

**PRINTING OPERATIONS
AIR GENERAL PERMIT REGISTRATION FORM**

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**BUREAU OF
AIR REGULATION**

Part II. Notification to Permitting Office
(Detach and submit to appropriate permitting office; keep copy onsite)

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)

0112680-005

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: 33065-7641

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

N/A

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ENVIRONMENTAL PROTECTION
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PERMITTING

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: 60131-2158

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, FL Zip Code: 33065-7641

Facility Contact Telephone Numbers

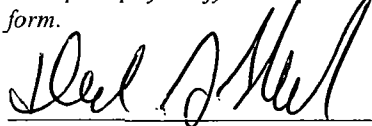
Telephone: (954) 345-4900 Fax: (954) 345-4931
Cell phone (optional):

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

8/12/11
Date

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OFFICE OF PERMITS AND COMPLIANCE

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

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NATURAL RESOURCES
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REVENUE

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 (inks, cleaning solvents, and fountain solutions) containing hazardous air pollutants:

December 2010 (12-month running total value) = 244 gallons

Highest 12-month total quantity of materials (cleaning solvents and fountain solutions):

December 2010 (12-month running total value) = 488 gallons

See Attachment A for the 12-Month Running Totals, Raw Material Usage Totals, and HAP Emissions Summary

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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.

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ENVIRONMENTAL PROTECTION
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FINDING AND ACCOUNTING
REVENUE

J.S. Paluch Company
Coral Springs, Florida
2010 Monthly Totals of Inks, Fountain Solution/Clean-up Solvent Used
2010 Monthly Tons of VOC Emissions
2009-2010 12-Month Running Totals of Material Usage/VOC Emissions/HAP Materials

2010	Monthly Pounds of Non-Heatset Inks Used	Monthly Gallons of Fountain Solution/Clean-Up Solvent Used	Monthly Tons of VOC Emissions from Ink, Fountain Solution and Clean-Up Solvent Use	2009-2010 - 12-Month Running Total - Gallons of Fountain Solution /Clean-Up Solvent Used	2009-2010 12-Month Running Total - Tons of VOC Emissions from Ink, Fountain Solution, and Clean-Up Solvent Use	2009-2010 12-Month Running Total - Gallons of HAP Containing Materials	
Permit Limits	No Monthly Usage Limit	No Monthly Usage Limit	No Monthly Limit	Rule 62-210.310(4)(f)2.b. (II) 14,250 gals/yr	Applies to 210.310(4)(f)2.a. 80 tons VOC/yr (8/20 tons HAP/yr)	Rule 62-210.310(4)(f)2.b. 1,333 gals/yr	
JANUARY	1231.00	29.16	0.09	315.95	3.87	236.88	
FEBRUARY	1234.00	55.30	0.10	344.33	3.64	223.04	
MARCH	1166.00	56.91	0.11	369.26	3.35	205.51	
APRIL	994.00	54.89	0.10	394.32	3.09	191.79	
MAY	1330.00	51.38	0.13	413.93	2.86	182.92	
JUNE	957.00	29.19	0.08	420.29	2.68	175.37	
JULY	1082.00	30.42	0.09	428.09	2.50	167.97	
AUGUST	1340.00	42.01	0.12	443.25	2.32	160.36	
SEPTEMBER	1166.00	35.73	0.10	458.91	2.19	158.97	
OCTOBER	821.00	42.87	0.08	481.27	1.99	192.88	
NOVEMBER	1111.00	30.80	0.06	481.81	1.65	209.48	
DECEMBER	985.00	29.59	0.06	488.23	1.11	244.00	
TOTALS	13417.00	488.23	1.11	488	HIGHEST 12-MONTH TOTAL OF SOLVENT CONTAINING MATERIALS (GALLONS)	244	HIGHEST 12-MONTH TOTAL GALLONS OF HAP CONTAINING MATERIALS (GALLONS)

