C of s. NR 445.07 that the source uses or emits.

M.3. Owners and operators of facilities required to file emission inventory reports shall keep accurate and reliable records sufficient to enable verification of the reports by the Department. [s. NR 438.03(4), Wis. Adm. Code.]

M.4. Copies of all records and reports required under this permit shall be retained by the permit holder for a period of 5 years. [s.

NR 439.04(2), Wis. Adm. Code.]

N. Compliance Certification.

N.1. The permit holder shall submit compliance certifications to the Department, and part 70 sources shall also submit this compliance certification to the United States Environmental Protection Agency. [s. NR 439.03(1)(c) and (9), Wis. Adm. Code]

N.1.a. The certification shall be submitted according to the schedule established in Part I of the permit. [s. NR 439.03(1)(c), Wis. Adm. Code]

N.1.b. The certification shall include the following:

N.1.b.(1) Identification of each permit term or condition that is the basis of the certification;

N.1.b.(2) The compliance status of the source with respect to each term or condition identified in N.1.b.(1);

N.1.b.(3) Whether compliance was continuous or intermittent;

N.1.b.(4) Method(s) used for determining the compliance status, currently and over the previous 12 month period;

N.1.b.(5) Compliance status with respect to 40 CFR 68 (Accidental Release Prevention) including registration and submission of the risk management plan, as specified in 40 CFR 68.160 and 68.150, respectively, if applicable.

N.1.b.(6) Other information required to determine the compliance status of the source, as specified in this permit. [s. NR 439.03(8), Wis. Adm. Code]

N.2. Compliance certifications shall be signed by a responsible official of the source. The responsible official shall certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [s. NR 439.03(10), Wis. Adm. Code]

O. Required Air Emission Inventory Reports.

The permit holder shall annually submit to the Department an emission inventory report of annual, actual emissions or throughput information in accordance with ch. NR 438, Wis. Adm. Code. [s. NR 438.03, Wis. Adm. Code]

P. Annual Emission Fees.

The permit holder shall pay an annual emissions fee to the Department at the rate specified in s. 285.69(2), Wis. Stats. [ss. NR 410.04 and NR 407.09(1)(e), Wis. Adm. Code]

Q. General Provisions for Hazardous Air Pollutant MACT Standards.

The general provisions in ch. NR 460, Wis. Adm. Code, apply to any permit holder that is affected or becomes affected by a standard promulgated by EPA under section 112 of the act (42 USC 7412). [s. NR 460.01, Wis. Adm. Code]

R. Stratospheric Ozone Protection.

R.1. Federal Requirements. (Call 1-800-296-1996 for information)

R.1.a. The permit holder shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

R.1.a.(1) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to section 82.106.

R.1.a.(2) The placement of the required warning statement must comply with the requirements pursuant to section 82.108.

- R.1.a.(3)The form of the label bearing the required warning statement must comply with the requirements pursuant to section 82.110.
- R.1.a.(4)No person may modify, remove or interfere with the required warning statement except as described in section 82.112.
- R.1.b. The permit holder shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in 40 CFR Part 82, Subpart B:
- R.1.b.(1)Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to section 82.156.
- R.1.b.(2)Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to section 82.158.
- R.1.b.(3)Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to section 82.161.
- R.1.b.(4)Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to section 82.166 (the term, “MVAC-like appliance”, is defined in section 82.152).
- R.1.b.(5)Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to section 82.156.
- R.1.b.(6)Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to section 82.166.
- R.1.c. If the permit holder manufactures, transforms, imports or exports a class I or class II substance, the permit holder is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- R.1.d. If the permit holder performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permit holder is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo or system used on passenger buses using HCFC-22 refrigerant.
- R.1.e. The permit holder may be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

[s. 285.65(12), Wis. Stats.]

R.2. State Requirements. (Call 1-608-264-6049 for information)

- R.2.a. During the salvaging, dismantling or transporting of refrigeration equipment, no person may knowingly or negligently release ozone-depleting refrigerant to the environment, except for minimal releases that occur as a result of efforts to transfer ozone-depleting refrigerant into storage tanks. [s. 285.59(2r)(a), Wis. Stats.*]
- R.2.b. No person may knowingly or negligently release from a storage tank to the environment ozone-depleting refrigerant that was removed during the salvaging, dismantling or transporting of refrigeration equipment, except for minimal releases that occur as a result of efforts to transfer ozone-depleting refrigerant into refrigeration equipment or other storage tanks. [s. 285.59(2r)(am), Wis. Stats.*]
- R.2.c. No person may salvage or dismantle any refrigeration equipment unless:
- R.2.c.(1)That person holds and prominently displays an annual registration of certification obtained from the Department under s. NR 488.04, Wis. Adm. Code;
- R.2.c.(2)That person uses refrigerant recovery equipment approved by the Department under s. NR 488.07, Wis. Adm. Code, to

transfer remaining ozone-depleting refrigerant from each piece of refrigeration equipment into storage tanks; and

R.2.c.(3) Individuals who use the approved refrigerant recovery equipment have, or are working under the direct supervision of individuals who have, the qualifications required under s. NR 488.08, Wis. Adm. Code. [s. NR 488.03(3), Wis. Adm. Code*]

R.2.d. Any person who sells, gives or transports refrigeration equipment to a scrap metal processor shall:

R.2.d.(1) Transfer ozone-depleting refrigerant from the refrigeration equipment into a storage tank using approved refrigerant recovery equipment or obtain and possess documentation that another person performed the transfer; and

R.2.d.(2) Provide documentation to the scrap metal processor that he or she has complied with R.2.d.(1).

Note: Sample forms for the documentation of compliance with R.2.d.(1) are available from the Bureau of Air Management CFC Program.

Exemption: R.2.d.(1) and R.2.d.(2) do not apply to a person who sells, gives or transports refrigeration equipment to a scrap metal processor when that processor has agreed in writing to transfer the ozone-depleting refrigerant into a storage tank using approved refrigerant recovery equipment and that the processor is registered with the Department under s. NR 488.04. [s. NR 488.05, Wis. Adm. Code*]

R.2.e. Any person who transports, for the purposes of salvaging or dismantling, refrigeration equipment that contains ozone-depleting refrigerant shall certify to the Department that person will not knowingly or negligently release ozone-depleting refrigerant to the environment, except for minimal releases that occur as a result of refrigerant recovery efforts. This certification shall be submitted annually, along with a description of the safe transport methods to be used, and the fees required under s. NR 488.11, Wis. Adm. Code. [s. NR 488.10, Wis. Adm. Code*]

ATTACHMENT I

EQUIPMENT INVENTORY

This is a list of equipment currently located at Serigraph Plants 1 and 2. This list is current as of the date of issuance of this permit. An updated, detailed list of significant air pollution emissions units is available on site and upon request.

Serigraph Equipment and Fugitive Numbers

Numbers assigned for miscellaneous emissions	Description
212	Plant 2 miscellaneous voc emission
240	reclaim
250	solvent usage
299	Plant 1 miscellaneous voc emission

Plant 2 Fugitive emissions	
Equipment numbers	
217	screen press
222	screen press
236	screen press
270	screen press
280	screen press
285	screen press
2001	screen press
288	pad printer

Plant 1 Fugitive emissions	
282	offset press
286	offset press
287	offset press
289	offset press
293	digital press
2003	digital press

Biofilter Controlled emissions		
253	screen press	X
259	screen press	X
261	screen press	X
264	screen press	X
266	screen press	X
276	screen press	X
277	screen press	X
278	screen press	X
291	screen press	X
297	screen press	X
298	screen press	X
2004	screen press	X
2006	screen press	X

**PERFORMANCE-BASED PERMIT
AIR POLLUTION CONTROL OPERATION PERMIT RENEWAL**

EI FACILITY NO: 267065260

OPERATION PERMIT NO: 267065260-P10

TYPE: Renewal of operation permit no. 267065260-P01

In compliance with the provisions of a Green Tier Participation Contract, Chapters 285, and 299, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code,

Name of Source: Serigraph, Inc. - Plant 2

Street Address: 3801 Decorah Rd,
West Bend, Washington County, Wisconsin

Responsible Official, & Title: Nicholas C. Leifeld, Director of Compliance and Quality

is authorized to operate under a plant-wide applicability limitation and to construct, modify, reconstruct, or replace fuel burning units and other equipment, and to operate the facility in conformity with the conditions herein. [ss. 285.60(1), 299.83, Wis. Stats.].

This renewed operation permit expires on August 26, 2016 [Section NR 407.09(1)(b)1., Wis. Adm. Code].

A renewal application must be submitted at least 6 months, but not more than 18 months, prior to the expiration date [ss. 285.66(3)(a), Wis. Stats. and NR 407.04(2), Wis. Adm. Code].

No permittee may continue operation of a source after the operation permit expires, unless the permittee submits a timely application for renewal of the permit. If a timely application for renewal is submitted, the existing operation permit will not expire until the renewal application has been finally acted upon by DNR. [ss. 227.51(2), 285.62(8)(b), Wis. Stats. and NR 407.04(2), Wis. Adm. Code].

This authorization requires compliance by the permit holder with the emission limitations, monitoring requirements and other terms and conditions set forth in Parts I through VI hereof.

Dated at Madison, Wisconsin

August 26, 2011

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
by the Secretary

By _____
Cathy Stepp
Secretary of the Department of Natural Resources

PREAMBLE TO OPERATION PERMIT

An Asterisk (*) throughout this document denotes legal authority, limitations and conditions which are not federally enforceable [Section NR 407.09(3)(b), Wis. Adm. Code.].

The permit conditions in the Draft Permit resulting from the proposed project covered by construction permit 07-KLH-284 have the construction permit number 07-KLH-284 in brackets.

Permit Actions Performed as Part of the Review and Issuance of this Permit:

WPDES Permits for Wastewater Discharge issued under ch. 283, Wis. Stat.:

NONE

WPDES Permits for Stormwater Discharge issued under ch. NR 216, Wis. Adm. Code:

NONE

Air Pollution Control Permits Revoked under ss. NR 406.11 and 407.15, Wis. Adm. Code:

99-DAA-220, 99-DAA-220-OP, 99-POY-132, 99-POY-132-OP, 01-JSB-279, 01-JSB-279-OP, 01-JSB-267-R, 01-JSB-267-OP, 03-JSB-168-R1, 03-JSB-168-OP, 267065260-P01, 05-JSB-139

Air Pollution Control Construction Permits Issued Under s. 285.61(8), Wis. Stats.:

07-KLH-284

Air Pollution Control Operation Permits Issued Under s. 285.62(7)(b), Wis. Stats.:

268012360-P10

Air Pollution Control Permit/Orders Adopted by this 268012360-P10:

07-KLH-284

Historical Summary of Air Pollution Control Permits/Orders Issued to the Facility.

Permit/Order Number	Issuance Date	Sources Covered & Description¹	Permit Status
†87-DAA-228	12/01/1987	Installation of Screen Presses 217, 222, 223, 224	Superseded by 99-DAA-220
†88-DAA-204	04/20/1988	Installation of screen presses 236 and Screen Reclaim 240	Superseded by 99-DAA-220
†89-DAA-221	07/12/1989	Installation of Screen Press 246	Superseded by 99-DAA-220
†90-DAA-208	04/25/1990	No Data	Superseded by 99-DAA-220
†91-DAA-267	10/31/1991	No Data	Superseded by 99-DAA-220
†92-DAA-243	07/02/1992	Installation of Screen Press 253	Superseded by 99-DAA-220
†92-DAA-307	08/25/1993	Installation of Screen Press 254	Superseded by 99-DAA-220
†93-DAA-227	06/17/1993	Installation of Screen Presses 259 and 261	Superseded by 99-DAA-220
†95-DAA-285	12/21/1995	Installation of Screen Press 264	Superseded by 99-DAA-220
†95-DAA-298	02/13/1996	Installation of Screen Press 266	Superseded by 99-DAA-220

Permit/Order Number	Issuance Date	Sources Covered & Description ¹	Permit Status
†96-DAA-230	07/04/1996	Installation of Screen Presses 269 and 270	Superseded by 99-DAA-220
†96-DAA-261	10/18/1996	Installation of Screen Press 271	Superseded by 99-DAA-220
†96-DAA-270	12/04/1996	Installation of Screen Press 272 and 274	Superseded by 99-DAA-220
99-DAA-220	07/22/1999	Install 3 screen presses (#276, 277 & 278)	Inactive - Adopted by 267065260-P01 through issuance of 99-DAA-220-OP. Revoked and replaced by 07-KLH-284 .
99-JSB-269	09/22/1999	Addition of pad printing	Exemption from construction permitting
99-POY-132	12/02/1999	Install screen press #279; place several presses in permanent total enclosure and use biofilter	Inactive - Adopted by 267065260-P01 through issuance of 99-POY-132-OP. Revoked and replaced by 07-KLH-284.
01-JSB-267	02/26/2001	Offset press installation	Not active. Revised and replaced by 01-JSB-267-R.
01-JSB-279	05/21/2001	Install sheet-fed, offset press #282	Inactive - Adopted by 267065260-P01 through issuance of 01-JSB-279-OP. Revoked and replaced by 07-KLH-284.
01-JSB-267-R	10/24/2002	Install sheet-fed press #281	Inactive - Adopted by 267065260-P01 through issuance of 01-JSB-267-OP. Revoked and replaced by 07-KLH-284 .
03-JSB-168	08/18/2003	Installation of 2 screen presses (#283 & 285), 1 offset press (#284) and a screen washing process (#295)	Inactive - Revised and replaced by 03-JSB-168-R1.
03-JSB-168-R1	09/08/2004	Reduce synthetic minor cap for units installed after July 1998 from 24 to 14.4 TPY.	Inactive - Adopted by 267065260-P01 through issuance of 03-JSB-168-OP. Revoked and replaced by 07-KLH-284.
AM-04-200	11/24/2004 Approved by EPA as a site specific revision to the SIP effective 12/13/2005 .	Issued to allow use of the biofilter as an equivalent means to control VOC emissions under s. NR 422.04(2)(d), Wis. Adm. Code.	Active
267065260-P01	12/30/2004	Total Facility	Inactive - Renewed with conditions revoked or revised through 07-KLH-284 upon issuance of 267065260-P10.
99-POY-132-OP	12/30/2004	Identical to 99-POY-132	Inactive - Issued concurrently with and adopted by 267065260-P01. Revoked and replaced upon issuance of 07-KLH-284.
99-DAA-220-OP	12/30/2004	Identical to 99-DAA-220	Inactive - Issued concurrently with and adopted by 267065260-P01 Revoked and replaced upon issuance of 07-KLH-284.
01-JSB-279-OP	12/30/2004	Identical to 01-JSB-279	Inactive - Issued concurrently with and adopted by 267065260-P01. Revoked and replaced by 07-KLH-284.
01-JSB-267-OP	12/30/2004	Identical to 01-JSB-267	Inactive - Issued concurrently with and adopted by 267065260-

Permit/Order Number	Issuance Date	Sources Covered & Description ¹	Permit Status
			P01. Revoked and replaced by 07-KLH-284.
03-JSB-168-OP	12/30/2004	Identical to 01-JSB-168	Inactive - Issued concurrently with and adopted by 267065260-P01. Revoked and replaced by 07-KLH-284.
05-JSB-139	06/21/2005	Installation of 1 screen press (#291), 2 offset presses(#287, and #289), and 1 pad printer (#288)	Inactive - Revoked and replaced by 07-KLH-284.
07-KLH-284	08/26/2011	Modification to include Plant-wide Applicability Limit	Issued concurrently with and adopted by 267065260-P10.
267065260-P10	08/26/2011	Facility – wide operations with :Plant-wide Applicability Limit	Primary Compliance Document

†Conditions in these permits are no longer in effect.

Equipment Inventory

Attachment I contains a list of equipment current as of the date of issuance of this permit. An updated, detailed list of significant air pollution emissions units is available on site and upon request.

Variances

Variances granted under ss. 299.83 Wis. Stats. - Green Tier, and NR 436.05, Wis. Adm. Code. This facility is granted variances from the following limitations and requirements as allowed under s. 299.83, Wis. Stats. and s. NR 436.05, Wis. Adm. Code.:

- ss. NR 423.035, and 423.037, Wis. Adm. Code. – Industrial Cleaning RACT Rule
- s. NR 422.145, Wis. Adm. Code. – Screen Printing RACT Rule
- ss. NR 422.142, and 422.143, Wis. Adm. Code. – Lithographic Printing RACT Rule parts 1 and 2
- s. NR 406.03, Wis. Adm. Code – Minor source construction permitting for addition of alternate fuels under specified conditions
- s. NR 424.03(2), Wis. Adm. Code, - Control of Organic Compound Emissions from Process Lines
- s. NR 439.04(3), (4) and (5), Wis. Adm. Code. – Applicable recordkeeping requirements associated with exemptions from RACT Rules listed above.

Permit Shield

Unless precluded by the Administrator of the US EPA, compliance with all emission limitations in this operation permit is considered to be in compliance with all emission limitations established under ss. 285.01 to 285.87, and 299.83, Wis. Stats., and emission limitations under the federal clean air act, applicable to this source. Any new standards applicable to this source that are promulgated after the date of issuance of this permit will still have to be met. The following emission limitations were reviewed in the analysis and preliminary determination and were determined not to apply to this stationary source:

There are no combustion units at this facility that would be considered an affected facility under s. NR 440.207, Wis. Adm. Code, because no units exceed 10 mmBtu/hr heat input capacity.

Since the facility does not spray coat surface coats, prime coats, texture coats or touch-up coats of plastic parts, it is not an affected facility under s. NR 440.72, Wis. Adm. Code.

The facility is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Printing and Publishing MACT – 40 CFR Part 63 subpart KK because the facility took permit limitations to make it an area source of federal HAP emissions prior to the effective date of the MACT.

The facility is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Plastic Parts Surface Coating MACT – 40 CFR Part 63 subpart PPPP because EPA's April 24, 2007, amendment to the MACT clarified that screen printing is not subject to this rule.

Because emissions of hazardous air contaminants do not exceed the thresholds listed in ch. NR 445, there are no specific emission limitations or control requirements from ch. NR 445, Wis. Adm. Code, applicable to the operations at this facility.

Part I — The headings for the columns in the permit are defined below. The legal authority for these limitations or methods follows them in [brackets].

Pollutant – This column lists which pollutant is being regulated by the permit.

Limitations – This column lists all applicable emission limitations that apply to the source, including case-by-case limitations such as Latest Available Control Techniques (LACT), Best Available Control Technology (BACT), or Lowest Achievable Emission Rate (LAER). It lists any voluntary restrictions on hours of operation, raw material use, or production rate requested by the permit holder to limit potential to emit.

