

8/28/09 - ORIGINAL - WITH ERRORS  
IN HAP/VOC CALCULATIONS  
USING MASS BALANCE  
APPROACH  
DAQ

PRINTING OPERATIONS  
AIR GENERAL PERMIT REGISTRATION FORM

Part II. Notification to Permitting Office

(Detach and submit to appropriate permitting office; keep copy onsite)

(EMISSION  
FACTORS  
NOT  
ALLOWED)

**Instructions:** To give notice to the Department of an eligible facility's intent to use this air general permit, the owner or operator of the facility must detach and complete this part of the Air General Permit Registration Form and submit it to the appropriate Department of Environmental Protection or local air pollution control program office which has permitting authority. Please type or print clearly all information, and enclose the appropriate air general permit registration processing fee pursuant to Rule 62-4.050, F.A.C. (\$100 as of the effective date of this form)

0112680-003

Registration Type

Check one:

**INITIAL REGISTRATION** - Notification of intent to:

- Construct and operate a proposed new facility.
- Operate an existing facility not currently using an air general permit (e.g., a facility proposing to go from an air operation permit to an air general permit).

**RE-REGISTRATION** (for facilities currently using an air general permit) - Notification of intent to:

- Continue operating the facility after expiration of the current term of air general permit use.
- Continue operating the facility after a change of ownership.
- Make an equipment change requiring re-registration pursuant to Rule 62-210.310(2)(e), F.A.C., or any other change not considered an administrative correction under Rule 62-210.310(2)(d), F.A.C.

**Surrender of Existing Air Operation Permit(s) - For Initial Registrations Only**

If the facility currently holds one or more air operation permits, such permit(s) must be surrendered by the owner or operator upon the effective date of this air general permit. In such case, check the first box, and indicate the operation permits being surrendered. If no air operation permits are held by the facility, check the second box.

- All existing air operation permits for this facility are hereby surrendered upon the effective date of this air general permit; specifically permit number(s):
- No air operation permits currently exist for this facility.

**General Facility Information**

Facility Owner/Company Name (Name of corporation, agency, or individual owner who or which owns, leases, operates, controls, or supervises the facility.)

J. S. Paluch Company, Inc.

Site Name (Name, if any, of the facility site; e.g., Plant A, Metropolis Plant, etc. If more than one facility is owned, a registration form must be completed for each.)

J. S. Paluch Company, Inc.

Facility Location (Provide the physical location of the facility, not necessarily the mailing address.)

Street Address: 4300 NW 124th Avenue

City: Coral Springs

County: Broward

Zip Code: 33065

RECEIVED  
AUG 21 11 53:20  
BUREAU OF AIR MONITORING & MOBILE SOURCES

RECEIVED

AUG 25 2009

CORRECTED RE-SUBMISSION USING  
MATERIAL USAGE APPROACH OR  
ORIGINAL FEA RECEIPT AUG. 21, 2009.

RECEIVED

SEP 18 2009

PRINTING OPERATIONS  
AIR GENERAL PERMIT REGISTRATION FORM

Bureau of Air Monitoring  
& Mobile Sources

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General Facility Information

Facility Owner/Company Name (Name of corporation, agency, or individual owner who or which owns, leases, operates, controls, or supervises the facility.)

J. S. Paluch Company, Inc.

Site Name (Name, if any, of the facility site; e.g., Plant A, Metropolis Plant, etc. If more than one facility is owned, a registration form must be completed for each.)

J. S. Paluch Company, Inc.

Facility Location (Provide the physical location of the facility, not necessarily the mailing address.)

Street Address: 4300 NW 124th Avenue

City: Coral Springs

County: Broward

Zip Code: 33065

Facility Start-Up Date (Estimated start-up date of proposed new facility.)(N/A for existing facility)

N/A

**Owner/Authorized Representative**

Name and Position Title (Person who, by signing this form below, certifies that the facility is eligible to use this air general permit.)

Print Name and Title: Dan Shrader, National Operations Manager

Owner/Authorized Representative Mailing Address

Organization/Firm: J. S. Paluch Company, Inc.

Street Address: 3708 North River Road, Suite 400

City: Franklin Park

County: Cook, IL

Zip Code: 60131

Owner/Authorized Representative Telephone Numbers

Telephone: 847-233-2778

Fax: 847-671-4911

Cell phone (optional):

**Facility Contact (If different from Owner/Authorized Representative)**

Name and Position Title (Plant manager or person to be contacted regarding day-to-day operations at the facility.)

Print Name and Title: John Ficarra, Plant Manager

Facility Contact Mailing Address

Organization/Firm: J. S. Paluch Company, Inc.

Street Address: 4300 NW 124th Avenue

City: Coral Springs

County: Broward

Zip Code: 33065

Facility Contact Telephone Numbers

Telephone: 800-432-3240

Fax: 954-345-4931

Cell phone (optional):

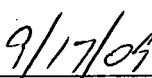
**Owner/Authorized Representative Statement**

This statement must be signed and dated by the person named above as owner or authorized representative

*I, the undersigned, am the owner or authorized representative of the owner or operator of the facility addressed in this Air General Permit Registration Form. I hereby certify, based on information and belief formed after reasonable inquiry, that the facility addressed in this registration form is eligible for use of this air general permit and that the statements made in this registration form are true, accurate and complete. Further, I agree to operate and maintain the facility described in this registration form so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof.*

*I will promptly notify the Department of any changes to the information contained in this registration form.*

  
Signature

  
Date

**Printing Process/InkType(s)**

Check all that apply:

- Heatset Offset Lithographic
- Screen or Letterpress
- Flexographic

- Non-Heatset Offset Lithographic
- Water Based
- Rotogravure

- Digital
- Ultraviolet Cured

**Compliance Assurance - Initial Registration (Not Required for Re-Registration)**

Below, or as an attachment to this form, provide the method (mass balance or material usage rates) expected to be used to demonstrate compliance with Rule 62-210.310(4)(f)2., F.A.C. Provide the estimated amount of materials containing hazardous air pollutants and solvent-containing materials expected to be used over a 12-month period.

