

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

N307948739

FACILITY: INTERNATIONAL MASTERTAG		SRN / ID: N3079
LOCATION: 9350 WALSH RD, MONTAGUE		DISTRICT: Grand Rapids
CITY: MONTAGUE		COUNTY: MUSKEGON
CONTACT: Chris Beck, Quality/Maintenance Manager		ACTIVITY DATE: 05/02/2019
STAFF: Chris Robinson	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY'19 on-site inspection to determine the facility's compliance status with respect to PTI No. 85-08A and any other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

Chris Robinson (CR) from the AQD was onsite to conduct an unannounced inspection of International Mastertag (SRN N3079) to determine the facility's compliance status with respect to Permit to Install (PTI) No. 85-08A and any other applicable air quality Rules and Regulations. The facility is located at 9350 Walsh Road in Montague, Muskegon County, Michigan. CR met with Mr. Mark Twiest, Production Manager; Dave Gignac, Human Resources Manager; and Mr. Chris Beck, Quality/Maintenance Manager. Intent of the inspection was relayed, and identification provided.

Weather conditions were cloudy with a light rain, approximately 49°F with winds coming out of the east-northeast at approximately 7mph ([www.weatherunderground.com](http://www.weatherunderground.com)). CR surveyed the perimeter of the facility upon arrival for odors and visible emissions, none were observed.

#### Facility Description

Mastertag manufactures and provides consumer care tags and signage for the horticulture industry. The facility prints on pre-purchased plastic sheets from which the tags are then die cut, packaged and then shipped. The printing presses covered in PTI No. 85-08A are listed in the table below. The two (2) rotary presses which were installed in one of the two other buildings located at 9751 US-31 were removed and scrapped in 2018. This building is now used only for warehousing while the second building, adjacent to this one, is used for offices.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Install / Mod Date
EU-SheetFed-01	6C Heidelberg CD-74 Sheetfed Offset Lithographic Printing Press with UV Curing. Manual Blanket and Roller Wash. Stack ID: SV-SheetFed-01a and SV-SheetFed-01b	June 18, 2008
EU-SheetFed-03	5C Heidelberg XL75 Sheetfed Offset Lithographic Printing Press with UV Curing. Automatic Blanket and Roller Wash. Stack ID: SV-SheetFed-03	June 10, 2010
EU-LetterPress-04	Rotary Letter Press with Conventional Inks. Manual Blanket and Roller Wash. In-Plant Emissions	June 18, 2008
EU-LetterPress-02	Rotary Letter Press with Conventional Inks. Manual Blanket and Roller Wash. In-Plant Emissions	June 18, 2008

#### Compliance Evaluation

The remaining two (2) printing presses are subject to a combined VOC emission limit of 5.9 tons per year which is based on a rolling 12-month time period. Records for January 2018 through March 2019 were provided (**Attachment A**). Based on these records the maximum VOC's calculated for any rolling 12-month time period was 0.1284 tons for December 2018.

The facility uses one (1) fountain solution (Optimum). Per Special Condition (SC) I.1 of the PTI, fountain solutions are subject to an "as applied" VOC weight limit of 5% and required, per SC VI.3 to be calculated using the equation provided in Appendix A of the permit. This calculation was provided (**Attachment A**) and the VOC content of the fountain solution was calculated to be 1.2%, which is well under the 5% limit as allowed in SC I.1.

Per SC III.3 any of the printing press-related cleaning solvents MUST NOT have a composite partial vapor pressure of greater than 10 mmHg @ 20°C (68°F). A list of these solvents is below with its respective vapor pressure calculated by the facility based on Safety Data Sheets (SDS's) and possibly old Manufacturer provided Certified Product Data Sheets. Four (4) of the eight (8) cleaning solutions exceed the limit and one (1) is unknown. CR verified with Mr. Beck on May 30, 2019, by phone, that all of the cleaning solutions listed below are "printing press related". A violation Notice will be issued for exceeding the vapor pressure. CR informed Mr.

Beck of this on May 31, 2019. Mr. Beck indicated that they had already reached out to Heidelberg for recommendations.

Press-Related Cleaning Solvent	Vapor Pressure (mmHg@20 deg. C)
AQ Coating Cleaner	0.03
Bottcherin Offset-UV wash	0.26
Bottcherin FR-1000	34.7
Febo Clean 2000	??
FujiFilm	0.2
Isopropanol	32.8
MRC ANC (USA)	55.79
B-Glaze Cleaner	48.84

Special Condition V.1 requires the VOC content of all materials (inks, coatings, fountain solution additives and cleaning solvents) used to be determined using federal Reference Test Method 24 unless, the permittee requests and is provided a written approval by the AQD District Supervisor allowing the use of manufacturer's formulation data. There are no such requests nor approvals on file. Therefore, the facility is required to use Method 24 data. Provided emission records appear to be based on SDS's and per discussion and email with Mr. Beck on 5/31/2019, the facility is submitting a request to use Manufacturer's formulation data. An electronic copy has been received and the paper copy is supposed to be mailed soon. Mastertag reached out to the various manufacturers they use to obtain this data. Although Mastertag is not in compliance with this requirement, the necessary steps have been taken to correct it. Monthly material usage and VOC emission records required by Special Conditions VI.2.b-d, were provided (**Attachment A**).

Special Condition VI.4 requires the facility to maintain a current listing from the manufacturer of the chemical composition of each VOC containing material, including the weight percent of each component. As allowed, the facility maintains SDS's, which were provided and are included in **Attachment B**.

Special Condition VII.1 required the facility to notify the AQD when the installation of the new printing presses was completed, which was the basis behind obtaining PTI No. 85-08A back in June 2010. It does not appear that the AQD was ever notified. A violation Notice will not be issued at this time. However, CR did inform staff that if new presses or other equipment were ever added under a PTI, they would be required to notify the AQD upon completion of installation.

Stack measurements were not explicitly measured but appeared to meet the requirements presented in Special Conditions VIII.1a-1c and were discharged as allowed. Both the stacks and remaining permitted equipment were labeled as required in Special Condition IX.1 of the PTI. This condition also requires the facility to notify the AQD District Supervisor, in writing, as to the date labeling was completed. No such notification was found in the site file. This was discussed with the facility.

### **Conclusion**

Based on observations, discussions and a record review, International Mastertag is not ~~be~~ in compliance with the Process/Operational Restrictions (SC III.3) of PTI No. 85-08A, as discussed above. A violation Notice will be issued.

NAME



DATE

6/10/2019

SUPERVISOR