Compliance Demonstration – The compliance demonstration methods outlined in this column may be used to demonstrate compliance with the associated emission limit or work practice standard listed under the corresponding **Limitations** column. The compliance demonstration column contains limits on parameters or other mechanisms that are monitored periodically to ensure compliance with the limitations. The requirement to test as well as initial and periodic test schedules, if testing is required, is stated here. Notwithstanding the compliance determination methods which the owner or operator of a source is authorized to use under ch. NR 439, Wis. Adm. Code, the Department may use any relevant information or appropriate method to determine a source's compliance with applicable emission limitations.

Reference Test Methods, Recordkeeping, and Monitoring Requirements – Specific US EPA Reference test methods or other approved test methods are contained in this area and are the methods that must be used whenever testing is required. A reference test method may be listed even if no testing is immediately required. Also included in this area are any recordkeeping requirements and their frequency and reporting requirements. Accuracy of monitoring equipment shall meet, at a minimum, the requirements of s. NR 439.055(3) and (4), Wis. Adm. Code, as specified in Part VI of this permit.

Condition Type – This column specifies other conditions that are applicable to the entire facility that may not be tied to one specific pollutant.

Conditions – This column lists specific conditions usually applicable to the entire facility or compliance requirements.

PART II — Performance Based Permit Applicability – This section outlines the requirements that the permit holder must follow in order to remain eligible for the Performance Based Permit

PART III – Operational Control – This section lays out the requirements for compliance demonstration methods and recordkeeping.

PART IV – Other General Conditions – This section lays out the other relevant information and conditions applicable to this permit.

PART V – Public Involvement – This section lays out the goals for public participation with this permit. These goals do not replace the notification and public comment requirements of ss. 285.62 and 299.83, Wis. Stats.

PART VI – General Requirement - This section contains the general limitations applicable to most sources of air pollution. This section contains the general limitations that the permit holder must abide by. These requirements are standard for most sources of air pollutants so they are included in this section with every permit.

ABBREVIATIONS AND DEFINITIONS

EMP – Environmental Management Program - A program that is created/maintained to achieve specific objectives and targets within the EMS. They include relevant and existing operational controls and activities (including their time lines, required resources, and delegated roles and responsibilities) that lead to the achievement of the objectives and targets. Environmental management programs are updated as activities are completed and become operational controls, and may be amended when the organization's activities change or new legal and/or other requirements are adopted.

EMS – Environmental Management System - The part of an organization's management system used to develop and implement its environmental policy and manage its environmental aspects. It is a set of interrelated elements (organizational structure, planning activities, responsibilities, practices, procedures, and resources) used to establish and achieve environmental performance objectives.

Environmental Aspect - Element of an organization's activities, products, or services that can interact with the environment.

HAP – Federally Regulated Hazardous Air Pollutant, substances listed in s. 112(b) of the clean air act

Hazardous air contaminant – substances regulated under ch. NR 445, Wis. Adm. Code.

MSDS – Material Safety Data Sheet

NESHAP – National Emission Standard for Hazardous Air Pollutant

PAL –plant-wide applicability limit

Objectives - An overall environmental goal, consistent with the environmental policy, that an organization sets itself to achieve.

Targets - Detailed performance requirements, applicable to the organization or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

PM – Particulate matter

PM2.5 – Particulate matter less than 2.5 microns in diameter.

PM10 – Particulate matter less than 10 microns in diameter.

Significant Environmental Aspect - An environmental aspect that an organization determines has, or has the potential to have, a significant impact on the environment.

VOC – Volatile Organic Compound

**Part I
APPLICABLE LIMITATIONS AND SPECIFIC CONDITIONS**

A. Total Facility Emissions

Pollutant	a. Limitations	b. Compliance Demonstration Requirements	c. Recordkeeping and Monitoring Requirements
<p>1. Volatile Organic Compounds and Federally Regulated Hazardous Air Pollutants</p>	<p>(1) Plant-Wide Applicability Limitation (PAL) - VOC The permit holder may not emit more than 100 tons volatile organic compounds in any 12 consecutive month period from this facility.¹ [07-KLH-284, s. 285.65(7), Wis. Stats., and s. NR 408.11(7)(a), Wis. Adm. Code.]</p> <p>(2) Plant-Wide Applicability Limitation (PAL) - HAP (a) The permit holder may not emit more than 9.9 tons of any single federally regulated hazardous air pollutant in any 12 consecutive month period from this facility. [07-KLH-284 and ss. NR 405.18(6)(a), Wis. Adm. Code, 285.65(7) and 299.83, Wis. Stats.]</p>	<p>(1) Within 30 days of the end of the calendar month, for the previous month, the permit holder shall calculate the monthly emissions of volatile organic compounds (VOC) and federally regulated hazardous air pollutants (HAP) from the facility including emissions from printing operations and associated wash and solvent usage, fugitive industrial cleaning operations, screen reclaim, and any other sources of VOC and HAP at the facility. [07-KLH-284 and s. 299.83, Wis. Stats., and s. NR 408.11(7)(f), Wis. Adm. Code.]</p> <p>(2) PAL Monitoring Requirements - The monitoring system implemented by the permit holder shall accurately determine plant-wide emissions of the PAL regulated air contaminants in terms of mass per unit of time. Any monitoring system authorized for use in the PAL permit shall be based on sound science and meet generally acceptable scientific procedures for data quality and manipulation. Acceptable monitoring methods are described below and in I.ZZZ.7. [07-KLH-284 and s. NR 408.11(12), Wis. Adm. Code.]</p> <p>(3) Emissions of VOC and HAP shall be calculated to demonstrate compliance with the PAL based on data gathered using the approach listed below or any of the alternate approaches listed in I.ZZZ.7. [07-KLH-284 and ss. NR 408.11(7)(g), and NR 408.11(12)(a) and (b), Wis. Adm. Code.]:</p> <p>Mass Balance Monitoring Approach When using a mass balance approach, all the following shall be done: [s. NR 408.11(12)(c), Wis. Adm. Code.]</p> <p>(a) Provide a demonstrated means of validating the published VOC or HAP content that is contained in or created by all materials used in or at the emissions unit.</p> <p>(b) Assume that the emissions unit emits all the VOC or HAP that is contained in or created by any raw material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process.</p>	<p>(1) Records for Annual Emissions Determination - The permit holder shall maintain records necessary to determine the rolling annual sum of VOC and HAP emissions from the facility on a monthly basis. Though daily calculations are not required by the permit, records shall meet the requirements of Part III of this permit and shall be retained for at least 5 years from the date of the record. At a minimum, records shall include:</p> <p>(a) All calculations methods used to determine emissions</p> <p>(b) USEPA Method 24A results, Material Safety Data Sheets, or an equivalent document provided by the ink/coating supplier for each ink or coating used at this facility. The documents shall contain sufficient information to calculate the VOC and HAP content in the units necessary to determine compliance. Where the documents differ, the Method 24A results shall govern;</p> <p>(c) The amount of inks, solvents, coatings cleaning solvents or other materials used;</p> <p>(d) The amounts and types of fuels used. [07-KLH-284 and 408.11(7)(h), Wis. Adm. Code.]</p>

¹ This limit is more stringent than the emission limit calculated in s. NR 408.11(7)(a) and is requested by the facility because of its status as a Tier 2 facility and its desire to show that potential emissions will not increase significantly under this permit.

A. Total Facility Emissions

Pollutant	a. Limitation	b. Compliance Demonstration	c. Recordkeeping and Monitoring Requirements
<p>1. Volatile Organic Compounds Continued...</p>	<p>(b) The permit holder may not emit more than 24.9 tons all federally regulated hazardous air pollutants combined in any 12 consecutive month period from the facility. [07-KLH-284 and ss. 285.65(7) and 299.83, Wis. Stats.]</p>	<p>(c) Where the vendor of a material or fuel publishes a range of VOC or HAP content from the material, use the highest value of the range to calculate the emissions unless the department determines there is site specific data or a site specific monitoring program to support another content within the range.</p> <p>(4) Calculation Procedures - Emissions shall be calculated as follows or, when approved by the Department, the permit holder may use an Approved Replicable Method to calculate emissions provided that the methods are based on sound science and meet generally acceptable scientific procedures for data quality and manipulation. Emissions calculations performed under this section shall include all emissions units covered by each PAL established in I.A.1.a.1.(1) and (2). [07-KLH-284 and s. NR 408.11(7)(f), Wis. Adm. Code.]</p> <p>(a) Printing Operations All Printing Operations including screen, offset, pad, digital, and Screen Reclaim Calculations: Emissions calculations during normal operations</p> $EM_M = \text{sum} [C_x U_x (1 - CE)]^2$ <p>Where:</p> <p>EM_M = total monthly emissions of VOC or HAP in kilograms (pounds) from all coatings, inks or other VOC or HAP emitting material used;</p> <p>C_x = the VOC or HAP content of material x, in percent by weight</p> <p>U_x = the amount of material x, as applied, during any month, in pounds or kilograms</p> <p>X = identifies the individual materials</p> <p>CE = 80% for the biofilter or the overall control efficiency including capture efficiency established for an alternative control device during department approved stack testing (see I.ZZZ.7). Where the equipment is not controlled, CE=0</p> <p>If the facility uses a control device to reduce VOC or HAP emissions, the permit holder shall perform stacktesting within 180 days of start up of the control device to establish a control efficiency. If total enclosure is not used, testing on capture efficiency will also be performed within 180 days of start up of the control device. The department may require additional stacktesting to ensure continual compliance. The control device shall meet the requirements in I.B.1.b.(2) and (3).</p>	<p>(2) Unit Inventory - The permit holder shall maintain on site a list of emissions units that emit VOC and HAP including screen presses, offset presses, pad printers, screen reclaim, solvent cleaning and other significant units³. This list shall be reviewed and updated at least annually or upon replacements, removal, or additions of equipment. [07-KLH-284 and s. NR 439.04, Wis. Adm. Code.]</p> <p>(3) The Permit holder shall monitor and record control device parameters as required under I.B.1.c.(3) [ss. NR 439.04, and 408.11(12), Wis. Adm. Code.]</p> <p>(4) Methodologies established as Approved Replicable Methods shall address but not be limited to addressing, use of appropriate VOC retention factors, control device maintenance, monitoring material usage, and capture efficiencies. [07-KLH-284 and ss. NR 408.11(13), and 439.04, Wis. Adm. Code.]</p> <p>(5) Calculation procedures including Approved Replicable Methods used to calculate emissions shall be included in</p>

² This equation assumes 100% capture of all production equipment which is the current situation at this facility.

³ A significant emission unit is an emission unit with maximum theoretical emissions that are equal to or exceed the levels listed in Table 3 of ch. NR 407, Wis. Adm. Code.

A. Total Facility Emissions

Pollutant	a. Limitation	b. Compliance Demonstration	c. Recordkeeping and Monitoring Requirements
		<p>(b) Combustion Unit Calculations: including emissions from burning fuel in heating units, air make up units, curing ovens and other units that combust fuel:</p> <p>(i) The permit holder shall calculate VOC and HAP emissions from fuel combustion using emission factors published by USEPA or site specific emission factors approved by the department multiplied by an appropriate fuel or energy throughput.</p> <p>(ii) In lieu of calculating emissions as laid out in (i), the permit holder may, for any unit combusting natural gas and propane with a maximum heat input capacity less than 10 mmBtu/hr, estimate VOC emissions by assigning a total emission value of 0.5 tons VOC per year per combustion unit.</p> <p>(c) Fugitive cleaning solvent calculations: Emissions of fugitive VOC or HAP from industrial solvent cleaning operations may be made using a mass balance including the amount of each cleaning solvent used each month, and the VOC and HAP content of the cleaning solvent. Unused solvent shipped off site and solvent recovered from towels or rags may be subtracted from the emissions as long as it is quantifiable.</p> <p>(d) Rags: The owner or operator may account for emissions reductions of VOC and/or HAP from any rag distillation system, centrifuge system or other similar purpose equipment, or solvent recovery program which minimizes solvent evaporation from the clean up solvent rags for all operations in the facility, the permittee shall. [s. 285.65(8), Wis. Stats.]</p> <p>(5) The annual emissions shall be based on a 12-month rolling total by summing the emissions calculated from each of the previous 12 consecutive months. Calculations shall be made by the end of each calendar month for the previous 12-month period. [07-KLH-284 and s. NR 408.11(7)(f), Wis. Adm. Code.]</p> <p>(6) When demonstrating compliance with the PAL, the permit holder shall also include any VOC or HAP emitted from startups, shutdowns, and malfunctions. [07-KLH-284 and s. NR 408.11(7)(d), Wis. Adm. Code.]</p> <p>(7) All data (such as control efficiencies, capture efficiencies, retention factors, and VOC and HAP contents of inks and solvents) used to establish the VOC and HAP emission levels shall be re-validated through performance testing or other scientifically valid means approved by the department. The testing, shall occur at least once every 5 years after the issuance of the PAL. [s. NR 408.11(12)(i), Wis. Adm. Code.]</p>	<p>the training plan required under the facility’s EMS to ensure responsible personnel are adequately trained in how to calculate emissions. [07-KLH-284 and ss. NR 408.11(13), and 439.04, Wis. Adm. Code.]</p> <p>(6) Rags In order to count emissions reductions from a Rag Program, the permittee shall maintain written records of emissions and the recovery of solvents from this system, or a solvent recovery program with an outside vendor. [s. 285.65(8), Wis. Stats.]</p>

B. Printing Operations

Pollutant	a. Limitations	b. Compliance Demonstration Requirements	c. Recordkeeping and Monitoring Requirements
<p>1. Volatile Organic Compounds emissions – Variance from ss. NR 422.142, 422.143, 422.145, and 424.03(2), Wis. Adm. Code.</p>	<p>(1) Upon issuance of this permit, ss. NR 422.142, 422.143, 422.145, and 424.03(2) do not apply to printing operations at this facility. ⁴ [ss. NR 436.05, Wis. Adm. Code, and 299.83, Wis. Stats.]</p> <p>(2) The permit holder shall identify as a significant environmental aspect in its EMS VOC emissions from printing operations including screen reclamation. [ss. 285.65(7) and 299.83, Wis. Stats.]</p> <p>(3) Within the first two years after issuance of this permit the permit holder shall include reductions in emissions from printing operations including screen reclamation in at least one of its environmental management programs established under its EMS. ⁵ [s. NR 436.05(2), and ss. 285.65(7), and 299.83, Wis. Stats.]</p>	<p>(1) The permit holder shall document any emission reductions achieved with respect to the 2004 baseline year under the environmental management program implemented as required in I.B.1.a.(3) [s. NR 439.04, Wis. Adm. Code.]</p> <p>(2) If a control device will be used to reduce emissions from printing operations, the permit holder shall establish parameters that may be monitored to demonstrate a control efficiency and ranges within which such parameters must be kept in order to assure continuous compliance. The permit holder shall operate the control device within the established operation parameter ranges. [s. NR 407.09(4)(a)1., Wis. Adm. Code]</p> <p>(3) The permit holder shall conduct emission testing consistent with s. NR 439.07 and s. NR 439.075, Wis. Adm. Code, to demonstrate the VOC and/or HAP emission control efficiency as follows: [s. 285.65(7), Wis. Stats., and NR 407.09(4)(a)1., Wis. Adm. Code]</p> <p>(a) For any control device reducing VOC or HAP emissions <u>and</u> that is necessary to meet an applicable limit or if the control efficiency is used in the emissions calculations under I.A.1.b., periodic testing shall be conducted within 180 days of start up of any device installed after issuance of this permit and, for existing and new devices, every 60 months within 90 days of the anniversary date of the previous test. The DNR may request more frequent testing for a control device if emissions are within 80% of the emission cap or an applicable emission limit or if required by s. NR 439.075.</p> <p>(b) All tests shall be conducted at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level that is approved by the Department in writing.</p>	<p>(1) The permit holder shall make available upon request its most recently updated list of significant environmental aspects identified under its EMS. [s. NR 439.04, Wis. Adm. Code.]</p> <p>(2) The permit holder shall maintain records as necessary to document the following: [ss. NR 439.04 and NR 439.055, Wis. Adm. Code.]</p> <p>(a) emissions reductions achieved through the environmental management program established under I.B.1.a.(3).</p> <p>(b) total annual VOC and HAP emissions from all printing operations including screen reclamation combined.</p> <p>(c) Records shall meet the requirements of Part III of this permit.</p> <p>(3) When a control device is used to control VOC and/or HAP emissions the permit holder shall monitor and record the parameters established as required in I.B.1.b.(2). [s. NR 407.09(1)(c)1.b., Wis. Adm. Code.]</p>

⁴ Upon issuance of this permit, the facility is granted variance from ss. NR 422.142, 422.143, 422.145, and 424.03(2), Wis. Adm. Code, per s. NR 436.05, Wis. Adm. Code.

⁵ The facility has committed to emissions reductions from printing operations as part of its commitment to superior environmental improvement. Requiring the facility to include VOCs as a significant environmental aspect in the facility EMS ensures that VOC emissions reductions will be included in objective and targets and Environmental Management Programs developed by the facility. As an incentive for these improvements, the facility is granted variance from ss. 422.142, 422.143, NR 422.145, and NR 424.03(2), Wis. Adm. Code.

C. Fugitive Industrial Cleaning Operations

Pollutant	a. Limitations	b. Compliance Demonstration Requirements	c. Recordkeeping and Monitoring Requirements
<p>1. Volatile Organic Compounds: Variance from s. NR 423.035, and 423.037 Wis. Adm. Code.</p>	<p>(1) Upon issuance of this permit, ss. NR 423.035, and 423.037, Wis. Adm. Code do not apply to industrial cleaning operations at this facility⁶. [ss. NR 436.05, Wis. Adm. Code, and 299.83, Wis. Stats., and 07-KLH-284]</p> <p>(2) The facility shall identify as a significant environmental aspect in its EMS, VOC emissions from solvent cleaning operations. [ss. 285.65(7) and 299.83, Wis. Stats and 07-KLH-284]</p> <p>(3) Within the first two years after issuance of this permit the facility shall include proposed reductions in emissions from solvent cleaning operations in at least one of its environmental management programs established under its EMS.⁷ [s. NR 436.05(2), and ss. 285.65(7), and 299.83, Wis. Stats. and 07-KLH-284]</p>	<p>(1) The permit holder shall document any emission reductions achieved with respect to the 2004 baseline year under the environmental management program implemented as required in I.C.1.a.(3) [s. NR 439.04, Wis. Adm. Code, and 07-KLH-284]</p>	<p>(1) The permit holder shall make available upon request its most recently updated list of significant environmental aspects identified under its EMS. [s. NR 439.04, Wis. Adm. Code, and 07-KLH-284]</p> <p>(2) The permit holder shall maintain records as necessary to document emissions reductions achieved through the environmental management program established under I.C.1.a.(3). Records shall meet the requirements of Part III of this permit. [ss. NR 439.04 and NR 439.055, Wis. Adm. Code, and 07-KLH-284]</p>

⁶ Upon issuance of this permit the facility is granted variance from ss. NR 423.035 and 423.037, Wis. Adm. Code, per s. NR 436.05, Wis. Adm. Code.