NOT APPLICABLE

**Compliance Determination - Re-Registration (Not Required for Initial Registration)**

Below, or as an attachment to this form, provide the highest 12-month total quantity of materials containing hazardous air pollutants and the highest 12-month total quantity of solvent-containing materials used in the last five years to show compliance with sub-subparagraph 62-210.310(4)(f)2.b., F.A.C. (material usage rates) or provide all calculations to show compliance with sub-subparagraph 62-210.310(4)(f)2.a., F.A.C. (mass balance).

Highest 12-month total quantity of materials containing hazardous air pollutants:

235.28 gallons - April 2009

Highest 12-month total quantity of cleaning solvent and fountain solution additives combined:

325.22 gallons - May 2009

See Attachment A for 12-Month Running Total, HAP Emission, and Raw Material Summary Tables.

**Description of Facility**

Below, or as an attachment to this form, provide a description of the printing operations at the facility in sufficient detail to demonstrate the facility's eligibility for use of this air general permit and to provide a basis for tracking any future equipment or process changes at the facility. Information should include a description of the number and types of printing processes, presses and ink systems being used at the facility. Describe all air pollutant-emitting processes and equipment at the facility, and identify any air pollution control measures or equipment used.

See Attachment B for equipment specifics, ink systems, and printing process descriptions.

**Attachment A**

**Monthly Material Usage, 12-Month Running Totals, and Material Usage Summary  
Tables**



**J.S. Paluch Company**  
**2008-2009 Material Usage/VOC Emissions/HAP Materials**  
**12-Month Running Totals**

2009	Monthly Gallons of Non-Heatset Inks Used	Monthly Gallons of Fountain Solution/Clean-Up Solvent Used	Monthly Tons of Ink, Fountain Solution and Clean-Up Solvent VOC Emissions	2008-2009 Gallons of Fountain Solution / Clean-Up Solvent Used - 12-Month Running Total	2008-2009 Tons of Ink, Fountain Solution and Clean-Up Solvent VOC Emissions - 12-Month Running Total	2008-2009 Gallons of HAP Containing Materials 12-Month Running Total
<b>Permit Limits</b>	N/A - No Usage Limit	N/A - No Usage Limit	N/A - No Usage Limit	14,250 gals/year	80 tons VOC/yr (8/20 tons HAP/yr)	Rule 62-210.310(4)(f)2.b. 1,333 gals
JANUARY	782.00	21.31	0.28	311.44	4.12	218.57
FEBRUARY	954.00	26.92	0.33	291.73	4.08	204.07
MARCH	1026.00	31.98	0.39	309.89	4.01	227.41
APRIL	1029.00	29.83	0.36	314.88	4.09	235.28
MAY	1070.00	31.78	0.37	325.22	4.07	225.05
JUNE	935.00	22.84	0.25	315.33	3.97	217.32
JULY	781.00	22.62	0.27	316.38	4.00	219.29
AUGUST	0.00	0.00	0.00	287.53	3.66	197.64
SEPTEMBER	0.00	0.00	0.00	270.52	3.40	187.61
OCTOBER	0.00	0.00	0.00	247.60	3.12	169.84
NOVEMBER	0.00	0.00	0.00	216.32	2.69	148.18
DECEMBER	0.00	0.00	0.00	187.27	2.26	148.18
<b>TOTALS</b>	<b>6577.00</b>	<b>187.27</b>	<b>2.26</b>			

Data available through July 2009; 12-month running totals include zero data for August thru December 2009

