

Compliance Certification for Lithographic Printing Facilities Reasonably Available Control Technology (RACT) Rule

NOTE: Compliance certification is due by within 180 days of installation of a new lithographic press, to demonstrate compliance with s. NR 422.143, Wis. Adm. Code. Affected facilities with a new press may use this format to submit the certification, or a format of their choice may be used so long as the same information is provided.

Facility Information

Facility Name	Facility ID
Facility Street Address	
City, State	ZIP

Does this apply to you?

If you can answer “No” to #1, then you are not required to submit a compliance certification. If you answer “Yes” to #1, then go to question #2. If you answered “No” to #2, keep a copy of this page and any documentation of the emissions calculations.

Applicability Questions

1. Is your lithographic printing facility located in an area that meets any of the following criteria:
 - Currently in Kenosha, Milwaukee, Ozaukee, Racine, Sheboygan, Washington or Waukesha county and has at least one new lithographic press installed after July 1, 2019*?
 - Constructed or modified after July 1, 2019* and in Kewaunee or Manitowoc county?

- Yes
 No

*NOTE: Only facilities with newly affected lithographic presses need to submit a compliance certification statement.

2. Do you have actual VOC emissions from all lithographic printing presses, including related lithographic cleaning activities and fountain solution use at the facility, before consideration of controls, equal or exceed 3 tons on a 12 consecutive month rolling basis?

- Yes
 No

If you answer “Yes” to both applicability questions above, proceed with the Certification Checklist questions.

Compliance Checklist

Printing facilities must be in compliance with the requirements as of July 1, 2019, or upon start up for new sources.

Exemptions (All Presses)

3. Any lithographic press with a total fountain solution reservoir of less than one gallon is exempt from the fountain solution requirements. Do **all new** lithographic presses in your facility have fountain solution reservoirs with less than one gallon? If you can answer "Yes", you may skip questions 4, 6, 9, 16, and 17a and b. If you have even one fountain solution reservoir greater than one gallon, select "No" and answer those questions for all new presses that are not exempt.

- Yes
 No

If any, which presses are exempt? List the press name, type, and emission unit ID (ex: P01).

Nonheatset Web Presses

Do you have nonheatset press(es)? If no, skip #4.

- Yes

Provide nonheatset press name and emission unit ID (ex: P01).

- No

Emission Limitations - Fountain Solution

4. Do you meet the following limit on all non-exempt **non-heatset web presses**?

- Use a fountain solution which contains no restricted alcohol, and which has a VOC content, as applied, of no more than 5.0% by weight.

- Yes
 No

Sheet-fed Presses

Do you have sheet-fed press(es)? If no, skip #5-6.

- Yes

Provide sheet-fed press name and emission unit ID (ex: P01).

- No

Exemptions

5. Sheet-fed presses with a maximum sheet size of up to 11 inches by 17 inches are exempt from the fountain solution requirements. Do all sheet-fed presses at your facility meet this exemption? If Yes, you may skip #6 for those presses.

- Yes

Which presses are exempt? List press name, sheet size, and emission unit ID (ex: P01).

- No

Emission Limitations - Fountain Solution

6. Do you meet one of the following limits on all **non-exempt sheet-fed lithographic presses**?

- Use a fountain solution which has a VOC content, as applied, of no more than:
 - 5.0% by weight, or
 - 8.5% by weight if the fountain solution is refrigerated to 60°F or less.

- Yes
 No

Heatset Presses

Do you have heatset press(es)? If no, skip #7-13.

- Yes

Provide heatset press name and emission unit ID (ex: P01).

- No

Exemptions

7. The printing of books on any heatset lithographic press is exempt from the requirements in #9-13. Do you print books on heatset lithographic presses? If yes, skip #9-13 for those presses.

- Yes

Which presses are exempt? List press name and emission unit ID (ex: P01).

- No

8. Printing on heatset lithographic presses with a maximum web width of up to 22 inches are exempt from the requirements in #9-13. Do you have any heatset presses with a web width no more than 22 inches? If yes, skip #9-13 for those presses.

- Yes

Which presses are exempt? List press name, web width, and emission unit ID (ex: P01).

- No

Emission Limitations - Fountain Solution

9. Do you meet at least one of the following limits on all **non-exempt heatset web presses**?

- Use a fountain solution which has a VOC content, as applied, of no more than:
 - 1.6% by weight if the fountain solution contains any restricted alcohol and is not refrigerated to 60°F or less
 - 3.0% by weight if the fountain solution contains any restricted alcohol and is refrigerated to 60°F or less
 - 5.0% by weight if the fountain solution contains no restricted alcohol

- Yes
 No

Emissions Limitations – Dryer Exhaust

10. Do you have a lithographic press that has maximum theoretical emissions of VOCs, from the dryer, equal to or greater than 25 tons per year from heatset inks? If no, skip #11-13.

