



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 9, 2008

Mr. Douglas Minkel
AAA Printing, Incorporated
6801 114th Avenue, North
Largo, Florida 33773

Dear Mr. Minkel:

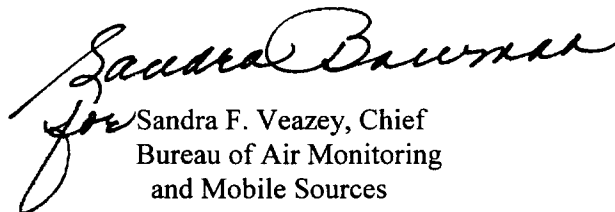
This is to acknowledge that your notification of intent to use the authority of Rule 62-210.310 to operate your facility was received on June 4, 2008. We have assigned ARMS No. 1030488-008 to this facility.

As you know, pursuant to Florida Statutes section 403.814, authority to operate under general permits commences thirty days after receipt of the registration form unless you have been notified by this office that your facility has not shown entitlement to operate pursuant to the rule provisions.

For your information, authority to operate pursuant to Rule 62-210.310 expires after 5 years. Therefore, a new registration form must be received no later than 5 years after the date your notice was received as indicated above. If your general permit rule conditions require testing, such testing must be completed within the time frame specified in the rule.

If you have any additional questions, please contact Dickson Dibble at 850/921-9586.

Sincerely,



Sandra F. Veazey, Chief
Bureau of Air Monitoring
and Mobile Sources

SFV/pg

cc: Mr. Gary Robbins, Pinellas County

F/A RECEIPT DATE 2008 JUN 04

PRINTING OPERATIONS
AIR GENERAL PERMIT REGISTRATION FORM

Dept. Of Environmental Protection
JUN 02 2008
Southwest District

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)

1030488-008

Bureau of Air Monitoring
& Mobile Sources

JUN 09 2008

RECEIVED

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.)
AAA Printing, 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.)
AAA Printing

Facility Location (Provide the physical location of the facility, not necessarily the mailing address.)
Street Address: 6801 114th Avenue North
City: Largo County: Pinellas Zip Code: 33773

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: Douglas Minkel, Corporate Secretary

Owner/Authorized Representative Mailing Address

Organization/Firm: AAA Printing, Inc.

Street Address: 6801 114th Avenue North

City: Largo

County: Pinellas

Zip Code: 33773

Owner/Authorized Representative Telephone Numbers

Telephone: (727) 544-0767 x 535

Fax: (727) 544-0765

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: Same as above

Facility Contact Mailing Address

Organization/Firm:

Street Address:

City:

County:

Zip Code:

Facility Contact Telephone Numbers

Telephone:

Fax:

Cell phone (optional):

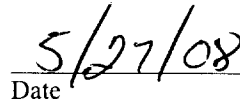
Owner/Authorized Representative Statement

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

Dept. Of Environmental Protection
JUN 02 2008
Southwest District

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.

The calculation methodology to be used for compliance assurance will be as described in 62-210.310(4)(f).a F.A.C., emission limits of less than 80% of the major source thresholds. The attached spreadsheet tracks all raw materials usage and calculates Total VOC's, Total HAP's, and Individual HAP's. Usage is calculated by month and as an aggregate total by year.

Since the facility has only been operating as AAA Printing under the current owners since June 2007, an actual 12-month usage and emissions total cannot be determined. However, an extrapolation of the available data allowing for 1000% growth over the 5-year life of the permit indicates that the facility's VOC and HAP usage and emissions will remain well below the eligibility thresholds. The usage and emissions estimates are attached as a separate spreadsheet. The spreadsheet shows the actual usage and emissions calculations under the facility's existing FESOP recordkeeping requirements as well as the expected emissions using the Air General Permit calculation methodology (without mitigating AP-42 factors or the control device's destruction efficiency).

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).

N/A

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.

