

**MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
AIR QUALITY DIVISION**

June 14, 2010

PERMIT TO INSTALL
No. 85-08A

ISSUED TO
International MasterTag

LOCATED AT
9350 Walsh Road
Montague, Michigan 49437

IN THE COUNTY OF
Muskegon

STATE REGISTRATION NUMBER
N3079

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Natural Resources and Environment. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: June 14, 2010	
DATE PERMIT TO INSTALL APPROVED: June 14, 2010	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

Table of Contents

Section	Page
Alphabetical Listing of Common Abbreviations / Acronyms	2
General Conditions	3
Special Conditions	5
Emission Unit Summary Table.....	5
Flexible Group Summary Table	5
Flexible Group Conditions for FG-Printers.....	6
Appendix A: Weight Percent of VOCs in Foundtain Solution	9

Common Abbreviations / Acronyms

Common Acronyms		Pollutant/Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
COM	Continuous Opacity Monitoring	°F	Degrees Fahrenheit
EPA	Environmental Protection Agency	gr	Grains
EU	Emission Unit	Hg	Mercury
FG	Flexible Group	hr	Hour
GACS	Gallon of Applied Coating Solids	H ₂ S	Hydrogen Sulfide
GC	General Condition	hp	Horsepower
HAP	Hazardous Air Pollutant	lb	Pound
HVLP	High Volume Low Pressure *	m	Meter
ID	Identification	mg	Milligram
LAER	Lowest Achievable Emission Rate	mm	Millimeter
MACT	Maximum Achievable Control Technology	MM	Million
MAERS	Michigan Air Emissions Reporting System	MW	Megawatts
MAP	Malfunction Abatement Plan	ng	Nanogram
MDNRE	Michigan Department of Natural Resources and Environment (Department)	NO _x	Oxides of Nitrogen
MSDS	Material Safety Data Sheet	PM	Particulate Matter
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM10	PM less than 10 microns diameter
NSPS	New Source Performance Standards	PM2.5	PM less than 2.5 microns diameter
NSR	New Source Review	pph	Pound per hour
PS	Performance Specification	ppm	Parts per million
PSD	Prevention of Significant Deterioration	ppmv	Parts per million by volume
PTE	Permanent Total Enclosure	ppmw	Parts per million by weight
PTI	Permit to Install	psia	Pounds per square inch absolute
RACT	Reasonably Available Control Technology	psig	Pounds per square inch gauge
ROP	Renewable Operating Permit	scf	Standard cubic feet
SC	Special Condition	sec	Seconds
SCR	Selective Catalytic Reduction	SO ₂	Sulfur Dioxide
SRN	State Registration Number	THC	Total Hydrocarbons
TAC	Toxic Air Contaminant	tpy	Tons per year
TEQ	Toxicity Equivalence Quotient	µg	Microgram
VE	Visible Emissions	VOC	Volatile Organic Compounds
		yr	Year

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Natural Resources and Environment, P.O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Natural Resources and Environment. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. **(R 336.1301)**
 - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
 - b) A visible emission limit specified by an applicable federal new source performance standard.
 - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EU-SheetFed-01	6C Hiedelberg 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	FG-Printers
EU-SheetFed-03	5C Hiedelberg XL75 Sheetfed Offset Lithographic Printing Press with UV Curing. Automatic Blanket and Roller Wash. Stack ID: SV-SheetFed-03	June 10, 2010	FG-Printers
EU-LetterPress-01	Rotary Letter Press with Conventional Inks. Manual Blanket and Roller Wash. In-Plant Emissions	June 18, 2008	FG-Printers
EU-LetterPress-02	Rotary Letter Press with Conventional Inks. Manual Blanket and Roller Wash. In-Plant Emissions	June 18, 2008	FG-Printers
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-Printers	Two Sheetfed Offset Lithographic Printing Presses and Two Rotary Letter Presses.	EU-SheetFed-01, EU-SheetFed-03, EU-LetterPress-01, EU- LetterPress-02

The following Flexible Group conditions apply to: FG-Printers

DESCRIPTION: Two Sheetfed Offset Lithographic Printing Presses and Two Rotary Letter Presses.

