

Operating Permit Options

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Technological advances in traditional printing and the advent of digital printing can make it more challenging to know when you need an air permit and which permit is best for your operations.

There are two main activities that may trigger air permitting - construction and operation; each of these comes with its own permitting requirements. Always check to see if you are required to apply for a construction permit before bringing new equipment on site. Once a source is installed, an operating permit will be necessary, which is the focus of this article.

Federal Title V operating permits (also referred to as Part 70 permits) are required for any facility that is considered a “major source” of air pollution. For purposes of operating permits only¹, a major source is a facility that has the potential to emit (PTE) more than 100 tons per year (tpy) of any criteria pollutant; volatile organic compounds (VOC), carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide (SO₂), particulate matter less than 10 microns (PM₁₀), or more than 10 tons of any individual hazardous air pollutant (HAP) or more than 25 tpy of combined HAPs. Permitting thresholds are lower for facilities located in non-attainment areas.

Some facilities take limits on material throughputs, hours of operation, or emissions in order to artificially lower their PTE to qualify for a Federally Enforceable State Operating Permit (FESOP). These permits are also called “synthetic minor” permits.

Facilities that do not exceed federal permitting thresholds may still need to acquire a state operating permit. State permitting programs have more options than ever before and are summarized below.

ILLINOIS:

All “emission units” are required to secure an air permit, or register with the Illinois EPA, even very small sources of air pollution. An “emission unit” is any piece of equipment located at an emission source that has a potential to emit air pollution. *Registration of Smaller Sources (ROSS)* is for operations that emit less than 5 tpy of combined criteria pollutants. Sources with a potential to emit more than 5 tpy, but whose emissions are less than the threshold for a FESOP, may qualify for a “life-time” operating permit.

Visit <http://www.epa.illinois.gov/topics/forms/air-permits/index> for more information on the Illinois EPA permitting program.

WISCONSIN:

ROP Type A Registration Permit is for facilities with actual emissions of less than 25 tpy for criteria pollutants and 6.25 tons per year for HAPs.

¹ For construction permitting purposes, the thresholds that define a “major source” are typically higher than the operating permit thresholds.

ROP Type B Registration Permit is for facilities with actual emissions of less than 50 tpy for criteria pollutants and 12.5 tpy for HAPs.

ROP C Registration Permit for Printers is only available to printers. To qualify for this permit, emissions of each criteria pollutant are limited to 25 tons per year, and HAPs are limited to 12.5 tons per year.

General Operation Permit (GOP) for Printers applies to digital, screen, lithographic web printing (both heatset and coldset), and lithographic sheetfed printing.

For more information on Wisconsin permits, visit <http://dnr.wi.gov/topic/AirPermits/Options>

INDIANA:

Source Specific Operating Agreement for Surface Coating or Graphic Arts Operations is available to printers with total VOC and HAPs that do not exceed 15 lb/day (7 lb/day in select counties).

Permit by Rule may be used for facilities that qualify for an operating agreement with criteria pollutant and HAP emissions that do not exceed 20% of the major source limits.

Find more on the Indiana permit options at <http://www.in.gov/idem/airquality>.

Whether you are applying for a state operating permit, or a federal operating permit, all applications will go through your state environmental regulatory agency.

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