⁷ The facility has committed to emissions reductions of solvent cleaning operations as part of its commitment to superior environmental improvement. Requiring the facility to include VOCs as a significant aspect in the facility EMS ensures that VOC emissions reductions will be included in objective and targets and Environmental Management Programs developed by the facility. As an incentive for these improvements, the facility is granted variance from ss. NR 423.035 and 423.037, Wis. Adm. Code. The facility wide emission cap ensures that emissions from solvent cleaning will not be greater than the levels allowed under the rule.

D. Miscellaneous Fuel Combustion Units

Pollutant	a. Limitations	b. Compliance Demonstration Requirements	c. Recordkeeping and Monitoring Requirements
<p>1. Particulate matter, volatile organic compounds, carbon monoxide, sulfur dioxide, nitrogen oxides and lead</p>	<p>(1) The particulate matter emissions from combustion units at the facility shall meet the following emission limits: [ss. NR 415.06, Wis. Adm. Code, and 285.65(3), Wis. Stats.]</p> <p>(a) 0.15 lb PM per million Btu heat input to each stack</p> <p>(b) The combined emissions of particulate matter from all heat combustion units combined at this facility may not exceed 0.5 lb/hr.⁸</p> <p>(2) The permit holder may not cause or allow emissions from combustion units at this facility of shade or density greater than number 1 of the Ringlemann chart or 20% opacity. [s. NR 431.05, Wis. Adm. Code]</p> <p>(3) Advanced Approval</p> <p>The permit holder may construct, reconstruct, relocate, modify, or replace, combustion units without the need for additional construction or operation permitting as long as the following conditions are met. This authority expires 60 months after issuance of this permit unless extended: . [07-KLH-284 and ss. 285.65(4) and 299.83, Wis. Stats.]</p>	<p>(1) Except as provided in (2) below, only natural gas, or propane, may be used in current and future combustion units at this facility¹¹. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code.]</p> <p>(2) Alternative Fuel Use – Variance from ch. NR 406, Wis. Adm. Code.</p> <p>The facility may use a fuel other than natural gas or propane without first obtaining a construction permit or permit revision, if the alternative fuel use is part of the objectives and targets established in the facility’s EMS or if use of the fuel is part of an environmental management program established in the EMS to further superior environmental performance and, as long as the requirements in (3) below are met. [s. NR 439.04, Wis. Adm. Code and 299.83, Wis. Stats.]</p> <p>(3) An alternate fuel other than natural gas or propane may only be used if the permit holder demonstrates that emissions from the combustion of the new fuel meet ambient air quality standards and that the requirements of ch. NR 445 , Wis. Adm. Code, are met as follows:</p>	<p>(1) Records for Annual Emissions Determination</p> <p>The permit holder shall maintain records as necessary to determine the following: [ss. NR 408.11(12), and 439.04(1)(d), Wis. Adm. Code.]</p> <p>(a) The total maximum rated heat input capacity of all combustion units combined</p> <p>(b) The types and amounts of fuels used</p> <p>(c) The annual emission rate of each pollutant emitted from the fuel combustion units</p> <p>(d) When an alternate fuel is used, information demonstrating that air quality standards are met as allowed under I.D.1.b.(3). Records shall meet the requirements of Part III of this permit.</p> <p>(2) Unit Inventory</p> <p>The permit holder shall maintain on site a list of all combustion units, their heat input capacities and the types of fuels that are combusted in them. This list shall be reviewed and updated at least annually or upon replacements, removal, or additions of fuel combustion equipment. [s. NR 439.04, Wis. Adm. Code.]</p> <p>(3) Whenever an alternate fuel is used, the permit holder shall keep records that show the following: [s. NR 439.04, Wis. Adm. Code.]</p> <p>(a)(i) Objective and target which contains the alternative fuel use and</p> <p>(ii) Conformity with the procedures for establishing</p>

⁸ This limitation is included to ensure that air quality standards for particulate matter emissions will be attained and maintained. Using AP-42 emission factor of 7.6 lb PM per million cubic feet of gas, at maximum fuel combustion rates, maximum theoretical emissions of particulate matter from all fuel combustion units and stacks combined at this facility are well below 0.5 lb/hr.

D. Miscellaneous Fuel Combustion Units

Pollutant	a. Limitations	b. Compliance Demonstration Requirements	c. Recordkeeping and Monitoring Requirements
	<p>(a) the total heat input capacity of all existing and proposed combustion units combined does not exceed 49.1 mmBtu/hr.⁹</p> <p>(b) the proposed project does not subject the combustion unit to a new emission limitation under the new source performance standards or a national emission standard for hazardous air pollutants under ss. 111 or 112 of the Clean Air Act, excluding ss. 112(d)(5) and 112(r).</p> <p>(c) Except as allowed under D.1.b.(2), only natural gas or propane may be used to fire new combustion units¹⁰</p>	<p>(a) demonstrate that maximum controlled emissions of criteria pollutants and hazardous air contaminants, when using the new fuel are less than inclusion levels listed in Table 3 of ch. NR 407, for each pollutant emitted; or</p> <p>(b) For each pollutant emitted at rates equal to or exceeding the value listed in table 3 of ch. NR 407, Wis. Adm. Code, provide air quality modeling results that show the ambient air quality standards and acceptable ambient air concentrations are met at the maximum controlled emission rate of the pollutant</p> <p>(c) Use of the new fuel may not subject the unit to a <u>new</u> standard or regulation under s. 111 and 112 of the act, excluding ss. 112(d)(5) and 112(r). [s. 285.65(3), Wis. Stats., and s. NR 439.09(4)(a)3.b., Wis. Adm. Code.]</p>	<p>objectives and targets.</p> <p>Or</p> <p>(b) How and why the fuel use needs to be included in an environmental management program.</p> <p>Records may include meeting minutes, calculations or other written records.</p>

⁹ This cap on total Btu of equipment is equivalent to adding exempt fuel burning equipment under s. NR 406.04(1)(a), Wis. Adm. Code.

¹⁰ The requirements in I.D.1.a.(3)(a) and (b) along with I.D.1.b.(1) (2) and (3) ensure that the impact of new or modified fuel burning equipment would not exceed the impact of equipment added that is exempt from construction permitting per s. NR 406.04(1)(a), Wis. Adm. Code.

¹¹ Because natural gas and propane are clean burning fuels, they will not cause a violation of emissions limitations when operated according to manufacturer’s specification.

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
<p>1. Compliance Certification and Monitoring Reports</p>	<p>(1) Except as allowed in (3) below, the permit holder shall submit periodic monitoring reports. [s. NR 407.09(1)(c)3., Wis. Adm. Code]</p> <p>(2) Except as allowed in (3) below, the permit holder shall submit periodic certification of compliance. [s. NR 407.09(4)(a)3., Wis. Adm. Code]</p> <p>(3) The report of audit results submitted to the department in compliance with s. 299.83(6m)(a), Wis. Stats., to fulfill the annual environmental compliance audit commitment required in s. 299.83(5)(c)3., may be submitted in lieu of the reports required in (1) and (2) above if the audit results contain the information required in I.ZZZ.1.b.(1)(a)-(d). [s. 299.83, Wis. Stats.]</p> <p>(4) The records required under this permit shall be retained for at least five (5) years and shall be made available to department personnel upon request during normal business hours. [s. NR 439.04, s. NR 439.05, Wis. Adm. Code]</p>	<p>(1) Except as provided in (3) below, the permit holder shall submit a monitoring report which contains the results of monitoring or a summary of monitoring results required by this permit to the Department every 6 months. [ss. NR 407.09(1)(c)3., NR 408.11(14), and NR 439.03(1)(b), Wis. Adm. Code]</p> <p>(a) The time periods to be addressed by the submittal January 1 to June 30 and July 1 to December 31.</p> <p>(b) The report shall be submitted to the Wisconsin Dept. of Natural Resources, Waukesha Service Center, 141 NW Barstow St, Room 180, Waukesha, WI 53188, within 60 days after the end of each reporting period.</p> <p>(c) All deviations from and exceedances of applicable requirements shall be clearly identified in the submittal.</p> <p>(d) Each submittal shall be certified by a responsible official as to the truth, accuracy and completeness of the report.</p> <p>(e) The content of the submittal is described in item D. of Part VI of the permit.</p> <p>(f) In addition to the information described in (e) above, the report shall also include the following:</p> <p>(i) The name of the owner and operator and the permit number</p> <p>(ii) Total annual emissions in tons/yr based on a 12-month rolling total for each month in the reporting period</p> <p>(iii) All data relied upon including any quality assurance or quality control data, in calculating the monthly and annual PAL regulated air contaminant emissions.</p> <p>(iv) A list of any emissions units modified or added to the major stationary source during the preceding 6-month period.</p> <p>(2) Except as provided in (3) below, the permit holder shall submit an annual certification of compliance with the requirements of this permit to the Wisconsin Dept. of Natural Resources, 141 NW Barstow St, Room 180, Waukesha, WI 53188 and to Compliance Data – Wisconsin, Air and Radiation Division, US EPA, 77 W. Jackson Street, Chicago, IL 60604.</p> <p>(a) The time period to be addressed by the report is January 1 to December 31 of the preceding year.</p> <p>(b) The report shall be submitted to the Wisconsin Department of Natural Resources and the US EPA within 60 days after the end of each reporting period.</p> <p>(c) The information included in the report shall comply with the requirements of Part VI, Section N of this permit.</p> <p>(d) Each report shall be certified by a responsible official as to the truth, accuracy and completeness of the report. [ss. NR 407.09(4)(a)3. & NR 439.03(1)(c), Wis. Adm. Code]</p>

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
		<p>(3) The annual compliance audit and reporting done under s. 299.83(5)(c)3., Wis. Stats., may be submitted in lieu of the reports and certification required under (1) and (2) above. [s. 299.83, Wis. Stats.]</p>
<p>2. Malfunction Prevention and Abatement Plans</p>	<p>(1) A malfunction prevention and abatement plan shall be prepared and followed for the plant. The facility may use procedures established in the operation control portion of its EMS to meet this requirement. [ss. NR 439.11, Wis. Adm. Code, and 299.83, Wis. Stats.]</p> <p>(2) All air pollution control equipment shall be operated and maintained in conformance with good engineering practices (i.e. operated and maintained according to manufacturer's specifications and directions) to minimize the possibility for the exceedance of any emission limitations. [s. NR 439.11(4), Wis. Adm. Code]</p>	<p>(1) The malfunction prevention and abatement plan shall be developed to prevent, detect and correct malfunctions or equipment failures which may cause any applicable emissions limitation to be violated or which may cause air pollution. [s. NR 439.11(1), Wis. Adm. Code]</p> <p>(2) This malfunction prevention and abatement plan shall include installation, maintenance and routine calibration procedures for the process monitoring and control equipment instrumentation. This plan shall require an instrumentation calibration at the frequency specified by the manufacturer, yearly or at a frequency based on good engineering practice as established by operational history, whichever is more frequent. Inspection and calibration shall also be conducted whenever instrumentation anomalies are noted. [ss. NR 407.09(1)(c)1.c., NR 439.055(4) and s. NR 439.11, Wis. Adm. Code]</p> <p>(3) The malfunction prevention and abatement plan shall require a copy of the operation and maintenance manual for the control equipment to be maintained on site. The plan shall contain all of the elements in s. NR 439.11(1)(a) – (h), Wis. Adm. Code. [s. NR 439.11, Wis. Adm. Code]</p>

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
<p>3. Plant-wide Applicability Limit (PAL) requirements.</p>	<p>(1) Construction/Modification under the PAL The permit holder may construct, reconstruct, relocate, modify, or replace, screen presses , flexographic presses, pad printers, offset presses, or other types of printing units and associated cleaning operations or other equipment that emits VOC and HAP without first obtaining a construction permit under chs. NR 408 and 406, Wis. Adm. Code, or an operation permit revision under ch. NR 407, Wis. Adm. Code, as long as all the following are met [07-KLH-284 and ss. 285.65(7), and 299.83, Wis. Stats., and ss. NR 408.11(1)(c), and 406.04(1f), Wis. Adm. Code.]:</p> <p>(a) actual emissions of volatile organic compounds and federally regulated hazardous air pollutants from the existing facility plus the projected actual emissions from any new or modified project do not exceed the PAL levels established in this I.A1. or I.A.2. of this permit.</p> <p>(b) the actual emissions of VOCs from any new emission unit¹² may not exceed 24.9 tons per year.¹³</p> <p>(c) any projected actual/actual increase in air pollutants emitted by the new or modified equipment other than VOCs does not exceed the levels specified in ss. NR 406.04(2)(b), (c), (cm), (d), and (f), Wis. Adm. Code, and 299.83, Wis. Stats.</p> <p>(d) the construction, reconstruction, replacement, relocation, or modification does not trigger new requirements under sections 111 or 112 of the Clean Air Act with the exception of ss. 112(d)(5) and 112(r).</p> <p>(e) For equipment added after the date of issuance of this permit, the permit holder shall evaluate additions of new equipment and any changes in the method of operation of existing equipment to ensure that the project conforms to the objectives and targets established in the facility’s EMS.</p> <p>(2) Increasing a PAL during the PAL effective Period – The department may increase a PAL level only if the permit holder complies with all the provision of s. NR 408.11(11), Wis. Adm. Code. [s. NR 408.11(11), Wis. Adm. Code.]</p>	<p>(1) The permit holder shall keep records or notes to show that constructed, reconstructed, relocated, modified or replaced equipment meets the requirements of I.ZZZ.3.(1) [s. NR 439.04(1)(d), Wis. Adm. Code.]</p> <p>(2) Prior to operating new equipment added under this section, the permit holder shall calculate the expected actual annual VOC and HAP emissions from the existing facility plus the new equipment to ensure that the applicable emission cap will continue to be met. Use methodologies established under I.A.1. [07-KLH-284 and s. NR 439.04, Wis. Adm. Code.]</p> <p>(3) The permit holder shall update its equipment inventory every time equipment is added or replaced. [07-KLH-284 and s. NR 439.04, Wis. Adm. Code.]</p> <p>(4) Records shall be kept that demonstrate that additions of new equipment or changes to the method of operation of existing equipment were evaluated and conform to the objectives and targets established in the facility EMS. [07-KLH-284 and s. NR 439.04, Wis. Adm. Code.]</p> <p>(5) Keep records of the calculations performed under sections I.A.1.b. [07-KLH-284 and s. NR 439.04, Wis. Adm. Code.]</p>
<p>4. Renewal of the PAL</p>	<p>(1) The permit holder shall submit an application to renew the PAL at least 6 months but not more than 18 months prior to expiration of the PAL. The application shall contain all of the information required in s. NR 408.11(10)(c), Wis. Adm. Code. [07-KLH-284 and s. NR 408.11(10)(b), Wis. Adm. Code.]</p> <p>(2) If the permit holder chooses to let the PAL expire, then the permit holder is subject to the</p>	<p>(1) Submit required documents to Wisconsin Department of Natural Resources, Southeast Region Air Program 141 NW Barstow St, Room 180, Waukesha, WI 53188. [s. NR 407.09(1)(f)5., Wis. Adm. Code.]</p>

¹² A new emissions unit means a new emissions unit as defined in s. NR 408.02(13)(a), Wis. Adm. Code.

¹³ This condition establishes a potential to emit for new equipment so that it can meet the exemption criteria in s. NR 406.04(1f), Wis. Adm. Code.

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
	<p>requirements of I.ZZZ.5. below. [07-KLH-284 and s. NR 408.11(7)(e), Wis. Adm. Code.]</p> <p>(3) Upon renewal, the PAL shall be reestablished at the levels equal to the PAL levels established in I.A.1.a.(1) and (2). Or, if requested by the permit holder, the PAL may be adjusted to one of the following levels in (a) or (b) as long as the adjusted PAL levels do not exceed the PAL levels established in I.A.1.a.(1) and (2): [07-KLH-284, s. NR 408.11(10)(d) and s. 299.83, Wis. Stats.]</p> <p>(a) the facility’s potential to emit VOCs at the time of PAL renewal.</p> <p>(b) A level determined by the permit holder to fulfill the objectives and targets of the facility’s EMS.</p> <p>As long as the facility remains in good standing with Tier 2 of the Green Tier Program, the Department agrees to use the discretion allowed under ss. NR 408.11(10)(d)(1) and (2) and 405.18(10)(d)1. and 2., Wis. Adm. Code, and not require adjustment of the PAL at renewal unless new laws or other new legal requirements require reopening the PAL.</p>	
<p>5. Expiration of the PAL</p>	<p>(1) The PAL becomes effective upon issuance of this permit and expires 10 years after the effective date unless the permit holder applies to renew the PAL in accordance with I.ZZZ.4 before the PAL expires. [07-KLH-284 and ss. NR 408.11(7)(b) and (c), Wis. Adm. Code.]</p> <p>(2) If the permit holder chooses to let the PAL expire or if the permit holder is no longer eligible for the PAL or if the permit holder no longer wishes to operate under the PAL the permit holder shall, prior to PAL expiration, submit an application for a construction permit under s. NR 406.035, Wis. Adm. Code, and an operation permit revision under s. NR 407.13, Wis. Adm. Code. containing the following: [s. NR 408.11(9), Wis. Adm. Code, 07-KLH-284 and s. 299.83, Wis. Stats.]</p> <p>(a) A proposed allowable emission limitation, as a 12-month rolling average, for each emission unit or group of emission units that distributes the PAL allowable emissions among each emission unit that existed under the PAL. As long as the facility remains in good standing with Tier 2 of the Green Tier Program, the Department agrees to redistribute emissions as proposed by Serigraph in a redistribution plan required under 408.11(9)(a)1.</p> <p>(b) The permit holder shall comply with the terms and conditions of the PAL until a construction permit and a revised operation permit are issued by the Department. The Wisconsin Department of Natural Resources will issue any necessary air pollution control permits within 120 days of submittal of a complete application.</p>	<p>(1) Submit reallocation request and permit applications to the Wisconsin Department of Natural Resources, Southeast Region Air Program 141 NW Barstow St, Room 180, Waukesha, WI 53188. [s. NR 407.09(1)(f)5., Wis. Adm. Code.]</p>

