ANALYSIS AND PRELIMINARY DETERMINATION FOR THE ELECTIVE OPERATION PERMIT FOR A COATING LINE FOR SERIGRAPH, LOCATED AT 760 INDIANA AVENUE, WEST BEND, WASHINGTON COUNTY, WISCONSIN

Permit # 02-DJH-241-OP

Facility I.D. # 267083850

This review was performed by the Wisconsin Department of Natural Resources, Southeast Region Air Program, 2300 North Martin Luther King, Jr. Drive, P.O. Box 12436, Milwaukee, WI 53212, phone (414) 263-8500 in accordance with Chapter 285, Wis. Stats., and Sections NR 400 to NR 499, Wis. Adm. Code.

Reviewed by: Dan Hellenberg Initials: _____ Date: _____

Preliminary Determination Approved by:	Signature	Date
Regional Supervisor		

cc: Jeff Hanson - AM/7
West Bend Community Memorial Library

INTRODUCTION

In the case a company makes changes to a process or uses an alternate raw material such that actual emissions will decrease (i.e. pollution prevention project) or in some shutdown cases, the Department certifies Emission Reduction Credits (ERCs) through the use of an Elective Operation Permit.

An Elective Operation Permit gives the source the authority to operate the process in a way to generate ERCs. The company can then use these credits to offset emissions from a new project or sell them to another company so they can offset the emissions from their project.

The company must comply with the conditions of the permit for the life of the equipment it covers in order to ensure ongoing progress towards achieving attainment in an area currently classified as nonattainment.

GENERAL APPLICATION INFORMATION

Owner/Operator:	Serigraph Inc. Plant 1 760 Indiana Avenue West Bend, WI 53095-0000
Contact:	Tom Ravn (414) 335-7343
Responsible Official:	George Palmer (262) 335-7240 Environmental Engineer
Submitted By:	Cheryl Weslager (262) 335-7615 Environmental Specialist
Date of Complete Application:	May 16, 12002

PROJECT DESCRIPTION

Serigraph, Inc. wishes to apply for eleven (11) tons of Emission Reduction Credits for its facility located at 760 Indiana Avenue, West Bend, Wisconsin (Plant 1). This facility uses only ultra-violet non-heatset inks on sheet-fed offset presses.

SOURCE DESCRIPTION

Serigraph, Inc. is a sheet-fed offset printing facility which supports the point of purchase industry for both domestic and international sales.

CROSS MEDIA IMPACTS

Not applicable.

WISCONSIN HAZARDOUS AIR POLLUTANT (NR 445) REVIEW

The proposed process changes do not involve an increase in any hazardous air pollutant (HAP) nor the emissions of a new HAP not emitted before. Therefore, no NR 445 review is necessary.

GREAT LAKES AGREEMENT, NR 445 WATCH LIST POLLUTANTS

This source does not have the potential to emit pollutants covered under the Great Lakes Agreement or under the ch. NR 445 Watch List.

COMPLIANCE AND TECHNOLOGY REVIEW

The processes that replaced this unit use low VOC coatings.

AIR QUALITY REVIEW

This project involves a decrease in VOC emissions. No air dispersion modeling is necessary to determine the approvability of this project.

EMISSIONS FROM NEW EQUIPMENT OR MODIFICATION

VOC Emissions by Year

EI Year	VOC (TPY)
1990	26.1
1996	30.5
1997	29.2
1998	32.8
1999	27.1
2000	32.1

The new facility wide limit will be 11 TPY. Only 22 TPY of the 26 TPY are from processes that were not part of growth accommodation credits (GAC) issued by the Department. GAC are not useable for sale to other companies as emission reduction credits.

22 TPY – 11 TYP = 11 TPY

I. Facility VOC Emission Cap

Pollutant	Potential to Emit	
	Pounds per Hour (lbs/hr)	Tons per Year (TPY) *
Volatile organic compounds (VOCs)		11.0

* Facility VOC emissions totaled 26 TPY in 1990. While they do have years with higher emissions within the five year window, this was the year that was included in the baseline emissions submitted to EPA by WDNR. Reducing for growth accommodation credits, this yields an emission reduction credit of 22 TPY - 11 TPY = 15 TPY.

FACILITY AND PROJECT CLASSIFICATION

1. Existing Facility Status:

The current facility is a Part 70 and nonattainment area major source (i.e. greater than 25 TPY VOC), but a PSD minor source and a HAP minor source.

2. Project Status:

The project involves a reduction in emissions, so it is a minor modification.

3. Facility Status After Completion of Project:

The facility will continue to be a Part 70 major source due to the fact it will have potential emissions of VOC greater than 25 TPY in a severe ozone nonattainment area.

4. Summary:

NSR Applicability	Existing Facility		Proposed Project		Facility After Project	
	Major	Minor	Major	Minor	Major	Minor
PSD		X		X		X
Non-Attainment		X		X		X
112(g)		X		X		X

Part 70 Applicability	Existing Facility			Facility After Project		
	Part 70	FESOP (Syn. Minor)	non-part 70	Part 70	FESOP (Syn. Minor)	non-part 70
Status	X			X		

ENVIRONMENTAL ANALYSIS

This is an elective operation permit involving the certification of a decrease in VOC emissions. Ch. NR 150 does not apply in this situation.

RULE APPLICABILITY

Prior to the change, ch NR 422, Wis. Adm. Code applied to the source. Since the permit will restrict the source to low-VOC materials, there are no applicable limits to the process other than those covered in Part II of the permit and the conditions necessary to ensure the reductions are certified, actual and permanent.

NEW SOURCE PERFORMANCE STANDARDS (NSPS) APPLICABILITY

For proposed construction of a source:

1. Is the proposed source in a source category for which there is an existing or proposed NSPS? No.

2. Is the proposed source an affected facility? No.

For the proposed modification of an existing source:

1. Is the existing source, which is being modified, in a source category for which there is an existing or proposed NSPS? Not applicable.