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 FINANCIAL ACCOUNTING

**J. S. Paluch Company
Coral Springs, Florida
2010 HAP Emissions Summary**

HAP Emission Summary

2010	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)	Manganese (lbs/gal)	Manganese Emissions
FC3 Fountain Solution (FS)	7.84	0	453.31	57.82	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Performa Fountain Solution 200A (FS)	9.00	0.9	849.69	94.41	9.44	84.97	0.9	84.97	0	0.00	0	0.00	0	0.00	0	0.00
Allied Photo Offset Hydro Plus Alcohol Substitute (FS)	8.08	1.94	64.96	8.04	1.93	15.60	1.94	15.60	0	0.00	0	0.00	0	0.00	0	0.00
Pitman Performa Alcohol Substitute 201A (FS)	7.75	6.2	205.69	26.54	21.23	164.55	6.2	164.55	0	0.00	0	0.00	0	0.00	0	0.00
Allied Photo Offset Fountain Dryer (FS)	8.50	0.07	30.69	3.61	0.03	0.25	0	0.00	0.04	0.14	0.032	0.12	0.0024	0.01	0	0.00
Allied A-Wash (CS)	6.67	0.62	510.26	76.50	7.11	47.43	0	0.00	0.33	25.25	0.26	19.89	0.02	1.53	0	0.00
Allied UV MRC (CS)	6.40	1.6	223.81	34.97	8.74	55.95	1.6	55.95	0	0.00	0	0.00	0	0.00	0	0.00
Allied UV Wash A (CS)	7.10	4.26	221.02	31.13	18.68	132.61	4.26	132.61	0	0.00	0	0.00	0	0.00	0	0.00
Allied MRC 88 (CS)	6.67	0	243.46	36.50	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Allied Dampening Cleaner (FS)	8.34	0.634	4.17	0.50	0.04	0.32	0.634	0.32	0	0.00	0	0.00	0	0.00	0	0.00
Allied DynaKlean (CS)	6.67	0	9.20	1.38	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Von Son Rapld 1 Step (CS)	9.06	0	87.25	9.63	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Allied Photo Offset Gum Arabic 14% (FS)	8.92	0	69.22	7.76	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Antiskin 10V7300 (CS)	6.90	0.00	1.08	0.16	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Allied EC Plate Cleaner (CS)	8.34	0.77	1.08	0.13	0.01	0.10	0	0.00	0.42	0.05	0.33	0.04	0.02	0.00	0	0.00
VanSol Liq Cobalt Drier (CS)	7.70	0	22.38	2.91	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Allied Dynamight Plate Cleaner (CS)	8.51	0	819.09	96.25	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Hostmann Offset Black Ink (lbs)	8.40	0	2226.00	265.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Hostmann Offset Pantone Color Ink (lbs)	8.40	0	1304.00	155.24	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Joules UV Ink (lbs)	10.00	0	9887.00	988.70	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Press Color UV Magenta	9.86	0	0.00	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Press Color UV Yellow	9.41	0	0.00	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Press Color UV Cyan	9.85	0	0.00	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Press Color UV Black	10.10	0	0.00	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Press Color Process Magenta	8.47	0	0.00	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Press Color Process Yellow	8.15	0	0.00	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Press Color Process Cyan	8.50	0.099	0.00	0.00	0.00	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.099	0.00
Press Color Process Black	8.79	0.103	854.00	97.16	1.14	9.99	0	0.00	0	0.00	0	0.00	0	0.00	0.103	9.99
Total (gals)				1994.33	68.35											
Total (lbs)			18087.34			511.77		454.00		25.44		20.05		1.54		9.99
Total (tons)			9.04			0.26		0.23		0.01		0.01		0.00		0.00
Total HAP Containing Materials (gals)					372.99											
Total Cleanup Solvents/Fountain Solutions (gals)					488.23											
Total Inks (gals)					1506.09											

**J. S. Paluch Company, Inc.
Coral Springs, Florida**

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AIR REGULATION**

PRINTING PROCESS DESCRIPTION

Printing operations at the facility will include the use of four (4) sheetfed, 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.

This application is being submitted due to the removal of one press with replacement by one press as follows:

Press No. 3 – Didde Web Press Model RSW11C6 Webcom C, Serial #189-0053 replaced by Press No. 5 - Super Web, Supercom 1000.

As such, the printing presses at the facility will 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 No. 5 - Super Web, Supercom 1000

Press Nos. 1 and 2 are five-color presses and Press Nos. 4 and 5 are eight color presses 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 sheetfed 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 three printing cylinders include 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

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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 four printing presses are sheetfed with the following maximum paper feed rates:

- Press 1 - 800 feet per minute (fpm) with the maximum paper sheet size of 11" x 17"
- Press 2 - 700 fpm with the maximum paper sheet size of 17" x 22"
- Press 4 - 1,000 fpm with the maximum paper sheet size of 17" x 22"
- Press 5 - 1,000 fpm with the maximum paper sheet size of 17" x 22"

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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:

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

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

The following are the current individual press ink coverage values:

- 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
- Press 5 - 0.000623 pounds of ink per sheet (Once permitted)

The maximum VOC content of the inks used at the facility is 1.60 pounds of VOC per gallon of ink (lbs VOC/gal). Maximum VOC content for fountain solution used at the facility is 6.40 lbs VOC/gal. Maximum VOC content for cleanup solvent used at the facility is 7.70 lbs VOC/gal.

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

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**DIVISION OF AIR
RESOURCE MANAGEMENT**

August 10, 2011

Florida Department of Environmental Protection
FDEP Receipts
Air General Permit Program
3800 Commonwealth Boulevard, MS-77
Tallahassee, Florida 32399

**Re: Air General Permit Re-Registration
Active Permit ID Number 0112680-004-AG
J.S. Paluch Company
4300 NW 124th Avenue
Coral Springs, Florida 33065-7641**

Enclosed please find the Air General Permit Re-Registration form for the J.S. Paluch Company facility located at 4300 NW 124th Avenue in Coral Springs, Florida (the facility). A check for the \$100.00 Re-Registration fee is included.

The Air Permit Re-Registration form is being submitted due to the proposed removal and replacement of one sheetfed coldset offset lithographic printing press (Press No. 3) by one sheetfed coldset offset lithographic printing press (Press No. 5) from the facility. The facility will continue to operate a total of four printing processes at the property (Press Nos. 1, 2, 4, and 5).

Attachment A to the form includes 12-month running totals for materials containing hazardous air pollutants and solvent containing materials, along with material usage summary tables. Attachment B includes information regarding equipment descriptions, ink systems, and printing processes. Regulated material usage rates and 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.

Dan Shrader
National Operations Manager

Enclosures

FLORIDA DEPARTMENT OF
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