Emission Units: EU-SheetFed-01, EU-SheetFed-03, EU-LetterPress-01, and EU-LetterPress-02

POLLUTION CONTROL EQUIPMENT: Not applicable (NA)

I. EMISSION LIMITS

Pollutant	Limit**	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. VOC Content of the Fountain Solution	< 5% By Weight as Applied	Per change in type of fountain solution	FG-Printers	SC VI.1, SC VI.3, SC VI.4	R 336.1702(a)
2. VOC	5.9* tpy	12-month rolling time period as determined at the end of each calendar month	FG-Printers	SC VI.1, SC VI.2, SC VI.4	R 336.1225, R 336.1702(a)

* Total Combined Emissions = Stack Emissions + In-plant Emissions (Fugitive)

** Applicable VOC Emission Factors:

Sheetfed Ink: Retention rate of 95 percent of the VOC in the oil based ink applied to the paper, the remaining 5 percent by weight of VOC emitted.

Cleanup Solution (e.g. Blanket Wash, Roller Wash): 50 percent credit for solvent retention.

References:

- *Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing*, EPA-453/R-06-002, September 2006
- *Alternative Control Techniques Document: Offset Lithographic Printing*, USEPA 453/R-94-054, June 1994
- *DRAFT Guideline Series – Control of VOC Emissions from Offset Lithographic Printing*, USEPA, Sept. 1993

II. MATERIAL LIMITS

NA

III. PROCESS/OPERATIONAL RESTRICTIONS

1. All VOC-containing inks, fountain solution, cleaning solvents such as blanket and roller washes, used shop towels, etc. (materials) shall be stored in closed containers and shall be handled / disposed of in an acceptable manner, in compliance with all applicable state Air Quality rules and federal Air Quality regulations. **(R 336.1225, R 336.1702(a), R 336.1901)**
2. The permittee shall not dispose of VOC-containing used shop towels in the trash. **(R 336.1225, R 336.1702(a), R 336.1901)**
3. All printing press-related cleaning solvents shall have composite partial vapor pressures that do not exceed 10 mmHg @ 20°F (68°C). **(R 336.1225, R 336.1702(a), R 336.1901)**

4. The permittee shall collect and reuse/recycle the blanket wash. **(R 336.1225, R 336.1702(a), R 336.1901)**

IV. DESIGN/EQUIPMENT PARAMETERS

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The VOC content of any material, as received and as applied, shall be determined using federal Reference Test Method 24 (inks, coatings, fountain solution additives and cleaning solvents) or 24A (only applies to solvent-borne inks and related coatings used in the publication rotogravure industry) pursuant to Rule 1040(5). Upon prior written approval by the AQD District Supervisor, VOC content may be determined from manufacturer's formulation data. If the Method 24 or 24A and the formulation values should differ, the Method 24 or 24A results shall be used to determine compliance. **(R 336.1702(a), R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. All required calculations shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. **(R 336.1225, R 336.1702(a))**
2. The permittee shall keep written record of the following for the FG-Printers on a calendar month period:
 - a) Identification of the category (ink, coating, blanket wash, roller wash, press wash, etc.) of each VOC containing material used.
 - b) The VOC content of each material as received and as-applied (in percent by weight or pounds per gallon).
 - c) The usage (in pounds or gallons) of each VOC containing material.
 - d) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept in a format acceptable to the AQD District Supervisor. All records shall be kept on file and made available to the Department upon request. **(R 336.1225, R 336.1702(a))**

3. The permittee shall calculate the VOC content of the fountain solution using the method detailed in Appendix A or an alternate method approved by the AQD District Supervisor. Calculations shall include both dampening aid and wetting agent, as used, in percent by weight. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
4. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each VOC containing material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. All records shall be kept on file and made available to the Department upon request. **(R 336.1225, R 336.1702, R 336.1901)**

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation,

construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EU-SheetFed-03. **(R 336.1201(7)(a))**

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air except SV-SheetFed-01a and SV-SheetFed-01b with horizontal discharge and SV-SheetFed-03 with vertical discharge and rain cap provision:

Stack & Vent ID	Maximum Exhaust Diameter (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1a. SV-SheetFed-01a	18	13	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
1b. SV-SheetFed-01b	18	13	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)
1c. SV-SheetFed-03	16	19	R 336.1225, R 336.1901, R 336.2803, R 336.2804, 40 CFR 52.21(c) & (d)

IX. OTHER REQUIREMENTS

1. Within 30 days of issuance of this permit, the permittee shall label each emission unit according to a method acceptable to the AQD District Supervisor. Within seven days of completing the labeling, the permittee shall notify the AQD District Supervisor, in writing, as to the date the labeling was completed. **(R 336.1201)**

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