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
<p>6. Stack Testing</p>	<p>(1) Whenever compliance emission testing is performed, the following reference test methods shall be used. When approved in writing, an equivalent test method may be substituted for the reference test method:</p> <p>(a) <u>Reference Test Method for Printing Inks and Related Coating Emissions</u>: Whenever compliance emission testing is performed, the appropriate US EPA Method; 24 or 24A shall be used. [s. NR 439.06(3)(b), Wis. Adm. Code]</p> <p>(b) <u>Reference Test Method for Carbon Monoxide Emissions</u>: Whenever compliance emission testing is performed, the appropriate US EPA Method; 10, 10A or 10B shall be used. [s. NR 439.06(4)(a), Wis. Adm. Code]</p> <p>(c) <u>Reference Test Method for Lead Emissions</u>: Whenever compliance emission testing is performed, US EPA Method 12 shall be used. [s. NR 439.06(5), Wis. Adm. Code]</p> <p>(d) <u>Reference Test Method for Nitrogen Compound Emissions</u>: Whenever compliance emission testing is performed, the appropriate US EPA Method; 7, 7A, 7B, 7C, 7D or 7E shall be used. [s. NR 439.06(6)(a), Wis. Adm. Code]</p> <p>(e) <u>Reference Test Method for Total Reduced Sulfur Compounds</u>: Whenever compliance emission testing is performed, the appropriate US EPA Method; 15, 15A, 16, 16A, or 16B shall be used. [s. NR 439.06(7)(a), Wis. Adm. Code]</p> <p>(f) <u>Reference Test Method for Hazardous Air Pollutant Emissions</u>: Whenever emissions testing for hazardous air pollutants is performed, USEPA Method 311 shall be used. [s. NR 439.06(8), Wis. Adm. Code]</p> <p>(g) <u>Reference Test Method for Particulate Matter Emissions</u>: Whenever compliance emissions testing is performed, the following USEPA Methods shall be used:</p> <p>(i) USEPA Method 5 for non-condensable particulate matter and</p> <p>(ii) USEPA Method 202 for condensable particulate matter. [s. NR 439.06(9)(a)1., Wis. Adm. Code.]</p> <p>(2) All testing shall be performed with the emissions unit operating at capacity or as close to capacity as practicable and in accordance with approved procedures. If operation at capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. [s. NR 439.07(1), Wis. Adm. Code]</p> <p>(3) If the biofilter will be used to control VOC or HAP emissions, the permittee shall conduct periodic emission testing consistent with s. NR 439.07 and s. NR 439.075, Wis. Adm. Code, to demonstrate compliance with the VOC emission control efficiency requirement as follows:</p>	<p>(1) The Department shall be informed at least 20 working days prior to any stack testing, so a Department representative can witness the testing. At the time of notification, a compliance emission test plan shall also be submitted to the Department for approval. When approved in writing, an equivalent test method may be substituted for the reference test method. The notification and test plan shall be submitted to the Wisconsin Department of Natural Resources. [s. NR 439.07(2), Wis. Adm. Code]</p> <p>(2) Two copies of the report on any compliance emission tests shall be submitted to the Department for evaluation within 60 days following the completion of tests. [s. NR 439.07(9), Wis. Adm. Code]</p>

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
	<p>(a) The testing shall be conducted every 60 months, within 90 days of the anniversary date of receipt of this determination while operating at 100% capacity.</p> <p>(b) If operation at 100% capacity is not feasible, the source shall operate at a capacity level that is approved by the Department in writing.</p> <p>(c) The Department shall be informed in writing at least 20 working days prior to any emission testing so a Department representative can witness the testing. At the time of notification an emission test plan shall also be submitted to the Department for approval.</p> <p>(d) If the compliance emission tests cannot be conducted by the dates required in this condition, the permit holder may request and the Department may approve, in writing, an extension of time to conduct the test(s);</p>	
<p>7. Alternate Monitoring Approaches allowed for compliance demonstration with PAL</p>	<p>(1) The following alternate monitoring approaches are allowed for calculating emissions of VOCs and HAPs under the PAL conditions in I.A.1. [07-KLH-284 and ss. NR 408.11(7)(g), and 408.11(12)(a), (b), , Wis. Adm. Code.]:</p> <p>(a) Emission factors from the following sources as approved by the Department: emission factors derived from the most recent stack test performed in accordance with I.ZZZ.6.a. and b., or AP-42, FIRE, or another source approved by the Department, if stack testing data is not available. When using emission factors to calculate VOCs from printing operations or solvents, all the following shall be done:</p> <p>(i) Adjust all emission factors, if appropriate, to account for the degree of uncertainty or limitations in the factors’ development.</p> <p>(ii) Operate the emissions unit within the designated range of use for the emission factor, if applicable.</p> <p>(iii) If technically practicable, for a significant emissions unit that relies on an emission factor to calculate VOC emissions, conduct validation testing to determine a site-specific emission factor within 6 months of permit issuance and at least once every 5 years unless the department determines that such testing is not required.¹⁴</p> <p>(b) Continuous emissions monitoring system (CEMS) as defined in s. NR 408.02, Wis. Adm. Code, that does both of the following:</p> <p>(i) Complies with applicable performance specifications found in 40 CFR part 60 Appendix B incorporated by reference in s. NR 484.04(21), Wis. Adm. Code.</p> <p>(ii) Samples analyzes and records data at least every 15 minutes or at an other less frequent</p>	<p>(1) If the permit holder uses approved replicable methods other than the equation listed in I.A.1.b.(3)(a), then written documentation of the methodology used shall be kept on site. [07-KLH-284 and s. 439.04(1)(d), Wis. Adm. Code.]</p> <p>(2) If stacktesting is performed to allow use of an alternate control efficiency or control device under I.B.1.b.(3), the stacktesting requirements of I.ZZZ.6., shall be followed. [07-KLH-284 and s. NR 439.04, Wis. Adm. Code.]</p> <p>(3) If a monitoring system is being used to calculate emissions and it fails to collect data on VOC emissions from an emission unit, during any period of time, the permit holder shall record and report maximum potential emissions without considering enforceable emission limitations or operational restrictions for that time period. [07-KLH-284 and s. NR</p>

¹⁴ At the time of issuance of this permit, the facility is not required to do validation testing for any site-specific emission factors. This condition applies to new site specific factors that might be developed as allowed by this permit, after the date of issuance of this permit.

ZZZ. Other Requirements Applicable to the Entire Facility

Condition Type	a. Condition	b. Compliance Demonstration Requirements
	<p>interval approved by the department while the emissions unit is operating.</p> <p>(c) Continuous parameter monitoring system (CPMS) or predictive emissions monitoring system (PEMS) as defined in s. NR 408.02, Wis. Adm. Code, that does both of the following:</p> <ul style="list-style-type: none"> (i) Is based on current site-specific data demonstrating a correlation between the monitored parameters and the VOC emissions across the range of operations of the emissions unit. (ii) Samples, analyzes and records data at least every 15 minutes or at another less frequent interval approved by the department while the emissions unit is operating. <p>(d) Other Approved Replicable Methods that can be used determine the emissions accurately as approved by the Department.</p> <p>(2) If emissions are determined based on a stack test derived emission factor under (1)(a)(iii) above or a control efficiency of a control device, the following conditions shall be met:</p> <ul style="list-style-type: none"> (a) When a stack test indicates a higher emission factor or lower control efficiency than currently in use, it must be used to calculate emissions from the date the stack test was conducted forward. (b) When a stack test indicates a lower emission factor or a higher control efficiency and the permit holder submits a written request to the department to use the new data, its use may commence 45 days after Department’s receipt of the applicant’s written request only if the Department does not object, in writing, to the use of the new emission factor. [s. NR 407.09(4)(a)1., Wis. Adm. Code] 	<p>408.11(12)(g), Wis. Adm. Code].</p>

Part II – Performance Based Applicability

A. The facility has entered into a Participation Contract under Tier 2 of Wisconsin’s Green Tier Program pursuant to s. 299.83, Wis. Stats. This contract contains certain commitments by the facility to establish and maintain an Environmental Management System, undertake certain operational requirements, and perform compliance auditing. This permit is based in part on these commitments. Thus, if the facility does not substantially comply with the Green Tier 2 Participation Contract, this permit may be suspended, modified or revoked pursuant to s. 285.67, Wis. Stats. and ss. NR 406.11, 407.14, and 407.15, Wis. Adm. Code.

B. Under the contract, the permit holder is to demonstrate compliance with the participation contract requirements in II.A. above by doing all of the following: [ss. 299.83(5)(c), and 285.65(7), Wis. Stats.]

1. demonstrating that it has implemented an environmental management system.
2. having an outside environmental auditor approved by the department conduct an annual environmental management system audit.
3. annually conducting, or having another person conduct, an audit of compliance with environmental requirements.

C. Under the contract, the annual report submitted by the permit holder to assure compliance with the participation contract requirements is to include the following information: [ss. 299.83(3)(d), 299.83(5)(c), and 285.65(7), Wis. Stats.]

1. the results of Environmental Management Programs (EMPs) including progress towards goals.
2. the results of the environmental management system audit.
3. the results of the compliance audit.

Part III – Operational Control

A. Environmental Management Plans and other plans and procedures established in this Facility’s EMS for the purpose of demonstrating compliance with the Specific Limitations in Section I., shall be made available for public inspection. This applies only to the plans and procedures established to demonstrate compliance with the permit limitations. Other parts of the facility’s EMS may be kept confidential as necessary to, among other things, protect trade secrets and/or business competitiveness.

B. Environmental Management Plans and other plans and procedures established under the Operational Control section of the Facility’s EMS may be used to demonstrate compliance with the applicable requirements listed in Part I of this permit if the plans address, at a minimum, the following elements:

1. DESIGNATION of the applicable requirement.
2. MONITORING that will be performed and frequency of monitoring that will be done to demonstrate compliance with the requirements in Part I
3. RECORDS and frequency of records that will be kept to demonstrate compliance with the requirements in Part I
4. REPORTING that will be done as required by the applicable requirement or the permit including the prompt reporting of deviations from and exceedances of permit terms and conditions in accordance with Part IV.
5. TESTING including a reference test method and any required or planned compliance testing that will be performed along with the frequency such testing that will be performed.
6. COMPLIANCE METHODS for each applicable limitation.

C. The Department has examined the reporting recordkeeping, monitoring, and testing requirements contained in Wis. Adm. Code chs. NR 400-499 and has determined that compliance with the requirements in the permit shall constitute compliance with all such

requirements in Wis. Adm. Code, NR 400-499. This statement does not prevent state and local authorities from using any credible evidence to determine compliance with an applicable limitation or requirement in accord with 40 CFR sections 52.12(c), 60.11(g), and 61.12(e) in effect on the date of issuance of this permit.

D. The permit holder may not be required to undergo any permit revision procedures to implement changes to Environmental Management System's Operational Control Section affecting permit compliance demonstration methods because such updates are a requirement of 299.83, Wis. Stats and Green Tier 2 Participation Contract dated August 26, 2011.

Part IV – Other General Conditions

A. DUTY TO COMPLY

1. The permit holder has the duty to comply with all conditions of the permit. Any noncompliance with the operation permit constitutes a violation of the statutes and is grounds for enforcement action; for permit suspension, revocation or revision; or for denial of a permit renewal application except as laid out in B. below and in s. 299.83(6m)(d), Wis. Stats.
2. It is not a defense for a permit holder in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the permit.
3. The permit may be revised, revoked or suspended for cause under this chapter. The filing of a request by the permit holder for a permit revision or for revocation, or the filing of notification of planned changes under s. NR 407.025 or of anticipated noncompliance, does not stay any permit condition.
4. The permit does not convey any property rights of any sort, or any exclusive privilege.
5. The permit holder shall furnish to the department, within a reasonable time specified by the department, any information that the department may reasonably request in writing to determine whether cause exists to revise, revoke or suspend the permit or to determine compliance with the permit. Upon request, the permit holder shall also furnish to the department copies of records required to be kept pursuant to the permit.

B. DEFERMENT OF CIVIL ENFORCEMENT If the facility finds an instance of noncompliance, the DNR will defer civil enforcement in accordance with the requirements in 299.83(6m)(d), Wis. Stats.

C. SEVERABILITY: In the event of a successful challenge to any portion of the permit, all other portions of the permit remain valid and effective.

Part V. Public Involvement

The permit holder shall publish annually a public notice and/or issue a press release informing the public that information on the facility's EMS is available upon request.

Part VI General Permit Conditions For Direct Stationary Sources

A. Scope.

This permit is valid only for the structure, building, facility, equipment or operation specifically identified herein. All emissions authorized hereby shall be in compliance with the terms and conditions of Parts I and II of this permit. [s. 285.60(7), Wis. Stats.]

B. Emissions Prohibited.

Unless the Department has approved an exception under s. NR 436.03(2), or this permit no person may cause, allow, or permit emissions of any air contaminant into the ambient air in excess of the limits set in chs. NR 400 to 499, Wis. Adm. Code. [s. NR 436.03(1), Wis. Adm. Code]

C. General Emission Limits.

C.1. Applicable to Insignificant Emissions Units.

The following general emission limitations may apply to one or more of the insignificant emission units identified in the preamble of this permit. It is the permit holder's responsibility to comply with these requirements, if they do apply. Insignificant emission units typically are associated with inconsequential environmental impacts and present little potential for violations of these generally applicable requirements. If there were no observed, documented or known instances of noncompliance, certification of compliance is appropriate. Testing or monitoring to assure compliance is not required by this permit.

- C.1.a. Section NR 415.05, Wis. Adm. Code – Particulate emission limits for processes;
- C.1.b. Section NR 415.06, Wis. Adm. Code – Particulate emission limits for fuel burning installations;
- C.1.c. Section NR 415.07, Wis. Adm. Code – Particulate emission limits for incinerators;
- C.1.d. Section NR 423.03, Wis. Adm. Code – Solvent metal cleaning;
- C.1.e. Section NR 485.05, Wis. Adm. Code – Visible emission limits for motor vehicles, internal combustion engines and mobile sources; and
- C.1.f. Section NR 485.055, Wis. Adm. Code – Particulate emission limit for gasoline and diesel internal combustion engines.

C.2. Applicable to Significant and Insignificant Emissions Units.

The following general emission limitations may apply to both significant and insignificant emission units. It is the permit holder's responsibility to comply with these requirements, if they apply. Testing or monitoring to assure compliance with these general emission limits is not required by this permit.

For each significant emission unit, if a more specific emission limit is included in Part I of this permit for any of the pollutants listed below, then compliance with that more specific limit will constitute compliance with the general emission limit. If a more specific limit is not included in Part I of this permit, then that pollutant was determined to be insignificant for that emission unit.

For insignificant emission units, if there were no observed, documented or known instances of non-compliance, certification of compliance is appropriate.

- C.2.a. No person may cause, allow, or permit particulate matter to be emitted into the ambient air which substantially contributes to exceeding of an air standard, or creates air pollution. [s. NR 415.03, Wis. Adm. Code]
- C.2.b. No person may cause, allow, or permit any materials to be handled, transported, or stored without taking precautions to prevent particulate matter from becoming airborne. Nor may a person allow a structure, a parking lot, or a road to be used, constructed, altered, repaired, sand blasted or demolished without taking such precautions. Such precautions shall include, but not be limited to the following [s. NR 415.04, Wis. Adm. Code]:
 - C.2.b.(1) Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, or construction operations.
 - C.2.b.(2) Application of asphalt, oil, water, suitable chemicals, or plastic covering on dirt roads, material stockpiles, and other surfaces which can create airborne dust, provided such application does not create a hydrocarbon, odor, or water pollution problem.
 - C.2.b.(3) Installation and use of hoods, fans and air cleaning devices to enclose and vent the areas where dusty materials are handled.
 - C.2.b.(4) Covering or securing of materials likely to become airborne while being moved on public roads, railroads, or navigable waters.
 - C.2.b.(5) Conduct of agricultural practices such as tilling of land or application of fertilizers in such manner as not to create air pollution.
 - C.2.b.(6) The paving or maintenance of roadway areas so as not to create air pollution.

- C.2.c. No person may cause, allow or permit emission of sulfur or sulfur compounds into the ambient air which substantially contribute to the exceeding of an air standard or cause air pollution. [s. NR 417.03, Wis. Adm. Code]
- C.2.d. No person may cause, allow or permit organic compound emissions into the ambient air which substantially contribute to the exceeding of an air standard or cause air pollution. No person may cause, allow or permit organic compounds to be used or handled without using good operating practices and taking reasonable precautions to prevent the spillage, escape or emission of organic compounds, solvents or mixtures. [s. NR 419.03, Wis. Adm. Code]
- C.2.e. No person may cause, allow or permit the disposal of more than 5.7 liters (1.5 gallons) of any liquid Volatile Organic Compound (VOC) waste, or of any liquid, semisolid or solid waste materials containing more than 5.7 liters (1.5 gallons) of any VOC, in any one day from a facility in a manner that would permit their evaporation into the ambient air during the ozone season. This includes, but is not limited to, the disposal of VOC which must be removed from VOC control devices so as to maintain the control devices at their required operating efficiency. Disposal during the ozone season shall be by methods approved by the Department, such as incineration, recovery for reuse, or transfer in closed containers to an acceptable disposal facility, such that the quantity of VOC which evaporates into the ambient air does not exceed 15% (by weight) or 5.7 liters (1.5 gallons) in any one day, whichever is larger. [s. NR 419.04, Wis. Adm. Code]
- C.2.f. No person may cause, allow or permit emissions of carbon monoxide to the ambient air which substantially contribute to the exceeding of an air standard or cause air pollution. [s. NR 426.03, Wis. Adm. Code].
- C.2.g. No person may cause, allow or permit emissions into the ambient air of lead or lead compounds which substantially contribute to the exceeding of an air standard or air increment, or which create air pollution. [s. NR 427.025, Wis. Adm. Code]
- C.2.h. No person may cause, allow, or permit nitrogen oxides or nitrogen compounds to be emitted to the ambient air which substantially contribute to the exceeding of an air standard or cause air pollution. [s. NR 428.03, Wis. Adm. Code]
- C.2.i. No person may cause, allow or permit emission into the ambient air of any substance or combination of substances in such quantities that an objectionable odor is determined to result unless preventive measures satisfactory to the Department are taken to abate or control such emission. [s. NR 429.03(1), Wis. Adm. Code*]
- C.2.j. Open burning is prohibited except as provided in s. NR 429.04, Wis. Adm. Code. [s. NR 429.04, Wis. Adm. Code*]
- C.2.k. No person may cause, allow or permit emissions into the ambient air from any direct or portable source in excess of one of the limits specified in ch. NR 431, Wis. Adm. Code. Where the presence of uncombined water is the only reason for failure to meet the requirements of ch. NR 431, Wis. Adm. Code, such failure is not a violation of the chapter. [s. NR 431.03, Wis. Adm. Code]
- C.2.l. When the Department requires instrumentation to monitor the operation of air pollution control equipment, or to monitor source performance, the instrument shall measure operational variables with the following accuracy: [ss. NR 439.055(3) and NR 407.09(1)(c)1.c., Wis. Adm. Code]
- C.2.l.(1) The temperature monitoring device shall have an accuracy of 0.5% of the temperature being measured in degrees Fahrenheit or $\pm 5^{\circ}\text{F}$ of the temperature being measured, or the equivalent in degrees Celsius (centigrade), whichever is greater.
- C.2.l.(2) The pressure drop monitoring device shall be accurate to within 5% of the pressure drop being measured or within ± 1 inch of water column, whichever is greater.
- C.2.l.(3) The current, voltage, flow or pH monitoring device shall be accurate to within 5% of the specific variable being measured.
- C.2.m. All instruments used for measuring source or air pollution control equipment operational variables shall be calibrated yearly or at a frequency based on good engineering practice as established by operational history, whichever is more frequent. [ss. NR 439.055(4) and NR 407.09(1)(c)1.c., Wis. Adm. Code]
- C.2.n. No person may cause, allow, or permit emissions into the ambient air of any hazardous substance in such quantity, concentration, or duration as to be injurious to human health, plant or animal life unless the purpose of that emission is for the control of plant or animal life. Hazardous substances include, but are not limited to, hazardous air contaminants listed in Tables A to C of s. NR 445.07, Wis. Adm. Code. [s. NR 445.03, Wis. Adm. Code*]

C.2.o. Chapter NR 447, Wis. Adm. Code, applies to all air contaminant sources which may emit asbestos, to their owners and operators and to any person whose action causes the emission of asbestos to the ambient air, including demolition and renovation activities. Chapter NR 447, Wis. Adm. Code, establishes emission limitations for asbestos air contaminant sources, establishes procedures to be followed when working with asbestos materials and contains additional reporting and record keeping requirements for owners or operators of asbestos air contaminant sources in order to protect air quality. [ch. NR 447, Wis. Adm. Code]

C.2.p. Accidental Release Prevention Requirements.

