

Policy: Permit Exemptions for Graphics Arts Printing and Coating Operations

Policy When a graphics arts operation or related printing activity qualifies for a permit exemption pursuant to Section 2-1-119.2 based on one of the following:

- Facility wide quantity of coating and ink < 30 gal/yr,
- Facility wide emissions from the coating and ink <150 lb/yr, or
- VOC content of the coating and ink < 1% by weight,

then the associated cleanup solvent is also exempt from permit requirements, unless the emissions exceed levels requiring permits specified in Sections 2-1-316 through 2-1-319.

Effective date September 17, 2007

Who is affected This policy affects Engineering staff that evaluates permit applications for printing sources.

Rationale This policy clarifies permitting exemptions for graphics arts operations and related printing activities for consistency based on the following rationale:

- The permit exemptions in Regulation 2-1-119.2 are based solely on the coating and ink use and not on the associated cleanup solvent.
- If a source meets Regulation 2-1-119.2 based on type and/or quantity of coating and ink used, the source is exempt from District permit requirements.
- A source loses its exemption if the requirements of Regulation 2-1-316 through 2-1-319 apply, based on coating, ink and cleanup solvent usage combined.

Background Regulation 2-1-119.2 includes permit exemptions for graphics arts operations, based on the type or quantity of material used. In addition to coatings and inks, these operations typically involve graphics arts solvent cleaning activities. Graphics arts operations or related printing activities that used more than the 20-gal/yr threshold in Regulation 2-1-118.9 have been permitted at times. At other times, permits have been issued solely for the solvent cleaning activities associated with an exempt graphic arts operation.

The rules did not intend to require permits for graphics arts solvent cleaning activities at graphics arts operations or related printing activities that would otherwise be exempt from permits.

Policy: Permit Exemptions for Graphics Arts Printing and Coating Operations (continued)

Definitions

The following is a list of associated definitions.

- **Graphics arts operation** - As defined in Regulation 8, Rule 20.
 - **Related printing activity** - Including but not limited to digital printing or ink jet printing.
 - **Graphics arts solvent cleaning activity** – Use of blanket wash, roller wash, metering roller wash, plate wash, ink removal solvent, or wipe cleaning solvents. Includes wipe cleaning activities. For the purpose of this policy, fountain solution shall also be included in this category.
 - **Wipe Cleaning** – Use of a rag wetted with solvent to clean soiled printing equipment.
 - **Surface preparation** – The cleaning of surfaces prior to coating, further treatment, sale or intended use.
 - **Coating and inks** – Includes coatings, inks and adhesives.
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Examples of scenarios

The following is a table of common scenarios.

When a graphics arts and/or printing operation...	Then the graphics arts operation and associated graphic arts solvent cleaning activity...
Uses less than 30 gallons per year of ink on a facility wide basis	Are exempt from permitting requirements.
Emits less than 150 pounds per year from the usage of inks and coatings on a facility wide basis	Are exempt from permitting requirements.
Uses coatings and inks with a VOC content less than 1% by weight	Are exempt from permitting requirements.

Equipment Exceptions

The following is a list of equipment not affected by this policy.

- Cold cleaners
- Degreasers

These sources are not categorically exempt from permits, even though they may be used to clean graphics arts operations that are exempt from permits.

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Cleaning Activity Exception

Surface preparation is not covered by this policy. It is subject to the permit exemption in Regulation 2-1-118.9.

What to do with currently permitted sources

For currently permitted printers that will be exempt from permitting by this policy, we plan to change the status to “exempt” during the next annual renewal. This will be covered in the Procedure: Permit Exemptions for Graphics Arts Operations.

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Linked documents

Procedure: Permit Exemptions for Graphics Arts Operations

Future Regulatory Activity

Rule Development is currently amending Regulation 8, Rule 20 to:

- Implement a registration program for smaller printing operations
- Reduce the low-use exemption threshold

Changes to Regulation 8, Rule 20 will require revisions to Regulation 2, Rule 1 that will include:

- Removing graphic arts printers from Regulation 2-1-119.2
- Creating a new graphic arts exemption based on Regulation 8, Rule 20 low use exemption threshold

This policy will be revised following the adoption of these rule amendments.

Approvals

Name & Title	Signature	Date
Brian Bateman, Director of Engineering	Signed by Brian Bateman	9/17/07