J.S. Paluch Company  
2008 HAP Emission Summary

HAP Emission Summary

2008	Density (lbs/gal)	HAP Content (lbs/gal)	Annual Material Usage (lbs)	Annual Material Usage (gals)	Annual HAP Content Usage (gals)	Total HAP Emissions (lbs)	Glycol Ether Content (lbs/gal)	Glycol Emissions (lbs)	Xylene (lbs/gal)	Xylene Emissions (lbs)	Cumene (lbs/gal)	Cumene Emissions (lbs)	Ethylbenzene (lbs/gal)	Ethylbenzene Emissions (lbs)	
FC3 Fountain Solution (FS)	7.84	0	261.93	33.41	0.00	0.00	0	0.00	0	0	0	0.00	0	0.00	
AllStar Ultra Fountain Solution	8.08	2.42	0.00	0.00	0.00	0.00	2.42	0.00	0	0	0	0.00	0	0.00	
Performa Fountain Solution 200A	9.00	0.9	677.70	75.30	7.53	67.77	0.9	67.77	0	0	0	0.00	0	0.00	
Allied Photo Offset Hydro Plus Alcohol Substitute (FS)	8.08	1.94	158.13	19.57	4.70	37.97	1.94	37.97	0	0	0	0.00	0	0.00	
Pitman Performa Alcohol Substitute 201A	7.75	6.2	189.26	24.42	19.54	151.40	6.2	151.40	0	0	0	0.00	0	0.00	
Allied Photo Offset Fountain Dryer (FS)	8.50	0	96.99	11.41	0.00	0.00	0	0.00	0	0	0	0.00	0	0.00	
A-60 Odorless (CS)	6.90	0	0.00	0.00	0.00	0.00	0	0.00	0	0	0	0.00	0	0.00	
Allied A-Wash	6.67	0.62	194.36	29.14	2.71	18.07	0	0.00	0.33	9.6162	0.26	7.58	0.02	0.58	
Allied UV Plus II Wash (CS)	7.70	2.31	235.85	30.63	9.19	70.76	2.31	70.76	0	0	0	0.00	0	0.00	
Allied UV MRC	6.40	1.6	105.60	16.50	4.13	26.40	1.6	26.40	0	0	0	0.00	0	0.00	
Allied UV Wash A	7.10	4.26	129.58	18.25	10.95	77.75	4.26	77.75	0	0	0	0.00	0	0.00	
Allied MRC 88 (CS)	6.67	0	261.26	39.17	0.00	0.00	0	0.00	0	0	0	0.00	0	0.00	
Von Son Rapid 1 Step	6.90	0	48.37	7.01	0.00	0.00	0	0.00	0	0	0	0.00	0	0.00	
Allied Photo Offset Gum Arabic 14% (CS)	8.92	0	10.70	1.20	0.00	0.00	0	0.00	0	0	0	0.00	0	0.00	
Allied Photo Offset Fresh Start Ink Spray (CS)	7.08	0	2.38	0.34	0.00	0.00	0	0.00	0	0	0	0.00	0	0.00	
Allied EC Plate Cleaner (CS)	8.34	0.75	4.25	0.51	0.05	0.38	0	0.00	0	0	0	0.00	0	0.00	
IPA	6.59	0	3.30	0.50	0.00	0.00	0	0.00	0	0	0	0.00	0	0.00	
Hostmann UV Black Ink (lbs)	8.4	0	0.00	0.00	0.00	0.00	0	0.00	0.42	0.00	0.33	0.00	0.02	0.00	
Hostmann UV Color Ink (lbs)	8.4	0	1772.40	211.00	0.00	0.00	0	0.00	0	0	0	0.00	0	0.00	
Hostmann Offset Black Ink (lbs)	8.4	0	23738.40	2826.00	0.00	0.00	0	0.00	0	0	0	0.00	0	0.00	
Hostmann Offset Pantone Color Ink (lbs)	8.4	0	13171.20	1568.00	0.00	0.00	0	0.00	0	0	0	0.00	0	0.00	
Superior UV Inks	8.6	0	0.00	0.00	0.00	0.00	0	0.00	0	0	0	0.00	0	0.00	
Joules UV Ink	10	0	58200.00	5820.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
<b>Total (gals)</b>				<b>10732.36</b>	<b>58.78</b>										
<b>Total (lbs)</b>			<b>41061.65</b>			<b>450.49</b>		<b>432.04</b>		<b>9.62</b>		<b>7.58</b>		<b>0.58</b>	
<b>Total (tons)</b>			<b>20.53</b>			<b>0.23</b>		<b>0.22</b>		<b>0.00</b>		<b>0.00</b>		<b>0.00</b>	
<b>Total HAP Containing Materials (gals)</b>				<b>214.32</b>											
<b>Total Cleanup Solvents/Fountain Solutions (gals)</b>				<b>307.36</b>											



