



## General Permits for Printers

August 2016

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

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

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

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

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

### What are the benefits of General Permits for Printers?

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

### Does the facility need a construction or operation permit?

- If the facility is covered by current air permits and no immediate changes are occurring, the facility can switch to the General Operation Permit (GOP) as long as existing permit conditions do not conflict with those in the GOP. Changes to the on-site printing operations covered by the GOP can be made, without obtaining a construction permit as long as the operations continue to comply with the conditions of the GOP.

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

### What are the other eligibility requirements?

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

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

### Emission limits within General Permits for Printers in Wisconsin

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

### What requirements are in the permit?

- Emissions may not exceed the limits in the table above.
- Annual recordkeeping of production/usage data necessary to calculate emissions.
- Operation and maintenance of all air pollution control devices and associated monitoring equipment.
- Recordkeeping requirements for pollution control device operating parameters.

- Lithographic and screen press operations must meet Reasonably Available Control Technology (RACT) requirements (found in ch. NR 422, Wis. Adm. Code), which are detailed in the respective permits.

### Is there a downside to a general permit?

Consider the following requirements before applying for a General Air Permit.

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

### How does a printing operation get a general permit or additional information?

- First, consider whether the printing operation qualifies for a general permit for construction, operation or both. Look at the list of press types covered by the general permits and consider whether the facility will need multiple permits, and/or whether the facility has equipment or activities that will not be covered by a general permit. Knowing this information will help speed up the application process.
- To view and download the permit application, visit <http://dnr.wi.gov/topic/AirPermits/Forms.html#Tab2x>. Under the “general, registration and exemption” tab, open form [4530-173](#)
- Contact Tom Zelinski at (414) 263-8577 or [Tom.Zelinski@wisconsin.gov](mailto:Tom.Zelinski@wisconsin.gov) to learn more and start the permit application process.

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