Synthetic Minor Determination and/or ☐ Netting Determination
Permit To Install: 02-22647

A. Source Description

This facility uses large inkjet printers (~50' x 20') to print large billboards on a vinyl substrate. The inkjet printers each include mixing stations. All emissions are captured and vented to a Regensorb concentrator and thermal oxidizer. Capture efficiency has been tested at 100%.

B. Facility Emissions and Attainment Status

The facility is in an attainment area for ozone (Wayne Co.). The facility currently operates 25 print machines and is requesting to add this machine to make 26. This machine is identical to the current machines R025 and R026, except wider. The facility operates under a synthetic minor permit which covers all of the current machines and restricts the PTE for VOC to 9.16 lbs/hr and 40.12 TPY and the PTE for HAPs to 9.9/24.9 TPY. This is accomplished through a production restriction as follows:

> Single HAPs employed in the printers of 500,000 lbs/yr and a limit on aggregate HAPs of 1,250,000 lbs/yr.
>
> VOC is restricted by the RTO which was made federally enforceable in the earlier PTI.

The permittee is requesting that this HAP production restriction and HAP emission limits remain the same after the addition of this new unit. However, the permittee is requesting that the combined limit for VOC from the RTO be increased to 9.27 lbs/hr and 40.60 TPY. This is due to an additional 0.11 lb/hr and 0.48 TPY contribution by this new unit.

C. Source Emissions

See above.

D. Conclusion

The HAPs limits above, along with appropriate record keeping and reporting should be sufficient to limit the facility's PTE to less than major source thresholds. The permittee can then remain a minor source and will not have to comply with any future MACTs.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
WAYNE COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 02-22647
Fac ID: 0285030295

DATE: 9/11/2007

Metromedia Technologies Inc
Carl Udell
1061 Venture Blvd
Wooster, OH 44691

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **NEDO**

WAYNE COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **02-22647** FOR AN AIR CONTAMINANT SOURCE FOR **Metromedia Technologies Inc**

On 9/11/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Metromedia Technologies Inc**, located at **1061 Venture Blvd, Wooster**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-22647:

Twist painting machine.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087 [(330)425-9171]

DRAFT PERMIT TO INSTALL 02-22647

Application Number:	02-22647
Facility ID:	0285030295
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Metromedia Technologies Inc
Person to Contact:	Carl Udell
Address:	1061 Venture Blvd Wooster, OH 44691

Location of proposed air contaminant source(s) [emissions unit(s)]:
1061 Venture Blvd
Wooster, Ohio

Description of proposed emissions unit(s):
Twist painting machine.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____

Chris Korleski
Director

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
VOC	40.60
Individual HAP	9.9
Combined HAPs	24.9

Issued: To be entered upon final issuance
PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (R027) - twist printing machine no. 3 inkjet printing on vinyl or other substrates, controlled by Regensorb concentrator and thermal oxidizer

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	See sections A.2.a through A.2.d below.
OAC rule 3745-21-07(G)(2)	The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C)	9.9 tons per year of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation and 24.9 tons per year of total combined HAPs, as a rolling, 12-month summation See section B.1 below.

2. Additional Terms and Conditions

2.a All organic compounds/volatile organic compounds (OC/VOC) emitted by this emissions unit shall be vented to a flow concentrator and thermal oxidizer with a minimum capture efficiency of 100 percent, by weight, and a minimum destruction efficiency of 95 percent, by weight.

2.b OC/VOC emissions from all coatings and inks employed in this emissions unit shall not exceed 0.11 pound per hour.

2.c OC/VOC emissions from all coatings and inks employed in emissions units R001 through R022, R123, R025, R026 and R027, combined, shall not exceed 9.27 lbs/hr and 40.60 tons per year.

2.d The hourly and annual OC/VOC emission limitations are based on this emissions unit's and the facility's potential to emit. Therefore, no record keeping

or reporting are required to maintain compliance with these limits.

2.e The building enclosure housing this emissions unit meets the criteria of a permanent total enclosure (defined in U.S. EPA's Reference Method 204), as previously demonstrated in the compliance tests performed on June 30, 1999 and March 24, 2005.

B. Operational Restrictions

1. The actual facility-wide input of HAPs as identified in Section 112(b) of Title III of the Clean Air Act shall not exceed 500,000 pounds per year of any individual HAP and 1,250,000 pounds per year of total combined HAPs. Compliance with these throughput restrictions shall be based on a rolling, 12-month summation.

   The above throughput restrictions correspond to the emission limitations specified in section A.I.1 through the following equations:

   For any individual HAP:
   (500,000 lbs/yr HAP input) x (1 - SR) x (1 - DE) x (1 ton / 2,000 lbs) = 9.9 TPY

   For total combined HAPs:
   (1,250,000 lbs/yr HAP input) x (1 - SR) x (1 - DE) x (1 ton / 2,000 lbs) = 24.9 TPY

   where:

   SR = solvent retention factor, determined through the 12/30/97 BAT study (0.209); and
   DE = minimum fractional destruction efficiency (0.95).

2. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall be no more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

3. The set point for the desorption air stream temperature shall be maintained at or above the temperature established during the most recent emission test that demonstrated the emissions unit was in compliance. The temperature of the desorption air stream during the regeneration cycle shall not be more than 50 degrees Fahrenheit below this set point. An audible alarm shall be activated whenever the temperature of the desorption air stream is more than 50 degrees Fahrenheit below the set point.

4. The set point for the regeneration cycle time shall be maintained at the value

established during the most recent emissions test that demonstrated compliance. The permittee shall maintain the duration of each regeneration cycle within five (5) percent of the set point. An audible alarm shall be activated whenever the duration of each regeneration cycle is not within five (5) percent of the set point.

5. Operation of the control equipment outside of the restrictions established above may or may not indicate a mass emission violation. If required by Ohio EPA, compliance with the mass emission limitation shall be determined by performing concurrent mass emission tests and parameter readings shall be used in determining whether or not the operation of the control equipment outside of the restrictions specified above is indicative of a possible violation of the mass emission limitation.

6. Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be reported to the Northeast District Office of Ohio EPA in accordance with OAC rule 3745-15-06(B). Parameter deviations due to such malfunctions, that comply with the requirements of OAC rule 3745-15-06(B), do not constitute violations of the operational restrictions for this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature and time monitors that measure the following when the emissions unit is in operation:

   a. the temperature of the exhaust gases in the combustion zone of the thermal oxidizer;

   b. the temperature of the desorption air stream entering the concentrator; and

   c. the duration of each regeneration cycle for the concentrator.

   The permittee shall operate a continuous temperature recorder for the temperature of the exhaust gases in the combustion zone of the thermal oxidizer, and record the temperature when the emissions unit is in operation.

   Units shall be in degrees Fahrenheit and minutes. The accuracy for each thermocouple, monitor, clock, and recorder shall be guaranteed by the manufacturer to be within one (1) percent of the temperature/time being measured or five (5) degrees Fahrenheit/0.5 minute, whichever is greater. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

2. The permittee shall operate and maintain audible alarms for deviations in the temperature of the desorption air stream entering the concentrator and the duration of each regeneration cycle for the concentrator. The set points and alarm activation levels shall be set at the values specified in sections B.3 and B.4 above.

   The permittee shall maintain a log of each instance when an audible alarm is activated, the cause of the alarm, the time interval of the deviation, the magnitude of the deviation (in degrees Fahrenheit and/or in minutes, as applicable), and the corrective action taken to restore the correct operational parameters.

3. The permittee shall maintain a log or record of operating time for the capture (collection) system, control devices, monitoring equipment and the associated emissions unit.

4. On each day of operation of the control system for this emissions unit, the permittee shall record the set points and alarm activation levels, and the corresponding values of temperature and time duration. At least once per calendar month, the permittee shall calibrate the set points and alarm activation levels and maintain records of the results of each calibration.

5. The permittee shall collect and record the following information each month for all organic compounds employed in emissions units R001 through R022, R123, R025, R026 and R027:

   a. the name and identification of each liquid organic compound contained in coatings, inks and cleanup materials employed;

   b. the amount of each liquid organic compound employed in coatings, inks and cleanup materials, in gallons;

   c. the OC content of each liquid organic compound employed in coatings, inks and cleanup materials, in lbs of OC/gallon; and

   d. the total combined monthly OC emissions [summation of (b x c) for each liquid organic compound employed in coatings, inks and cleanup materials multiplied by one (1) minus the retention factor determined in the 12/30/97 BAT study (0.209), multiplied by one (1) minus the overall control efficiency determined during the most recent emission test that demonstrated the emissions unit was in compliance].

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

6. The permittee shall collect and record the following information each month for emissions units R001 through R022, R123, R025, R026 and R027:

   a. the name and identification number of each ink/coating employed;

   b. the individual HAP* content for each HAP of each ink/coating in pounds of individual HAP per gallon of ink/coating, as applied;

   c. the total combined HAP content of each ink/coating in pounds of combined HAPs per gallon of ink/coating, as applied [sum all the individual HAP contents from (b)];

   d. the number of gallons of each ink/coating employed;

   e. the name and identification number of each cleanup material/thinner employed;

   f. the individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;

   g. the total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];

   h. the number of gallons of each cleanup material/thinner employed;

   i. the total individual HAP input for each HAP from all inks/coatings and cleanup materials/thinner employed, in pounds per month [for each HAP the sum of (b) times (d) for each ink/coating, plus the sum of (f) times (h) for each cleanup material/thinner];

   j. the total combined HAP input from all inks/coatings, and cleanup materials/thinner employed, in pounds per month [the sum of (c) times (d) for each ink/coating plus the sum of (g) times (h) for each cleanup material/thinner];

   k. the updated rolling, 12-month summation of the input for each individual HAP, in pounds (this shall include the information for the current month and the preceding eleven calendar months); and

   l. the updated rolling, 12-month summation of the input for total combined HAPs, in pounds (this shall include the information for the current month and the

preceding eleven calendar months).

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Northeast District Office contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit quarterly temperature/time deviation (excursion) reports that identify the following:

   a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance;

   b. all instances when the set points and alarm activation levels for the temperature of the desorption air stream prior to the concentrator did not comply with the limitations specified in section B.3, based on the records maintained pursuant to section C.4 of these terms and conditions, and the magnitude of each deviation;

   c. all instances when the set points and alarm activation levels for the duration of the regeneration cycle did not comply with the limitations specified in section B.4, based on the records maintained pursuant to section C.4 of these terms and conditions, and the magnitude of each deviation; and

   d. all instances when an audible alarm was activated, the cause of each alarm (if known), the time interval of the deviation, the magnitude of the deviation (in degrees Fahrenheit and/or in minutes, as applicable) and the corrective action taken to restore the correct operating parameters.

2. The permittee shall submit annual reports that specify the total OC emissions for emissions units R001 through R022, R123, R025, R026 and R027, combined, for the previous calendar year. These reports shall be submitted to the Northeast District Office of Ohio EPA by January 30 of each year and shall cover the previous calendar year.

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month HAP emission limitations.

E. Testing Requirements

Issued: To be entered upon final issuance

1. Compliance with the emission limitations specified in sections A.1 and A.2 shall be determined in accordance with the following methods:

1.a Emission Limitation:

All OC/VOC emitted by this emissions unit shall be vented to a flow concentrator and thermal oxidizer with a minimum capture efficiency of 100 percent, by weight, and a minimum destruction efficiency of 95 percent, by weight.

Applicable Compliance Method:

Compliance with the above requirement shall be determined through emission testing as outlined in section E.2 below. Method 24A shall be used to determine the OC contents of the coatings, inks and cleanup materials.

1.b Emission Limitation:

OC/VOC emissions from all coatings and inks employed in this emissions unit shall not exceed 0.11 pound per hour.

Applicable Compliance Method:

Compliance with the hourly OC/VOC limitation shall be determined using the following equation:

E = MP x G x OC x (1 - RF) x (1 - DE)

where:

E = hourly emission rate, in lbs/hr;
MP = maximum amount of material printed per hour (1,200 sq. ft./hr);
G = ink usage factor, in gallons of ink/coating per sq. ft. (0.00029 gal/sq. ft.);
OC = maximum ink/coating OC content (7.6 lbs/gal);
RF = solvent retention factor, determined through the 12/30/97 BAT study (0.209); and
DE = minimum fractional destruction efficiency of the control system (0.95).

1.c Emission Limitation:

OC/VOC emissions from all coatings and inks employed in emissions units R001 through R022, R123, R025, R026 and R027 shall not exceed 9.27 lbs/hr and 40.60 tons per year.

Applicable Compliance Method:

Compliance with the short-term (lbs/hr) OC/VOC emission limitation shall be demonstrated based upon the emission testing requirements specified in section E.2.

Compliance with the annual OC/VOC emission limitation shall be determined by the record keeping requirements specified in section C.5.

1.d Emission Limitation:

9.9 tons per year of any individual HAP, as a rolling, 12-month summation and 24.9 tons per year of total combined HAPs, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance with the annual HAP limitations shall be determined by the record keeping requirements specified in section C.6.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirement.

Issued: To be entered upon final issuance

a. The emissions testing shall be conducted in accordance with the permit to operate issued on August 30, 2006 for emissions units R001 through R022, R025 and R026. Emissions units R123 and R027 shall also be in operation during this testing.

b. The emission testing shall be conducted to demonstrate compliance with the destruction efficiency requirement specified in section A.2.a.

c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or an approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Northeast District Office of Ohio EPA.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test' notification to the Northeast District Office of Ohio EPA. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Northeast District Office of Ohio EPA's refusal to accept the results of the emissions test(s).

f. Personnel from the Northeast District Office of Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test and submitted to the Northeast District Office of Ohio EPA within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Northeast District Office of Ohio EPA.

Emissions Unit ID: **R027**

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with ORC 3704.03(F)(4)(b) ["Review of New Sources of Air Toxics Emissions, Option A."] 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. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install 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 permit-to-install.

2. All of the terms and conditions of this permit are federally enforceable except section F.1 above.

Metromedia Technologies Inc **Facility ID: 0285030295**
PTI Application: 02-22647
Issued: To be entered upon final issuance

Emissions Unit ID: **R027**

SIC CODE	2759	SCC CODE	4-02-040-11	EMISSIONS UNIT ID	R027

EMISSIONS UNIT DESCRIPTION twist printing machine no. 1 inkjet printing on vinyl or other substrates, controlled by Regensorb concentrator and thermal oxidizer

DATE INSTALLED upon issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	attainment	0.11 lb/hr	0.48	9.27 lbs/hr, combined for all units at facility	40.60 combined for all units at facility
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination See NSR discussion.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? n/a

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____