J.S. Paluch Company  
2009 HAP Emission Summary

HAP Emission Summary

2009	Density (lbs/gal)	HAP Content (lbs/gal)*	Annual Material Usage (lbs)	Annual Material Usage (gals)	Annual HAP Content Usage (gals)	Total HAP Emissions (lbs)	Glycol Ether Content (lbs/gal)	Glycol Emissions (lbs)	Xylene (lbs/gal)	Xylene Emissions (lbs)	Cumene (lbs/gal)	Cumene Emissions (lbs)	Ethylbenzene (lbs/gal)	Ethylbenzene Emissions (lbs)	
FC3 Fountain Solution (FS)	7.84	0	125.99	16.07	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
AllStar Uita Fountain Solution	8.08	2.42	0.00	0.00	0.00	0.00	2.42	0.00	0	0.00	0	0.00	0	0.00	
Performa Fountain Solution 200A	9.00	0.9	398.52	44.28	4.43	39.85	0.9	39.85	0	0.00	0	0.00	0	0.00	
Allied Photo Offset Hydro Plus Alcohol Substitute (FS)	8.08	1.94	70.30	8.70	2.09	16.88	1.94	16.88	0	0.00	0	0.00	0	0.00	
Pitman Performa Alcohol Substitute 201A	7.75	6.2	121.06	15.62	12.50	96.84	6.2	96.84	0	0.00	0	0.00	0	0.00	
Allied Photo Offset Fountain Dryer (FS)	8.50	0.474	54.74	6.44	0.36	3.05	0	0.00	0.04	0.26	0.032	0.21	0.0024	0.02	
A-60 Odorless (CS)	6.90	0	0.00	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
Allied A-Wash	6.67	0.62	170.15	25.51	2.37	15.82	0	0.00	0.33	8.42	0.26	6.63	0.02	0.51	
Allied UV Plus II Wash (CS)	7.70	2.31	0.00	0.00	0.00	0.00	2.31	0.00	0	0.00	0	0.00	0	0.00	
Allied UV MRC	6.40	1.6	132.03	20.63	5.16	33.01	1.6	33.01	0	0.00	0	0.00	0	0.00	
Allied UV Wash A	7.10	4.26	156.20	22.00	13.20	93.72	4.26	93.72	0	0.00	0	0.00	0	0.00	
Allied MRC 88 (CS)	6.67	0	80.91	12.13	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
Allied Dampening Cleaner	8.34	0.634	37.53	4.50	0.34	2.85	0.634	2.85	0	0.00	0	0.00	0	0.00	
Allied DynaKlean	6.67	0	8.34	1.25	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
Von Son Rapid 1 Step	9.06	0	13.87	2.01	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
Allied Photo Offset Gum Arabic 14% (CS)	8.92	0	28.99	3.25	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
Antiskin 10V7300	6.90	0.00	0.00	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
Allied EC Plate Cleaner (CS)	8.34	0.75	4.17	0.50	0.04	0.38	0	0.00	0	0.00	0	0.00	0	0.00	
VanSol Liq Cobalt Drier	7.70	0	33.69	4.38	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
IPA	6.59	0	0.00	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
Hostmann UV Black Ink (lbs)	8.40	0	0.00	0.00	0.00	0.00	0	0.00	0.42	0.00	0.33	0.00	0.02	0.00	
Hostmann UV Color Ink (lbs)	8.40	0	0.00	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
Hostmann Offset Black Ink (lbs)	8.40	0	13633.20	1623.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
Hostmann Offset Pantone Color Ink (lbs)	8.40	0	6610.80	787.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
Joules UV Ink	10	0	41670.00	4167.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
<b>Total (gals)</b>				<b>6764.27</b>	<b>40.49</b>										
<b>Total (lbs)</b>			<b>21680.48</b>			<b>302.40</b>		<b>283.16</b>		<b>8.68</b>		<b>6.84</b>		<b>0.53</b>	
<b>Total (tons)</b>			<b>10.84</b>			<b>0.15</b>		<b>0.14</b>		<b>0.00</b>		<b>0.00</b>		<b>0.00</b>	
<b>Total HAP Containing Materials (gals)</b>				<b>148.18</b>											
<b>Total Cleanup Solvents/Fountain Solutions (gals)</b>				<b>187.27</b>											



**Attachment B**

**Equipment, Ink Systems, and Printing Process**

## Process Description/Rule Applicability

Printing operations at the facility include the use of three (3) sheet-fed, coldset (e.g., non-heatset) offset lithographic printing presses. The emission points consist of fugitive emissions from the printing press operations. No emission control devices or dedicated exhaust are used at the facility. Emission control is accomplished by the use of low Volatile Organic Compound (VOC) inks.

The printing presses at the facility include the following:

Press No. 1 - Didde Web Press, Model 206-678 Compu - Press, Serial #420-0128

Press No. 2 - Didde Web Press, Model 205-821 Webcom 700, Serial #189-0161

Press No. 4 - Super Web, Supercom 1000

Press Nos. 1 and 2 are five-color presses and Press No. 4 is an eight color press that will also process UV inks.

Lithography is an "offset" printing technique. Ink is not applied directly from the printing plate (or cylinder) to the substrate as it is in gravure, flexography and letterpress. Ink is applied to the printing plate to form the "image" (such as text or artwork to be printed) and then transferred or "offset" to a rubber "blanket". The image on the blanket is then transferred to the substrate (typically paper or paperboard) to produce the printed product. On sheet-fed presses, the substrate is fed into the press one sheet at a time at varying speeds.

All offset presses have three printing cylinders, as well as the inking and dampening systems. The plate cylinder, the blanket cylinder and the impression cylinder.

Lithography uses a planographic plate, a type of plate on which the image areas are neither raised nor indented (depressed) in relation to the non-image areas. Instead the image and non-image areas, both on essentially the same plane of the printing plate, are defined by differing physiochemical properties.

Lithography is based on the principle that oil and water do not mix (hydrophilic and hydrophobic process). Lithographic plates undergo chemical treatment that render the image area of the plate oleophilic (oil-loving) and therefore ink-receptive and the non-image area hydrophilic (water-loving). During printing, fountain (dampening) solution, which consists primarily of water with small quantities of isopropyl alcohol and other additives to lower surface tension and control pH, is first applied in a thin layer to the printing plate and migrates to the hydrophilic non-image areas of the printing plate. Ink is then applied to the plate and migrates to the oleophilic image areas. Since the ink and water essentially do not mix, the fountain solution prevents ink from migrating to the non-image areas of the plate.

As the plate cylinder rotates, the plate comes in contact with the dampening rollers first. The dampening rollers wet the plate so the non-printing areas repel ink. Then the inking

rollers transfer ink to the dampened plate, where ink only adheres to the image areas. The inked image is transferred to the rubber blanket, and the substrate is printed as it passes between the blanket and impression cylinder.

The major unit operations in a lithographic printing operation include:

- Image preparation
- Processing printing plates
- Printing
- Finishing
- Image Preparation of Lithographic Printing Plates

Image preparation begins with camera-ready (mechanical) art/copy or electronically produced art supplied by the customer. Images are captured for printing by camera, scanner or computer. Components of the image are manually assembled and positioned in a printing flat when a camera is used. This process is called stripping. When art/copy is scanned or digitally captured the image is assembled by the computer with special software. A simple proof (brown print) is prepared to check for position and accuracy. When color is involved, a color proof is submitted to the customer for approval.