2. Is the existing source, which is being modified, an affected facility (prior to modification)? Not applicable.

3. Does the proposed modification constitute a modification under NSPS to the existing source? Not applicable.

4. Will the existing source be an affected facility after modification? Not applicable.

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS) APPLICABILITY

Part 61 NESHAPS:

1. Will the proposed new or modified source emit a pollutant controlled under an existing or proposed NESHAPS? No

2. Is the proposed new or modified source subject to an existing or proposed NESHAPS? No

Part 63 NESHAPS:

1. Is the proposed project subject to s. 112(g) of the Clean Air Act? No. The section 112(g) rules were promulgated on Dec. 15, 1996 and only apply to new construction or reconstruction after the date of promulgation of Wisconsin rules or June 15, 1998, whichever comes first.

CRITERIA FOR PERMIT APPROVAL

Section 285.63, Wis. Stats., sets forth the specific language for permit approval criteria. The Department finds that:

1. The source will meet emission limitations.

2. The source will not cause nor exacerbate a violation of an air quality standard or ambient air increment.

3. The source is operating or seeks to operate under an emission reduction option.

DETERMINATION

The preliminary determination of the DNR Air Management Program is that this project when constructed or modified and operated consistent with the application and subsequent information submitted will be able to meet the emission limits and conditions included in the attached Draft Permit. A final decision regarding emission limits and conditions will be made after the Department has reviewed and evaluated all comments received during the comment period. The proposed emission limits and other proposed conditions in the Draft Permit are written in the same form that they will appear in the construction permit and, where applicable, the operation permit. These proposed conditions may be changed as a result of public comments or further evaluation by the Department.

PART I
AIR POLLUTION CONTROL OPERATION PERMIT

EI FACILITY NO. 267083850 PERMIT NO. 267083850-P03

TYPE: Part 70, Major Source

Name of Source: Serigraph, Inc., Plant One

Street Address: 760 Indiana Avenue
West Bend, Wisconsin 53095
WASHINGTON COUNTY

Responsible Official, & Title: George H. Palmer, Sr. V.P.--Specialty Graphics

is authorized to operate six sheet-fed, lithographic printing presses where two are equipped with flexographic tower coaters in conformity with the conditions herein, and in compliance with the provisions of Chapter 285, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code.

THIS OPERATION PERMIT EXPIRES December 11, 2006 . A RENEWAL APPLICATION MUST BE SUBMITTED AT LEAST 12 MONTHS, BUT NOT MORE THAN 18 MONTHS, PRIOR TO THIS EXPIRATION DATE [s. NR 407.09(1)(b)1., Wis. Adm. Code]. No permittee may continue operation of a source after the operation permit expires, unless the permittee submits a timely and complete application for renewal of the permit [s. 285.66(3), Wis. Stats., and s. 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 and II hereof.

Dated at Milwaukee, Wisconsin, _____, 2002 .

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
For the Secretary

By _____
Daniel Schramm
Air Management Supervisor
Southeast Region Air Program

Preamble

An Asterisk "*" throughout this document denotes legal authority, limitations and conditions which are not federally enforceable.

Concurrent Permit Actions Performed as Part of the Review and Issuance of Permit 267083850-P02

Construction Permits Issued In Conjunction with Permit 267083850-P02 under s. 285.61(8), Wis. Stats.
NONE

Revised Construction Permits Issued in Conjunction with Permit 267083850-P02 under s. NR 406.11, Wis. Adm. Code:
NONE

Operation (CONOP) Permits Issued in Conjunction with Permit 267083850-P02 under s. 285.62(7)(b), Wis. Stats.:
NONE

Revised Operation Permits Issued in Conjunction with Permit 267083850-P02 under ss. NR 407.11, 407.12, 407.13 and/or 407.14, Wis. Adm. Code:
NONE

The following permits, orders, etc. are adopted, under ss. 285.65(3), Wis. Stats., NR 406.11(1)(c) and (d), NR 407.09(2)(d) and NR 407.15(3) and (4), Wis. Adm. Code, by Permit 267083850-P02 which then becomes the primary enforceable document:

01-JSB-268, 94-DAA-218, 93-DAA-222, 92-DAA-297, 88-DAA-215, and 87-DAA-224, 267083850-P01

Stack and Process Index

Stack	S01	Unstacked Fugitive Emissions from Printing Emissions Units
Process	P17 (1017)	28" 2-Color Heidelberg Lithographic Offset Press, Sheet-Fed.
	P20 (1020)	28" 4-Color Heidelberg Lithographic Offset Press, Sheet-Fed
	P21 (1021)	40" 6-Color Heidelberg Lithographic Offset Press, Sheet Fed
	P23 (1023)	40" 6-Color Heidelberg Lithographic Offset Press, Sheet-Fed
	P24 (1024)	40" 6-Color Heidelberg Lithographic Offset Press with a Tower Coater that is equipped with flexographic printing head
	P31 (1031)	40" 6-Color Heidelberg Lithographic Offset Press with a Tower Coater that is equipped with flexographic printing head
Stack	S99	Unstacked Fugitive Emissions from other Activities and Operations that use VOCs
Process	P25 (1025)	Lumped process representation of all other operations and activities that result in net usages of VOCs that are unassociated with the six printing presses. Monitoring records of net VOC usage from miscellaneous cleaning solvent usage, including those used for industrial cleaning operations, shall be attributed to this lumped process.

Insignificant Emission Sources

For the following two units, the permittee reports that combined VOC maximum theoretical emissions from UV inks, organic clean-up solvents, and screen reclamation for both presses equals approximately 400 pounds per year:
One small, manual, hand-drawn screen press for research and development
One small, electric, clamshell screen press for research and development

Research and Development, including laboratory activities (assume:VOC emissions<2,000 pounds/year)
Coating preparation activities (assume:VOC emissions<2,000 pounds/year)
Coating Manufacturing (assume:VOC emissions<2,000 pounds/year)
Recycling Activities (not limited to container recycling, but not including VOC material reclamation which is addressed under "VOC net usage" definition. Assume: VOC emissions<2,000 pounds/year)
Maintenance of Grounds, Equipment, and Buildings (lawn care, painting, etc.)
Boiler, Turbine, and HVAC System Maintenance
Internal Combustion Engines Used for Warehousing and Material Transport
Fire Control Equipment
Janitorial Activities
Office Activities
Convenience Water Heating
Convenience Space Heating (< 5 million Btu/hr Burning Gas, Liquid, or Wood)
Fuel Oil Storage Tanks (<10,000 gal)
Demineralization and Oxygen Scavenging of Water for Boilers
Purging of Natural Gas Lines

This source is NOT subject to any new source performance standard (NSPS).

