



1/26/2015

Mrs. Cara Ahrens
 Nexeo Solutions, LLC
 3 Waterway Square Place, Suite 1000
 The Woodlands, TX 77380

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
 Facility ID: 1431152467
 Permit Number: P0118172
 Permit Type: Renewal
 County: Hamilton

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
 77 South High Street, 17th Floor
 Columbus, OH 43215

Certified Mail

Yes	TOXIC REVIEW
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	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

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: SWOAQA



FINAL

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

Facility ID:	1431152467
Permit Number:	P0118172
Permit Type:	Renewal
Issued:	1/26/2015
Effective:	1/26/2015
Expiration:	1/26/2020



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
Nexeo Solutions, LLC

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Authorization

Facility ID: 1431152467
Application Number(s): A0051685
Permit Number: P0118172
Permit Description: FEPTIO Renewal permit for a chemical distribution facility that stores, blends and packages chemicals and solvents for industrial and commercial customers. Emissions units include storage tanks, container filling operations, a loading rack and blend tank.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 1/26/2015
Effective Date: 1/26/2015
Expiration Date: 1/26/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Nexeo Solutions, LLC
2788 GLENDALE-MILFORD RD
Evendale, OH 45241

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:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0118172

Permit Description: FEPTIO Renewal permit for a chemical distribution facility that stores, blends and packages chemicals and solvents for industrial and commercial customers. Emissions units include storage tanks, container filling operations, a loading rack and blend tank.

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

Emissions Unit ID: J001
 Company Equipment ID: Loading Rack for Chemicals
 Superseded Permit Number: P0108712
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P002
 Company Equipment ID: TANK 131
 Superseded Permit Number: P0108712
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P009
 Company Equipment ID: P009
 Superseded Permit Number: P0108685
 General Permit Category and Type: Not Applicable

Emissions Unit ID: T054
 Company Equipment ID: Tank 54
 Superseded Permit Number: P0105417
 General Permit Category and Type: Not Applicable

Group Name: Filling Lines

Emissions Unit ID:	P003
Company Equipment ID:	CORROSIVE DRUMMING
Superseded Permit Number:	P0108712
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	SOLVENT DRUMMING
Superseded Permit Number:	P0108712
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	Food Grade Drumming Line
Superseded Permit Number:	P0108712
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Drumming Line for Organic Materials
Superseded Permit Number:	P0108712
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	Container Filling Line for Organic Materials
Superseded Permit Number:	P0108712
General Permit Category and Type:	Not Applicable



Group Name: Organic Material Storage Tanks

Emissions Unit ID:	T009
Company Equipment ID:	TANK #101
Superseded Permit Number:	P0108712
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T010
Company Equipment ID:	TANK 102
Superseded Permit Number:	P0108712
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T011
Company Equipment ID:	TANK 103
Superseded Permit Number:	P0108712
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T012
Company Equipment ID:	TANK 104
Superseded Permit Number:	P0108712
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T013
Company Equipment ID:	TANK 105
Superseded Permit Number:	P0108712
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T014
Company Equipment ID:	TANK 106
Superseded Permit Number:	P0108712
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T015
Company Equipment ID:	TANK 107
Superseded Permit Number:	P0108712
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T016
Company Equipment ID:	TANK 108
Superseded Permit Number:	P0108712
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T046
Company Equipment ID:	TANK 129
Superseded Permit Number:	P0108712
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T047
Company Equipment ID:	TANK 130
Superseded Permit Number:	P0108712
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
Nexeo Solutions, LLC
Permit Number: P0118172
Facility ID: 1431152467
Effective Date: 1/26/2015

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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 of this permit 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 [DO/LAA] 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 submitting 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 emission 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.



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.



Final Permit-to-Install and Operate
Nexeo Solutions, LLC
Permit Number: P0118172
Facility ID: 1431152467
Effective Date: 1/26/2015

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) c)(1), c)(2), e)(1), f)(1), and g)(1).

c) Applicable Emissions Limitations and/or Control Requirements

(1) The following emission limitations and/or control measures apply to the entire facility*. Emissions from the facility 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)	Facility-wide emissions shall be limited to 49.9 tons VOC/year*, 24.9 tons combined hazardous air pollutants (HAPs)/year*, and 9.9 tons of any single HAP/year*.