There are four common types of lithographic inks that are very viscous to the point they are paste-like. Litho inks are generally very strong in color value to compensate for the lesser amount applied. Sheetfed litho inks are similar to oxidizing types of letterpress inks. To accelerate drying and control ink flow characteristics, litho inks contain solvents (or drying oils) that result in some VOC emissions from the ink.

The three printing presses at the facility are sheet fed presses with the following maximum paper feed rates for each of the presses:

- Press 1 - 800 feet per minute (fpm) with the maximum paper sheet size being 11" x 17"
- Press 2 - 700 fpm with the maximum paper sheet size being 17" x 22"
- Press 4 - 1,000 fpm with the maximum paper sheet size being 17" x 22"

Maximum press operating hours are limited by the following process limitations and bottlenecks:

- Press preparation/cleaning = 1.5 hours per job or shift
- Catholic Church is the facility's only client that provides orders on a weekly basis for weekend delivery (for Sunday use)
- Weekly order shipments must be completed by 5 P.M. Fridays - Partial day Friday (17 hrs) and no weekend work due to client base

Job orders are received weekly on Mondays with jobs requiring completion by the following Friday for shipment to the client by 5 P.M. Therefore, printing operations are limited to Tuesday-Friday with Friday printing operations completed by 5 P.M. to allow



for shipment to the customer. In addition, press preparation and cleanup activities also limit the press operating times. Typical press preparation and cleanup activities require 1.5 hours per press for each new printing job. With these process limitations/bottlenecks in place, annual maximum press operating hours are restricted to 4,316 hours per year as indicated in the following equation:

$$[(3 \text{ days Mon-Thurs} \times 24 \text{ hrs/day}) - (1.5 \text{ hrs day prep/cleanup time} \times 3 \text{ days/wk})] + [17 \text{ hrs/day Fri (12AM-5PM)} - 1.5 \text{ hrs/day prep/cleanup time}] = 83 \text{ hrs/week}$$

$$83 \text{ hrs/wk} \times 52 \text{ week/yr} = 4,316 \text{ hrs/yr}$$

Based upon current ink coverage values, the following is the maximum ink consumption per press:

- Press 1 - 0.000280 pounds of ink per sheet
- Press 2 - 0.000561 pounds of ink per sheet
- Press 4 - 0.000623 pounds of ink per sheet

The maximum VOC content of the inks used at the facility is 4.2 pounds of VOC per gallon of ink (lbs VOC/gal). Maximum VOC content for fountain solution used at the facility is 6.4 lbs VOC/gal and maximum VOC content for cleanup solvent used at the facility is 6.9 lbs VOC/gal.



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SEP 18 2009

Bureau of Air Monitoring  
& Mobile Sources

**J.S. PALUCH COMPANY, INC.**  
**3708 RIVER ROAD, SUITE 400**  
**FRANKLIN PARK, ILLINOIS 60131**

September 17, 2009

Mr. Dickson Dibble  
Florida Department of Environmental Protection- DARM  
Air General Permit Program  
Suite 164  
111 South Magnolia Drive  
Tallahassee, Florida 32301

**Re: Air General Permit Re-Registration:**  
**Active Permit ID Number 0112680-002-AG**  
**J.S. Paluch Company**  
**4300 NW 124<sup>th</sup> Avenue**  
**Coral Springs, Florida 33065**

Dear Mr. Dibble:

Enclosed please find the resubmittal of the Air General Permit Re-Registration form for the J.S. Paluch Company (JS Paluch) facility located at 4300 NW 124<sup>th</sup> Avenue in Coral Springs, Florida (the facility). The \$100.00 Re-Registration fee was included in the original submittal.

The Air Permit Re-Registration form is being submitted due to the removal of one of the four printing presses described in the original Air General Permit Registration Form dated August 2006. Press Number 3 will no longer operate at the facility.

Per the Florida Department of Environmental Protection request, Attachment A to the form includes 12-month running total, hazardous air pollutant, and material usage summary tables. Attachment B includes information regarding the current equipment descriptions, ink systems, and printing processes. Regulated emissions will remain below Air General Permit limits as outlined in Rule 62-210.310(4)(f).

If you have any questions or require additional information, please contact our environmental consultant, Mostardi Platt Environmental, Rosanne Linden at (630) 993-2111.

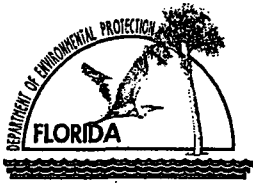
Regards,

J.S. PALUCH COMPANY, INC.

*Daniel Shrader*

Dan Shrader  
National Operations Manager

Enclosures



# Department of Environmental Protection

## Division of Air Resource Management

### PRINTING OPERATIONS AIR GENERAL PERMIT REGISTRATION FORM

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SEP 18 2009

Bureau of Air Monitoring  
& Mobile Sources

#### Part I. Procedures and Conditions for Use of Air General Permit

The Department of Environmental Protection ("Department" or "DEP") has established an "air general permit" at Florida Administrative Code ("F.A.C.") Rule 62-210.310(4)(f) for printing operations. An air general permit is an authorization by rule to construct or operate a specific type of air pollutant emitting facility. Use of such authorization by any individual facility does not require action by the Department. The terms and conditions of the air general permit are set forth in the rule, rather than in a separately issued air construction or air operation permit.

