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*This Advisory is provided to inform you about activities of the Air District which may affect your operation. It is intended to assist you in your effort to achieve and maintain compliance with applicable air pollution regulations.*

**This Advisory supersedes a previous compliance advisory to the Bay Area Graphics Arts Industry dated June 15, 2009. The new language is underlined.**

**ATTENTION: OWNERS AND OPERATORS OF COMMERCIAL DIGITAL PRINTERS**

**SUBJECT: NEW MONITORING/ RECORD KEEPING REQUIREMENTS AND VOC CONTENT INFORMATION REQUIREMENTS**

Regulation 8, Rule 20: Graphic Arts Printing and Coating Operations was amended on November 19, 2008 to include digital printing operations. For the first time, this rule will require recordkeeping by owners or operators of the following types of **commercial** digital printing equipment:

- Any inkjet or liquid electrophotographic printer that uses solvent-based ink including ultraviolet (UV) or electron beam (EB) inks, or
- Any water-based inkjet printer that has the capacity to operate at print speeds of at least 10,000 ft<sup>2</sup> per hour.

These requirements **do not apply** to digital printing operations in home offices.

Effective July 1, 2009, owners or operators of **commercial** digital printing operations shall:

- Maintain a list of all inks, coatings, adhesives, makeup solvents, and cleaning products currently in use to document the Volatile Organic Compound (VOC) content of each and maintain such records for the previous 36 months (starting July 1, 2009).
- Record and add up on a monthly basis the type and amount of each ink, coating, adhesive, makeup solvent, surface preparation solvent, and cleaning product used during that month and maintain such records for the previous 36 months (starting July 1, 2009).
- Register the operation with the Air District if the emissions of VOC from the operation are 75 pounds or more per month but less than 400 pounds per month. If VOC emissions are 400 pounds or greater in any given month, the owner or operator must apply for a permit.
- Have available data sheets which include the VOC content for inks, coatings, and adhesives used. VOC content shall be expressed in grams per liter or pounds per gallon, as supplied, less water.

- Only use inks and solvents subject to recordkeeping requirements in Section 503.3 that are distributed in containers with labels which specify the VOC content. This labeling requirement only applies if such products are subject to the VOC limits in Sections 302, 307, or 309. Currently, digital printing inks and solvents are not subject to the VOC limits in Sections 302, 307, or 309.

If, however, a graphic arts operation uses a cleaning product to clean both digital printing equipment and traditional printing press equipment, the cleaning product container must have a label that specifies the VOC content. "Traditional" graphic arts operations are listed in the definition of graphic arts operations, Regulation 8, Rule 20, Section 204.

Note that the Air District understands that products manufactured prior to July 1, 2009 will have already been distributed and are available for sale to graphic arts operators. Therefore, manufacturers and suppliers do NOT have to attach labels to containers of inks, coatings, adhesives, fountain solutions, and cleaning products that are manufactured prior to July 1, 2009 for use in graphic arts operations within the District. However, manufacturers and suppliers must be able to verify that a product was manufactured prior to July 1, 2009. The verification must be readily available to the District during compliance inspections of graphic arts operations.

Registration will be handled online at [www.baaqmd.gov](http://www.baaqmd.gov). For information about obtaining a permit, visit [www.baaqmd.gov/pmt/index.htm](http://www.baaqmd.gov/pmt/index.htm).

If you have any further needs, please call the District at the following numbers.

- ☎ For questions about this advisory contact Eric Pop, Air Quality Specialist, at [epop@baaqmd.gov](mailto:epop@baaqmd.gov) or (415) 749-5172.
- ☎ For a copy of the above listed rule, see [www.baaqmd.gov/dst/regulations/rq0820.pdf](http://www.baaqmd.gov/dst/regulations/rq0820.pdf).
- ☎ For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline.

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