(2) Additional Terms and Conditions

a. *The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from the emissions units located at Nexeo Solutions, LLC (Premise Number: 1431152467), other de minimis air contaminant sources (P008 & P010) as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install (T017-T030, T032-T045, and T054) pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

d) Operational Restrictions

(1) None.

e) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall calculate and maintain monthly records that include the following information, including fugitive emissions from pumps, valves and connectors (for the entire facility):



- a. total VOC emissions, in tons, for all the materials employed;
- b. the individual HAP emissions, in tons, for all the materials employed;
- c. the combined HAPs emissions, in tons, for all the materials employed;
- d. the rolling, 12-month VOC emissions, in tons;
- e. the rolling, 12-month individual HAP emissions, in tons; and
- f. the rolling, 12-month combined HAPs emissions, in tons.

[Emissions are calculated monthly for the facility using a computer system based on AP-42 Section 5.2 and the TANKS program]

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

f) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, that identify the following:
 - a. all deviations (excursions) of the following emission limitations:
 - i. exceedances of the rolling, 12-month VOC emission limitation of 49.9 tons (for the entire facility);
 - ii. all exceedances of the rolling, 12-month individual HAP emission limitation of 9.9 tons (for the entire facility); and
 - iii. all exceedances of the rolling, 12-month combined HAPs emission limitation of 24.9 tons (for the entire facility).
 - 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 the calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted 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).



- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

g) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section c) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:
49.9 TPY of VOC;
9.9 TPY for any single HAP; and
24.9 TPY for any combination of HAPs.

Applicable Compliance Method:

Compliance with the VOC and HAP emission limitations found in c)(1)a. shall be demonstrated by the recordkeeping requirements found in e)(1).

h) Miscellaneous Requirements

- (1) None.



Final Permit-to-Install and Operate
Nexeo Solutions, LLC
Permit Number: P0118172
Facility ID: 1431152467
Effective Date: 1/26/2015

C. Emissions Unit Terms and Conditions



1. J001, Loading Rack for Chemicals

Operations, Property and/or Equipment Description:

Loading rack for chemicals and solvents

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. None.

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)	<p>Volatile organic compound (VOC) emissions shall not exceed 36.96 pounds per hour.</p> <p>VOC emissions shall not exceed 49.9 tons per year (TPY) based on a rolling, 12-month summation.</p> <p>See b)(2)a., b)(2)b., and c)(1).</p>

(2) Additional Terms and Conditions

a. The hourly VOC emission limitation above represents the emissions unit's potential to emit. Therefore, no monitoring, recordkeeping, and/or reporting requirements are necessary to ensure compliance with this emission limitation.

b. The annual VOC emission limitation above represents the facility-wide restricted limit. Monitoring, recordkeeping, and reporting requirements are detailed in Section B. "Facility-Wide Terms and Conditions" of this permit.



c) Operational Restrictions

- (1) The loading operation shall employ submerged or bottom fill.

d) Monitoring and/or Recordkeeping Requirements

- (1) None.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.

- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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 Limitation:

Volatile organic compound (VOC) emissions shall not exceed 36.96 pounds per hour.

Applicable Compliance Method:

The hourly allowable emission limitation was established by multiplying a loading loss factor (LI), specific to each material loaded, by the amount of material loaded (per 1,000 gallons). The loading loss equation from AP-42 (June 2008), Section 5.2.2.1.1 is expressed as:

$$LI = 12.46 * S * P * M/T$$



Where:

LI = Loading loss (lb/1,000 gallons)

S = Saturation factor (0.6 for submerged fill)

P = Saturated vapor pressure of the material (psia)

M = Molecular weight of the material (lb/lb-mol)

T = Temperature of the material (degrees R)

The pounds per hour of VOC limit is based on the emissions unit's potential to emit. There are no testing requirements necessary for compliance determination.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

VOC emissions shall not exceed 49.9 tons per year (TPY) based on a rolling, 12-month summation.

Applicable Compliance Method:

The annual VOC emission limitation above represents the facility-wide restricted limit. Testing requirements are detailed in Section B. "Facility-Wide Terms and Conditions" of this permit.

g) Miscellaneous Requirements

(1) None.