The owner or operator of an eligible facility comprising one or more printing operations may register to use the air general permit at Rule 62-210.310(4)(f), F.A.C., by following the general procedures given at Rule 62-210.310(2), F.A.C., the text of which is provided below. The owner or operator shall notify the Department of the facility's intent to use this general permit by submitting Part II of this registration form to the appropriate Department of Environmental Protection or local air pollution control program office which has permitting authority. Questions concerning this air general permit or the registration process may be directed to any such office or to the Department's small business assistance program at 1-800-SBAP-HLP (1-800-722-7457).

The owner or operator of a facility who properly registers to use this air general permit, and who is not denied use of the air general permit by the Department, is authorized to construct and operate the facility in accordance with the general terms and conditions of Rule 62-210.310(3), F.A.C., and the specific terms and conditions of Rule 62-210.310(4)(f), F.A.C. The text of these two rules is also provided below, followed by definitions of words and phrases used in the rules and on this form. A facility using this air general permit shall not be entitled to use more than one air general permit for the facility.

#### Rule 62-210.310(2), F.A.C.

**(2) General Procedures.** This subsection sets forth general procedures for use of any of the air general permits provided at subsections 62-210.310(4) and (5), F.A.C.

**(a) Determination of Eligibility.** The owner or operator of a proposed new or existing facility shall determine the facility's eligibility to use an air general permit under this rule. A facility is eligible to use an air general permit under this rule if it meets any specific eligibility criteria given in the applicable air general permit at subsection 62-210.310(4) or (5), F.A.C., and the following general criteria.

1. The facility shall not emit nor have the potential to emit 10 tons per year or more of any hazardous air pollutant, 25 tons per year or more of any combination of hazardous air pollutants, or 100 tons per year or more of any other regulated air pollutant; be collocated with, or relocated to, such a facility; or create such a facility in combination with any other collocated facilities, emissions units, or pollutant-emitting activities, including any such facility, emissions unit, or activity that is otherwise exempt from air permitting.

2. The facility shall not contain any emissions units or activities not covered by the applicable air general permit, except:

a. Units and activities that are exempt from permitting pursuant to subsection 62-210.300(3), F.A.C., or Rule 62-4.040, F.A.C.; and

b. Units and activities that are authorized by another air general permit where such other air general permit and the air general permit of interest specifically allow the use of one another at the same facility.

**(b) Registration.** The owner or operator who intends to construct or operate an eligible facility under the authority of an air general permit shall complete and submit the proper registration form to the Department for the specific air general permit to be used, as provided in subsection 62-210.920(1) or (2), F.A.C. The registration form shall be accompanied by the appropriate air general permit processing fee pursuant to Rule 62-4.050, F.A.C. (*\$100 as of the effective date of this form*)

**1. Initial Registration.** Registration of a facility which is not currently authorized to construct or operate under the terms and conditions of an air general permit is classified as an initial registration. Any existing, individual air operation permit(s) authorizing operation of the facility must be surrendered by the owner or operator, effective upon the first day of use of the air general permit.

**2. Re-registration.** Registration of a facility which is currently authorized to operate under the terms and conditions of an air general permit is classified as a re-registration. An owner or operator shall re-register the facility in the following cases:

- a. Impending expiration of the term for air general permit use;
- b. Change of ownership of all or part of the facility;
- c. Proposed new construction, modification, or other equipment change that requires registration pursuant to paragraph 62-210.310(2)(e), F.A.C.; and
- d. Any other change not considered an administrative correction under paragraph 62-210.310(2)(d), F.A.C.

**(c) Use of Air General Permit.**

1. Unless the Department denies use of the air general permit, the owner or operator of an eligible facility may use the air general permit for such facility 30 days after giving notice to the Department. The first day of the 30-day time frame, day one, is the date the Department receives the proper registration form and processing fee. The last day of the 30-day time frame, day 30, is the date the owner or operator may use the air general permit, provided there is no agency action to deny use of the air general permit.

2. To avoid lapse of authority to operate, an owner or operator intending to use, or continue to use, an air general permit must submit the proper registration form and processing fee at least 30 days prior to expiration of the facility's existing air operation permit or air general permit.

**(d) Administrative Corrections.** Within 30 days of any minor changes requiring corrections to information contained in the registration form, the owner or operator shall notify the Department in writing. Such changes shall include:

1. Any change in the name, address, or phone number of the facility or authorized representative not associated with a change in ownership or with a physical relocation of the facility or any emissions units or operations comprising the facility; or
2. Any other similar minor administrative change at the facility.

**(e) Equipment Changes.** The owner or operator shall maintain records of all equipment changes. In the case of installation of new process or air pollution control equipment, alteration of existing process or control equipment without replacement, or replacement of existing process or control equipment with equipment substantially different in terms of capacity, method of operation, material processed, or intended use than that noted on the most recent registration form, the owner or operator shall submit a new and complete air general permit registration form for the facility with the appropriate fee pursuant to Rule 62-4.050, F.A.C. to the Department, provided, however, that any change that would constitute a new major stationary source, major modification, or modification that would be a major modification but for the provisions of paragraph 62-212.400(2)(a), F.A.C., shall require authorization by air construction permit.

**(f) Enforcement of Ineligibility.** If a facility using an air general permit at any time becomes ineligible for the use of the air general permit, or if any facility using an air general permit is determined to have been initially ineligible for use of the air general permit, it shall be subject to enforcement action for constructing or operating without an air permit under subsection 62-210.300(1) or (2), F.A.C., or Chapter 62-213, F.A.C., as appropriate.