This source is subject to s. NR 424.03(2)(c), Wis. Adm. Code, and has had LACT determinations approved by the Department. However, the source has elected under s. NR 424.03(3), Wis. Adm. Code, to fulfill all but two of the conditions of the LACT determinations by complying with all RACT rules under s. NR 422.142. The source is required to comply with the remaining two LACT conditions pertaining to adhesive use and cleaning of adhesive from tower coater surfaces that are not addressed by the Lithographic Printing or Graphic Arts RACT requirements.

Permit Shield - Unless precluded by the Administrator of the USEPA, compliance with all emission limitations in this operation permit is considered to be compliance with all emission limitations established under ss. 285.01 to 285.87, Wis. Stats., and emission limitations under the federal clean air act, that are applicable to the source if the permit includes the applicable limitation or if the Department determines that the emission limitations do not apply. The following emission limitations were reviewed in the analysis and preliminary determination and were determined not to apply to this stationary source:

1. *ss. NR 445.04 and NR 445.05, Wis. Adm. Code, the emission limitations for Hazardous Air Contaminants in Tables 1 to 5, for the lithographic printing presses, P17 (1017), P20 (1020), P21 (1021), P23 (1023), P24 (1024), P31 (1031), and miscellaneous solvent clean-up activities, F99 (1025). Under ss. NR 445.04 and NR 445.05, Wis. Adm. Code, a stationary source is exempt from the tabulated threshold values therein, if the emissions are released as indoor fugitive emissions. To qualify for an exemption for compounds listed under Table 3A, Table 3B, or Table 5, there is a further requirement that a threshold limit value has been established by the American Conference of Governmental Industrial Hygienists in the versions of the Threshold Limit Values and Biological Exposure Indices as referenced under s. 445.04 or s. 445.05, incorporated by reference in s. NR 484.11, and for which the source demonstrates

to the Department that it is in compliance with applicable Occupational Safety and Health Administration requirements.

2. s. NR 440.565, Wis. Adm. Code, the NSPS requirement for Pressure Sensitive Tape and Label Surface Coating Operations. Though press P31 (1031) may coat with adhesives, the NSPS section cited does not apply under s. NR 440.565(1)(a), Wis. Adm. Code, since the tower coater does not print on a continuous web as the definition under s. NR 440.565(2)(a)1, Wis. Adm. Code, requires for applicability.

3. s. NR 422.07, Wis. Adm. Code, the Paper Coating RACT requirements applicable to coating application devices within a coating line that apply uniform coatings to paper. Since the definition of "paper coating" under s. NR 422.02(62), Wis. Adm. Code, encompasses only "web" processes, none of the sheet-fed printing presses at this facility are subject to the paper coating RACT.

4. s. NR 423.035, Wis. Adm. Code, the Industrial Cleaning Operations requirements. An exemption from this section exists under ss. NR 423.035(2)(a)1., Wis. Adm. Code, for the lithographic press blanket and roller wash operations, since these are governed under s. NR 422.142(2)(c). Since the facility's existing lithographic industrial cleaning operations are exempt and since the facility's remaining VOC emissions units or activities are also exempt or are unregulated under this section, the facility is not currently subject to s. NR 423.035, Wis. Adm. Code. Moreover, the facility's maximum theoretical emissions are currently estimated to be 88.6 tons per year (TPY) of volatile organic compounds (VOC) under s. NR 400.02(95), Wis. Adm. Code. Since all six lithographic printing presses are specifically subject to s. NR 422.142, Wis. Adm. Code, the facility's maximum theoretical emissions subject to that section are 64 tons VOC per year under the definition in s. NR 419.02(11), Wis. Adm. Code, since the facility has a 40 TPY VOC net usage limit and a 24 TPY VOC net usage limit. Therefore, the maximum theoretical emissions of VOC from the facility, excluding those emissions subject to s. NR 422.142, are estimated to equal 24.6 tons per year. This quantity falls just under the threshold named for applicability.

5. s. NR 422.145, Wis. Adm. Code, the Screen Printing RACT requirements. The maximum theoretical emissions (MTE) of VOC by the two small research and development screen presses is approximately 400 pounds per year. Under s. 422.03(4m)(b), Wis. Adm. Code, these screen presses are exempt from the Screen Printing RACT requirements, since the MTE of VOCs by the two screen presses is less than 25 tons per year. Note that recordkeeping requirements under s. NR 439.04(4), Wis. Adm. Code, still apply to the facility and the screen presses.

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

Pollutant -- This area will note which pollutant is being regulated by the permit.

Limitations -- This area will list 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 will also list any voluntary restrictions on hours of operation, raw material use, or production rate requested by the permittee to limit potential to emit.

Compliance Demonstration -- The compliance demonstration methods outlined in this area may be used to demonstrate compliance with the associated emission limit or work practice standard listed under the corresponding *Limitations* column. The compliance demonstration

area contains limits on parameters or other mechanisms that will be monitored periodically to ensure compliance with the limitations. The requirement to test as well as initial and periodic test schedules, if testing is required, will be stated here. Notwithstanding the compliance determination methods which the owner or operator of a sources 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 USEPA Reference test methods or other approved test methods will be contained in this area and are the methods that must be used whenever testing is required. A reference test method will 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 II of this permit.

Condition Type -- This area will specify other conditions that are applicable to the entire facility that may not be tied to one specific pollutant.

Conditions -- Specific conditions usually applicable to the entire facility or compliance requirements.

Compliance Demonstration -- This area contains monitoring and testing requirements and methods to demonstrate compliance with the conditions.

PART II -- This section contains the general limitations that the permittee must abide by. These requirements are standard for most sources of air pollutants so they are included in this section with every permit.

PART I. APPLICABLE LIMITATIONS AND SPECIFIC CONDITIONS

A. Conditions Applicable to Entire Facility Unless Written Otherwise

The facility also houses the Pre-press support services (art, film processing and platemaking). More than 95% of the printing substrate used in the recent past has been plastic.

