

# Policy: Permit Exemptions for Digital Printing Equipment

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**Policy** Digital printing equipment is subject to Regulation 8-4 and not Regulation 8-20. Therefore, it is eligible for the permit exemption in Regulation 2-1-103, provided it meets the criteria in Regulation 2-1-103.

Furthermore, the ink usage of exempt digital printers should not be included in the facility-wide usage of coating referenced in Regulation 2-1-119.2.

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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.

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**Effective date** June 14, 2007

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**Rationale** This policy clarifies permitting exemptions for digital printing equipment (i.e., inkjet printers) based on the following rationale:

- Regulation 8-20 (Graphic Arts Printing and Coating Operation) does not apply to digital printing equipment, because they are not included in the definition of a graphic arts operation in Regulation 8-20-204 (3/3/99).
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**Definitions** The following is a list of associated definitions.

- **Graphics arts operation** - As defined in Regulation 8, Rule 20.
  - **Inkjet printer** - A type of printer that works by spraying ionized ink on a sheet of paper.
  - **Digital printing equipment** – Including but not limited to inkjet, electrophotographic, thermal transfer, and dye sublimation.
  - **Electrophotographic** - The printing technique used in copy machines, laser and LED printers.
  - **Thermal Transfer** – A printing process that uses heat to register an impression on paper.
  - **Dye Sublimation** - A printing process that uses heat to transfer dye onto paper.
  - **Surface preparation** – The cleaning of surfaces, prior to printing or coating, further treatment, sale or intended use.
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# Policy: Permit Exemptions for Digital Printing Equipment, Continued

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## What to do with currently permitted sources

For currently permitted printers that are exempt from permitting under this policy, contact the Engineering Permit Systems Section to change the permit status to “exempt” and document this change in the facility’s plant file.

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## Equipment Exception

Digital printing equipment is not exempt, if it is subject to:

- Regulation 8-11 (Metal Container, Closure, and Coil Coating).
- Regulation 8-23 (Coating of Flatwood Paneling and Wood Stock).

because these two rules contains ink standards.

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## Contact

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## Linked Document

Policy: Permit Exemptions for Graphics Arts Printing and Coating Operations

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## Future Regulatory Activity

The Rule Development Section is currently amending Regulation 8, Rule 20 to add digital printing equipment into Regulation 8-20. This rule development activity is anticipated to occur by the end of 2007.

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## Document Control

Version	Revised By	Description	Date
1.1	MKCL	New Policy	6/14/07
1.2	MKCL	Mapping & Updating of Policy	3/13/08

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## Approval

Name & Title	Signature	Date
Brian Bateman, Director of Engineering	<b>Signed by Brian Bateman</b>	2/28/2008

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