



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/4/2013

Certified Mail

Carl Udell
Metromedia Technologies, Inc.
1061 Venture Boulevard
Wooster, OH 44691

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0285030295
Permit Number: P0113015
Permit Type: OAC Chapter 3745-31 Modification
County: Wayne

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Daily Recorder. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: MMT prints billboards and large signs on vinyl fabric using various sized computer-controlled color printers.

3. Facility Emissions and Attainment Status: The facility has requested a permit modification to remove all but six of the "core" printers, dismantle the oxidizer, and install new exempt UV printing machines. The new printers will use zero HAP and very low VOC inks. Additionally, MMT has requested federally enforceable restrictions on VOC emissions and VOC input on the remaining Core/TWIST machines (including clean-up operations).

4. Source Emissions: The facility has 32 permitted printers, a clean-up operation and several exempt emission units. 15 printers have been shut down and removed, and 6 more are scheduled for removal by summer 2013. MMT's current synthetic minor requires VOC controls to maintain 100% capture and a minimum destruction efficiency of 95%. PTE for the remaining Core and TWIST machines exceeds major source thresholds. Coatings used in the TWIST machines contain trace amounts of HAP (less than 0.13 tons/year PTE from all three printers). Potential to emit from all the new/de minimis printing machines is less than 5 tons/year. MMT has requested a combined, 40 ton VOC/year limit for the Core/TWIST printers and clean-up operations.

5. Conclusion: The VOC emission and VOC input limitations will sufficiently maintain emissions below the major source threshold. Permit required record keeping and reporting will adequately demonstrate compliance.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	40

PUBLIC NOTICE

6/4/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Metromedia Technologies, Inc.

1061 Venture Boulevard,

Wooster, OH 44691

Wayne County

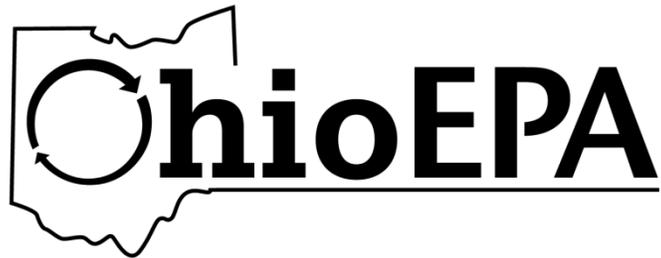
FACILITY DESC.: Other Commercial Printing

PERMIT #: P0113015

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Chapter 31 Modification: replacement of core machines with UV printers, removal of control device and request federally enforceable restriction on PTE

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Zorica Dejanovic, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Metromedia Technologies, Inc.**

Facility ID:	0285030295
Permit Number:	P0113015
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	6/4/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Metromedia Technologies, Inc.

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Authorization

Facility ID: 0285030295
Application Number(s): A0046485
Permit Number: P0113015
Permit Description: Chapter 31 Modification: replacement of core machines with UV printers, removal of control device and request federally enforceable restriction on PTE
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$1,800.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 6/4/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Metromedia Technologies, Inc.
1061 Venture Boulevard
Wooster, OH 44691

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0113015

Permit Description: Chapter 31 Modification: replacement of core machines with UV printers, removal of control device and request federally enforceable restriction on PTE

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Core Machines

Emissions Unit ID:	K001
Company Equipment ID:	WO-15
Superseded Permit Number:	02-21700
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K002
Company Equipment ID:	WO-16
Superseded Permit Number:	02-21700
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	WO-5
Superseded Permit Number:	02-21700
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	WO-14
Superseded Permit Number:	02-21700
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	WO-13
Superseded Permit Number:	02-21700
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K006
Company Equipment ID:	WO-6
Superseded Permit Number:	02-21700
General Permit Category and Type:	Not Applicable

Group Name: Twist Machines

Emissions Unit ID:	K007
Company Equipment ID:	Twist 5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K008
Company Equipment ID:	Twist 4
Superseded Permit Number:	02-22970
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K009
Company Equipment ID:	Twist 2
Superseded Permit Number:	02-21700
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

Metromedia Technologies, Inc.

Permit Number: P0113015

Facility ID: 0285030295

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate

Metromedia Technologies, Inc.

Permit Number: P0113015

Facility ID: 0285030295

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

Metromedia Technologies, Inc.

Permit Number: P0113015

Facility ID: 0285030295

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Draft Permit-to-Install and Operate

Metromedia Technologies, Inc.