Stack S01		Unstacked Fugitive Emissions from Printing Emissions Units
Process	P17 (1017)	28" 2-Color Heidelberg Lithographic Offset Press, Sheet-Fed.
	P20 (1020)	28" 4-Color Heidelberg Lithographic Offset Press, Sheet-Fed
	P21 (1021)	40" 6-Color Heidelberg Lithographic Offset Press, Sheet Fed
	P23 (1023)	40" 6-Color Heidelberg Lithographic Offset Press, Sheet-Fed
	P24 (1024)	40" 6-Color Heidelberg Lithographic Offset Press, Sheet-Fed, with a Tower Coater that is equipped with flexographic printing head
	P31 (1031)	40" 6-Color Heidelberg Lithographic Offset Press, Sheet-Fed, with a Tower Coater that is equipped with flexographic printing head that can apply adhesive
Stack S99		Unstacked Fugitive Emissions from other Activities and Operations that use VOCs
Process	P25 (1025)	Lumped process representation of all other operations and activities that result in net usages of VOCs that are unassociated with the six printing presses. Monitoring records of net VOC usage from miscellaneous cleaning solvent usage, including those used for industrial cleaning operations, shall be attributed to this lumped process.

<u>The following conditions apply to all processes listed above, unless a condition is stated otherwise.</u>

1. POLLUTANT: Volatile Organic Compounds (VOC)

a. Limitations

(1) 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 (General Limitation)]

(2) The permittee may not cause, allow, or permit the total volatile organic compound (VOC) net usage from the inks, fountain solutions, adhesives, blanket or roller washes, cleaning solvents, and cleaning solutions associated with lithographic offset presses P17 (1017), P20 (1020), P21 (1021), and P23 (1023) to exceed 6,666 pounds of VOC per month, averaged over any twelve consecutive month period1. The terms “VOC net usage,” “net VOC usage,” or “net usage of VOC” shall be defined as the total usage of VOCs from VOC-containing materials (in pounds or tons of VOCs) by the facility, emissions unit(s), or operation, less the amount of VOCs from VOC-containing materials returned to inventory, recovered, or reclaimed. [ss. 285.65(3), and 285.63(7), Wis. Stats., and NR 407.09(2)(d)3, Wis. Adm. Code (incorporated from permit # 93-DAA-222)]

(3) The permittee may not cause, allow, or permit the total volatile organic compound (VOC) net usage from the inks, fountain solutions, adhesives, blanket or roller washes, cleaning solvents, and cleaning solutions associated with lithographic offset presses P24 (1024) and P31 (1031) to exceed 4,000 pounds of VOC per month, averaged over any twelve consecutive month period. The terms “VOC net usage,” “net VOC usage,” or “net usage of VOC” shall be defined as the total usage of VOCs from VOC-containing materials (in pounds or tons of VOCs) by the facility,

1 This condition assures that actual emissions will not exceed the amount of offset provided.

emissions unit(s), or operation, less the amount of VOCs from VOC-containing materials returned to inventory, recovered, or reclaimed. [ss. 285.65(7), Wis. Stats., and NR 407.09(2)(d)2 (incorporated from permit # 01-JSB-268), Wis. Adm. Code]

(4) The permittee shall not sell or transfer any amount of growth accommodation credit to any person other than the Department. [ss. 285.63(7)(b)7, Wis. Stats., and NR 407.09(2)(d)3, Wis. Adm. Code (incorporated from permit # 93-DAA-222)]

(5) Any person who owns or operates a sheet-fed lithographic printing press shall, when printing on a substrate other than metal, metal-foil or plastic substrate, use a fountain solution which has a VOC content as applied of no more than one of the following:

(a) 5.0% by weight.

(b) 8.5% by weight if the fountain solution is refrigerated to 60 degrees F or less.

[s. NR 422.142(2)(b)3., Wis. Adm. Code (RACT)]

(6) Any person who owns or operates a sheet-fed lithographic printing press shall, when printing on a metal, metal-foil or plastic substrate, use a fountain solution which has a VOC content as applied of no more than one of the following:

(a) 13.5% by weight if the fountain solution contains any restricted alcohol and is refrigerated to 60 degrees F or less.

(b) 5.0% by weight.

[s. NR 422.142(2)(b)4., Wis. Adm. Code (RACT)]

(7) Except as provided below in condition I.A.1.a.(8), the permittee shall use only a blanket cylinder or roller wash solution which, as applied, has one of the following:

(a) A VOC content of no greater than 30% by weight.

(b) A vapor pressure for each VOC component of less than or equal to 10 mm of Hg at 20 degrees C (68 degrees F).

[s. NR 422.142(2)(c)1., Wis. Adm. Code (RACT)]

(8) The permittee may use a blanket or roller wash solution which does not meet the emission limitations in condition I.A.1.a.(7) provided the total amount of non-compliant solutions used at the facility over any 12 consecutive months does not exceed one of the following:

(a) 55 gallons (208 liters), if the facility does not print on a plastic substrate.

(b) 165 gallons (624.5 liters), if the facility does print on a plastic substrate.

[s. NR 422.142(2)(c)2., Wis. Adm. Code (RACT)]

(9) Adhesive application by press P31 (1031) is not a printing process nor a flexographic printing process. Rather, it is a surface coating operation performed by the tower coater, employed temporarily as a coating applicator. If and when the tower coater on printing press P31 (1031) is used to apply adhesives or when cleaning the tower coater after adhesive use, the permittee shall use the Latest Available Control Techniques and operating practices demonstrating best current technology (LACT), as approved by the department.2
LACT for adhesive use or post-use clean-up has been defined as follows:

(a) With printing press P31 (1031) the permittee shall use only adhesives in the tower coater which have a VOC content of no more than 6.5 pounds per gallon[3], as applied.

(b) With printing press P31 (1031) the permittee shall only use clean-up solvents to remove adhesive from the tower coater which have a VOC content of no more than 6.9 pounds per gallon.

[ss. NR 407.09(2)(d)3 (permit # 93-DAA-222) and NR 424.03(2)(c), Wis. Adm. Code]

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2 Prior to the existence of RACT rules for lithographic presses, the Department approved LACT conditions for all presses at this facility after 85% control had been demonstrated to be technologically infeasible (see 93-DAA-222 and 94-DAA-218). The permittee has chosen to use, selectively, the Election option under s. NR 424.03(3), Wis. Adm. Code. Thus, the RACT requirements under s. NR 422.142, Wis. Adm. Code, have been substituted for the prior LACT construction permit and Administrative Order requirements, except that the LACT requirements have been retained that allow the use of high VOC adhesives and adhesive solvent on P31 (1031), as written above.