- Yes
 No

11. If yes to #10, do you meet the following control requirements for your dryer exhaust where they apply to your press/operation?

- If the emission control device was first installed prior to May 1, 2010, the owner or operator shall reduce VOC emissions from the lithographic press dryer exhaust by **90% by weight** as carbon, minus methane and ethane, or maintain a maximum dryer exhaust outlet VOC concentration of 20 ppmv, as carbon, minus methane and ethane.
- If the emission control device was first installed after May 1, 2010, the owner or operator shall reduce VOC emissions from the lithographic press dryer exhaust by **95% by weight** as carbon, minus methane and ethane, or maintain a maximum dryer exhaust outlet VOC concentration of 20 ppmv, as carbon, minus methane and ethane.

- Yes
 No

Recordkeeping

12. For a **heatset web lithographic printing press using a control device**, have you set up the system to collect and record the following information:

- Temperature monitoring data of the control device in accordance with temperature demonstrated to comply with the appropriate destruction efficiency as of the last stack test.
- A log or record of any time when the control device or control device monitoring equipment is offline while the associated printing line is in operation.
- A maintenance log for the control device and control device monitoring equipment detailing all maintenance performed and including dates and duration of any outages.
- Annual inspection results for catalytic oxidizers.

- Yes
 No

Compliance testing

13. If control device is installed to control VOC emissions, indicate the date of initial compliance demonstration test that established the control device met the appropriate destruction efficiency or emission rate:

- Date of compliance demonstration test: ____ / ____ / _____. [Attach results to compliance certification.]
- I do not have any heatset lithographic printing presses that use a control device
-

All Facilities and Presses

Emissions Limitations – Cleaning Solutions

14. Do you meet at least one the following limits for your cleaning solutions? [NOTE: You may use up to 110 gallons of cleaning solution, on a 12-consecutive month rolling basis, with VOC content or composite partial vapor pressure above these limits.]

- A VOC content of less than 70% by weight
 - A composite partial vapor pressure of less than or equal to 10 mm of Hg at 68°F
- Yes
- No
- Not Applicable

Work Practices

15. Are you in compliance with the following Work Practice Standards?

- Store all solvents, solvent solutions and any applicator moistened with solvents or solvent solutions that are used in cleaning operations related to lithographic printing in covered nonabsorbent, non-leaking containers, except when filling or emptying the container.
- Yes
- No

Temperature Monitoring – Fountain Solutions

16. If you are affected by any of the “Emissions Limitations – Fountain Solutions” requirements and must refrigerate your fountain solution (e.g., 8.5% VOC content for sheetfed presses and 3% restricted alcohol content for web presses), are you in compliance with the temperature monitoring requirements?

- Monitor, at least once each 8-hour shift of operation, the temperature of each fountain solution reservoir for any fountain solution subject to maximum temperature limits.
- Yes
- No
- Not Applicable

Recordkeeping

17. To demonstrate compliance with the requirements, have you established a method to record the following information?

- a. For **fountain solutions monitored under the “Temperature Monitoring” section**, record the fountain solution reservoir temperature for each 8-hour shift of operation.

- Yes
- No
- Not Applicable

- b. For **each fountain solution used**, record the percent by weight VOC content as applied, and the CAS number and chemical name of each restricted alcohol.

- Yes
- No
- Not Applicable

c. For **each cleaning solution**, record the percent by weight VOC content as applied or the composite partial vapor pressure, as appropriate, in measurement units consistent with the applicable emission limitation.

- Yes
- No
- Not Applicable

d. For each month of operation, record the volume of all **cleaning solution used which does not meet the emission limitations** in the “Emission Limitations – Cleaning Solution” section.

- Yes
- No
- Not Applicable

Compliance Certification Statement

The owner or operator of a new lithographic printing press shall submit to the department, no later than 180 days after installation, written certification that the press is in compliance with the applicable requirements of the “Emission Limitations - dryer exhaust”, “Emission Limitations - fountain solution”, “Emission Limitations – cleaning solution”, “Work Practices” and “Temperature Monitoring” that apply to their operation.

I have reviewed this facility’s compliance status with respect to the requirements specified in this compliance certification. Based on information and belief formed after reasonable inquiry, I certify below that the statements and information in this document are true, accurate and complete.

Print or type the name and title of the Responsible Official for the facility:

Responsible Official Name	Title
Signature	Date

A Responsible Official can be:

- the president, vice-president, secretary, or treasurer of the company that owns the facility;
- the owner of the facility;
- the facility engineer or supervisor;
- a government official if the facility is owned by the Federal, State, City, or County government;
- a ranking military officer if the facility is located on a military base.

Submit this form or similar compliance certification statement to DNR’s Central Office:

Wisconsin DNR
 Air Management Program - AM/7
 ATTN: RACT Rule Compliance Certification
 PO Box 7921
 Madison WI 53707-7921