



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.

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 ft² per hour.

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

Effective July 1, 2009, owners or operators of 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.

In addition, there are now product labeling requirements for those solvents and inks that are distributed and sold for use in digital printing operations **and** that are subject to the recordkeeping requirements of Regulation 8-20-503.3. Manufacturers and suppliers of these products must distribute the products in containers with labels that specify the products VOC content, expressed in grams per liter or pounds per gallon. The label must include the manufacturer's recommended dilution or mix ratio for that product.

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. For information about obtaining a permit, visit 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 or (415) 749-5172.
-  For a copy of the above listed rule, see www.baaqmd.gov/dst/regulations/rq0820.pdf.
-  For compliance assistance, call (415) 749-4999, the Compliance Counselor Hotline.

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