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of 40 CFR Part 68, no later than the latest of the following dates:

C.2.p.(1) June 21, 1999;

C.2.p.(2) Three years after the date on which a regulated substance is first listed under 40 CFR 68.130; or

C.2.p.(3) The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR Part 68.10]

D. Reporting Requirements.

D.1. The Department shall be notified of the following events:

<u>Event</u>	<u>Timing</u>
D.1.a. Hazardous substance air spill.	Immediate call: 1-800-943-0003
D.1.b. Malfunction or other unscheduled event which causes or may cause any emission limitation to be exceeded (except certain visible emission limit exceedances by a continuous emission monitor - see s. NR 439.03(4)(a)2., Wis. Adm. Code.).	Notification by next business day of any such event at the source which is not reported in advance to the Department. Report the cause and duration of the exceedance, the period of time considered necessary for correction, and measures taken to minimize emissions during the period.
D.1.c. Deviation from any other condition specified in this permit.	Notification by next business day identifying the deviation, cause, duration and steps taken to prevent recurrence.

[ss. 285.65(10) and 292.11(2), Wis. Stats., and s. NR 439.03(4)*, Wis. Adm. Code]

D.2. Persons possessing or controlling a hazardous substance shall immediately notify the Department of any hazardous emission not in conformity with a permit or allowed by the Department under chs. NR 400 to 499. Notice shall be given as required by s. 292.11, Stats., and ch. NR 706.

<u>Event</u>	<u>Timing</u>
D.2.a. Hazardous substance air spill	Immediate call: 1-800-943-0003

[s. 292.11(2), Wis. Stats., and s. NR 445.08, Wis. Adm. Code*]

D.3. The permit holder shall report to the Department, in advance, schedules for planned shutdown and startup of air pollution control equipment and the measures to be taken to minimize the down time of the control equipment while the source is operating. Scheduled maintenance or any other scheduled event, including startup, shutdown or soot blowing procedures which have been approved by the Department under s. NR 436.03(2)(b), which causes an emission limit to be exceeded shall also be reported in advance to the Department. Advance reporting pursuant to this permit condition does not relieve any person from the duty to comply with any applicable emission limitations. Emissions in excess of the limits set in chs. NR 400-499, Wis. Adm. Code, may be allowed when the emissions are temporary and due to scheduled maintenance, startup or shutdown of

operations carried out in accord with a plan and schedule approved by the Department. [s. NR 436.03(2)(b) and NR 439.03(6), Wis. Adm. Code]

D.4. The permit holder shall furnish to the Department, within a reasonable time specified by the Department, any information that the Department may request in writing to determine whether cause exists to revise, revoke or suspend this permit or to determine compliance with this permit. Upon request, the permit holder shall also furnish to the Department copies of records required to be kept pursuant to this permit. [s. NR 407.09(1)(f)5., Wis. Adm. Code]

D.5. The permit holder shall submit the results of monitoring required by the permit to the Department according to the schedule established in Part I of this permit. Any such report shall clearly identify all instances of deviations from permit requirements. All such reports shall be signed by the responsible official for the source. [s. 285.17(2), Wis. Stats., and s. NR 439.03(1)(b), Wis. Adm. Code]

D.6. Each report required under s. NR 439.03, Wis. Adm. Code, shall be certified by a responsible official as to its truth, accuracy and completeness. This certification and any other certification required under ch. NR 439 shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete. [s. NR 439.03(10), Wis. Adm. Code*]

D.7. Except for information determined to be confidential under s. 285.70(2), Wis. Stats., any information or reports obtained by the Department in the administration of ss. 285.01 to 285.87 and 299.15, Wis. Stats., will be available for public inspection at the offices of the Department. [s. 285.70(1), Wis. Stats.]

D.8. All certifications made under s. NR 439.03, Wis. Adm. Code, and all material statements and representations made in any report or notice required by this operation permit shall be truthful. [s. NR 439.03(11), Wis. Adm. Code*]

D.9. Any document required under this permit and submitted to the Department, including reports, shall contain a certification by a responsible official that meets the requirements of s. NR 407.05(4)(j), Wis. Adm. Code. [s. NR 407.09(4)(a)1., Wis. Adm. Code]

E. Right of Entry and Inspection.

The permit holder shall allow authorized representatives of the Department to enter upon the permit holder's premises, to have access to and examine any record relating to emissions or required to be kept, and to make any inspection necessary to ascertain compliance with air pollution control laws and the terms of this permit. The Department may, for the purpose of determining a source's compliance with applicable requirements, sample or monitor at reasonable times production materials or other substances or operational parameters. [ss. 285.13 and 285.19, Wis. Stats., and s. NR 439.05, Wis. Adm. Code]

F. Malfunction Prevention and Abatement Plans.

The owner or operator of any direct or portable source which may emit hazardous substances or emits more than 15 pounds in any day or 3 pounds in any hour of any air contaminant for which emission limits have been adopted shall prepare a written malfunction prevention and abatement plan to prevent, detect, and correct malfunctions or equipment failures which may cause any applicable emission limitation to be violated or which may cause air pollution. Any such plan shall be carried out by the owner or operator. The plan shall be updated at least every 5 years. The Department may require the plan to be submitted for review and approval. [s. NR 439.11, Wis. Adm. Code*]

G. Emission Control Action Plan.

For source(s) covered by this permit which emit 0.25 tons or more per day of any air contaminant for which air standards have been adopted, the permit holder shall prepare an emission control action program, consistent with good industrial practice and safe operating procedures, for reducing the emission of air contaminants into the outdoor atmosphere during periods of an air pollution alert, air pollution warning or air pollution emergency declared under s. NR 493.03(2), Wis. Adm. Code. The emission control action program shall be in writing, available on the premises and is subject to review and approval by the Department on request. [s. NR 493.04, Wis. Adm. Code*]

H. Change in Ownership or Control.

In the event of a change in ownership or operational control of a source, the permit holder shall file a written request for an

administrative permit revision in accordance with s. NR 407.11, Wis. Adm. Code. The request should include a written agreement between the current and new owner or operator which sets forth a specific date for transfer of permit responsibility, coverage and liability. If the Department determines that no other change in this permit is necessary, this permit may be revised according to the administrative revision procedures in s. NR 407.11, Wis. Adm. Code. [s. NR 407.11(3)(a), Wis. Adm. Code]

I. Permit Flexibility, Revision, Suspension, and Revocation.

- I.1. Changes to the source which are not modifications and changes in permit content are regulated under the permit flexibility provisions of s. 285.60(4m), Wis. Stats., and s. NR 407.025, Wis. Adm. Code, and the permit revision provisions in ss. NR 407.11, NR 407.12, NR 407.13, NR 407.14, and NR 407.16, Wis. Adm. Code.
- I.2. An operation permit may be suspended or revoked, in whole or in part, for cause. [ss. NR 407.09(1)(f)3. and NR 407.15, Wis. Adm. Code.]

J. Construction, Reconstruction, Replacement, Relocation or Modification.

- J.1. Unless the replacement is authorized by this permit or is exempt under s. NR 406.04, Wis. Adm. Code, replacement of the source(s) covered by this permit is prohibited. [s. 285.60(1)(a), Wis. Stats.]
- J.2. No person may commence construction, reconstruction, replacement, relocation or modification of a stationary source unless the person has a construction permit for the source or unless the source is exempt from the requirement to obtain a permit under s. 285.60(5), Wis. Stats., or under ch. NR 406, Wis. Adm. Code, or Green Tier 2 Participation Contract signed August 26, 2011, under s. 299.83(6)(j), Wis. Stats.. Applications for the construction permit shall be submitted on forms which are available from the Department at its Madison headquarters and district offices. [s. 285.60(1)(a), Wis. Stats.]

Note: The address of the Madison headquarters is: Wisconsin Department of Natural Resources, Bureau of Air Management, PO Box 7921, Madison, WI 53707. Attention: Permit Application Forms.

- J.3. For new or modified sources for which no construction permit is required, the application for an operation permit revision shall be filed before the source commences construction or modification if terms or conditions of the operation permit must be changed to allow operation of the new or modified source. [s. NR 407.04, Wis. Adm. Code]

K. Circumvention.

- K.1. The installation or use of any article, machine, equipment, process, or method which conceals an emission which would otherwise constitute a violation of an applicable rule is prohibited unless written approval has been obtained from the Department. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance and the unnecessary separation of an operation into parts to avoid coverage by a rule that applies only to operations larger than a specified size. [s. NR 439.10, Wis. Adm. Code]
- K.2. No one may render inaccurate any monitoring device or method required under ch. NR 439, Wis. Adm. Code, or in this permit. [s. NR 439.03(12), Wis. Adm. Code*]
- K.3. No person may knowingly falsify, tamper with, render inaccurate or fail to install any monitoring device or method required to be maintained or followed under the Clean Air Act. [Clean Air Act s. 113(c)(2)(C); 42 USC 7413(c)(2)(C), s. 285.65(13), Wis. Stats.]

L. Civil/Criminal Liability.

- L.1. Nothing in this permit shall be construed to relieve the permit holder from civil and/or criminal penalties under ss. 285.87 and 299.15, Wis. Stats., for violation of the terms or conditions of this permit, or for violation of ss. 285.01 to 285.87, 292.11(2) and 299.15, Wis. Stats., or of any rule or any special order issued under those sections except where the operation permit shield provisions of s. 285.62(10)(b), Wis. Stats., are applicable. [s. 285.62(10)(b), Wis. Stats.]
- L.2. The permit holder has the duty to comply with all conditions of the permit. Any noncompliance with this permit constitutes a violation of the Wisconsin statutes, the federal clean air act, or both, and is grounds for enforcement action; for permit suspension, revocation or revision; or, if allowed under s. 285.62(6), Wis. Stats., for denial of a permit renewal application. [ss. NR 407.14, NR 407.15, and NR 407.09(1)(f)1., Wis. Adm. Code, s. 285.60(7), Wis. Stats. and 42 USC 7661a]

L.3. The following items are provided per s. NR 407.09(1)(d) and (f), Wis. Adm. Code:

- L.3.a. It is not a defense for a permit holder in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with this permit. [s. NR 407.09(1)(f)2., Wis. Adm. Code]
- L.3.b. The filing of a request by the permit holder for a permit revision or revocation, or the filing of a notification of planned changes under s. NR 407.025, Wis. Adm. Code, or of anticipated noncompliance, does not stay any permit condition. [s. NR 407.09(1)(f)3., Wis. Adm. Code]
- L.3.c. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege, nor does it authorize any injury to private property or any invasion of personal rights. [s. NR 407.09(1)(f)4., Wis. Adm. Code]
- L.3.d. The provisions of this permit are severable. In the event of a successful challenge to any portion of the permit, all other portions of the permit remain valid and effective. [s. NR 407.09(1)(d), Wis. Adm. Code]

M. Recordkeeping Requirements.

M.1. The permit holder shall maintain the following records, per s. NR 439.04, Wis. Adm. Code:

M.1.a. Records of all sampling, testing and monitoring conducted or required under this permit. Records of sampling, testing or monitoring shall include the following:

- M.1.a.(1) The date, monitoring site and time and duration of sampling, testing, monitoring or measurements.
 - M.1.a.(2) The dates the analyses were performed.
 - M.1.a.(3) The company or entity that performed the analysis.
 - M.1.a.(4) The analytical techniques or methods used, including supporting information such as calibration and maintenance records of all original recording charts for continuous monitoring instrumentation including emissions or equipment monitors.
 - M.1.a.(5) The results of the analyses.
 - M.1.a.(6) The relevant operating conditions that existed at the time of sampling, testing, monitoring or measurement.
- M.1.b. Records detailing all malfunctions which cause any applicable emission limitation to be exceeded, including logs to document the implementation of the plan required under s. NR 439.11, Wis. Adm. Code;
- M.1.c. Records detailing all activities specified in any compliance schedule approved by the Department under chs. NR 400 to 499, Wis. Adm. Code; and
- M.1.d. Any other records relating to the emission of air contaminants which may be requested in writing by the Department.

M.2. *For each hazardous air contaminant emitted determined as laid out in s. NR 406.04(3), Wis. Adm. Code, the owner or operator of a source constructed or last modified prior to July 1, 2004, with non-exempt, potential to emit emissions of the hazardous air contaminant less than or equal to the applicable threshold in column (c), (d), (e), or (f) of Table A, B or C of s. NR 445.07 shall maintain records in accordance with s. NR 439.04(1) and (2) starting no later than June 30, 2007..[s. NR 445.08(6)(b), Wis. Adm. Code]

The records shall list the hazardous air contaminants in Tables A, B, and C of s. NR 445.07 that the source uses or emits.

M.3. Owners and operators of facilities required to file emission inventory reports shall keep accurate and reliable records sufficient to enable verification of the reports by the Department. [s. NR 438.03(4), Wis. Adm. Code.]

M.4. Copies of all records and reports required under this permit shall be retained by the permit holder for a period of 5 years. [s.

NR 439.04(2), Wis. Adm. Code.]

N. Compliance Certification.

N.1. The permit holder shall submit compliance certifications to the Department, and part 70 sources shall also submit this compliance certification to the United States Environmental Protection Agency. [s. NR 439.03(1)(c) and (9), Wis. Adm. Code]

N.1.a. The certification shall be submitted according to the schedule established in Part I of the permit. [s. NR 439.03(1)(c), Wis. Adm. Code]

N.1.b. The certification shall include the following:

N.1.b.(1) Identification of each permit term or condition that is the basis of the certification;

N.1.b.(2) The compliance status of the source with respect to each term or condition identified in N.1.b.(1);

N.1.b.(3) Whether compliance was continuous or intermittent;

N.1.b.(4) Method(s) used for determining the compliance status, currently and over the previous 12 month period;

N.1.b.(5) Compliance status with respect to 40 CFR 68 (Accidental Release Prevention) including registration and submission of the risk management plan, as specified in 40 CFR 68.160 and 68.150, respectively, if applicable.

N.1.b.(6) Other information required to determine the compliance status of the source, as specified in this permit. [s. NR 439.03(8), Wis. Adm. Code]

N.2. Compliance certifications shall be signed by a responsible official of the source. The responsible official shall certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [s. NR 439.03(10), Wis. Adm. Code]

O. Required Air Emission Inventory Reports.

The permit holder shall annually submit to the Department an emission inventory report of annual, actual emissions or throughput information in accordance with ch. NR 438, Wis. Adm. Code. [s. NR 438.03, Wis. Adm. Code]

P. Annual Emission Fees.

The permit holder shall pay an annual emissions fee to the Department at the rate specified in s. 285.69(2), Wis. Stats. [ss. NR 410.04 and NR 407.09(1)(e), Wis. Adm. Code]

Q. General Provisions for Hazardous Air Pollutant MACT Standards.

The general provisions in ch. NR 460, Wis. Adm. Code, apply to any permit holder that is affected or becomes affected by a standard promulgated by EPA under section 112 of the act (42 USC 7412). [s. NR 460.01, Wis. Adm. Code]

R. Stratospheric Ozone Protection.

R.1. Federal Requirements. (Call 1-800-296-1996 for information)

R.1.a. The permit holder shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

R.1.a.(1) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to section 82.106.

R.1.a.(2) The placement of the required warning statement must comply with the requirements pursuant to section 82.108.

- R.1.a.(3)The form of the label bearing the required warning statement must comply with the requirements pursuant to section 82.110.
- R.1.a.(4)No person may modify, remove or interfere with the required warning statement except as described in section 82.112.
- R.1.b. The permit holder shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in 40 CFR Part 82, Subpart B:
- R.1.b.(1)Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to section 82.156.
- R.1.b.(2)Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to section 82.158.
- R.1.b.(3)Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to section 82.161.
- R.1.b.(4)Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to section 82.166 (the term, “MVAC-like appliance”, is defined in section 82.152).
- R.1.b.(5)Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to section 82.156.
- R.1.b.(6)Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to section 82.166.
- R.1.c. If the permit holder manufactures, transforms, imports or exports a class I or class II substance, the permit holder is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- R.1.d. If the permit holder performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permit holder is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo or system used on passenger buses using HCFC-22 refrigerant.
- R.1.e. The permit holder may be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

[s. 285.65(12), Wis. Stats.]

