



Environmental Protection Agency

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

4/19/2011

Ms. LINDA DENISON
Nexeo Solutions, LLC
5200 Blazer Pkwy
Dublin, OH 43017

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677130036
Permit Number: P0107979
Permit Type: Administrative Modification
County: Summit

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final 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. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI 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
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: ARAQMD



FINAL

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

Facility ID:	1677130036
Permit Number:	P0107979
Permit Type:	Administrative Modification
Issued:	4/19/2011
Effective:	4/19/2011
Expiration:	11/21/2013



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

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Authorization

Facility ID: 1677130036
Application Number(s): M0001223
Permit Number: P0107979
Permit Description: Facility requested Admin Modification for name change to indicate the new ownership
Permit Type: Administrative Modification
Permit Fee: \$750.00
Issue Date: 4/19/2011
Effective Date: 4/19/2011
Expiration Date: 11/21/2013
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

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.

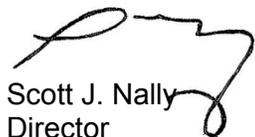
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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



Authorization (continued)

Permit Number: P0107979
Permit Description: Facility requested Admin Modification for name change to indicate the new ownership

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

Emissions Unit ID: P001
Company Equipment ID: Submerged fill container filling line
Superseded Permit Number: P0104088
General Permit Category and Type: Not Applicable

Group Name: Fill Lines

Table with 2 columns: Emissions Unit ID and details. Rows include P008 (Submerged fill drumming line), P009 (Splash fill drumming line), and P010 (Tote and pail Splash filling line).

Group Name: Loading Racks

Table with 2 columns: Emissions Unit ID and details. Rows include J001 and J002 (Loading and unloading rack for bulk liquid chemicals).

Group Name: Mix Tanks

Table with 2 columns: Emissions Unit ID and details. Rows include P004, P005, and P006 (Mixing Tank).

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.

B. Facility-Wide Terms and Conditions

Final Permit-to-Install and Operate

Nexeo Solutions, LLC

Permit Number: P0107979

Facility ID: 1677130036

Effective Date: 4/19/2011

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 in this permit 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 in this permit are enforceable under state law only, with the exception of those listed below, which are federally enforceable.

(1) None.

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 OCs/year*, 24.9 tons combined hazardous air pollutants (HAPs)/year*, and 9.9 tons of any single HAP/year*. * based on rolling, 12-month summations of the monthly emissions rates

(2) Additional Terms and Conditions

a. *The facility-wide emissions stated above shall include the total combined emissions from the bulk and the warehouse facilities.

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 OC 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 OC 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.]

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 exceedances of the rolling, 12-month OC emission limitation of 49.9 tons (for the entire facility);
 - b. all exceedances of the rolling, 12-month individual HAP emission limitation of 9.9 tons (for the entire facility); and
 - c. all exceedances of the rolling, 12-month combined HAPs emission limitation of 24.9 tons (for the entire facility).
- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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

g) Testing Requirements

- (1) Compliance with the emission limitations shall be determined in accordance with the following methods:
 - a. Emission Limitations
 - 49.9 tons OC//rolling, 12-month summation (for the entire facility)
 - 9.9 tons of any HAP//rolling, 12-month summation (for the entire facility)
 - 24.9 tons of all HAPs, combined//rolling, 12-month summation (for the entire facility)
- Applicable Compliance Method:
- The permittee shall demonstrate compliance with the annual emission limitations above based on the record keeping requirements established in e)(1).

h) Miscellaneous Requirements

- (1) The permittee shall not engage in cleaning tankers, storage tanks, railcars or drums unless emissions from such cleaning operations are included against the facility wide emissions limits established.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Loading Racks: J001 and J002

EU ID	Operations, Property and/or Equipment Description
J001	West loading and unloading rack for bulk liquid chemicals
J002	East loading and unloading rack for bulk liquid chemicals

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 in this permit are federally enforceable, with the exception of those listed below, which are enforceable under state law only.

a. d)(1) through d)(4).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions in this permit 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 operations(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. 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)	For emissions unit J001: 131.59 lbs organic compounds (OC)/hr 49.9 tons OC per year For emissions unit J002: 394.77 lbs OC/hour 49.9 tons OC per year See b)(2)a.
c.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(1) through d)(4).

(2) Additional Terms and Conditions

- a. The hourly OC emission limitations above represent the emissions units' potentials to emit. Therefore, no monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these emission limitations.

c) Operational Restrictions

- (1) All loading operations performed at emissions units J001 and J002 shall employ submerged or bottom fill.

d) Monitoring and/or Recordkeeping Requirements

- (1) The federally enforceable permit-to-install and operate (FEPTIO) application for all the emissions units at the facility (emissions units J001, J002, P001, and P004-P006) 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 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 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 (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Methylene Chloride is the “worst case” toxic.

TLV (ppm): 50 (methylene chloride)

Maximum Hourly Emission Rate (lbs/hr): 161.32 (methylene chloride, with operating restrictions described in application; includes units J001, J002, P001, and P004).

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17.23

MAGLC (ug/m3): 17.4

The permittee, has demonstrated that emissions of methylene chloride, from (emissions units J001, J002, P001, and P004-P006), is calculated to be less than the maximum acceptable ground level concentration (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 PTI, PTIO, or FEPTIO (as applicable) 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 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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

f) Testing Requirements

(1) Compliance with the emission limitations shall be determined in accordance with the following methods:

a. Emission Limitations:

For emissions unit J001:
131.59 lbs OC/hr
49.9 tons OC per year

For emissions unit J002:
394.77 lbs OC/hour
49.9 tons OC per year

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying a loading loss factor (L*) by the maximum pump capacity** and by 60, and then dividing by 1000.