1. The process inks used contain VOC's but no HAP's, and are delivered directly to the ink units automatically from sealed totes via a pumping system. The specialty inks are manually added to the ink units, and some contain solvents with HAP's.
2. Harris M1000 6-unit heatset 38" web press - This press operates at around 800 feet per minute, and is equipped with a single-chamber, dual-control oven that is routed to a Thermal Oxidizer which operates at approximately 1300 deg F. The process inks used on this press contain VOC's. Some of the specialty inks used on this press also contain HAP's.
3. UV Coater - This coater uses low VOC (0% - 5%) coatings. No solvent is used in this process other than the small quantity of Isopropyl Alcohol used to clean the unit.
4. The application of the Blanket Wash is done manually with rags. The solvent-soaked rags are stored in closed, fireproof containers throughout the press room prior to disposal. The Fountain Solution(s) are diluted with water and are automatically delivered to the wells via a closed-loop pumping and chilling system.
5. Pre-Press and plate preparation - Aqueous developers and replenishers are used on the plates. These solutions are released to the POTW with only pH neutralization required prior to release.
6. The Bindery operations only involve cutting, folding, and stitching. No gluing is done at the facility. Paper scrap from the stitcher is routed to the compactor via ductwork and a vacuum system. All other paper scrap is manually delivered to the compactor.
7. All VOC and HAP containing raw materials and waste are stored in closed containers when not in use

(New equipment list continued on following page)

Added Equipment to the Inventory of Facility # 1030488.

- ✓ 8. Komori L4-26, 4 color Non-heatset offset lithograph. sheet feed press. This press runs at around 5000 sheets per hour.
- ✓ 9. Komori L6-26, 6 color non-heatset offset lithographic sheet feed press. This press runs at around 8000 sheets per hour.
- ✓ 10. Royobi, 1 color non-heatset lithographic sheet feed press. This press runs at around 3000 sheets per hour.
- ✓ 11. Royobi, 2 color non-heatset lithographic sheet feed press. This press runs at around 5000 sheets per hour.
- ✓ 12. Halm jet press, 1 color non-heat set lithographic envelope press. This press runs at around 20,000 sheets per hour.
- ✓ 13. AB Dick paper plate maker
14. Diddie conserver 11"web press. 2 color non-heat set lithographic press. This press runs at around 25,000 sheets per hour.