2. P002, TANK 131

Operations, Property and/or Equipment Description:

10,600 gallon Blend Tank #131

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. None.

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)	<p>Volatile organic compound (VOC) emissions shall not exceed 37.5 pounds per hour.</p> <p>VOC emissions shall not exceed 49.9 tons per year (TPY) based on a rolling, 12-month summation.</p> <p>See b)(2)a., b)(2)b., and c)(1).</p>

(2) Additional Terms and Conditions

a. The hourly VOC emission limitation above represents the emissions unit's potential to emit. Therefore, no monitoring, record keeping, and/or reporting requirements are necessary to ensure compliance with this emission limitation.

b. The annual VOC emission limitation above represents the facility-wide restricted limit. Monitoring, record keeping, and reporting requirements are detailed in Section B. "Facility-Wide Terms and Conditions" of this permit.



- c) Operational Restrictions
 - (1) All loading operations of the blend tank performed at the emissions unit shall employ submerged or bottom fill.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.
 - (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- 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 Limitation:

Volatile organic compound (VOC) emissions shall not exceed 37.5 pounds per hour.

Applicable Compliance Method:

The hourly allowable emission limitation was established by multiplying a working loss factor (L_w), specific to each material loaded, by the amount of material loaded. The working loss equation from AP-42 5th edition, Section 7.1.3.1.2 (November 2006), is expressed as:

$$L_w = 0.000024 * M * P * K_N * K_P$$



Where:

L_w = Tank working loss (lb/gallons)

M = Molecular weight of the material (lb/lb-mol)

P = Saturated vapor pressure of the material (psia)

K_N = Turnover factor (1 if less than 36 turnovers)

K_P = Working loss product factor (1 for organic liquids)

Additionally, the pounds per hour limitation can be determined using USEPA TANKS software program (version III or later). The pounds per hour of VOC limit is based on the emissions unit's potential to emit. There are no testing requirements necessary for compliance determination.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

VOC emissions shall not exceed 49.9 tons per year (TPY) based on a rolling, 12-month summation.

Applicable Compliance Method:

The annual VOC emission limitation above represents the facility-wide restricted limit. Testing requirements are detailed in Section B. "Facility-Wide Terms and Conditions" of this permit.

g) Miscellaneous Requirements

(1) None.



3. P009, P009

Operations, Property and/or Equipment Description:

Organic materials tote filling line located in the Drum Fill Room, North Tote Line

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. b)(1)b., b)(2)c., d)(1)-(4), and e)(2).

(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. None.

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)	<p>Volatile organic compound (VOC) emissions shall not exceed 26.83 pounds per hour.</p> <p>VOC emissions shall not exceed 49.9 tons per year (TPY) based on a rolling, 12-month summation.</p> <p>See b)(2)a. and b)(2)b.</p>
b.	OAC rule 3745-114-01	See b)(2)c.

(2) Additional Terms and Conditions

a. The hourly VOC emission limitation above represents the emissions unit's potential to emit. Therefore, no monitoring, record keeping, and/or reporting requirements are necessary to ensure compliance with this emission limitation.



- b. The annual VOC emission limitation above represents the facility-wide restricted limit. Monitoring, record keeping, and reporting requirements are detailed in Section B. "Facility-Wide Terms and Conditions" of this permit.
 - c. In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the Director has established, per ORC 3704.03(F)(4)(c), a limit for P009, which shall not exceed 3,600 gal/hr process weight rate. The allowable process weight rate is the emissions unit's maximum capacity submitted in the permit application. Therefore, no monitoring, record keeping, and/or reporting requirements are necessary to ensure compliance with this restriction.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The PTIO application for this/these emissions unit(s) was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) 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 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 unit(s), (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. STEL (short term exposure limit) 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 Maximum Acceptable Ground-Level Concentration (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 or “worst case” toxic contaminant(s):

Toxic Contaminant: methylene chloride (worst-case toxic modeled)

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 26.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,019

MAGLC (ug/m3): 4,135.3

The permittee, having demonstrated that emissions of methylene chloride from emissions unit, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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", ORC 3704.03(F), 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 PTIO 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":
 - 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 Maximum Acceptable Ground-Level Concentration (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 submitted 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.
 - a. The permittee shall include in the annual Permit Evaluation Report (PER) any changes made to a parameter or value used in the dispersion model, that was



used to maintain compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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 Limitation:

Volatile organic compound (VOC) emissions shall not exceed 26.83 pounds per hour.

Applicable Compliance Method:

The hourly allowable emission limitation was established by multiplying a loading loss factor (LI), specific to each material loaded, by the amount of material loaded (per 1,000 gallons). The loading loss equation from AP-42 (June 2008), Section 5.2.2.1.1 is expressed as:

$$LI = 12.46 * S * P * M / T$$

Where:

LI = Loading loss (lb/1,000 gallons)

S = Saturation factor (1.45 for splash fill)

P = Saturated vapor pressure of the material (psia)

M = Molecular weight of the material (lb/lb-mol)

T = Temperature of the material (°R)



Final Permit-to-Install and Operate

Nexeo Solutions, LLC

Permit Number: P0118172

Facility ID: 1431152467

Effective Date: 1/26/2015

The pound per hour VOC limit is based on the emissions unit's potential to emit. There are no testing requirements necessary for compliance determination.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with Methods 1 – 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

VOC emissions shall not exceed 49.9 tons per year (TPY) based on a rolling, 12-month summation.

Applicable Compliance Method:

The annual VOC emission limitation above represents the facility-wide restricted limit. Testing requirements are detailed in Section B. "Facility-Wide Terms and Conditions" of this permit.

g) Miscellaneous Requirements

(1) None.



4. T054, Tank 54

Operations, Property and/or Equipment Description:

40,000 gallon storage tank with internal floating roof

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)c., b)(2)c., d)(1)a., d)(1)b., and d)(1)c.

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), as effective 11/30/2001	<p>Volatile organic compound (VOC) emissions shall not exceed 49.9 tons per year (TPY) based on a rolling, 12-month summation.</p> <p>See b)(2)a. and b)(2)d.</p>
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)b.
c.	40 CFR Part 60, Subpart Kb	See b)(2)c.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality



Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year.

- c. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- d. The annual VOC emission limitation above represents the facility-wide restricted limit. This emission limitation also applies under OAC rule 3745-31-05(D) as detailed in Section B. "Facility-Wide Terms and Conditions" of this permit. Monitoring, record keeping, and reporting requirements are also detailed in Section B.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In accordance with 40 CFR 60.116b(a) and (b), the permittee shall keep readily accessible records, for the life of the source, showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel.

In addition, the following records shall be maintained;

- a. An identification of each volatile organic liquid stored.
- b. The period of storage for each volatile organic liquid stored.
- c. The maximum true vapor pressure, in pounds per square inch absolute (psia), of the volatile organic liquid during the respective storage period.

These records shall be retained in the company's files for a period of not less than three years and shall be made available to the Director of Ohio EPA, or any authorized representative of the Director of Ohio EPA for review during normal business hours.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.
- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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 Limitation:

Volatile organic compound (VOC) emissions shall not exceed 49.9 tons per year (TPY) based on a rolling, 12-month summation.

Applicable Compliance Method:

The annual VOC emission limitation above represents the facility-wide restricted limit. Testing requirements are detailed in Section B. "Facility-Wide Terms and Conditions" of this permit.

g) Miscellaneous Requirements

- (1) None.



5. Emissions Unit Group - Filling Lines: P003, P004, P005, P006, and P007

EU ID	Operations, Property and/or Equipment Description
P003	Corrosive material container filling
P004	Organic materials drum filling line – South Drum Line
P005	Food grade materials container filling
P006	Drumming line for organic liquids – North Drum Line
P007	Organic tote filling line – South Tote Line

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. None.

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)	<p>Volatile organic compound (VOC) emissions shall not exceed 26.83 pounds per hour.</p> <p>VOC emissions shall not exceed 49.9 tons per year (TPY) based on a rolling, 12-month summation.</p> <p>See b)(2)a. and b)(2)b.</p>



- (2) Additional Terms and Conditions
 - a. The hourly VOC emission limitation above represents the emissions unit's potential to emit. Therefore, no monitoring, recordkeeping, and/or reporting requirements are necessary to ensure compliance with this emission limitation.
 - b. The annual VOC emission limitation above represents the facility-wide restricted limit. Monitoring, recordkeeping, and reporting requirements are detailed in Section B. "Facility-Wide Terms and Conditions" of this permit.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.
 - (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- 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 Limitation:

Volatile organic compound (VOC) emissions shall not exceed 26.83 pounds per hour.