R.2. State Requirements. (Call 1-608-264-6049 for information)

- R.2.a. During the salvaging, dismantling or transporting of refrigeration equipment, no person may knowingly or negligently release ozone-depleting refrigerant to the environment, except for minimal releases that occur as a result of efforts to transfer ozone-depleting refrigerant into storage tanks. [s. 285.59(2r)(a), Wis. Stats.*]
- R.2.b. No person may knowingly or negligently release from a storage tank to the environment ozone-depleting refrigerant that was removed during the salvaging, dismantling or transporting of refrigeration equipment, except for minimal releases that occur as a result of efforts to transfer ozone-depleting refrigerant into refrigeration equipment or other storage tanks. [s. 285.59(2r)(am), Wis. Stats.*]
- R.2.c. No person may salvage or dismantle any refrigeration equipment unless:
- R.2.c.(1)That person holds and prominently displays an annual registration of certification obtained from the Department under s. NR 488.04, Wis. Adm. Code;
- R.2.c.(2)That person uses refrigerant recovery equipment approved by the Department under s. NR 488.07, Wis. Adm. Code, to

transfer remaining ozone-depleting refrigerant from each piece of refrigeration equipment into storage tanks; and

R.2.c.(3) Individuals who use the approved refrigerant recovery equipment have, or are working under the direct supervision of individuals who have, the qualifications required under s. NR 488.08, Wis. Adm. Code. [s. NR 488.03(3), Wis. Adm. Code*]

R.2.d. Any person who sells, gives or transports refrigeration equipment to a scrap metal processor shall:

R.2.d.(1) Transfer ozone-depleting refrigerant from the refrigeration equipment into a storage tank using approved refrigerant recovery equipment or obtain and possess documentation that another person performed the transfer; and

R.2.d.(2) Provide documentation to the scrap metal processor that he or she has complied with R.2.d.(1).

Note: Sample forms for the documentation of compliance with R.2.d.(1) are available from the Bureau of Air Management CFC Program.

Exemption: R.2.d.(1) and R.2.d.(2) do not apply to a person who sells, gives or transports refrigeration equipment to a scrap metal processor when that processor has agreed in writing to transfer the ozone-depleting refrigerant into a storage tank using approved refrigerant recovery equipment and that the processor is registered with the Department under s. NR 488.04. [s. NR 488.05, Wis. Adm. Code*]

R.2.e. Any person who transports, for the purposes of salvaging or dismantling, refrigeration equipment that contains ozone-depleting refrigerant shall certify to the Department that person will not knowingly or negligently release ozone-depleting refrigerant to the environment, except for minimal releases that occur as a result of refrigerant recovery efforts. This certification shall be submitted annually, along with a description of the safe transport methods to be used, and the fees required under s. NR 488.11, Wis. Adm. Code. [s. NR 488.10, Wis. Adm. Code*]

ATTACHMENT I

EQUIPMENT INVENTORY

This is a list of equipment currently located at Serigraph Plants 1 and 2. This list is current as of the date of issuance of this permit. An updated, detailed list of significant air pollution emissions units is available on site and upon request.

Serigraph Equipment and Fugitive Numbers

Numbers assigned for miscellaneous emissions	Description
212	Plant 2 miscellaneous voc emission
240	reclaim
250	solvent usage
299	Plant 1 miscellaneous voc emission

Plant 2 Fugitive emissions	
Equipment numbers	
217	screen press
222	screen press
236	screen press
270	screen press
280	screen press
285	screen press
2001	screen press
288	pad printer

Plant 1 Fugitive emissions	
282	offset press
286	offset press
287	offset press
289	offset press
293	digital press
2003	digital press

Biofilter Controlled emissions		
253	screen press	X
259	screen press	X
261	screen press	X
264	screen press	X
266	screen press	X
276	screen press	X
277	screen press	X
278	screen press	X
291	screen press	X
297	screen press	X
298	screen press	X
2004	screen press	X
2006	screen press	X



March 10, 2008

Mr. Mark McDermid
DNR Bureau of Cooperative Environmental Assistance
PO Box 7921
Madison, WI 53707-7921

Re: Letter of Intent to Apply for Tier 2 of the Green Tier Program

Dear Mr. McDermid,

I would like to take this opportunity to inform you of Serigraph's intentions to participate at Tier II of the Green Tier program. You will find the application form and all the necessary attachments enclosed with this Letter of Intent.

Eligibility Requirements

We submit that Serigraph, Inc. meets all of the eligibility requirements for Tier 2 of Green Tier. Attachment two (2) of this application demonstrates Serigraph's long-standing commitment to superior environmental performance.

Summary of recent accomplishments:

- Since 2000, over 180 tons of VOC have been prevented from being discharged into the air by using the Bio Filter.
- Serigraph operates a corporate-wide recycling program, which resulted in the recycling of 1.5 million pounds of plastic in 2006
- Serigraph has a 100 - acre main campus, of which 75 acres are kept natural.
- Screen reclamation water consumption was reduced to 2,432,360 gallons /year from 6,949,600 gallons, a 65% improvement.
- Scrap as a percent of cost has been reduced from 29% in FY 2002 to 21% in FY 2008. Conversely, yields have improved from 80.6% to 85%. Yield, which is the percentage of good parts yielded from a quantity of raw material, provides a powerful environmental measurement since less material is produced, wasted, and recycled for the same quantity of good parts. This significant improvement in yield saved approximately 1,674,330 parts from having to be recycled as scrap in FY 2007.

- Serigraph established a natural prairie of 25 acres at its corporate headquarters. One of Serigraph's employees guides a program to prevent the spread of invasive species on its properties.
- Serigraph's property includes a sediment capture pond that contains run-off soils before it empties into Milwaukee River.
- Serigraph has removed lead from its inks.
- Serigraph is in negotiations with the Ozaukee –Washington Land Trust (OWLT) to donate a large tract of land along the Milwaukee River. That donation will be completed in 2008.
- Officers of Serigraph were leaders in bringing OWLT to Washington County. Its chairman and chief financial officer serve on the land trust board. The company donates its financial expertise to manage the financial affairs of the trust. The wife of chairman served four years as president of OWLT. Officers of the company lead the redevelopment efforts of West Bend, which put an emphasis on in-fill development, and its staff has been used as more than a dozen brown field sites were cleaned up in the city.
- The company donates the time of its people to many civic activities. One manager, for example, served on the board of Riveredge. One spouse headed its fund-raising bike ride for three years. Serigraph has been a major sponsor of the bike ride for more than a decade. Up to 50 of its co-workers participate in that fund-raising event every year. Serigraph's chairman serves on the board of the Wisconsin chapter of the Nature Conservancy.
- A walking path on company grounds encourages health and fitness for co-workers. It will be expanded to the company's 40 acres along the Milwaukee River in 2008.
- The company has worked to promulgate "The Kettle Moraine Ethic" for two decades. It is an effort that honors the glacial topography of Wisconsin and Washington County and aims to protect the Milwaukee River water shed. To that end, it uses its resources, financial and human, to protect and preserve the land and water resources of Southeastern Wisconsin. One of the projects to promote the Kettle Moraine Ethic has been the commissioning of prominent artists to depict the glacial topography as they see it. The first artist was Arthur Secunda, who uses torn paper collage as a medium. Serigraph introduced him to the Kettle Moraine and then bought five of his originals. It then reproduced the original, using its cutting edge printing technologies. Those prints have been spread across the state, including the state capitol and the Washington County board room. Secunda, personally signed four prints over four years. In 2007, Serigraph commissioned Reggie Baylor, a Milwaukee artist for another service of four originals and prints. They will be used to promote the virtues of the Kettle Moraine and the Milwaukee River water shed. Fifty prints were donated to OWLT for use in its fund-raising. Many Serigraph co-workers worked on the prints. (See attached print). Dan Sackett, who supervised the printing used the printing in the company's patented printing technologies to make the print. The new prints are now being sent all over the region and the state.
- Serigraph served as the lab in 2006 and 2007 for the efforts to pass a referendum in Washington County to preserve prime farmland. The company donated many of the campaign materials. Its co-workers were heavily involved in the campaign, which, unfortunately failed to produce a positive outcome in April, 2007. At the same time, its CEO served on the Working Lands Initiative and authored the provisions to endorse

preservation of development rights (PDRs) at the state level. To date, it has not been acted on.

- Serigraph serves as an incubator for a wide range of environmental initiatives. A group, begun at Serigraph, gave birth to West Bend Trailblazers, a group dedicated to the expansion of the trail system in West Bend and Washington County. Currently, Serigraph is the site for a group of business people, city representatives, and environmental groups (Wisconsin Wildlife Federation, Friends of the Milwaukee Rivers, The Wisconsin River Alliance, and The Wisconsin Wetlands Association) to find a way to expand the West Bend Airport without damage to adjacent wetlands. Serigraph is the heaviest business user of the airport and its adjoining property.
- In 2006, the company agreed to go on an interruptible power plan. That means less need for power at peak loads for WE Energies, and, long term, less generating capacity. In short, Serigraph agreed to shut down operations during peak load demands, if necessary.

Serigraph has implemented an environmental management system (EMS) in 2005. Serigraph performs a management review that includes internal audits results of its quality and environmental systems including corrective actions. An external audit was performed in 2007 by a certified ISO 14001 Lead assessor which resulted in several minor areas for improvement, all of which are being addressed by corrective actions that will be completed in the next 30 days.

Involvement of Interested Persons

Serigraph has not historically involved stakeholders in environmental affairs, but a new course has been charted with this Green Tier application. Since the establishment of our EMS and in developing our proposal, a series of discussions have been held involving employees at all levels of the company. Employees were asked to provide their thoughts and ideas for environmental improvement. In addition, two key suppliers and two key customers were engaged in discussions to improve the quality and delivery and whether they would attach any value to working with a Green Tier company. All of these discussions helped shape the application and these stakeholders will have an important role in ongoing environmental improvements.

It is Serigraph's intention to further these efforts by including other stakeholders from the community and/or representatives of environmental groups provided that all parties are dedicated to a positive and constructive dialogue. Serigraph's EMS has very specific procedures for communicating with the public, but Serigraph, Inc. is committed to go beyond simple communications by hosting regular meetings with outside stakeholders, if the interest is there.

Please review Attachment 4 which shows a list of some of the stakeholders that we think will take an interest in our Green Tier participation. The names, roles or interests represented, and addresses for each person or group are listed. The list includes a City of West Bend official, Serigraph employees, an interested customer, and an active statewide environmental group.

Proposed Provisions of the Participation Contract

Serigraph would like to propose a participation contract that is premised upon the following list of environmental performance commitments and incentives. If and when negotiations begin for

participation at the Tier II level, Serigraph is amenable to being flexible in the types of incentives offered as well as the benefits delivered.

A. Proposed Commitments to Improve Our Superior Environmental Performance:

1. Waste minimization (including recycling) - Reduce scrap as a percent of cost by 5% at a minimum.
2. Minimizing solvent usage – Reduce usage of part / tool clean up solvents by 10% at a minimum.
3. Reduction in electrical consumption – Review Plant 2 / 4 consolidation to determine new levels and develop reduction goals for FY 2008
4. Prairie restoration and maintenance – Keep current acreage at or above natural prairie state using native vegetation around the majority of Serigraph facilities and eliminate known invasive species on Serigraph land and to reduce green gas emissions.
5. Water use reductions - Review Plant 2 / 4 consolidation to determine new levels and develop reduction goals for FY 2008
6. Low VOC coatings to replace conventional ink – Increase UV ink construction conversions from conventional solvent based constructions by 5% annually at a minimum.
7. Increase the number of screens reclaimed per pound of centrifuge solvent by 5% at a minimum.
8. Complete mixture Design of Experiment to determine if cleaning solvent blend can be reformulated with 10% less VOC component percentage

Note: Environmental incentives and commitment will be measured against FY 2002 as a baseline.

B. Requested Incentives:

1. Numbered certificate of recognition;
2. Identify Serigraph, Inc. as a Tier 2 participant on DNR's Green Tier Internet site;
3. Annually notify the West Bend News and Milwaukee Journal Sentinel of Serigraph's participation in Tier 2 of the program;
4. Permission to use the Green Tier logo on written materials produced by Serigraph Inc.;
5. A single point of contact at DNR assigned to Serigraph, Inc. who can field all of our questions and communications related to Green Tier participation, DNR regulatory approvals, or technical environmental issues;
6. DNR will conduct any required inspections of Serigraph, Inc. at the lowest frequency permitted under chs. 29 to 31, 160, or 280 to 299, Wis. Stats., except in cases where DNR has reason to believe that Serigraph, Inc. is not complying with the terms of any DNR approval or other environmental requirement;
7. DNR to issue a performance based, cross media permit that would serve as its Air Pollution Control Operation Permit. This permit would contain facility-wide VOC and hazardous air

pollutant emission caps and allow new construction and modification of air pollution emitting equipment as long as emissions remain under this cap.

8. Line-by-line variance from several applicable RACT rules (found in chs. NR 422, 423, and 424, Wis. Adm. Code) removed to simplify recordkeeping and reporting requirements.
9. The Wisconsin Department of Natural Resources collaborates with Serigraph, Inc. to explore opportunities for an environmental equivalence of the Integrated Spill Prevention Control and Countermeasures (ISPCC) Under EPCRA.
10. As a final flexibility, Serigraph would like to explore other options for shutting down its biofilter at a later date.

Explanation of Proportionality

Serigraph, Inc. believes that the proposed measures to improve environmental performance are proportional to the requested incentives. Of the ten incentives proposed, B.1 - B.6 are afforded automatically to Green Tier participants even at the Tier 1 level. Incentive B.7 is justified based upon Serigraph's proven record of superior environmental performance and the confidence that results from our EMS. Incentive B.8 saves enough money to pay for some of the environmental improvements, and it is predicated upon the requirement that the company's air emissions will not increase. In summary Serigraph, Inc. is requesting operational flexibility that makes the company more competitive without posing any additional risks to human health or the environment. In return, Serigraph, Inc. is pledging to make real and significant improvements across a range of high-priority environmental issues. The net result of this proposal is a clear win-win situation for the environment and Wisconsin's economy.

Next Steps

I'd like to add that Serigraph, Inc. is proud of its environmental performance record. We look forward to your response and our future efforts with the DNR in making Wisconsin both an economically and environmentally better place to live.

Sincerely,

Nicholas Leifeld
Vice President Quality & Compliance

Enclosures:

- Form 4800-022 (Green Tier Application)
- Attachment 2 - Environmental Performance and annual report
- Attachment 3 - Functional Equivalency Determination
- Attachment 4 - Stakeholder Information

Green Tier Application

Notice: Collection of this information is authorized under s. 299.83 Wis. Stat. Participation in Green Tier and completion of this form are voluntary. Personal information collected on this form, including such data as your name, address, phone number, etc., will be used in the implementation of Green Tier and will be made broadly available under the Green Tier program. Information will also be made accessible to requesters under Wisconsin's Public Records Law (ss. 19.32 - 19.39, Wis. Stats.). If you need to request confidential treatment of any information in order to protect a trade secret, please contact a DNR representative prior to submitting this form. Applications must be considered complete by the DNR in order to be processed. For complete application instructions, see "Green Tier Application Instructions," publication number CO-501.

This application is for... (check one): Tier 1 Tier 2 (attach Letter of Intent to this form)

I. Applicant Information

Contact Name	MICHAEL S. LEIFELD			Title	VICE PRESIDENT - QUALITY & COMPLIANCE			
Street Address	3801 E DEERAN		City	WEST BEND	State	WI	ZIP Code	53095
Telephone Number	262 335 7306		Fax Number	262 335 7699		E-mail Address		ml@scg.com

II. Facility Information

Facility Name	SCRIBBACH			County	WASHINGTON			
Street Address	3801 E DEERAN		City	WEST BEND	State	WI	ZIP Code	53095
Mailing Address	3801 E DEERAN		City	WEST BEND	State	WI	ZIP Code	53095

Please provide all DNR Facility Identification numbers (FID #) that apply to the covered facility or activity.
FID 267065260

III. Scope of Green Tier Participation (check one)

- This application covers all activities at the facility listed in Section II.
- This application covers all activities at more than one facility. For each facility to be covered under this application provide the information from Section II on a separate page labeled **Attachment 1**.
- This application **does not** cover all activities at every covered facility. Please describe the exact scope of activities and facilities to be covered in the program on a separate page labeled **Attachment 1**.

IV. Environmental Performance

Please provide the following information on a separate page labeled **Attachment 2**. Refer to the *Application Instructions* for definitions of environmental performance and superior environmental performance.

Tier 1 Applicants:

- Describe your past and current environmental performance with respect to each covered facility or activity included in this application. Within this attachment establish a baseline date against which future progress can be measured.
- Describe your future plans for enhancing the environment with respect to the same facilities/activities.

Tier 2 Applicants:

- Provide information demonstrating your record of superior environmental performance. Within this attachment establish a baseline date against which future progress can be measured.
- Describe the measures you propose to take to maintain and improve your superior environmental performance.

V. Environmental Management System (EMS)

- a. Have you implemented an EMS that is certified to the ISO 14001 standard? Yes No (circle one)
- b. Have you implemented an EMS that is functionally equivalent to ISO 14001? Yes No (circle one)

If you circled "No" for both questions, you are not eligible for Tier 2. Please proceed to Section VI only if you are applying for Tier 1.

If you circled "Yes" for either question, please provide a copy of the following documents labeled as **Attachment 3**:

- Proof of ISO 14001 certification OR functional equivalence (refer to *Application Instructions* for details)
- Environmental policy statement and scope statement
- Documented objectives and targets for the covered facilities/activities

Green Tier Application

VI. Public Notice/Stakeholder Identification

Please provide in a separate document labeled **Attachment 4** a list of stakeholders whom you know or expect will have a strong interest in your Green Tier application, as well as contact information for those stakeholders. This information will help DNR expedite the processing of your application. Tier 2 applicants must provide additional information about stakeholder involvement in a Letter of Intent. Refer to *Application Instructions* for details.

VII. Enforcement Record

Please review the Enforcement Record requirements described in the *Application Instructions* very carefully, and then check the appropriate box:

- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

If a waiver is requested, please provide information describing any requirements not met and a justification for the waiver request on a separate page labeled **Attachment 5**. Note that waivers will be granted only in exceptional circumstances.

VIII. Tier 1 Applicant Statement of Commitments

I commit with my signature to the following statements and certify that all information provided in this application is true and correct under penalty of law:

- Implement, within one year of the date of this application, an EMS for each covered facility or activity that is certified to the ISO 14001 standard or is functionally equivalent to ISO 14001 as determined by DNR.
- Conduct annual EMS audits, with every 3rd EMS audit performed by a DNR-approved outside environmental auditor.
- Submit to DNR an annual report on each EMS audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.
- Submit to DNR an annual report on progress towards meeting objectives related to improved environmental performance for aspects regulated under chs. 29 to 31, 160, or 280 to 299, Wis. Stats., unregulated environmental aspects, or voluntary actions to restore, enhance, or preserve natural resources.