RAW MATERIALS/HAPs	lb/gal	% VOCs	lb/gal VOCs	% HAPs	lb/gal HAPs	JUN 2007	JUL 2007	AUG 2007	SEPT 2007	OCT 2007	NOV 2007	DEC 2007	JAN 2008	FEB 2008	MAR 2008	APR 2008	TOTAL USAGE	Units	Lb/Yr Total VOC Emits	TPY Total VOC Emits	Lb/Yr HAP Emits	TPY HAP Emits	General Permit Actual VOC TPY	General Permit Actual HAP TPY	1000% Growth GP VOC TPY	1000% Growth GP HAP TPY	
Prisco E-Cure 109F UV Coat	8.76	0.0%	0.00						82	120	12	29	62				305	lbs	0.00	0.000			0.000		0.000		
UVC-10333 UV Coating(Wikoff)	9.103	4.5%	0.41			12	28	80									120	lbs	5.40	0.003			0.003		0.027		
970-UV-4090 CD	9.179	1.1%	0.10													135	0	lbs	0.00	0.000			0.000				
A.C.E. Plate Cleaner (gal)	8.512	35.0%	2.98			1	2	1		0.5		0.25			0.5		45	lbs	15.64	0.008			0.008		0.078		
Ultranox Antiskin for Inks (oz)	6.576	90.0%	5.92														0	lbs	0.00	0.000			0.000		0.000		
Eurofin Plate Gum (oz)	9.013	2.0%	0.18														0	lbs	0.00	0.000			0.000		0.000		
Lithocleaner R (Blnkt wsh)(gal)	6.63	100.0%	6.63						15	35	55	15	40				1061	lbs	712.73	0.356			0.530		5.304		
Xylene (1330-20-7)				2.5%	0.17																	17.82	0.01		0.013		0.133
Cumene (98-82-8)				2.5%	0.17																	17.82	0.01		0.013		0.133
COLDSET PRESSES INKS																											
Prima Ultra Gloss Black (Kg)	9.295	0.0%							40	70	130	50	60	100			204.55	lbs	0.00	0.000			0.000				
Prima Ultra Gloss Cyan (Kg)	9.295	0.0%							30	60	130	30	70	70			177.27	lbs	0.00	0.000			0.000				
Prima Ultra Gloss Magenta (Kg)	9.295	0.0%							30	50	110	50	50	50			154.55	lbs	0.00	0.000			0.000				
Prima Ultra Gloss Yellow (Kg)	9.295	0.0%							50	60	160	60	50	90			213.64	lbs	0.00	0.000			0.000				
Metaprint HGA Low VOC 877 Silver (Kg)	9.295	12.0%	1.12														0.00	lbs	0.00	0.000			0.000				
Metaprint HGA Low VOC 873 Gold (Kg)	9.295	0.0%	0.00														0.00	lbs	0.00	0.000			0.000				
Ultracolor Offset Metallic Pantone Inks (Kg)	N/D	0.0%	0.00							3				2			2.27	lbs	0.00	0.000			0.000				
PMS Pantone Inks (Kg)	9.295	0.0%								7.5		7.5	10				11.36	lbs	0.00	0.000			0.000				
Ultracolor Offset Ink (Kg)	10.14	0.0%								37.5			4	7.5			22.27	lbs	0.00	0.000			0.000				
COLDSET PRESSES ALLIED CHEMICALS																											
VWM Blanket Wash (gal)	7.27	6.7%	0.49														0.00	lbs	0.00	0.000			0.000				
Xylene (1330-20-7)				1.6%	0.12																	0	0		0.000		0.000
Cumene (98-82-8)				1.0%	0.07																	0	0		0.000		0.000
Blanket Hardener JK-162 (gal)	6.93	96.0%	6.65														0.00	lbs	0.00	0.000			0.000				
Methanol (67-56-1)				5.0%	0.35																	0	0		0.000		0.000
Glycol Ethers				5.0%	0.35																	0	0		0.000		0.000
Toluene				3.0%	0.21																	0	0		0.000		0.000
Xylene (1330-20-7)				55.0%	3.81																	0	0		0.000		0.000
MIBK (108-10-1)				5.0%	0.35																	0	0		0.000		0.000
Advantage Optimum Plus Fountain Solution (gal)	8.197	50.0%	4.10														0.00	lbs	0.00	0.000			0.000				
Glycol Ethers				50.0%	4.10																	0	0		0.000		0.000
Solafont AF20 (Fount Sol'n) (L)	8.45	40.0%	3.38														0.00	lbs	0.00	0.000			0.000				
Ethylene Glycol (107-21-1)				10.0%	0.85																	0	0		0.000		0.000
Glycol Ethers				30.0%	2.54																	0	0		0.000		0.000
PRBCC (Cylinder Cleaner) (gal)	8.43	35.1%	2.96														0.00	lbs	0.00	0.000			0.000				
True Blue Plate Cleaner (gal)	8.79	23.9%	2.10														0.00	lbs	0.00	0.000			0.000				
Ink Read (oz)	6.25	73.6%	4.60														0.00	lbs	0.00	0.000			0.000				
Ultracolor Super 88 Varn.	8.8	1.1%	0.10						32	48							80.00	lbs	0.88	0.000			0.000				
Ultrashine Varnish (gal)	8.8	1.1%	0.10						5	10	5	13.5	5	5			382.80	lbs	4.21	0.002			0.002				

RAW MATERIALS/HAPs	lb/gal	% VOCs	lb/gal VOCs	% HAPs	lb/gal HAPs	JUN 2007	JUL 2007	AUG 2007	SEPT 2007	OCT 2007	NOV 2007	DEC 2007	JAN 2008	FEB 2008	MAR 2008	APR 2008	TOTAL USAGE	Units	Lb/Yr Total VOC Emits	TPY Total VOC Emits	Lb/Yr HAP Emits	TPY HAP Emits	General Permit Actual VOC TPY	General Permit Actual HAP TPY	1000% Growth VOC TPY	1000% Growth HAP TPY		
*** SUMMARY DATA ***																									GENERAL PERMIT SUMMARY DATA			
Total Raw Material Usage in Pounds																			30649			TPY @ Current Prod.		TPY @ 1000% Growth				
Total VOC Emissions (lbs/yr and tons/yr)																			10714.29	5.357			VOC's		HAP's			
Total HAP Emissions (lbs/yr and tons/yr)																			1026.97	0.513			VOC's		HAP's			
Individual HAPs																							Individual HAP TPY		Individual HAP TPY			
																					lb/yr	TPY						
Cobalt Compounds																					0.39	0.000			0.00028	0.00275		
Manganese Compounds																					1.93	0.001			0.00138	0.01375		
Xylene (1330-20-7)																					52.90	0.026			0.04287	0.42866		
Toluene (108-88-3)																					526.19	0.263			0.33115	3.31146		
Methanol (67-56-1)																					263.10	0.132			0.16557	1.65573		
Cumene (98-82-8)																					23.67	0.012			0.01911	0.19109		
Ethylene Glycol (107-21-1)																					0.00	0.000			0.00000	0.00000		
Glycol Ethers																					158.80	0.079			0.09594	0.95942		
Diethylene Glycol Monobutyl Ether (112-34-5)																												
Ethylene Glycol Monobutyl Ether (111-76-2)																												