(10) The permittee shall use only printing inks and clear coat materials that require UV curing3 on presses P17 (1017), P20 (1020), P21 (1021), P23 (1023), P24 (1024), and P31 (1031). [ss. 285.65(7), Wis. Stats., NR 407.09(2)(d)3, Wis. Adm. Code, and permit #93-DAA-222 and by Order #94-DAA-218]

(11) No person may cause, allow or permit the disposal of more than 5.7 liters (1.5 gallons) of any liquid 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. [s. NR 419.04(1), Wis. Adm. Code]

(12) 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(2), Wis. Adm. Code]

(13) The permittee shall not cause, allow, or permit visible emissions from the facility to exceed 20% opacity. [s. NR 431.05, Wis. Adm. Code]

b. Compliance Demonstration

(1) The permittee shall establish and implement operating procedures to reduce and monitor the amount of evaporation of VOCs from the handling, transfer, storage and disposal of VOC containing materials (e.g., inks, coatings, thinning agents, fountain solutions, blanket cylinder or roller wash solutions, cleaning solvents, and cleaning solutions and contaminated rags). The operating procedures shall include, but not be limited to, the storage of all VOC containing materials in closed containers which prevent the evaporation of VOCs. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]

(2) The permittee shall determine the VOC content, as applied or used, of each ink, coating, adhesive, fountain solution, blanket or roller wash solution, cleaning solvent, cleaning solution used or applied, in units of pounds of VOC per gallon of liquid solution, as applied. This determination shall be made through the use of approvable published literature (e.g., material safety data sheet (MSDS), or certified manufacturer or supplier specifications, if the permittee obtains further documentation for a material) and a calculation method approvable by the Department for the permittee. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]

(3) For the following determinations the permittee may use approvable certified specifications (which may not be limited to material safety data sheet (MSDS) documents, if the permittee obtains further documentation for a material), approvable published chemical literature with a calculation method approvable by the Department for the permittee. The permittee shall determine:

a) the identity of inks and coatings used at the permittee's facility that require UV curing,
b) the identity of all chemicals that compose the fountain solution,
c) the identity the fountain solution chemical components that are considered restricted alcohols by the Department,
d) the identity of blanket cylinder and roller wash solutions in use at the facility and, if the VOC content of a wash solution is greater than 30% by weight, vapor pressures of the VOC chemical components of the blanket cylinder and roller wash solutions, and
e) the formulation and VOC content of adhesives applied by press P31 (1031)'s tower coater and of the solvents specifically used to clean the tower coater parts after adhesive

3 The permittee has elected to take this restriction in order to simplify the consideration of ink emissions. In addition, the permittee has informed the Department that press rolls have been installed that only allow the use of UV-cured inks. Note that, previously, presses P23 (1023), P24 (1024), and P31 (1031) have been restricted to the use of UV-cured inks by permit #93-DAA-222 and by Order #94-DAA-218.

use.
f) the identity of cleanup solvents and solutions in use at the facility
g) the density of all chemicals and chemical solutions, as applied and as delivered from the suppliers.
[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]

(4) If any of the blanket cylinder or roller wash solutions used do not meet the emission limitations in I.A.1.a.(7), above, the permittee shall uniquely identify these solutions and, at the end of each month, determine the total amount of non-specification solutions used during the previous 12 consecutive months, in units of gallons. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]

(5) If for compliance demonstration purposes the fountain solutions are refrigerated, the permittee shall monitor at least once each 8-hour shift the temperature of each fountain solution reservoir. [ss. NR 407.09(4)(a)3.b. and NR 422.142(3), Wis. Adm. Code]

(6) Within 20 days of the end of each calendar month, according to I.A.1.a.(2) the permittee shall determine the individual press total net usage of volatile organic compounds (VOCs) from presses P17 (1017), P20 (1020), P21 (1021), and P23 (1023) during that month in units of pounds of VOC used per press. The total VOC net usage for that month from these four presses, combined, shall be totaled.

The terms “VOC net usage,” “net VOC usage,” or “net usage of VOC” shall be defined as the total usage of VOCs from VOC-containing materials (in pounds or tons of VOCs) by the facility, emissions unit(s), or operation, less the amount of VOCs from VOC-containing materials returned to inventory, recovered, or reclaimed. A limitation that applies this definition may not be construed as a direct limitation on the usage of a specific material; rather, the definition applies to the usage of VOCs contained in a material.

Credits for VOCs from returned, recovered, or reclaimed VOC-containing material(s) shall be granted only for the amount of material actually directed into a sealed container and calculated, handled, and processed according to methods described in the facility's VOC Recovery Program Plan. In order to claim recovery credits for VOCs from VOC-containing materials, the facility shall prepare and maintain a VOC Recovery Plan. At a minimum, the Plan shall consist of the following:

a) Identification of those persons engaged in VOC recovery.
b) Description of materials returned to inventory, recovered, or reclaimed.
c) VOC content of the materials for which VOC recovery is claimed.
d) Procedures employed for recovering VOC materials.
e) Disposition of returned or recovered materials not destined for reuse.

The VOC Recovery Program Plan shall be subject to review by the Department of Natural Resources. The permittee shall submit the Plan to the Department of Natural Resources upon request for review and approval. The permittee may use the Plan or a modified Plan, unless the Department has requested a review, has not approved the Plan as a result of the review, and has submitted an amended Plan to the permittee. The permittee shall submit notification to the Department once the Plan has been created and whenever the Plan has been modified. The permittee shall keep a copy of the currently approved VOC Recovery Program document, if any, available for inspection at the facility.

The permittee shall comply with all limitations established under ss. 285,01 to 285.87, Wis. Stats., and under the Wisconsin Administrative Code that apply to the recovery, handling, reclamation, and disposal of VOC-containing materials.