**Rule 62-210.310(3), F.A.C.**

**(3) General Conditions.** All terms, conditions, requirements, limitations, and restrictions set forth in this subsection are "general permit conditions" and are binding upon the owner or operator of any facility using an air general permit provided at subsection 62-210.310(4) or (5), F.A.C.

(a) The owner or operator's use of an air general permit is limited to five (5) years. Prior to the end of the five (5) year term, the owner or operator who intends to continue using the air general permit for the facility shall re-register with the Department pursuant to subparagraph 62-210.310(2)(b)2., F.A.C. To avoid lapse of authority to operate, the owner or operator must submit the proper registration form and processing fee at least thirty (30) days prior to expiration of the facility's existing air general permit. The air general permit re-registration form shall contain all current information regarding the facility.

(b) Use of an air general permit is not transferable and does not follow a change in ownership of the facility. Prior to any sale, other change of ownership, or permanent shutdown of the facility, the owner or operator is encouraged to notify the Department of the pending action. The new owner or operator who intends to continue using the air general permit for the facility shall re-register with the Department pursuant to subparagraph 62-210.310(2)(b)2., F.A.C..

(c) The air general permit is valid only for the specific type of facility and associated emissions units and pollutant-emitting activities indicated.

(d) The air general permit does not authorize any demolition or renovation of the facility which involves asbestos removal. The air general permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., or 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference at Rule 62-204.800, F.A.C.

(e) The general permit does not authorize any open burning.

(f) The owner or operator shall not circumvent any air pollution control device or allow the emission of air pollutants without the proper operation of all applicable air pollution control devices.

(g) The owner or operator shall maintain the authorized facility in good condition. Throughout the term of air general permit use, the owner or operator shall ensure that the facility maintains its eligibility to use the air general permit and complies with all terms and conditions of the air general permit.

(h) The owner or operator shall allow a duly authorized representative of the Department access to the facility at reasonable times to inspect and test, upon presentation of credentials or other documents as may be required by law, to determine compliance with the air general permit and Department rules.

(i) If, for any reason, the owner or operator of any facility operating under an air general permit does not comply with or will be unable to comply with any condition or limitation of the air general permit, the owner or operator shall immediately provide the Department with the following information:

1. A description of and cause of noncompliance; and

2. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

(j) Use of an air general permit does not relieve the owner or operator of the facility from liability and penalties when the construction or operation of the authorized facility causes harm or injury to human health or welfare; causes harm or injury to animal, plant or aquatic life; or causes harm or injury to property. It does not allow the owner or operator to cause pollution in contravention of Florida law.

(k) The air general permit conveys no title to land or water, nor does it constitute state recognition or acknowledgment of title.

(l) The air general permit does not convey any vested rights or exclusive privileges, nor does it authorize any injury to public or private property or any invasion of personal rights. It does not authorize any infringement of federal, state, or local laws or regulations.

(m) Use of the air general permit shall be effective until suspended, revoked, surrendered, expired, or nullified pursuant to this rule and Chapter 120, F.S.

(n) Use of the air general permit does not eliminate the necessity for the owner or operator to obtain any other federal, state or local permits that may be required, or relieve the owner or operator from the duty to comply with any federal, state or local requirements that may apply.

**Rule 62-210.310(4)(f), F.A.C.**

**(f) Air General Permit for Facilities Comprising Printing Operations.**

1. A facility comprising one or more printing operations shall be eligible to use this air general permit provided it meets the general eligibility criteria of paragraph 62-210.310(2)(a), F.A.C., and the following specific criteria.

a. The facility shall use no other air general permit.

b. The facility shall not be subject to any unit-specific applicable requirement.

2. A facility using this air general permit shall comply with the general conditions given at subsection 62-210.310(3), F.A.C., and the following specific conditions, provided, however, that the facility shall comply with the limitations of either sub-subparagraphs 62-210.310(4)(f)2.a or b., F.A.C. The facility may change method of compliance between sub-subparagraphs 62-210.310(4)(f)2.a. and b., F.A.C., provided the owner or operator maintains records to demonstrate compliance with the appropriate requirement at the time of change and thereafter.

a. The facility shall not emit 80 tons or more of volatile organic compounds, 8 tons or more of any individual hazardous air pollutant, or 20 tons or more of any combination of hazardous air pollutants in any consecutive twelve months. The facility shall not rely upon add-on controls to meet these limitations. The owner or operator shall keep records of material usage and calculate, using a mass balance approach, for each calendar month and each consecutive twelve months, the emissions of volatile organic compounds, individual hazardous air pollutants and total combined hazardous air pollutants. The owner or operator shall retain these records, available for Department inspection, for a period of at least five years; or

b. The facility shall use less than 1,333 gallons of materials containing any hazardous air pollutants and not exceed the following material usage limitations in any consecutive twelve months. The owner or operator shall keep records of material usage for each calendar month and each consecutive twelve months to demonstrate compliance with such limitations. The owner or operator shall retain these records, available for Department inspection, for a period of at least five years. Specifically, the facility shall:

(I) Operate only heatset offset lithographic printing lines and use less than 100,000 pounds of ink, cleaning solvent and fountain solution additives combined;

(II) Operate only non-heatset offset lithographic printing lines and use less than 14,250 gallons of cleaning solvent and fountain solution additives combined;

