

April 18, 2012

COMPLIANCE ADVISORY

NOTICE OF AMENDMENTS TO RULE 67.16 – GRAPHIC ARTS OPERATIONS

On November 9, 2011, the Air Pollution Control Board adopted amendments to District Rule 67.16 – Graphic Arts Operations, which limits volatile organic compound (VOC) emissions from inks, cleaning solvents, and other graphic arts materials used in printing operations. The rule was first adopted in 1988 and last revised in 1996.

The purpose of the amendments is to ensure ongoing compliance with federal Reasonable Available Control Technology (RACT) requirements, applicable to the printing industry as required by the Clean Air Act.

The following is a summary of the amendments to Rule 67.16:

- The VOC content limit for non-refrigerated fountain solutions is reduced to 5% VOC by volume, and to 8.5% by volume for refrigerated fountain solutions;
- The allowable VOC content of cleaning materials is reduced to less than 100 grams/liter.
 Alternatively, cleaning materials must have a VOC vapor pressure of 5 mm Hg at 20 degrees Celsius or less;
- The VOC limit for adhesives used in graphic arts operations is reduced to 150 grams/liter, less water and exempt compounds;
- New exemptions are provided for stripping of cured inks, coatings and adhesives, cleaning of UV lamps and reflectors and electronic beam processors;
- The amended rule contains new and revised definitions including definitions for digital printing operations; and
- The rule also includes the updated test methods for determining VOC content of graphic arts and cleaning materials, determining vapor pressure of cleaning materials and the overall control efficiency of emission control systems.

Digital printing operations are exempt from Rule 67.16; however, large commercial digital printing operations must maintain certain specified records in Rule 67.16. A large commercial digital printing operation is defined as a digital printing operation where a print capacity of any individual printer that uses solvent based inks is 1,000 square feet per hour or higher; or an operation where a print capacity of any individual printer that uses water based or UV inks is 10,000 square feet per hour or higher.

An application for an Authority to Construct will be required prior to any equipment modification to a graphic arts operation. These modifications include replacements (except identical replacements as specified in Rule 11(5)(i)) and/or modifications of the graphic arts equipment or installation of control equipment. An application will not be required when replacing graphic arts materials, fountain solutions or solvents to comply with the provisions in Rule 67.16, unless the existing conditions in the Permit to Operate cannot be met upon this replacement.

The amendments to the rule will become effective on May 9, 2012.

A copy of Rule 67.16 is available by contacting the District at (858) 586-2712 or on the District's web site at http://www.sdapcd.org/rules/Reg4pdf/R67-16.pdf. For more information, please contact the District Compliance Division at (858) 586-2650.

GMH:jlm