From the current month’s total and from past records the permittee shall calculate the 12-consecutive-month, average monthly VOC net usage from these four presses combined. The VOCs used shall include, but are not limited to, the VOCs emitted from application of inks, coatings, thinning agents, fountain solutions, blanket cylinder or roller wash solutions, cleaning solvents, and cleaning solutions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]

(7) Within 20 days of the end of each calendar month, according to I.A.1.a.(3) the permittee shall determine the individual press total net usage of volatile organic compounds (VOCs) from presses P24 (1024) and P31 (1031) during that month in units of pounds of VOC used per press. The total VOC net usage for that month from these two presses, combined, shall be totaled and reported.

The terms “VOC net usage,” “net VOC usage,” or “net usage of VOC” shall be defined as the total usage of VOCs from VOC-containing materials (in pounds or tons of VOCs) by the facility, emissions unit(s), or operation, less the amount of VOCs from VOC-containing materials returned to inventory, recovered, or reclaimed. A limitation that applies this definition may not be construed as a direct limitation on the usage of a specific material; rather, the definition applies to the usage of VOCs contained in a material.

Credits for VOCs from returned, recovered, or reclaimed VOC-containing material(s) shall be granted only for the amount of material actually directed into a sealed container and calculated, handled, and processed according to methods described in the facility's VOC Recovery Program Plan. In order to claim recovery credits for VOCs from VOC-containing materials, the facility shall prepare and maintain a VOC Recovery Plan. At a minimum, the Plan shall consist of the following:

a) Identification of those persons engaged in VOC recovery.
b) Description of materials returned to inventory, recovered, or reclaimed.
c) VOC content of the materials for which VOC recovery is claimed.
d) Procedures employed for recovering VOC materials.
e) Disposition of returned or recovered materials not destined for reuse.

The VOC Recovery Program Plan shall be subject to review by the Department of Natural Resources. The permittee shall submit the Plan to the Department of Natural Resources upon request for review and approval. The permittee may use the Plan or a modified Plan, unless the Department has requested a review, has not approved the Plan as a result of the review, and has submitted an amended Plan to the permittee. The permittee shall submit notification to the Department once the Plan has been created and whenever the Plan has been modified. The permittee shall keep a copy of the currently approved VOC Recovery Program document, if any, available for inspection at the facility.

The permittee shall comply with all limitations established under ss. 285,01 to 285.87, Wis. Stats., and under the Wisconsin Administrative Code that apply to the recovery, handling, reclamation, and disposal of VOC-containing materials.

From the current month’s total and past records the permittee shall calculate the 12-consecutive-month, average monthly VOC net usage from these two presses combined. The VOCs used shall include, but are not limited to, the VOCs emitted from application of inks, coatings, thinning agents, fountain solutions, blanket cylinder or roller wash solutions, cleaning solvents, and cleaning solutions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]

(8) For each press the permittee shall monitor the substrate types used and the time periods in which each substrate type was used for printing at the facility. (e.g. paper, metal, metal-foil, or plastic substrates)
[s. NR 407.09(4)(a)3.b., Wis. Adm. Code]

(9) During each calendar month the permittee shall monitor for each press the total applied volume or weight of each adhesive, fountain solution, blanket or roller wash solution, and cleanup solvent and solutions. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]

c. Reference Test Methods, Recordkeeping, and Monitoring Requirements

(1) Whenever any testing of an ink, coating, thinning solvent, fountain solution, wipe cleaning solvents, blanket cylinder or roller wash solution or other cleaning solvent for organic solvent content, volume of solids, weight of solids, water content and/or density is required, the permittee

shall use U.S. EPA Method 24 or 24A in 40 CFR part 60, Appendix A, unless the Department has approved the permittee to use another alternative or equivalent method. [ss. NR 407.09(1)(c)1. & 4(a)1. and NR 439.06(3)(b), Wis. Adm. Code]

(2) Whenever any testing of a blanket or roller wash solution for vapor pressure of each VOC chemical is required, the permittee shall use ASTM D2879-97, unless the Department has approved the permittee to use another alternative or equivalent method. [ss. NR 407.09(1)(c)1. & 4(a)1. and NR 422.142(5)(d), Wis. Adm. Code]

(3) The permittee shall establish and implement procedures for the handling, transportation, storage and disposal of VOC containing materials (e.g. inks, coatings, thinning agents, fountain solutions, blanket cylinder or roller wash solutions, cleaning solvents, and cleaning solutions and contaminated rags) to reduce the evaporation of VOCs. These procedures shall include, but are not limited to, the storage of all VOC containing materials in closed containers which prevent the evaporation of VOCs. [ss. NR 407.09(1)(c)1. & 4(a)1. and NR 439.04(1)(d), Wis. Adm. Code]

(4) The permittee shall keep a record of the following information and update these records within 20 days of the end of each month:

(a) The identity of each ink, coating, adhesive, thinning agent, fountain solution, blanket cylinder or roller wash solution, cleaning solvent, and cleaning solution applied or used (Each material used or applied shall be identified with a unique identification number and/or name).
(b) For each ink, coating, and adhesive used, provide identification of those that require UV curing, and report the ink or coating's VOC content as applied, in units of pounds VOC per gallon.
(c) For each fountain solution used, the percent by weight VOC content as applied, the total density of the fountain solution as applied (in units of pounds per gallon, as applied), the names of all chemicals in the fountain solution formula, and identification of each restricted alcohol by name.
(d) For each cleaning solvent, cleaning solution, blanket or roller wash solution the VOC content in units of percent by weight as applied, and, where required for compliance demonstration, the vapor pressure of each VOC component, in units of mmHg at 20 degrees C (68 degrees F).
(e) If blanket or roller wash solution used not meeting the emission limitations in I.A.1.a.(7), above, the name of the solutions used, the total amount of these solutions used over the previous 12 consecutive months, in units of gallons.
(f) If for compliance demonstration purposes the fountain solutions are refrigerated, the temperature of each fountain solution reservoir at least once each 8-hour shift, in units of degrees F.
(g) the density of all chemicals and solutions, as applied and as delivered from the suppliers.

To meet the above requirements in (a) through (f) the VOC contents and vapor pressures shall be determined through the use of certified specifications submitted to the Department by the permittee for any material. Certified specifications may not be limited to material safety data sheet (MSDS) documents, if the permittee obtains and submits further documentation for a material.

If certified specifications are not submitted by the permittee or do not directly specify VOC content or vapor pressure, compliance may be determined by published chemical literature, and either appropriate mass balance calculations or a method approvable by the Department.

