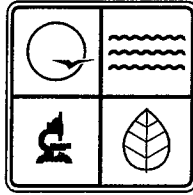


STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI AIR CONSERVATION COMMISSION



PERMIT BOOK

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **07 2 0 0 6 - 0 0 4**

Project Number: **2006-05-072**

Owner: **Visant Corporation**

Owner's Address: **One Byram Brook Place, Suite 202, Armonk, NY 10504**

Installation Name: **Von Hoffmann Corporation**

Installation Address: **1005 Commercial Drive, Owensville, MO 65066**

Location Information: **Gasconade County, S28, T42N, R5W**

Application for Authority to Construct was made for:

Installation of four (4) sheetfed, coldset offset presses. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required.*

- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions (listed as attachments starting on page 2) are applicable to this permit.

JUL 14 2006

EFFECTIVE DATE

Steven J. Jule for JLS

DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional Office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed Special Conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention Construction Permit Unit.

Page No.	2
Permit No.	
Project No.	2006-05-072

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Von Hoffmann Corporation
Gasconade County, S28, T42N, R5W

1. **Superseding Condition**
The conditions of this permit supersede Special Condition No. 2 found in the previously issued construction permit (Permit Number 012006-013) from the Air Pollution Control Program.
2. **Emission Limitation**
 - A. Von Hoffmann Corporation shall emit less than ten (10) tons individually or twenty-five (25) tons combined of Hazardous Air Pollutants (HAPs) from the entire installation in any consecutive 12-month period.
 - B. Attachment A and Attachment B or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Condition 2.A. Von Hoffmann Corporation shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used at the installation.
 - C. Von Hoffmann Corporation shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 2.B indicate that the source exceeds the limitation of Special Condition Number 2.A.
3. **Operational/Work Practices**
Von Hoffmann Corporation shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. Von Hoffmann Corporation shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2006-05-072
Installation ID Number: 073-0008
Permit Number:

Von Hoffmann Corporation
1005 Commercial Drive
Owensville, MO 65066

Complete: May 26, 2006

Parent Company:
Visant Corporation
One Byram Brook Place, Suite 202
Armonk, NY 10504

Gasconade County, S28, T42N, R5W

REVIEW SUMMARY

- Von Hoffmann Corporation has applied for authority to construct four (4) sheetfed, coldset offset presses.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are glycol ethers and ethylene glycol.
- None of the New Source Performance Standards (NSPS) are applicable to this project. 40 CFR Part 60 Subpart QQ, *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing*, does not apply since this installation uses lithographic printing technique.
- None of the Maximum Achievable Control Technology (MACT) standards, listed in 40 CFR Part 63, apply to this project. 40 CFR Part 63 Subpart KK, *National Emission Standards for the Printing and Publishing Industry*, does not apply since this installation is not a major source of HAP emissions.
- No air pollution control equipment is being used in association with the new equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of volatile organic compounds (VOC) are below de minimis levels.
- This installation is located in Gasconade County, an attainment area for all criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential emissions of the

application are below de minimis levels. In addition, no model is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions.

- Emissions testing is not required for the equipment.
- A Part 70 Operating Permit application is required for this installation within 1 year of equipment startup.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Von Hoffmann Graphics, Incorporated operates lithographic presses, heatset and nonheatset web presses, and sheet-fed presses used in the production of printed material. The installation operates under a 10/25 installation-wide HAPs limit and has recently submitted an Intermediate operating permit renewal application (Project No. 2006-02-031). Upon issuance of this permit, Von Hoffmann will be submitting a Part 70 operating permit application.

During Von Hoffmann's last permit review, a recalculation of the installation's existing potential emissions was conducted, taking in to account several pieces of equipment that have been previously removed from the plant. The resulting permit also included special conditions for the removal of three additional heatset printers (EP-4, EP-5 and EP-23). After revising the existing potential emissions during this project's review, the installation remains an existing minor source of VOC emissions. The following table contains a list of equipment currently at the plant.

Table 1: Summary of Existing Equipment

Emission Point ID No.	Description of Equipment	MHDR (tons/hr of ink)	Dryer Fuel Usage (MMCF/hr Nat Gas)
EP-6	Heatset Web Press w/ Nat. Gas/LPG Dryer	0.00383	0.0042 (0.0323 Mgal/hr LPG)
EP-7	Heatset Web Press w/ Nat. Gas/LPG Dryer	0.00383	0.0042 (0.0323 Mgal/hr LPG)
EP-8	Heatset Web Press w/ Nat. Gas/LPG Dryer	0.00383	0.0042 (0.0323 Mgal/hr LPG)
EP-24	Heatset Web Press w/ Nat. Gas/LPG Dryer	0.00383	0.0042 (0.0323 Mgal/hr LPG)
EP-25	Sheetfed Heidelberg Press	0.00166	
EP-26	Sheetfed Heidelberg Press	0.00166	
EP-27	Timson Heatset Web Press	0.00448	
EP-15	Natural Gas/LPG Boiler		0.0018 (0.02 Mgal/hr LPG)
EP-16	Natural Gas/LPG Boiler		0.0018 (0.02 Mgal/hr LPG)
EP-17	Cleanup Chemicals (all presses)	0.00339 (Mgal/hr)	
EP-18	Pre-Press Chemicals	0.00448 (Mgal/hr)	
EP-19	Plant Wide Chemicals	0.00036 (Mgal/hr)	
EP-28	Heatset Web Press	0.0053 tons/hr	
EP-29	Heatset Web Press	0.0053 tons/hr	
EP-30	Heatset Web Press	0.0053 tons/hr	