Applicant Signature

Date Signed

IX. Tier 2 Applicant Statement of Commitments

I commit with my signature to the following statements and certify that all information provided in this application is true and correct under penalty of law:

- Conduct annual EMS audits performed by a DNR-approved outside environmental auditor.
- Conduct or have another person conduct an annual audit of compliance with environmental requirements that are applicable to the facilities and activities covered under Green Tier.
- Submit to DNR an annual report on each EMS audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.
- Submit to DNR an annual report on each compliance audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.

Applicant Signature

Date Signed



9-20-07

X. For Department Use Only

Date Received	Initials of Reviewer	Status	Date Returned to Applicant for Additional Information	Date Denied	Date Approved

Attachment 2

Serigraph's Environmental Performance

For nearly two decades Serigraph Inc has maintained a steadfast commitment to the environment. Serigraph was one of the first printers to recover solvent from used wipes in order to minimize air emissions. The company was a pioneer in the use of no Volatile Organic Compounds (VOC) UV inks for offset printing on plastic substrate. In 1997, Serigraph installed a bio filtration system to control VOC from its screen printing operation. This system uses bacteria that "eat" VOC at 80-90% efficiency rate and was the first system of its kind to convert 25 compounds simultaneously. Since 2000, over 180 tons of VOC have been prevented from being discharged into the air by using the Bio Filter. This has helped improve air quality in SE Wisconsin by reducing ozone levels. Internally, the company has reduced VOC emissions over the years by 75%.

Serigraph operates a corporate-wide recycling program which resulted in the recycling of 1.5 million pounds of plastic in 2006. This equates to a 90 mile path of plastic four feet wide and 1/8" thick. In addition, almost 70 tons of scrap metal was recycled over the past two years which is enough metal to build 65 cars. In 1999, Serigraph received the DNR's Partners for Clean Air award and was a recipient of the Wisconsin Manufacture and Commerce's Business Friends of the Environment award in 2003.

In addition to the installation of a bio filtration system at Plant 2, Serigraph has engaged in a number of other environmentally friendly programs. In 2001, Serigraph incorporated the use of a plate and frame heat exchanger to reduce air conditioning loads during the winter months. This project reduced electrical consumption by about 280,000 KW per year. Since that time, the company has continued to fine tune the system in order to increase the reduction to 450,000 KW per year. Assuming an average house consumes 9,000 KW per year, this equates to saving enough electricity to power 50 homes.

During 1997, Serigraph re-landscaped its Plant 2 site to incorporate a natural prairie theme. Thirty to forty native prairie species were planted as well as a variety of native trees which provide food and shelter for native birds. This natural border of plants was planted around the pond to minimize salt run off and to prevent fertilizer and pesticide application. Serigraph has a 100 acre main campus of which 75 acres are kept natural. Carbon credits can be allocated to land at the rate of .4 tons/acre in SE Wisconsin if kept in a natural state to absorb Carbon Dioxide (CO₂) from the atmosphere. This means 30 tons of CO₂ are absorbed every year by plants surrounding Serigraph to reduce this Green House Gas.

A project was completed during April 2006 to dramatically reduce water usage. Screen reclamation water consumption was reduced to 2,432,360 gallons /year from 6,949,600 gallons (65% improvement). This project involved pumping reclamation water into the bio-filter instead of fresh water. This not only reduced water consumption, but it also saves energy since less

water is sent to the city of West Bend's water treatment plant. A typical household uses 36,000 gallons of water per year; therefore, enough water is saved to provide water to 125 homes. Additional projects are evaluated and selected each year that have a positive impact on the environment. This process of continuous improvement will keep Serigraph at the leading edge of being an environmentally friendly company that pursues operational excellence in every aspect of its business.

For FY 2008, Serigraph has selected the following environmental goals for plant 2:

Measurement	Actual	Objective	Goal/Target
Ratio of # Screens reclaimed / lbs of Centrifuge Solvent	.80	.85	.90
Ratio of # Screens reclaimed / lbs of wipes	.70	.75	.80
Conventional Ink hazardous waste shipments	14,562 lbs	13,500 lbs	12,000 lbs
Scrap as % of Cost (Less scrap saves energy by not making as much raw material and less material has to be recycled)	21%	20%	18%

1. Plant 2 and 4 water consumption levels will be reviewed after consolidation to establish goals for FY 2008

Summary

Serigraph wishes to remain on leading edge of environmentally friendly processes. Serigraph has asked the DNR to issue a performance based cross media permit that would serve as it's Air Pollution Control Operation Permit. This permit would contain facility-wide VOC and hazardous air pollutant emission caps and then allow new construction and modification of air pollution emitting equipment as long as emissions remain under this cap. It would be preferred to have the line-by-line limitations from several applicable RACT rules (found in chs. NR 422, 423, and 424, Wis. Adm. Code) be removed to simplify recordkeeping and reporting requirements. Beyond air rules, a conditional waiver of the Integrated Spill Prevention Control and Countermeasures (ISPPC) Under EPCRA is requested. As a final flexibility, Serigraph has agreed to have an extra VOC reduction goal in its permit with the understanding that, upon meeting this goal, the facility would be allowed to permanently shut down its bio-filter

Annual Green Tier Report 2006
May 25, 2007



BUSINESS OVERVIEW

Serigraph Inc. is a manufacturer of decorative components for a wide range of OEM customers as well as the Point-of-Purchase advertising industry. In short, Serigraph decorates all kinds of products and stores for a wide range of very demanding global customers.

The products range from the graphics for the instrument cluster in a car, the control panel on a dishwasher or office copier, an outboard marine engine or a golf club shaft, or for advertising french fries and soft drinks in a fast food store. Serigraph's basic technologies revolve around a variety of printing processes, but include many other methods of adding decorative effects for products and stores. Serigraph can be thought of as a "high tech" printer.

Serigraph's Mission: "To market and produce exciting decorating solutions for our customers' products and displays".

Serigraph's Environmental Policy: "1. Serigraph believes that environmental stewardship is a corporate responsibility. 2. Serigraph shall manage its operations in a manner that reflects continual environmental improvement of the air, land and water".

Introduction

On May 27, 2005, Serigraph Inc submitted an application for its Plant 4 facility located at 2230 Stonebridge Circle West Bend Wisconsin to join the Department of Natural Resource's Green Tier I program. On November 28 of the same year, the Company notified the DNR that it wished to amend its application to include its Plant 2 facility located at 3801 E. Decorah Road. This report shall cover the activities that transpired from the date of application(s) to February 7, 2007. Serigraph's Environmental Health & Safety Department (EH&S) served as the coordinating unit for the 2005 – 2006 Green Tier project. The following objectives were established for the 2006 year.

1. Develop an environmental management program (system) EMS
 - a. Create an EMS manual
 - b. Develop an EMS operating system that reflects the requirements of Wis. Stats. §299.83(1)(dg)
2. Restructure environmental procedures
3. Identify environmental improvement opportunities.
4. Complete one or more projects that improve the environment

History

Serigraph has always kept pace with changing requirements by being proactive through its strategic planning process which looks at the strengths, weaknesses, opportunities and threats of markets, customers, regulations, and global economics. Serigraph made a pioneering effort in 1997 to bring in Biofiltration technology to reduce VOC emissions by 30 tons. This was followed up with a conversion to alcohol-free fountain solutions for UV offset printing which reduced 23 tons of air VOC's annually in 2000. In 2003, Wisconsin received the Wisconsin Business Friends of the Environment Award for its efforts in reducing VOC air emissions. In 2004 Serigraph committed to replacing solvent-based inks with low-VOC coatings and is working with its customers to get approvals for the new ink constructions.

Serigraph's environmental ethics extend beyond meeting and exceeding regulated and unregulated edicts. Serigraph has voluntarily undertaken a number of projects that have improved the environment. When the company headquarters was built in 1997, a prairie restoration was undertaken to preserve green space in a natural state. Serigraph has a 100 acre main campus of which 75 acres are kept natural. The roof discharge from the 165,000 sq ft main building is routed to a natural plant filtration system that minimizes nitrification of a pond in front of the building. A natural border of plants around the pond minimizes salt run off and fifty acres of natural prairie is maintained to prevent fertilizer and pesticide application. When the headquarters building was built, an agreement was made with the city of West Bend to widen the road from the city with a bike lane so that employees could ride bicycles and/or walk to work safely. For two decades, Serigraph and its leaders have promoted the "Kettle Moraine Ethic" and have led a county wide effort for land and water preservation.

The establishment of an Environmental Management System and pursuing Green Tier has reinforced the role of an EMS system that involves suppliers, employees and customers. By working together with suppliers and customers, significant reductions have been made to reduce lead content in inks to a level where it is non existent for new inks. Serigraph's senior leadership

team feels that more results will be forthcoming with Green Tier. Serigraph has spent \$50,000 over the last 5 years in permit fees which can be eliminated. Savings from future Green Tier projects in FY 2007 are projected to be \$25,000. Green Tier has become part of the management review system, which has helped senior leadership make more informed decisions about environmental issues as well as measure progress on goals and objectives. Several customers have requested that a documented, verifiable EMS based upon ISO 14001 be implemented by their suppliers. Our EMS satisfies this important requirement. Serigraph has a long history of taking proactive approaches to reduce pollution and improve the environment as evidenced by the accomplishments listed in Appendix A.

Activity Report

a. Using the Screen Graphics Imaging Association (SGIA) template, Serigraph developed its EMS manual. A steering committee comprised of members of EH&S and the participating facilities were convened for the purpose of identifying and quantifying environmental aspects and impacts. The areas evaluated were:

- Recycling
- Ink room
- Screen room
- Printing
- Post printing

Areas that will be evaluated in FY 2007 are:

- Receiving – Completed 4-07
- Shipping
- Maintenance
- Buildings and grounds – Completed 4-07

Criteria used to evaluate the feasibility of alternative actions included volume of the aspect, impact of the aspect with respect to the environment as well as health and safety, cost, return on investment, and ability to complete the alternative in a timely manner. For 2006, a considerable amount of weight was given to the ability to complete alternative approaches.

b. The Functional Equivalency Determination (FED) submitted by Serigraph demonstrated that the EMS is functionally equivalent to ISO 14001. The EMS FED was submitted to the DNR on February 8, 2007. Serigraph agreed to the following examples of superior environmental performance.

1. VOC and Air Toxic Emissions Reductions
2. Waste minimization (including recycling)
3. Minimizing solvent usage
4. Reducing energy consumption
5. Prairie restoration and maintenance
6. Water use reduction
7. Low VOC coatings to replace conventional inks
8. Greenhouse gas emissions reductions
9. Using native vegetation around Serigraph grounds and eliminating invasive species on Serigraph land

1. VOC and Air Toxic Emissions Reductions

a. Serigraph researched the use of Soy inks for use in the Specialty Graphics markets; however, none of the inks could be processed effectively. The ink supplier could not resolve the quality problems and decided to stop producing the ink. R&D continues to look for alternative ink systems with suppliers and as they are developed, operations and the reliability lab test the inks to ensure they meet internal and external customer expectations.

b. The pressroom tested three different wash solutions for rollers and blankets over a three month period as a low VOC replacement to the current wash solution. None of the three replacement solutions worked effectively, however, and none are viable alternatives. The

pressroom supervisor continues to test new wash solution formulas that may result in reduced VOC emissions.

c. The pressroom reduced fountain solution VOC levels 75% by using a VOC free solution. Close cooperation with suppliers helped to make this project a success.

d. The technical services department supports the 4 pillars of Serigraph’s strategic plan through various actions and developments. One strategic focus is on operational excellence which includes identifying and developing low VOC ink systems.

2. Waste minimization

a. Plastic Pail Recycling

Serigraph’s screen printing process uses relatively small quantities of ink for each printing sequence. As a result the coatings are contained in one and three gallon pails. These pails cannot be repeatedly used due to residual contamination. An analysis indicated that if Serigraph was using and disposing of about 44,000 one gallon plastic pails annually. Once used, the pails were being land filled. A goal was established to rinse the pails and send them to a vendor for recycling. The Company had a custom washer built for processing the pails generated at Plants 2, 3, and 4. The project was fully implemented in November. Currently Serigraph is recovering pails at an annual rate of 30,000 units.

b. Stainless Steel Recycling

During 2006 EH&S gave a Green Tier presentation at the quarterly General Co-worker meetings. Subsequently, a co-worker who had attended one of the sessions asked if used stainless steel mesh could be recycled. A follow up found that the local scrap metal dealer would take the material. Serigraph instituted a stainless steel recycling program in Plants 2, 3, and 4. The company is currently recycling about 1,200 pounds of mesh annually.

c. Recycling stations

Glass, plastic, aluminum cans and scrap paper are all recycled. In addition, polycarbonate, styrene, polyester, and metal flake are recycled. Charts illustrating the amount and types of material being recycled are found in Chart A under Historical trends.

Material	2005	2006	% Change
	Pounds	Pounds	
POLYCARBONATE	1,047,817	914,407	-14.6%
STYRENE	422,157	638,928	33.9%
PAPER	861,821	837,453	-2.9%
METALS	150,013	156,460	4.1%
Grand Total	2,481,808	2,547,248	2.6%

3. Minimizing solvent usage

A task team has been organized to research alternative low VOC solvents which can be used to replace current clean up solvents used in printing and pre-press.

4. Reducing Energy Consumption

a. Electrical Energy Reduction

During 2006, Serigraph entered into an interruptible power agreement with WE Energy. This program is designed to lessen the electrical drain during peak demand periods. In turn, it reduces the number of backup generation units that need to be built. Serigraph also purchased a power monitoring and energy shed program for its building management system. The program is designed to limit peak demand power. The reductions from these projects have yet to be determined. Energy efficient frequency drive motors have been installed for the cooling towers, Bio-filter and circulating pumps to reduce power consumption and extend motor life.

b. Lighting Project

All new energy efficient lighting fixtures were installed throughout the plant when it was built in 1997 and plant lighting is replaced every three years or the wattage is automatically reduced.

GAS (Therms)		ELECTRIC (kwh)
FY 2005	373,411	14,577,872
FY 2006	395,480	15,362,069
FY 2007 YTD	229,010	10,313,226

5. Prairie restoration

When the company headquarters was built in 1997, a prairie restoration was undertaken to preserve green space in a natural state. Serigraph has a 100 acre main campus of which 75 acres are kept natural. Special efforts were taken using controlled burning to ensure invasive species were not introduced to the land surrounding the facilities. A natural border of plants was planted around the pond to minimize salt run off and fifty acres of natural prairie is maintained to prevent fertilizer and pesticide application.

6. Water Use Reduction

An evaluation of water usage at Plant 2 revealed that the highest water consumption activities were:

- Bio filtration 2,627,700 gallons
- Cooling tower 2,375,650 gallons
- Screen reclamation 6,949,600 gallons
- Total 11,952,950 gallons**

While a cooling tower process is based upon evaporation to create cooling, a portion of the water is used for blow down in order to maintain water quality. This water, which is of relatively good quality, was being discharged to drain. Further investigation of the screen reclamation process found that two rinse booths were operating almost continuously irrespective of what was required for the process. In addition, the quality of the waste water exceeded the city sewer treatment plant limits for biological oxygen demand (BOD). A Green Tier goal was developed to reduce the amount used in during screen reclamation and route the remaining water to the bio filter along with the entire blow down water discharged by the cooling towers. The project was completed during April 2006. The results were as follows:

- a. Screen reclamation water consumption was reduced to 2,432,360 gallons for a savings of 4,517,240 gallons (65% improvement).
- b. Make up water for bio filtration humidification was virtually eliminated (100% improvement).
- c. BOD from screen reclamation water was reduced through the bio filtration system from 12,300 to 307 units (97% improvement).

7. Low VOC coatings to replace conventional inks

Serigraph has made significant progress in converting to UV ink coatings from conventional solvent based chemistries. Partnerships have been developed with suppliers to jointly develop coatings which meet customer specifications. The customer approval process has been steady, but slow. Chart B under Historical trends demonstrates the steady improvement over the past several years.

8. Greenhouse Gas Emissions Reductions

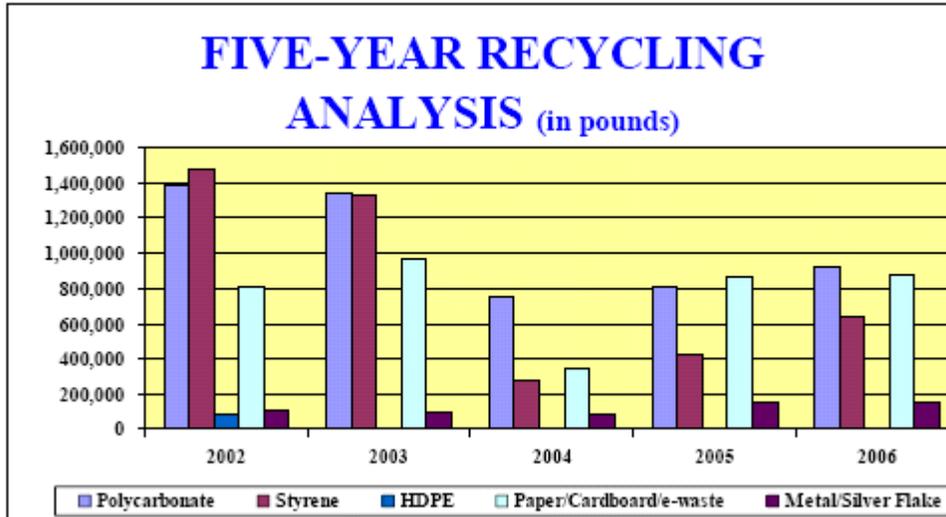
By keeping most of the land owned by Serigraph in a natural state, CO₂ is absorbed by the native plants to reduce greenhouse emissions. The Bio-filter used at Serigraph operates at over 85% efficiency to remove hydrocarbon VOC's from emissions. Chart D illustrates the improvement reducing the tons of VOC's as a percent of sales.

9. Using Native Vegetation and Eliminating Invasive Species

Serigraph has a 100 acre main campus of which 75 acres are kept natural. Special efforts were taken using controlled burning to ensure invasive species were not introduced to the land surrounding the facilities.