For certified specifications supplied by the permittee, the most accurate and precise specifications among the documents submitted shall be used to determine compliance. When certified specifications or published literature specify a range of values for a composition analysis, chemical property, or physical property, compliance shall be determined by the worst-case value within the range specified by the applicable

document.

If published literature is used to determine a material's VOC content and the material used is compounded or thinned, the permittee shall use a mass balance equation or other approvable method to calculate the worst-case value, in accordance with other statements above. [ss. NR 407.09(1)(c)1. & 4(a)1., NR 422.142(4)(b)-(e) & NR 439.04(1)(d), Wis. Adm. Code]

(5) The permittee shall clearly record within 20 days after the end of each calendar month the values determined in accordance with I.A.1.b.(6) in units of pounds of VOC used per month. The VOCs used shall include, but are not limited to, the VOCs emitted from application of inks, the application of fountain solutions and the usage of blanket-roller wash solutions, cleaning solvents, and cleaning solutions.

The VOC Recovery Program Plan shall be subject to review by the Department of Natural Resources. The permittee shall submit the Plan to the Department of Natural Resources upon request for review and approval. The permittee may use the Plan or a modified Plan, unless the Department has requested a review, has not approved the Plan as a result of the review, and has submitted an amended Plan to the permittee. The permittee shall submit notification to the Department once the Plan has been created and whenever the Plan has been modified. The permittee shall keep a copy of the currently approved VOC Recovery Program document, if any, available for inspection at the facility.
[ss. NR 407.09(4)(a)1. and NR 439.04(1)(d), Wis. Adm. Code]

(6) The permittee shall clearly record within 20 days after the end of each calendar month the values determined in accordance with I.A.1.b.(7) in units of pounds of VOC used per month. The VOCs emitted shall include, but are not limited to, the VOCs emitted from application of inks, the application of fountain solutions and the usage of blanket-roller wash solutions, cleaning solvents, and cleaning solutions.

The VOC Recovery Program Plan shall be subject to review by the Department of Natural Resources. The permittee shall submit the Plan to the Department of Natural Resources upon request for review and approval. The permittee may use the Plan or a modified Plan, unless the Department has requested a review, has not approved the Plan as a result of the review, and has submitted an amended Plan to the permittee. The permittee shall submit notification to the Department once the Plan has been created and whenever the Plan has been modified. The permittee shall keep a copy of the currently approved VOC Recovery Program document, if any, available for inspection at the facility.
[ss. NR 407.09(4)(a)1. and NR 439.04(1)(d), Wis. Adm. Code]

(7) Notwithstanding the requirements under I.A.1.c.(1), whenever the Department requires that determination of the VOC content of lithographic inks, fountain solutions and blanket or roller wash in complying with s. NR 422.142, Wis. Adm. Code, the permittee shall use U.S. EPA Method 24, unless the Department has approved the permittee to use another alternative or equivalent method. [s. NR 439.06(3)(j), Wis. Adm. Code]

(8) Within 20 days of the end of each calendar month, for each press the permittee shall record the names of the substrate types used during that calendar month and the time periods in which each substrate type was used for printing at the facility. (e.g. paper, metal, metal-foil, or plastic substrates)
[ss. NR 407.09(1)(c)1. & 4(a)1. and NR 439.04(1)(d), Wis. Adm. Code]

(9) Within 20 days of the end of each calendar month, the permittee shall collect and record the following information: for each press the total volume or weight of each adhesive, fountain solution, wipe cleaning solvents, blanket or roller wash solution and other cleanup solvent applied to each press during that calendar month. [ss. NR 407.09(1)(c)1. & 4(a)1. and NR 439.04(1)(d), Wis. Adm. Code]

(10) Method 18, 25, 25A or 25B in 40 CFR part 60, Appendix A, incorporated by reference in s.

NR 484.04 (13), shall be used to determine organic compound emission concentrations or emission rates, unless the Department has approved the permittee to use another alternative or equivalent method. [s. NR 439.06(3)(a), Wis. Adm. Code]

(11) Compliance with visible emission limits shall be determined by U.S. EPA Method 9, unless the Department has approved the permittee to use another alternative or equivalent method. [s. NR 439.06(9), Wis. Adm. Code]

(12) The records required under this operation 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 422.142(4), s. NR 439.04, s. NR 439.05, Wis. Adm. Code]

(13) An industrial cleaning operation is defined as the process of cleaning products, product components, tools, equipment or general work areas during production, repair, maintenance or servicing with solvents or solvent solutions. Within 20 days from the end of each calendar month, the permittee shall determine and record the month's total net VOC usage from all industrial cleaning operations. This net VOC usage shall be accounted and recorded as part of the records of net VOC usage by the lumped set of operations and activities P25 (1025). This record of industrial cleaning operations shall exclude net VOC usage resulting from solvents or solutions that were used as blanket wash, roller wash, or for press-associated cleaning, since these shall be accounted and recorded as VOC net usage by the appropriate associated press according to I.A.1.c.(5) or I.A.1.c.(6).
[ss. NR 422.02(49), NR 423.02(8), NR 423.035(9), and NR 423.035 (2)(a)1, Wis. Adm. Code]

2. POLLUTANT: Hazardous Air Pollutants (HAPs)

a. Limitations--The combined emissions from the six (6) sheet-fed lithographic printing presses and their respective clean-up activities and operations need to be considered when determining the facility's potential-to-emit, actual, or maximum theoretical emissions. Because the presses' HAP emissions are released as indoor fugitives, these emissions are exempt from the threshold values established in ch. NR 445, Wis. Adm. Code. However, the indoor fugitive emissions eventually are emitted from the facility through the building's general ventilation system and these emissions are subject the general emission limitation under s. NR 445.03, Wis. Adm. Code. At this facility, based upon the information submitted to the Department, the presses emit Formaldehyde, Methyl Isobutyl Ketone, Toluene, Hydroquinone, and 2-Ethoxyethyl Acetate. However, under realistic operating conditions it is estimated that no hazardous air pollutant currently has the potential-to-emit above its corresponding de minimus value in s. NR 445.05, Wis. Adm. Code.

