



CLARK COUNTY AIR QUALITY REGULATIONS

Section 106: VOC Emissions Control for Offset Lithographic, Letterpress, and Flexible Package Printing and Other Graphic Arts Operations Fact Sheet

May 2024

DEFINITIONS

“**Flexible package printing operation**” means a printing process for applying words, designs, or pictures to a substrate designed to be used as non-rigid packaging material. Flexible package printing operations typically use flexographic or rotogravure printing operation methods. Shrink-wrap label or wrapper printing that is conducted on or in-line with a flexible package printing press is considered a flexible package printing operation, but printing of self-adhesive labels is not (Section 106.3, “Definitions”).

“**Graphic arts operations**” means offset lithographic, letterpress, and/or flexible package printing operations, and includes in-line and off-line coating and laminating processes when these are performed in association with offset lithographic, letterpress, or flexible package printing operations (Section 106.3, “Definitions”).

“**Letterpress printing operations**” means the application of words, designs, or pictures using a method in which the image area is raised relative to the nonimage area and the paste ink is transferred to the substrate directly from the image surface (Section 106.3, “Definitions”).

“**Offset lithographic printing operations**” means the application of words, designs, or pictures using a planographic method of printing in which the image and nonimage areas are on the same plane and the ink is transferred from a plate to an intermediary surface, typically a rubber blanket, that in turn transfers the image to the substrate. It includes the application of overprint coatings (Section 106.3, “Definitions”).

“**Projected maximum emissions**” (PME) means the highest annual rate, in tons per year, at which the stationary source is projected to emit VOC based on anticipated production, throughput, heat input, or material utilization rates that does not include emission reductions from add-on controls (Section 101.3, “Definitions”).

“**Stationary source**” means any building, structure, facility, or installation that emits or may emit any regulated air pollutant (Section 0, “Definitions”).

AREA OF APPLICABILITY

The rule applies to an area known as Hydrographic Area 212 (HA 212), which is roughly 1,500 square miles of the Las Vegas Valley (see map below). The rule also applies to any other area designated with a “moderate” or higher ozone nonattainment classification within Clark County on or after January 5, 2023.

APPLICABILITY

Applicable

Section 106 is applicable to any owner or operator of a stationary source with PME of volatile organic compounds (VOC) **equal to or greater than 3.0 tons per calendar year** from offset lithographic printing operations, letterpress printing operations, and/or flexible packaging printing operations (Section 106.4 lists exemptions from parts of this rule).

Sections 106.7, 106.8(b)–(c), and 106.9–106.11 (on work practices (including periodic inspections and training) and registration, notification, and recordkeeping requirements) apply to any owner or operator of a stationary source with a PME of VOC of **less than 3.0 tons per calendar year** from offset lithographic printing operations, letterpress printing operations, and/or flexible packaging printing operations (Section 106.4 lists exemptions from parts of this rule).

Not Applicable

Section 106 rules do not apply:

- To stationary sources using less than 500 gallons (1,892 L) or 5,000 pounds (2,268 kg) of graphic arts material per calendar year (Section 106.2(c)(1)).

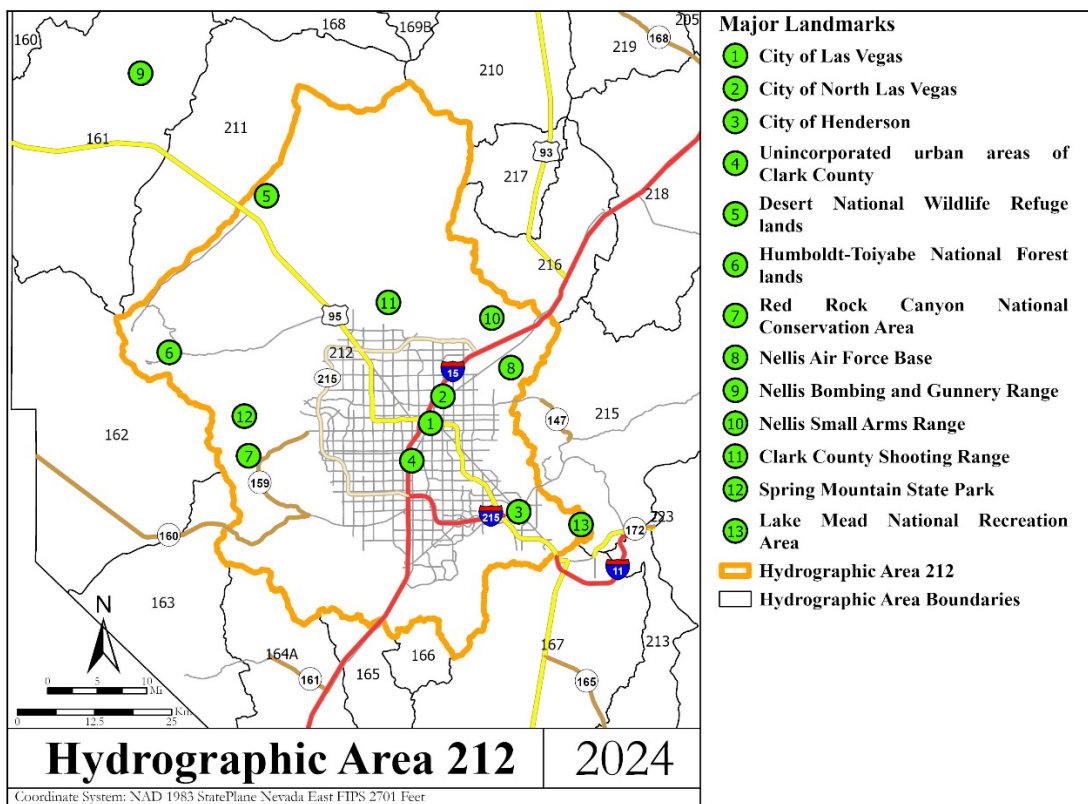


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- When using graphic arts materials for the following (Section 106.2(c)(2)):
 - Circuitry and other associated printing performed for labeling, logo, or identification purposes on a printed circuit, its substrate, its immediate covering, or its immediate encapsulant by a circuitry printer.
 - Applications that are considered coating operations but are not performed in association with a printing operation.
 - Printing conducted with digital printing equipment.
 - Screen printing operations.