Applicable Compliance Method:

The hourly allowable emission limitation was established by multiplying a loading loss factor (LI), specific to each material loaded, by the amount of material loaded (per 1,000 gallons). The loading loss equation from AP-42 (June 2008), Section 5.2.2.1.1 is expressed as:

$$LI = 12.46 * S * P * M/T$$

Where:

LI = Loading loss (lb/1,000 gallons)

S = Saturation factor (1.45 for splash fill)

P = Saturated vapor pressure of the material (psia)

M = Molecular weight of the material (lb/lb-mol)

T = Temperature of the material (degrees R)

The pounds per hour of VOC limit is based on the emissions unit's potential to emit. There are no testing requirements necessary for compliance determination.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

VOC emissions shall not exceed 49.9 tons per year (TPY) based on a rolling, 12-month summation.

Applicable Compliance Method:

The annual VOC emission limitation above represents the facility-wide restricted limit. Testing requirements are detailed in Section B. "Facility-Wide Terms and Conditions" of this permit.

g) Miscellaneous Requirements

- (1) None.



6. Emissions Unit Group - Organic Material Storage Tanks: T009, T010, T011, T012, T013, T014, T015, T016, T046, and T047

EU ID	Operations, Property and/or Equipment Description
T009	20,100 gallon vertical fixed roof storage tank
T010	20,100 gallon vertical fixed roof storage tank
T011	20,100 gallon vertical fixed roof storage tank
T012	20,100 gallon vertical fixed roof storage tank
T013	20,700 gallon vertical fixed roof storage tank
T014	20,700 gallon vertical fixed roof storage tank
T015	29,600 gallon vertical fixed roof storage tank
T016	29,600 gallon vertical fixed roof storage tank
T046	20,700 gallon vertical fixed roof storage tank
T047	20,700 gallon vertical fixed roof storage tank

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. None.

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.	40 CFR Part 60, Subpart Kb	See b)(2)a., b)(2)b., and d)(1).
b.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 49.9 tons per year (TPY) based on a rolling, 12-month summation.</p> <p>See b)(2)c. and c)(1).</p>



(2) Additional Terms and Conditions

- a. The application and enforcement of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- b. The storage tank is large enough that the facility is required to monitor the stored materials maximum true vapor pressure to verify the applicability of the NSPS. See d)(1) below.
- c. The annual VOC emission limitation above represents the facility-wide restricted limit. Monitoring, record keeping, and reporting requirements are detailed in Section B. "Facility-Wide Terms and Conditions" of this permit.

c) Operational Restrictions

- (1) The tank shall employ submerged or bottom fill.

d) Monitoring and/or Recordkeeping Requirements

- (1) In accordance with 40 CFR, 60.116b(a) and (b), the permittee shall keep readily accessible records, for the life of the source, showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel.

In addition, the following records shall be maintained:

- a. An identification of each volatile organic liquid stored.
- b. The period of storage for each volatile organic liquid stored.
- c. The maximum true vapor pressure, in pounds per square inch absolute (psia), of the volatile organic liquid during the respective storage period.

These records shall be retained in the company's files for a period of not less than two years and shall be made available to the Director of the Ohio EPA, or any authorized representative of the Director of the Ohio EPA for review during normal business hours.

e) Reporting Requirements

- (1) The Director of the Ohio EPA and the Administrator of USEPA must be notified within 30 days when the maximum true vapor pressure of the liquid exceeds 27.6 kPa (4.0 psia).
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept



hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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 Limitation:

Volatile organic compound (VOC) emissions shall not exceed 49.9 tons per year (TPY) based on a rolling, 12-month summation.

Applicable Compliance Method:

The annual VOC emission limitation above represents the facility-wide restricted limit. Testing requirements are detailed in Section B. "Facility-Wide Terms and Conditions" of this permit.

g) Miscellaneous Requirements

(1) None.