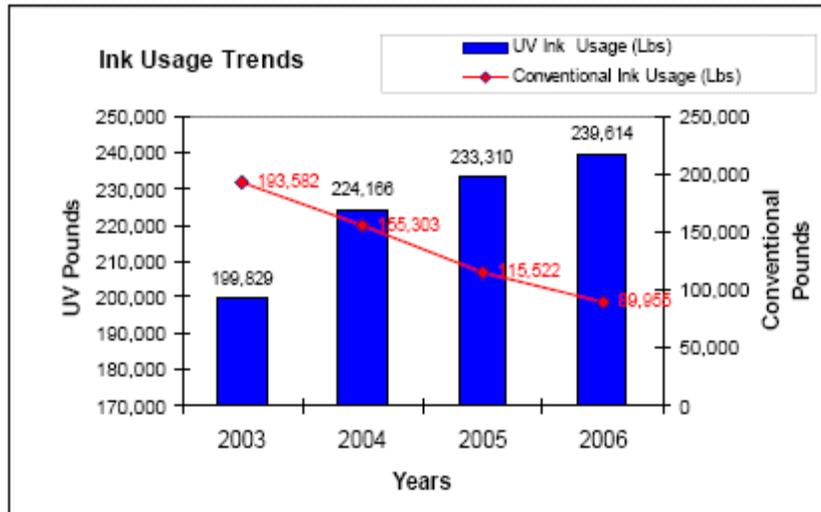
Historical Trends for Environmental Performance Indicators

Chart A



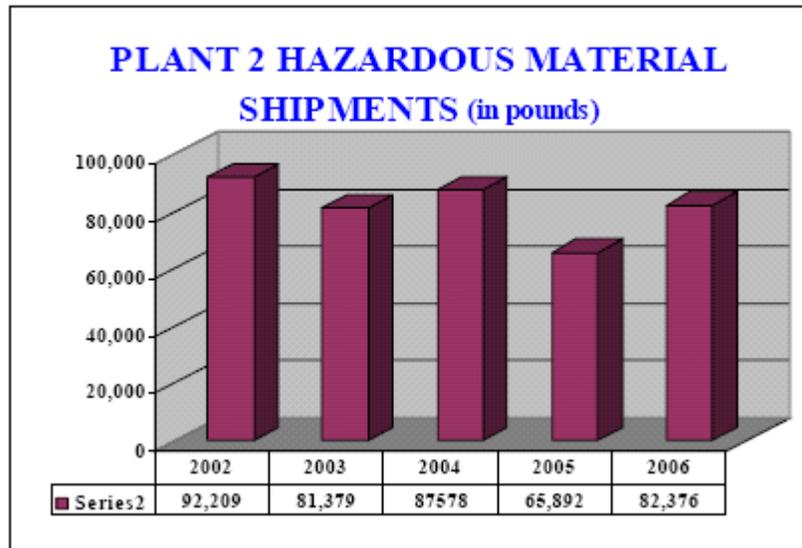
Serigraph has made significant improvements in reducing scrap using Lean and Six Sigma, which has reduced the amount of material being recycled. The volumes of the different types of materials being processed are dependent upon customer requirements.

Chart B



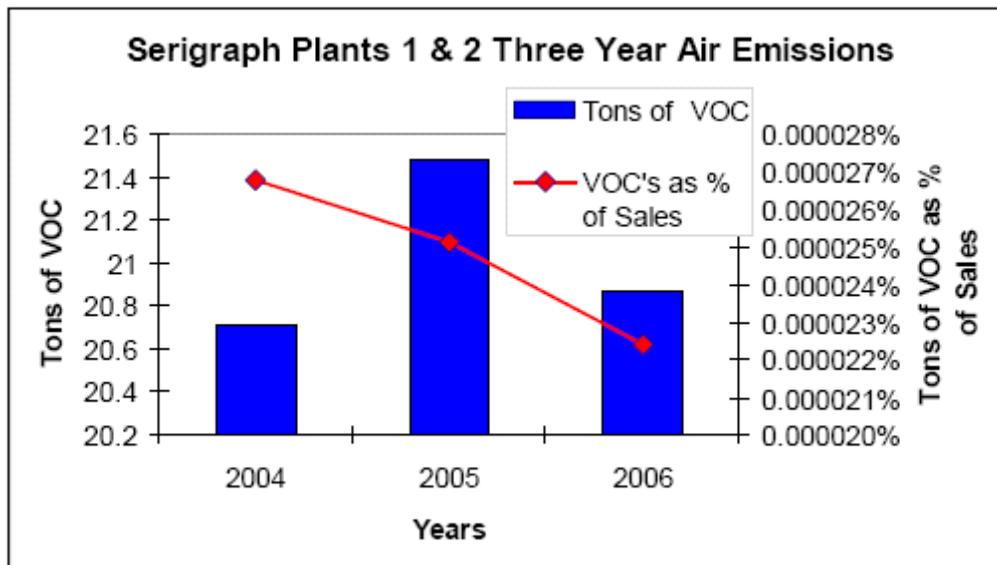
Serigraph has partnered with ink suppliers to develop UV ink systems that meet demanding OEM performance specifications. This has resulted in reduced usage of conventional solvent based inks to more environmentally friendly UV inks. This equates to a 20% increase in the use of UV inks.

Chart C



Pounds of hazardous material being shipped have steadily improved over the past five years. Hazardous materials include conventional inks, centrifuged solvents from wipes, and combustible liquids. There was a slight increase in 2006 due to a shipment of centrifuged solvents that did not ship in late 2005, but instead shipped in 2006. With this adjustment, the trend would be a steady improvement.

Chart D



Air emissions have improved as a percent of sales due to several factors. 1) Reduced conventional solvent based ink usage, 2) Increased use of UV inks, and 3) Reduced scrap due to improved process controls, lean and six sigma efforts which result in fewer parts that have to be produced as planned overrun for scrap.

Continuous Improvement

1. As part of the strategic planning process, environmental goals and objectives will be established and reported in the TS 16949 management review process for FY 2008.
 - A. Number of Spills
 - CY 2005 - 3
 - CY 2006 - 3
 - CY 2007 – 0

2. A timeline has been developed to complete Green Tier 2 actions

3. Green Tier projects for 2007:
 - A. Reduce wipe usage ratio of 65/screen to 40/screen
 - B. Complete mixture Design of Experiment to determine if cleaning solvent blend can be re-formulated with less VOC component percentage

Appendix A

11-YEAR ENVIRONMENTAL REPORT

1995 Serigraph completes Greenlight program, installing high-efficiency lighting. This program reduces our electrical energy consumption by 580,000 KW/hrs/year.

Serigraph introduces waterborne coatings, reduces our VOC emissions for the company by 16%.

1996 Serigraph expands the recycling program for solid materials. Program diverts 4,000,000 pounds of product waste which is converted to renewable materials used in recycled garden products such as plant containers, park benches, and garden trellises.

Fountain solution system is purchased for the offset printing facility, which reduces alcohol concentration by 20%.

Serigraph receives the Partners for Clean Air Award by the Department of Natural Resources for continuous progress in reducing emissions through technology, employee alternative transportation program, and prairie grass renewal programs.

1997 Biofiltration system is installed at the new automotive facility. The installation of this new technology in the printing industry is expected to reduce company's emission by 30 tons.

1998 Serigraph achieves a 10-year low in air emission levels.

1999 Serigraph participates in EPA's Design for the Environment/Environmental Management System Printer's Pilot Project. Serigraph establishes framework for an Environmental, Health & Safety management system.

2000 Serigraph converts to alcohol-free fountain solution for UV offset printing on plastic substrates. New process eliminates 23 tons of air VOC's annually.

2001 Serigraph achieves a 15-year low in air emissions.

2002 Serigraph re-permits its Plant 1 facility from major to minor source for air pollution.

Serigraph reduces VOC emissions from five plants at four sites to 46.7 tons, a 63% reduction since 2000.

2003 Serigraph reclassifies three of its four sites from large-quantity to small-quantity generator for hazardous waste.

Serigraph receives Wisconsin Business Friends of the Environment Award for its efforts in reducing VOC air emissions.

Serigraph initiates a lead phase-out program for all products.

2004 Company commits to replacing solvent-based inks with low-VOC coatings.

Serigraph reduces VOC air emissions in two plants, which results in reclassification from Part 70 status to a FESOP.

2005 Serigraph's EH&S Manager, J. Thomas Ravn, receives the 2004 William D. Schaeffer Environmental Award in recognition of his pioneering efforts, original developments, and investment of time and personal and organizational resources that result in cost savings, more reasonable regulations, improved community relations, and a more wholesome workplace.

2006 Serigraph accepts the Green Tier Award from the DNR for its reduction of hazardous waste and emissions, as well as other efforts to work toward environmental improvements.

Attachment 3



Mr. Mark McDermid
Bureau of Cooperative Environmental Assistance
Wisconsin Department of Natural Resources
PO Box 7921, CO/7
Madison, WI 53707

Reference: 2007 Green Tier Functional Equivalency Submission

Dear Mr. McDermid,

I have reviewed the Serigraph Inc. functional equivalency submission. I find that Serigraph's Green Tier Program conforms to each of the 12 requirements in Wis. Statutes §299.83(1)(dg) as a functionally equivalent management system. Serigraph will schedule an annual audit by an approved third party environmental auditor and will submit an annual report on the environmental management system audit that is in compliance with (6m) (a).

Signed: _____ Date: _____

Linda H. Buntrock
Sr. VP Human Resources & EHS



Program Scope

Serigraph has developed and is maintaining an EMS in order to ensure that the company continues to supply a high-quality product to our customers while providing a safe, healthy workplace for our employees, and acting as a responsible member of our community. Serigraph's EMS is designed to help the company identify and understand its environmental impacts and, through proactive management, reduce the risks that operations pose to its co-workers and to the environment. The EMS is also the means through which we follow through on the commitments expressed in our environmental policy.

Serigraph's EMS presently covers its operations on all sites owned or operated in the West Bend, Wisconsin area. The management of the EMS commences at the point of entry of raw materials and ceases at the point of exit of manufactured product. This policy also covers the management of all byproducts produced as the result of manufacturing operations, which go offsite, including but not limited to, wastes and recyclables. This policy shall also cover all real estate owned and/or under the direct control of Serigraph in the West Bend area. The EMS policy excludes activities that are beyond the control of Serigraph including customer requirements, designs, and materials mandated by Serigraph customers. This policy shall also exclude, at this time, materials shipped by Serigraph to other company-controlled sites or partnerships outside of the West Bend area. The scope of Serigraph's EMS may be modified at any time as corporate management deems necessary. Modifications shall be incorporated into this document.

Environmental Policy

Serigraph Inc. believes that environmental stewardship is a corporate responsibility. Serigraph shall manage its operations in a manner that reflects continual environmental improvement of the air, land, and water. To achieve this, Serigraph shall establish a framework for setting and reviewing environmental objectives and targets.

Serigraph shall endeavor to:

Maximize the efficient use of raw materials

Manage its waste products in a responsible manner

Maintain and improve the environment in a feasible manner

Serigraph shall maintain compliance with respect to all local, state, and national environmental requirements.

Serigraph shall involve the community as necessary in an advisory manner.

This policy and its intent shall be communicated to all Serigraph co-workers.

Goals FY 2008:

1. Recycle 100% of all materials identified as recyclable
2. Reduce wipe usage ratio of 65/screen to 40/screen
3. Complete mixture Design of Experiment to determine if cleaning solvent blend can be re-formulated with less VOC component percentage from current formula.
4. Reduce VOC's as a percent of sales to .000020%.



2006 Green Tier Functional Equivalency Documentation February 7, 2007

Introduction

Green Tier is a collaborative system of contracts and charters crafted jointly by participating businesses and the Department of Natural Resources designed to streamline environmental requirements and encourage new environmental ideas. On May 27, 2005, Serigraph, Inc. submitted an application for its Plant 4 facility located at 2230 Stonebridge Circle, West Bend, Wisconsin, to join the Green Tier I program. On November 28 of the same year, the Company notified the DNR that it wished to amend its application to include its Plant 2 facility located at 3801 E. Decorah Road, West Bend, Wisconsin. One of the criteria of Tier I is to install an environmental management system (EMS) that meets the requirements of ISO 14001:2004 or has been determined by the Department to be functionally equivalent.

Tier I allows for the use of one of two options for demonstrating that an EMS has been established. Option A allows the applicant to submit documentation substantiating the installation of an EMS, and Option B consists of a third party audit. Serigraph, Inc. chooses at this time to utilize Option A. Wisconsin Statute §299.83(1)(dg) outlines the specific criteria that a Green Tier applicant must address in order to be considered to have a function EMS.

The following material in this document is for the purpose of supporting Option A:

1. Adoption of an Environmental Policy

During 2006, Serigraph amended its Environmental Policy, placing greater emphasis on sustainability. A copy of the policy can be found in the appendix.

2. Analysis of Environmental Aspects and Impacts

During 2006, Serigraph developed a system to identify environmental aspects and evaluate their impacts. The process involved a steering committee which included co-workers from Environmental Health & Safety (EH&S), production supervisors and hourly co-workers. A numerical ranking system was used for evaluating both aspects and impacts. The evaluation criterion for aspect impact includes:

- Frequency of the activity
- Volume of the activity
- Severity of the environmental implications
- Co-worker health and safety hazard

Each of the elements was assigned a numerical number based on intensity. The numbers were summed for each aspect which then allowed for a ranking system of all the aspects.

Serigraph decided to limit its identification of aspects to certain areas where the high's impacts were most likely to occur. These areas included ink and screen rooms, printing, post printing, and recycling. Areas that were deferred for evaluation to a later date were receiving, maintenance, buildings & grounds, vendors, and customers. Samples of aspect and impact evaluations are located in the appendix.

3. Plans and Procedures for Compliance

Serigraph has several written programs for the management of air emissions, waste, and water related issues. The company maintains a daily record keeping system for VOC activities. Records are reviewed on a weekly basis for accuracy and a monthly emission summary is developed. Semi-annually Serigraph reviews its VOC program and submits an air emission compliance demonstration report to the DNR and EPA. EH&S reviews all capital purchasing requests with respect to permitting requirements and if a permit is necessary, proceeds accordingly. The company maintains a protocol for accumulating storing and shipping of its hazardous and non-hazardous wastes. Waste water is sampled semi-annually with test results being provided to the local POTW. Serigraph maintains a non-contact status for storm water and has a written program for its management along with an SPCC program. During the establishment of the EMS, compliance plans and procedures were reviewed by EH&S to assure that they conformed to EMS expectations.

4. Identification of All Pertinent Environmental Requirements

Serigraph has reviewed codes and regulations to identify those that may be relevant to the company. The Company believes that it has, to the best of its ability, identified those requirements that are pertinent. A list of those applicable requirements is contained in Serigraph's EMS Manual.

5. A Process for Setting Objectives and Action Plans

Serigraph's EMS manual contains a method for the evaluation of environmental impacts by the EMS steering committee so that objectives and actions plans can be established. The plan ranks the environmental aspects according to their environmental impact numerical rating. The steering committee then identifies alternative approaches. The approaches are then evaluated for environmental impact, economic feasibility, and implementation ability. For Serigraph, one of the primary driving factors is the ability to implement a project in order to achieve continual environmental improvement. During 2006, Serigraph implemented three projects, wastewater recovery and reuse, plastic pail recycling, and stainless steel screen mesh recycling. A summary of each project is located in the appendix.

6. Operational Control Structure

As part of EMS development, EH&S reorganized its written plans, work instructions, and forms. The new structure divides the EMS program into the following categories:

- Corporate Wide – Programs that affect the company corporate wide

- Pre-printing – Programs that affect those activities prior to or support the printing process

- Printing – Programs directly associated with the printing process

- Post Printing – Programs that affect post printing operations and other ancillary support groups.

Within each of the categories are the sections:

- Written Plans

- Work Instructions

- Forms

7. Employee Training Plan

Serigraph's training plan is divided into the following categories:

- Orientation for new co-workers

- General awareness which is presented periodically all co-workers at Quarterly Meetings

- Specific training provided as a part of the co-worker's job function

- Retraining which is provided in the event of changes in procedures or in the event that an infraction is uncovered.

The training section of Human Resources is responsible for the training program.

8. Emergency Response and Corrective Action

Serigraph's emergency action plan is divided into several parts:

- Tornado

Fire/Explosion
Utility Failure
Chemical Spill

Serigraph utilizes the uniform command system for responding to emergency situations. The Company maintains a Level B hazardous materials response team which is on call 24 hours per day. In addition, various co-workers receive first Responder / Spill training. Serigraph has written plans for Spill Prevention Control and Countermeasures, releases of hazardous materials, and malfunction abatement prevention for its bio filter. Corrective action measures are incorporated into various management plans and the training program.

9. Communication Plan

Serigraph communicates with its co-workers through general co-worker meetings, periodic bulletins, and when necessary departmental meetings. The company has developed a procedure for addressing inquiries initiated by the public. Serigraph regularly communicates with the DNR on various matters. The company's EMS plan provides for an annual report to be developed and made available.

10. Procedures for Document Control

During the development of the operation control structure, EH&S created an alpha-numeric system for its documents. The following illustrates the control method.

	Plan / Procedure	Work Instruction	Form
Corporate Wide	CWP xxx	CWI xxx	CWF xxx
Preprinting	PPP xxx	PPI xxx	PPF xxx
Printing	PTP xxx	PTI xxx	PTF xxx
Post Printing	PSP xxx	PSI xxx	PSF xxx

11. Environmental Management Systems Audit

Serigraph's EMS manual contains a process for conducting internal audits. In general, the format conforms to ISO 9001 structure. The process contains elements for corrective action and follow up. Internal audits shall be conducted at a minimum of annually. Audits will be performed by Serigraph's internal ISO auditors.

12. Continual Improvement of Environmental Performance

Serigraph's EMS program provides for an annual review of environmental activities. This includes the following elements:

- Review of previously identified environmental aspects and impacts
- Identification and evaluation of any environmental aspects
- Establishment of annual targets and goal
- Plan development and implementation
- Evaluation of annual activities

The process involves hourly and salaried co-workers and is coordinated by EH&S.

Management Review

EH&S shall create an annual report which will be reviewed by senior management. In addition, quarterly updates describing current activities shall be prepared and reviewed with management by EH&S staff.

ISO 14001 / Green Tier Audit Schedule

o = audit scheduled

+ = results completed satisfactorily

x = audits with corrective action

1,2,3 = shifts audited

	Feb	Mar	Apr	May Start ISO 14001 / Green Tier2	Jun	Jul	Aug	Sep	Nov	Dec
Processes & Activities										
Management Review				o/1,B+			o/1,A+			
EMS Responsibilities				o/1,B+			o/1,B+			
1.Environmental Policy				o/1,B+						
2. Identification of Environment Aspects			o/1,B+							
3. Review of compliance demonstration records			o/1,B+							
4. Identification of Environment Requirements			o/1,B+							
5. Environmental Objs in Management Review				o/1,A+						
6. Operational control of Env performance in MR		o/1,B+								
7. Hazmat / FRO / Env Training			o/1,B+							
8. Environmental Emergency response process			o/1,B+				o/1,B+			
9. Communication plan with Employees and public				o/1,A+			o/1,A+			
10. Environmental Doc control procedure			o/1,B+							
11. EMS audits completed as scheduled				o/1,A+						
12. Management Review Process for CI of Env Objs			o/1,B+				o/1,A+			
SPCC-Spill Prev Control Countermeasures			o/1,B+				o/1,A+			