The following construction permits have been issued to Von Hoffmann Graphics, Inc. from the Air Pollution Control Program.

Table 2: Previously Issued Construction Permits

Permit	Project Description
0894-016	Installation of three (3) cold-set Harris Lithographic web presses, two (2) heat-set Harris lithographic web presses, three (3) heat-set Hantcho lithographic web presses, three (3) Heidelberg sheet-fed presses, and six (6) Didde Glaser cold-set forms web presses.
0195-007	Installation of six (6) Heidelberg sheet-fed printing presses.
0995-011	Amendment to the existing permits 0894-016 and 0195-017.
0797-013	Addition of one (1) heat-set lithographic web press and propane fired dryer.
0797-024	Addition of one (1) heat-set lithographic web press.
0797-024A	Amendment to permit No. 0797-024.
072000-013	Addition of a 4-unit Harris heat set lithographic web press and two (2) propane fired dryer.
092001-019	Addition of two (2) Heidelberg sheetfed presses with UV coaters and a Creo platemaker.
022005-008	Addition of a web press
012006-013	Installation of three (3) new heatset presses

Von Hoffmann has had two other permitting actions take place during a short time span (November 2004 – present), and Von Hoffmann was questioned as to the relationship between the three projects. Von Hoffmann asserts that at the time the press permitted in Permit No. 022005-008 was being considered the plant was not planning any further additions. In fact, the plant was considering shut down early in the fall 2004. The equipment associated with Permit No. 012006-013 was an attempt to prove the viability of the Owensville location. These presses allowed the facility to do 4-color printing and more commercial jobs. Von Hoffmann’s parent company considered the Owensville location a potential candidate for the addition of the proposed presses due to the success of the last venture. Although the three projects have undergone New Source Review over a period of less than two years, the projects should not be considered as one.

PROJECT DESCRIPTION

Von Hoffmann is proposing to install and operate four (4) sheetfed, coldset offset presses. Two of the sheetfed presses are considered to be traditional coldset presses, while the other two will utilize ultraviolet curing of inks. In addition to the presses, two folders, one sheeter and one plate burner will be installed. However, negligible particulate matter less than ten (10) microns in diameter (PM₁₀) emissions are expected from these additional pieces of equipment.

EMISSIONS/CONTROLS EVALUATION

VOCs are the main pollutants from this project. The potential printing press emissions for this project were determined by mass balance computations derived from applicable Material Safety Data Sheets (MSDS) and information provided by the applicant. It was assumed that 95% of the VOCs contained in the inks for the non-heatset presses is retained in the substrate, according to the Air Pollution Control Program’s policy for non-heatset offset lithographic printing.

Existing potential emissions were taken from Project No. 2005-11-024. Special conditions contained in Permit No. 012006-013 required the removal of three presses. Potential emissions from those three presses were removed from the installation's existing potential during this review. Existing actual emissions were taken from the applicant's 2005 Emissions Inventory Questionnaire (EIQ) submittal. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM ₁₀	15.0	1.25	0.10	N/A	N/A
SO _x	40.0	0.10	0.01	N/A	N/A
NO _x	40.0	21.61	1.35	N/A	N/A
VOC	40.0	209.04	69.53	35.01	N/A
CO	100.0	13.83	1.14	N/A	N/A
HAPs	10.0/25.0	10.0/25.0**	0.02	5.80	< 10.0/25.0

*N/A = Not Applicable

**Von Hoffmann was limited to less than 10.0 tpy of each individual HAP and 25.0 tpy of combined HAPs in Permit No. 012006-013. That limit is reinstated in this permit, inclusive of the new equipment.

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC are below de minimis levels.

APPLICABLE REQUIREMENTS

Von Hoffmann Corporation shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110

The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.

- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

 Lina Klein
 Environmental Engineer

 Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated May 25, 2006, received May 26, 2006, designating Visant Corporation as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- St. Louis Regional Office Site Survey, dated June 6, 2006.

Mr. Mark Swisher
Vice President of Manufacturing
Von Hoffmann Corporation
1005 Commercial Drive
Owensville, MO 65066

RE: New Source Review Permit - Project Number: 2006-05-072

Dear Mr. Swisher:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your revised operating permit is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:kl

Enclosures

c: St. Louis Regional Office
PAMS File 2006-05-072

Permit Number: