



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

7/15/2013

Certified Mail

Hanh Duong
Nexeo Solutions, LLC
1400 Woodloch Forest Dr., Suite 200
The Woodlands, TX 77380

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: 1677130036
Permit Number: P0112816
Permit Type: Renewal
County: Summit

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, Akron Beacon Journal. 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 Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

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 Akron Regional Air Quality Management District at (330)375-2480.

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
ARAQMD; Pennsylvania; West Virginia; Canada

PUBLIC NOTICE

7/15/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Nexeo Solutions, LLC
1610 EAST HIGHLAND RD,
Twinsburg, OH 44087
Summit County

FACILITY DESC.: Other Chemical and Allied Products Merchant Wholesalers

PERMIT #: P0112816

PERMIT TYPE: Renewal

PERMIT DESC: Renewal FEPTIO for a small container fill line for transfer of organic liquids. BAT limits were revised with updated emission factors.

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: Kelly Kanoza, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308. Ph: (330)375-2480



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: Nexeo Solutions, LLC is an existing chemical mixing and distribution facility located in the city of Twinsburg in Summit County, Ohio. This is a single facility operating out of two separate locations (bulk transfer plant at 1610 East Highland Road and warehouse at 1842 Enterprise Parkway). The facility contains the following emissions units in addition to 50 fixed-roof storage tanks:

EU ID	Description	Installation Date
J001	1 bay truck loading rack for bulk liquid chemicals	4/1/1983
J002	2 bay truck loading rack for bulk liquid chemicals	5/1/1999
P001	Submerged filling line for portable tanks, drums, and small containers	4/1/1983
P004	8,500 gallon, vertical, fixed roof, coned bottom mixing tank	4/1/1983
P005	8,000 gallon, vertical, fixed roof, coned bottom mixing tank	4/1/1983
P006	10,000 gallon, vertical, fixed roof, coned bottom mixing tank	4/1/1983
P008	Submerged filling line for 55 gallon drums	2/1/2000
P009	Splash filling line for 55 gallon drums	2/1/2000
P010	Splash filling line for 550 and 350 gallon totes and small containers	2/1/2000
P011	Splash filling line for 5 gallon containers	3/1/2001

3. Facility Emissions and Attainment Status: Emissions from this facility consist of volatile organic compounds (VOC) and hazardous air pollutants (HAP) from evaporation of various organic liquids. The facility has requested a federally enforceable permit-to-install and operate (FEPTIO) with rolling, 12-month limits of 49.9 tons VOC, 24.9 tons combined HAP, and 9.9 tons individual HAP in order to avoid Title V major source applicability. Summit County is designated in attainment for all criteria pollutants, except particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}) and ozone.
4. Source Emissions: U.S. EPA does not allow the use of annual emission limitations alone, to restrict the potential to emit; they require a process variable such as coating usage, hours of operation, or production rate to also be restricted. Terms are included in this permit, which require the facility to record the process variables used to calculate the emissions (e.g., VOC and HAP content, the amount of material used, and the subsequent calculation of emissions to document compliance with the emission limitations).
5. Conclusion: Compliance with the rolling, 12-month VOC and HAP emission limitations, in accordance with the associated monitoring, recordkeeping and reporting requirements, will ensure this facility remains a synthetic minor source, through OAC rule 3745-31-05(D), with respect to VOC and HAP emissions. Issuance of FEPTIO #P0112816 is recommended.



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	49.9
Combined HAP	24.9
Individual HAP	9.9



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Nexeo Solutions, LLC**

Facility ID:	1677130036
Permit Number:	P0112816
Permit Type:	Renewal
Issued:	7/15/2013
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
Nexeo Solutions, LLC

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Draft Permit-to-Install and Operate

Nexeo Solutions, LLC

Permit Number: P0112816

Facility ID: 1677130036

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1677130036
Application Number(s): A0046690
Permit Number: P0112816
Permit Description: Renewal FEPTIO for a small container fill line for transfer of organic liquids. BAT limits were revised with updated emission factors.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 7/15/2013
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:

Nexeo Solutions, LLC
1610 EAST HIGHLAND RD
Twinsburg, OH 44087

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:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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



Draft Permit-to-Install and Operate

Nexeo Solutions, LLC

Permit Number: P0112816

Facility ID: 1677130036

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0112816

Permit Description: Renewal FEPTIO for a small container fill line for transfer of organic liquids. BAT limits were revised with updated emission factors.

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

Emissions Unit ID:	P011
Company Equipment ID:	Automated small container fill line
Superseded Permit Number:	16-02118
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

Nexeo Solutions, LLC

Permit Number: P0112816

Facility ID: 1677130036

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 Akron Regional Air Quality Management District 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.