*(1) No person may cause, allow or permit emissions into the ambient air of any hazardous substance in a quantity, concentration, or duration which is 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 1 to 5 of s. NR 445.04, Wis. Adm. Code. [s. NR 445.03, Wis. Adm. Code.]

b. Compliance Demonstration

*(1) The permittee shall determine, for each material used or applied, the identity of all hazardous air pollutants present, as identified in Tables 1 to 5 of s. NR 445.04, Wis. Adm. Code, and the maximum concentrations of these hazardous air pollutants. This determination shall be made by a chemical composition calculation methodology and by the use of approved material safety data sheets 4, other approvable data, and any further approvable, certified supplier or manufacturer analyses. [ss. NR 407.09(4)(a)3.b, Wis. Adm. Code]

*(2) The permittee shall review the net usage of each material and its potential emission of HAPs to determine, as used or applied, under maximum operating conditions, whether or not the emission from the facility of any hazardous air pollutant identified in b.(1), above, will exceed the emission rates published in Tables 1, 3, 4 & 5 of s. NR 445.04, Wis. Adm. Code. [s. NR 407.09(4)(a)3.b., Wis. Adm. Code]

c. Reference Test Methods, Recordkeeping and Monitoring Requirements

*(1) Whenever the compliance testing of any material (e.g., ink, coating, thinning agent, fountain solution, blanket or roller wash solution, and cleaning solution, or cleanup solvent) for a particular hazardous air pollutant concentration or emission rate is required, the permittee shall use a test method and testing protocol approved by the USEPA, unless the Department has approved the permittee to use another alternative or equivalent method. [ss. NR 407.09(1)(c)1. & 4(a)1. and NR 439.06(8), Wis. Adm. Code]

*(2) Recordkeeping and monitoring are not required for any emission unit that does not have the potential to violate the emission limitations under normal operating conditions. [ss. 285.65(3) and 285.63(4)(b), Wis. Stats.]

B. REPORTS

1. Compliance Monitoring Report

4 “approved material safety data sheet” has the meaning given under s. NR 445.02(1), Wis. Adm. Code.

(a) Submit the results of monitoring or a summary of monitoring results required by this permit to the Department every six (6) months

(b) The time periods to be addressed by the submittal are: January 1 to June 30 and July 1 to December 31.

(c) The report shall be submitted to the Plymouth Service Center, Department of Natural Resources, P.O. Box 12436, Milwaukee, WI 53212, within 60 days after the end of each reporting period.

(d) All deviations from applicable requirements shall be clearly identified in the submittal.

(e) Each submittal shall be certified by a responsible official as to the truth, accuracy and completeness of the report.
[ss. NR 407.09(1)(3)3 and NR 439.03(1)(b), Wis. Adm. Code]

2. Compliance Certification Report

(a) Submit an annual certification of compliance with the requirements of this permit to the Wisconsin Department of Natural Resources, Plymouth Service Center, P.O. Box 12436, Milwaukee, WI 53212, and to Compliance Data - Wisconsin, Air and Radiation Division, U.S. EPA, 77 W. Jackson, Chicago, IL 60604.

(b) The time period to be addressed by the report is: January 1 to December 31 of each calendar year.

(c) The report shall be submitted to the Department's Plymouth Service Center and to U.S. EPA within 60 days after the end of each reporting period.

(d) The information included in the report shall comply with the requirements of Part II Section N of this permit.

(e) Each report shall be certified by a responsible official as to the truth, accuracy and completeness of the report.
[s. NR 407.09(4)(a)3. and NR 439.03(1)(c), Wis. Adm. Code]

BEFORE THE DEPARTMENT OF NATURAL RESOURCES AIR MANAGEMENT PROGRAM

Wisconsin Department of Natural Resources, Air Management Program, Preliminary Determination on an Air Pollution Control Permit to Operate an Air Contaminant Source at West Bend, Washington County, Wisconsin.

Air Pollution Operation Permit No. 02-DJH-241-OP.

Serigraph, Inc. 760 Indiana Avenue has submitted to the Department of Natural Resources (DNR) permit applications including plans and specifications for the use of low VOC fountain solution in order to certify emission reduction credits.

The Southeast Region Air Program of the DNR has analyzed these materials and has preliminarily determined that the project should meet applicable criteria for permit approval as stated in s. 285.63, Wis. Stats., including both the emission limits and the ambient air standards and should, therefore, be approved.

The issuance of this operation permit would require changing to a low VOC fountain solution.

This type of proposal normally does not have the potential to cause significant adverse environmental effects and the DNR has not prepared an Environmental Assessment of the proposal. This preliminary determination does not constitute approval from the Air Management Program or any other DNR sections which may also require a review of the project.

The DNR hereby solicits written comments from the public regarding the preliminary determination to approve the operation permit application. These comments will be considered in the DNR's final decision regarding this proposal. Information, including plans and the DNR's preliminary analysis, is available for public inspection at the Department of Natural Resources Bureau of Air Management Headquarters, Seventh Floor, 101 South Webster Street, Madison, Wisconsin, at the Southeast Region Air Program, 2300 North Martin Luther King, Jr. Drive, P.O. Box 12436, Milwaukee, WI 53212, phone (414) 263-8500 and at West Bend Community Memorial Library, 630 Poplar St., West Bend, WI 53095-3246 or contact Dan Hellenberg at (414)-263-8562, (helled@dnr.state.wi.us). This information is also available for downloading from the internet using a world wide web browser at: http://www.dnr.state.wi.us/org/aw/air/reg/regs.htm

Interested persons wishing to comment on the proposal and preliminary determinations should submit written comments within 30 days to:

Wisconsin Department of Natural Resources, Southeast Region Air Program, 2300 North Martin Luther King, Jr. Drive, P.O. Box 12436, Milwaukee, WI 53212, phone (414) 263-8500 Attn: Dan Hellenberg.

A public hearing may be requested by individuals if the project is of significant concern to them. The request for hearing should indicate the interest of the party filing the request and reasons why a hearing is warranted. The DNR may then hold a public hearing if it determines that there is a significant public interest in holding a hearing.

Reasonable accommodation, including the provision of informational material in an alternative format, will be provided for qualified individuals with disabilities upon request.

Dated at Milwaukee, Wisconsin _____.

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
For the Secretary

By _____
Dan Schramm, Air Supervisor
Southeast Region Air Program