RAW MATERIALS/HAPs	lb/gal	% VOCs	lb/gal VOCs	% HAPs	lb/gal HAPs	JUN 2007	JUL 2007	AUG 2007	SEPT 2007	OCT 2007	NOV 2007	DEC 2007	JAN 2008	FEB 2008	MAR 2008	APR 2008	TOTAL USAGE	Units	Lb/Yr Total VOC Emits	TPY Total VOC Emits	Lb/Yr HAP Emits	TPY HAP Emits	General Permit Actual VOC TPY	General Permit Actual HAP TPY	1000% Growth GP VOC TPY	1000% Growth GP HAP TPY
CALCULATION METHODOLOGY																						CALCULATION METHODOLOGY (GEN'L PERMIT)				
INKS	June - November 2007: Ink VOC and HAP emissions were calculated using the AP-42 Emissions Factor for heatset lithography. The values above reflect 30% substrate retention of the ink solvents and 70% released as emissions. December 2007 and Forward: FESOP converted to an Air General Permit - Ink VOC and HAP emissions were calculated <u>without</u> using any mitigating factors per the conditions of the Air General Permit.																					Per the conditions of operating under an Air General Permit, no Emission Factors or Control Device Efficiencies were used to mitigate the final VOC and HAP tons/year emissions. All final emission values in these four columns equal <u>total</u> VOC and HAP usage values.				
BLANKET WASHES	June - November 2007: Blanket Wash VOC and HAP emissions were calculated using the Manual Application AP-42 Emissions Factor for heatset lithography. The values above reflect a 50% retention of solvent in the application rags and 50% released as emissions. December 2007 and Forward: FESOP converted to an Air General Permit - Blanket Wash VOC and HAP emissions were calculated <u>without</u> using any mitigating factors per the conditions of the Air General Permit.																									
FOUNTAIN SOLUTIONS	June - November 2007: Fountain Solution VOC and HAP emissions were calculated using the AP-42 Emissions Factor for heatset lithography. The values above reflect a 30% substrate retention and 70% released as emissions. December 2007 and Forward: FESOP converted to an Air General Permit - Fountain Solution VOC and HAP emissions were calculated <u>without</u> using any mitigating factors per the conditions of the Air General Permit.																									
ALL OTHER RAW MAT'LS	For FESOP & Air General Permit: All other raw materials' emissions were calculated without emissions factors. In the case of these raw materials, VOC and HAP emissions are equal to the VOC and HAP usage.																									
NOTE:	In accordance with the conditions of AAA Printing's air permit (both the FESOP and the Air General Permit), no Control Device capture and destruction efficiencies were used to reduce the emissions reported.																									

Florida Department of Environmental Protection
Cash Receiving Application (CRA)
Cashlisting by Deposit #: 281701 thru 281701
Printed: 6/5/2008 4:27:20 PM - Page 8

Cashlisting: **68891** Cashlist Area: **3755** Description: **DIV OF AIR RESOURCES MGMT.**
 Deposit No: **281701** Date Deposited: **06/05/2008** Contact: **E. WALKER**

Object	Transmittal	Dep DDN	Receipt Number	Pre-Numbered Receipt	Name	Check Number	Payment Amount	Reference Account	Payment Number	Remittance Number	Fund	Grant
002272	48844		627480		AAA PRINTING	1030488-008 001427	\$100.00	7/11/2008-POB	884152	784244	PFTF	
	48844		627481		X-PRESS MATERIALS	8253	\$100.00	7775208	884153	784245	PFTF	
Object Code 002272 Subtotal:							\$200.00					
002309	48829	483712	627375		ORANGE COUNTY, BOCC	0000683466	\$610.00		884118	784031	PFTF	
Object Code 002309 Subtotal:							\$610.00					
Cashlisting 68891 Total:							\$810.00					

AAA Printing, Inc.

FLA. DEPT OF ENVIROMENTAL PROTECTION
Licenses and permits

5/30/2008

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Dept. Of Environmental Protection

JUN 02 2008

Southwest District