¹ Permittees 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

Nexeo Solutions, LLC

Permit Number: P0112816

Facility ID: 1677130036

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



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) Facility-wide emissions (total combined emissions from the bulk plant, 1610 East Highland Road, and the warehouse, 1842 Enterprise Parkway) shall not exceed:
 - a. 49.9 tons of volatile organic compounds (VOC) per rolling, 12-month period;
 - b. 24.9 tons of combined hazardous air pollutants (HAP) per rolling, 12-month period; and
 - c. 9.9 tons of any individual HAP per rolling, 12-month period.
 - (2) The permittee shall not engage in cleaning tank trucks, storage tanks, railcars, totes, or drums unless emissions from such cleaning operations are included against the established facility-wide emissions limitations.
 - (3) The permittee shall collect and record the following information each month on a facility-wide basis (including fugitive emissions from pumps, valves and connectors):
 - a. the company identification for each material employed;
 - b. the amount of VOC, in pounds per gallon, in each material employed
 - c. the amount of individual HAP, in pounds per gallon, in each material employed;
 - d. the number of gallons of each material employed;
 - e. the total VOC emissions, in tons, for all materials employed;
 - f. the combined HAP emissions, in tons, for all materials employed;
 - g. the individual HAP emissions, in tons, for all materials employed;
 - h. the rolling, 12-month summation of VOC emissions, in tons;
 - i. the rolling, 12-month summation of combined HAP emissions, in tons; and
 - j. the rolling, 12-month summation of individual HAP emissions, in tons.



- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. 49.9 tons of VOC per rolling, 12-month period;
 - ii. 24.9 tons of combined HAP per rolling, 12-month period;
 - iii. 9.9 tons of any individual HAP per rolling, 12-month period;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the reporting period.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or Local Air Agency).

- (5) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

49.9 tons VOC per rolling, 12-month period

24.9 tons of combined HAP per rolling, 12-month period

9.9 tons of any individual HAP per rolling, 12-month period

Applicable Compliance Method:

Compliance with the allowable VOC and HAP emission limitations identified above shall be demonstrated by the monitoring and record keeping requirements specified in b)(3).



Draft Permit-to-Install and Operate

Nexeo Solutions, LLC

Permit Number: P0112816

Facility ID: 1677130036

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P011, Automated small container fill line

Operations, Property and/or Equipment Description:

Automated five-gallon container, splash-fill line for organic liquids.

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. None.

(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)b.

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(A)(3), PTI 16-02118 issued 6/20/2002	Volatile organic compound (VOC) emissions shall not exceed 71.3 pounds per day and 13.0 tons per year. See b)(2)a.
b.	OAC rule 3745-31-05(D), Synthetic Minor to Avoid Title V	See b)(2)b.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) emission limitations established pursuant to OAC rule 3745-31-05(A)(3) are based on the maximum potential to emit for this emissions unit. Therefore, no monitoring or record keeping requirements are necessary to ensure ongoing compliance with these emission limitations.

However, the permittee shall apply for and, if required, obtain a final federally enforceable permit-to-install and operate (FEPTIO) prior to making any changes to equipment, type of materials processed, method of operation, or any other



changes to this emissions unit that would result in an increase of potential emissions.

- b. Emissions unit P011 is part of the facility-wide, federally enforceable emission limitations established for the purpose of avoiding Title V applicability for volatile organic compounds (VOC) and hazardous air pollutants (HAP) under section B.1.b) of this permit.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The FEPTIO application for this emissions unit, P011, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system (P011 shares a common stack with P001), as specified by the permittee. The "Toxic Air Contaminant Statute," ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A," as follows:
 - a. The exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. Threshold Limit Value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices;" or
 - ii. Short Term Exposure Limit (STEL) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices;" the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days



per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the MAGLC:

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Methylene Chloride

TLV (mg/m³): 174

Maximum Hourly Emission Rate (lbs/hr): 25.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 5.1

MAGLC (ug/m³): 17.4

The permittee, has demonstrated that emissions of methylene chloride, from emissions unit P011, is calculated to be less than 80% of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute,” ORC 3704.03(F).

- (2) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s) that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute,” ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification,” the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level



concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (3) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute," ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
 - (4) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute," ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) 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.

The permittee shall include in the annual PER any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration.



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

71.3 lbs VOC/day and 13.0 tons VOC/year

Applicable Compliance Methods:

Compliance with the daily allowable VOC emission limitation identified above shall be demonstrated by multiplying the worst-case loading loss of 10.19 pounds per 1000 gallons of liquid loaded (AP-42, Section 5.2, Equation 1, June 2008) by the emissions unit's maximum daily throughput of 7,000 gallons per day.

$$E = A \times L$$

where:

E = emissions, pounds per day (lbs/day);

A = activity rate, gallons per day (gal/day);

L = loading loss, pounds per 1000 gallons (lbs/10³ gal) of liquid loaded;

$$L = 12.46(SPM/T);$$

S = 1.45, splash loading saturation factor (AP-42, Table 5.2-1);

P = 3.47 pounds per square inch absolute (psia), true vapor pressure of liquid loaded;

M = 86.17 pounds per pound-mole (lb/lb-mole), molecular weight of vapors, and;

T = 530 degrees Rankine (°R), temperature of bulk liquid loaded.

The ton per year emission limitation was developed by multiplying the daily allowable particulate emission limitation by the maximum annual operating schedule of 365 days per year, and dividing by a conversion factor of 2,000 pounds per ton. Therefore, if compliance is shown with the short-term emission limitation, compliance shall be demonstrated with the annual emission limitation.

g) Miscellaneous Requirements

(1) None.