(III) Operate only digital printing lines and use less than 12,100 gallons of solvent based inks, clean-up solutions and other solvent-containing materials combined;

(IV) Operate only screen or letterpress printing lines and use less than 14,250 gallons of solvent based inks, clean-up solutions and other solvent-containing materials combined;

(V) Operate only water-based or ultraviolet-cured- material flexographic or rotogravure printing lines and use less than 400,000 pounds of water-based inks, coatings and adhesives, combined;

(VI) Operate only solvent-based material flexographic or rotogravure printing lines and use less than 100,000 pounds of inks, dilution solvents, coatings, cleaning solutions and adhesives, combined; or

(VII) Operate any combination of heatset lithographic, non-heatset lithographic, digital, screen or letterpress, rotogravure or flexographic printing lines and use no more than the most stringent of the material usage limitations contained in sub-sub-subparagraphs 62-210.310(4)(f)2.b.(I) through (VI), F.A.C., for the type of printing lines at the facility. For purposes of determining which limit is the most stringent, the pounds of materials used for heatset offset lithographic lines and flexographic lines shall be converted to the equivalent gallons by dividing by 8.5 pounds per gallon and shall be compared with the limits for non-heatset offset lithographic, digital, screen and letterpress lines, as applicable, for the type of

printing lines at the facility. The most stringent limit shall apply to the total of all solvent-containing material used.

c. The facility shall comply with the objectionable odor prohibition of subsection 62-296.320(2), F.A.C.

#### **Rule 62-210.200, F.A.C., Definitions**

**“Digital Printing”** – The transfer of electronic files directly from the computer to an electronically driven output device that prints the image directly on the selected media (substrate).

**“Electron Beam-Cured”** – An ink and coating drying process by which monomers, oligomers, and other components polymerize to form a film when exposed to an electron beam radiation.

**“Emissions Unit”** – Any part or activity of a facility that emits or has the potential to emit any air pollutant.

**“Facility”** - All of the emissions units which are located on one or more contiguous or adjacent properties, and which are under the control of the same person (or persons under common control).

**“Flexographic Printing”** – The application of words, designs and pictures to a substrate by means of a roll printing technique in which the pattern to be applied is raised above the printing roll and the image carrier is made of rubber or other elastomeric materials.

**“Fountain Solution”** – A mixture of water and other volatile and non-volatile chemicals and additives that maintains the quality of the printing plate and reduces the surface tension of the water so that it spreads easily across the printing plate surface. The fountain solution wets the non-image area so that the ink is maintained within the image areas. Non-volatile additives include mineral salts and hydrophilic gums.

**“Fountain Solution Additives”** – Wetting additives that include alcohol and alcohol substitutes, including isopropyl alcohol, glycol ethers and ethylene glycol, which are used to reduce the surface tension of the fountain solution.

**“Heatset”** – A lithographic web printing process where heat is used to evaporate ink oils from the printing ink. Heatset dryers (typically hot air) are used to deliver the heat to the printed web.

**“Letterpress Printing”** – A printing system in which the image area is raised relative to the non-image area and the ink is transferred to the substrate directly from the image surface.

**“Lithographic Printing”** – A planographic printing system where the image and non-image areas are chemically differentiated. The image area is oil receptive and non-image area is water receptive. Ink film from the lithographic plate is transferred to an intermediary surface (blanket), which, in turn, transfers the ink film to the substrate. Fountain solution is applied to maintain the hydrophilic properties of the nonimage area. Ink drying is divided into heatset and non-heatset.

**“Non-heatset”** – A lithographic printing process where the printing inks are set without the use of heat. Traditional non-heatset inks set and dry by absorption and/or oxidation of the ink oils. Ultraviolet-cured and electron beam-cured inks are considered non-heatset although radiant energy is required to cure these inks.

**“Owner” or “Operator”** – Any person or entity who or which owns, leases, operates, controls or supervises an emissions unit or facility.

**“Printing Line”** – A printing production assembly composed of one or more units used to produce a printed substrate including any associated coating, spray powder application, or infrared, natural gas, or electric heating units or dryers.

**“Rotogravure Printing”** – The application of words, designs, and pictures to a substrate by means of a roll printing technique which involves an intaglio or recessed image areas in the form of cells.

**“Screen Printing”** – A printing system where the printing ink passes through a web or fabric to which a refined form of stencil has been applied. The stencil openings determine the form and dimensions of the imprint.

**“Thermography”** – The process of spreading thermal powders on the wet ink of a print application and heating it in order to melt the powder into a single solid mass which creates a raised printing effect. The heating is accomplished with a natural gas or electric oven.

**“Ultraviolet-Cured”** – An ink and coating drying process by which monomers, oligomers, and other components polymerize to form a film when exposed to ultraviolet radiation.

**“Water-based Ink/Coating/Adhesive”** – An ink, coating or adhesive with a VOC content less than or equal to 25 percent by weight as applied.



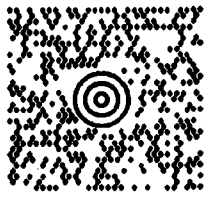
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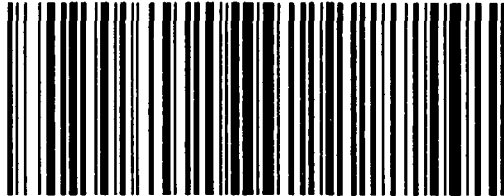
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