EXEMPTIONS

A stationary source may be excluded from portions of the regulation based on operations, usage, and materials (see Section 106.4). See the accompanying [flow diagram](#) showing the criteria needed to claim an exemption and the regulations that may still apply.

EMISSIONS STANDARDS FOR STATIONARY SOURCES WITH PME EQUAL TO OR GREATER THAN 3.0 TONS OF VOC PER YEAR

VOC emissions must be controlled by complying with the emissions standards outlined in Section 106.5–106.6, which include limiting alcohol concentration in fountain solutions, maintaining dryer pressure in the press room, using cleaning materials containing less VOC by weight or less VOC composite, using graphic art materials with low VOC content, and work practices (Section 106.7).

If an owner or operator chooses to use an emissions control system (ECS), then an operations and maintenance plan must be developed per Section 106.8.1. In addition, ECS monitoring devices must be installed and maintained according to manufacturer specifications.



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COMPLIANCE DATES

Document / Requirement	Due Date
Compliance dates for all applicable stationary sources	
Compliance with Section 106 for existing stationary source (Section 106.11(a))	No later than November 17, 2024, or when the stationary source commences normal operations or becomes subject to any requirements in Section 106, whichever is later
Compliance with Section 106 for new stationary source (Section 106.11(b))	Upon commencing normal operations
Owner or operator who already has a stationary source permit or are is already complying with another SIP-approved regulation	
Permit revision instead of registration application (Section 106.9(d))	No later than November 17, 2024, or 45 days after becoming subject to any requirements in Section 106, whichever is later
Notice of exemption (Section 106.10.1(b))	Within 30 days of compliance date in Section 106.11
Compliance with Section 106.5–106.6; Control Officer’s discretion on accepting alternative compliance date (Section 106.11(e))	No later than May 21, 2027
Registration and recordkeeping for all applicable stationary sources	
Registration application (Section 106.9(a)(1))	No later than November 17, 2024, or 45 days after becoming subject to any requirements in Section 106, whichever is later
Registration application revision update for material change (Section 106.9(a)(2))	Within 60 days of material change
Record retention (Section 106.10.2(a)(2))	5 years from creation
All records for review (Section 106.10.2(a)(3))	Upon request from Control Officer during hours of operation
Record graphic arts materials used in previous month (Section 106.10.2(a)(4))	Monthly
Record of emissions calculations (Section 106.10.2(a)(6))	Every calendar year
PME equal to or greater than 3.0 tons of VOC	
Registration revision if previous registration listed PME equal to or greater than 3.0 tons of VOC, but less than 3.0 tons of VOC were emitted and reported in each of the previous three consecutive calendar years (Section 106.9(c))	As applicable
Annual emissions inventory (Section 106.10.3(b))	On or before March 31 of each year
Compliance using ECS (Section 106.11(d))	November 12, 2025
If using a performance test to determine ECS control efficiency	
Conduct ECS performance test (Section 106.10.1(a)(1))	Within 180 days of initial operation or by November 17, 2024, whichever is later; or provide documentation of a successfully completed stack test performed within the last 5 years prior to May 21, 2024



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Document / Requirement	Due Date
Submit ECS performance test protocol (Section 106.10.1(a)(2))	At least 45, but no more than 90, days before anticipated test date
Submit performance test report to Control Officer (Section 106.10.1(a)(3))	60 days after test completed

RESOURCES

Forms and Worksheets:

- Calculation Worksheet (Section 106.10.2(a)(6)) – for calculating PME of VOC tons per calendar year to determine applicability (Section 106.2(a)-(b)).
- [Registration Application](#) (Section 106.9) – for all applicable sources required to comply with Section 106 described in the Applicability section (Section 106.2(a)-(b)).
- [Notification Form](#) (Section 106.10.1(b)) – for claiming an exemption from certain provisions of Section 106 (see Section 106.4 for exemption list).

The final rule is available on the department website at:

https://www.clarkcountynv.gov/government/departments/environment_and_sustainability/division_of_air_quality/rules_regulations/current_aq_rules.php

Questions about these rules can be directed to the Department of Environment and Sustainability [Permitting Section](#) or our Small Business Assistance Program at: (702) 455-1660 or AQSBAP@ClarkCountyNV.gov.

References:

[Clean Air Act, Section 182\(b\)\(2\)\(A\), Title 42, U.S. Code Section 7511a \(42 U.S.C. 7511a\)](#)

[AQR Section 106, "VOC Emissions Control for Offset Lithographic, Letterpress, and Flexible Package Printing and Other Graphic Arts Operations"](#)

Disclaimer

This fact sheet is for general information and guidance purposes only. Do not rely solely on the information provided here as a basis for making any business, legal or any other decisions.