Permit Number: P0113015

Facility ID: 0285030295

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Groups – Core Machines: K001, K002, K003, K004, K005, K006; TWIST Machines: K007, K008, K009

EU ID	Operations, Property and/or Equipment Description
K001	Computer controlled 4-color, 2 print head, inkjet printer 61.4 x 32 ft for vinyl fabric
K002	Computer controlled 4-color, 2 print head, inkjet printer 61.4 x 22.1 ft for vinyl fabric
K003	Computer controlled 4-color, 2 print head, inkjet printer 61.4 x 22.1 ft for vinyl fabric
K004	Computer controlled 4-color, 2 print head, inkjet printer 61.4 x 32 ft for vinyl fabric
K005	Computer controlled 4-color, 2 print head, inkjet printer 61.4 x 32 ft for vinyl fabric
K006	Computer controlled 4-color, 2 print head, inkjet printer 61.4 x 22.1 ft for vinyl fabric
K007	Inkjet printer for vinyl or other substrates, small TWIST machine
K008	Inkjet printer for vinyl or other substrates, large TWIST machine
K009	Inkjet printer for vinyl or other substrates, small TWIST machine

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a, c)(1)-(2).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	The combined VOC emissions from (K001 – K009) all inks and clean-up operations shall not exceed 40 tons/year, based upon a rolling, 12-month summation. See c)(1)-(2).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b	ORC 3704.03(T)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
c	ORC 3704.03(F)	See d)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) VOC input for all inks and clean-up operations (K001-K009) shall not exceed 101,140 pounds/year, per rolling, 12-month summation.

(2) These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the material usage upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following each month for all inks:

- a. the name and identification of each ink employed;
- b. the VOC content of each ink employed, in pounds/gallon;
- c. the amount of each ink employed, in gallons;
- d. the total monthly VOC emissions, $[b \times c \times (1 - RF, \text{ see } f)(1)a.]$, in pounds;
- e. the VOC input from all inks employed, in lbs;
- f. the total VOC emissions from all inks during the rolling, 12-month period, calculated by adding emissions for the present month to the preceding 11 months of operation for each emissions unit, in tons; and
- g. the total VOC input from all inks during the rolling, 12-month period, calculated by adding emissions for the present month to the preceding 11 months of operation for each emissions unit, in tons.

This information does not have to be kept on a line-by-line basis.

(2) The permittee shall collect and record the following each month for all clean-up materials:

- a. the name and identification of each clean-up material employed;
- b. the VOC content of each clean-up employed, in pounds/gallon;



- c. the amount of each clean-up material employed, in gallons; and
 - d. the total monthly clean-up emissions, [b x c], in pounds;
 - e. the total VOC emissions from all clean-up materials, during the rolling, 12-month period, calculated by adding emissions for the present month to the preceding 11 months of operation for each emissions unit, in tons; and
 - f. the total VOC input from all clean-up materials, during the rolling, 12-month period, calculated by adding emissions for the present month to the preceding 11 months of operation for each emissions unit, in tons.
- (3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (3) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the rolling, 12-month emission limitations for this facility.
- The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- f) Testing Requirements
- (1) Compliance with the emissions limitations specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
The combined VOC emissions from (K001-K009) all inks and clean-up operations shall not exceed 40 tons/year, based upon a rolling, 12-month summation



Applicable Compliance Method

Compliance with this emission limitation shall be determined by the record keeping and reporting in sections d) and e) above and the following equations:

Core Machines + TWIST Machines + clean-up materials

$$[V_{\text{core}} \times U_{\text{core}} \times (1-\text{RF})] + [V_{\text{twist}} \times U_{\text{twist}} \times (1-\text{RF})] + [V_{\text{cleanup}} \times U_{\text{cleanup}}]$$

where:

V_{core} = VOC content of inks, 5.27 lbs/gal

V_{twist} = VOC content of inks, 7.27 lbs/gal

V_{cleanup} = VOC content of clean-up materials, 7.52 lbs/gal

U = total amount of inks/clean up materials employed, lbs

RF = VOC retention factor, 20.9% (BAT study 12-30-1997)

b. Emission Limitation

VOC input for all inks and clean-up operations (K001-K009) shall not exceed 101,140 pounds/year, per rolling, 12-month summation.

Applicable Compliance Method

Compliance with this emission limitation shall be determined by the record keeping and reporting in sections d) and e) above and the following equation:

$$[\text{total lbs VOC in inks} \times (1 - \text{RF})] + \text{total lbs VOC in clean-up}$$

where:

RF = VOC retention factor, 20.9% (12-30-1997 BAT study)

- (2) If required, formulation data or US EPA Method 24 or 24A shall be used to determine the VOC content of the inks and clean-up materials.

g) Miscellaneous Requirements

- (1) None.