The loading loss factor was derived using AP-42, Section 5.2, the "Loading Loss Equation" and isopentane (worst case emissions are generated by isopentane).

*L = 12.46 SPM/T

Where: L = loading loss, pounds per 1000 gallons loaded (Q)
S = saturation factor, 0.6 for submerged fill
P = vapor pressure of liquid loaded, pounds per square inch absolute
M = molecular weight of vapor
T = temperature of bulk liquid (°R)

MW = 72.149
P @ 61°F = 9.623
Submerged Fill Factor = 0.6
Temperature = 520.67 °R

**for emissions unit J001, the maximum pump capacity = 220 gallons per minute
**for emissions unit J002, the maximum pump capacity = 660 gallons per minute

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

As long as compliance with the annual allowable facility-wide OC emission limitation is maintained, compliance with the annual allowable OC emission limitations for emissions units J001 and J002 shall be assumed.

g) Miscellaneous Requirements

- (1) The permittee remains subject to all applicable federal law and regulations and all applicable provisions of the Ohio State Implementation Plan as approved by the Administrator of the U.S. EPA. The provisions of the Ohio State Implementation Plan are independently enforceable by the U.S. EPA.

2. P001, Submerged fill container filling line

Operations, Property and/or Equipment Description:

Chemical Material filling line for drums, totes, and pails

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 in this permit are federally enforceable, with the exception of those listed below, which are enforceable under state law only.

a. d)(1) through d)(4).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions in this permit 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 operations(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. 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)	Compliance with the special terms and conditions of this permit.
b.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(1) through d)(4).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The federally enforceable permit-to-install and operate (FEPTIO) application for all the emissions units at the facility (emissions units J001, J002, P001, and P004-P006) 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 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 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 (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Methylene chloride covered under the worst-case toxic modeled.

TLV (ppm): 50 (methylene chloride)

Maximum Hourly Emission Rate (lbs/hr): 161.32 (methylene chloride, with operating restrictions described in application; includes units J001, J002, P001, and P004.)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17.23

MAGLC (ug/m3): 17.4

The permittee, has demonstrated that emissions of methylene chloride, from (emissions units J001, J002, P001, and P004-P006), is calculated to be less than the maximum acceptable ground level concentration (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 PTI, PTIO, or FEPTIO (as applicable) 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.);

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Nexeo Solutions, LLC

Permit Number: P0107979

Facility ID: 1677130036

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- 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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.
- f) Testing Requirements
- (1) None.
- g) Miscellaneous Requirements
- (1) None.

3. Emissions Unit Group - Mix Tanks: P004, P005 and P006

EU ID	Operations, Property and/or Equipment Description
P004	Mixing Tank: 8500-gallon vertical, fixed roof, cone bottom blend tank (inside)
P005	Mixing Tank: 8000-gallon vertical fixed-roof cone bottom mixing tank (outside)
P006	Mixing Tank: 10000-gallon vertical fixed-roof cone bottom mixing tank (outside)

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 in this permit are federally enforceable, with the exception of those listed below, which are enforceable under state law only.

a. d)(2) through d)(5).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions in this permit 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 operations(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. 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)	Compliance with the special terms and conditions of this permit.
c.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(2) through d)(5).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) All loading operations performed at emissions units P004, P005, and P006 shall employ submerged or bottom fill.

- (2) The total usage in the mixing tanks (emissions units P004, P005 and P006, combined) for each chemical listed below, shall not exceed 1,788,750 gallons per calendar month:
- a. hydrogen peroxide
 - b. 2-methoxyethanol
 - c. acetic acid
 - d. n, n-dimethylformamide
 - e. furfural
 - f. 2-ethoxethanol
 - g. n-pentane
 - h. n-hexane
- (3) Operations involving the use of methylene chloride shall be restricted as follows:
- a. No more than 573,750 gallons per month of methylene chloride shall be mixed in emissions unit P004 (inside mixing tank) to form blends.
 - b. There shall be no blends containing methylene chloride made in either of the outside blend tanks (emissions units P005 and P006).
 - c. The permittee shall include these restrictions in the Standard Operating Procedures (SOP) for the facility. A copy of the SOP has been submitted to The Akron Regional Air Quality Management District.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall record and maintain each month the following information:
- a. the total amount of throughput, in gallons, of each chemical listed in c)(2) for emissions units P004, P005 and P006, combined; and
 - b. the total amount of throughput, in gallons, of methylene chloride for emissions unit P004.
- (2) The federally enforceable permit-to-install and operate (FEPTIO) application for all the emissions units at the (emissions units J001, J002, P001, and P004-P006), 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 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 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. The modeling assumed that no chemical would be used at the plant more than 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) remains:

$$\text{TLV}/10 = \text{MAGLC}$$

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 (ppm): 50 ppm (methylene chloride)

Maximum Hourly Emission Rate (lbs/hr): 161.32 (methylene chloride with operating restrictions listed in permit application).

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17.23

MAGLC (ug/m3): 17.4

The permittee, has demonstrated that emissions of methylene chloride, from (emissions units J001, J002, P001, and P004-P006), is calculated to be less than

the maximum acceptable ground level concentration (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).

- (3) 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 PTI, PTIO, or FEPTIO (as applicable) 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.

- (4) 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 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.
- (5) 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 also identify in the annual permit evaluation report the following information concerning the operation during the 12-month reporting period for this emissions unit:
- a. all exceedances of the monthly throughput restriction of 1,788,750 gallons for each chemical listed in c)(2) for emissions units P004, P005, and P006, combined; and
 - b. all exceedances of the methylene chloride monthly throughput restriction of 573,750 for emissions unit P004.

Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

f) Testing Requirements

- (1) Compliance with the emission limitations shall be determined in accordance with the following methods:
- a. Operational Restriction:

The total throughput for each chemical listed in c)(2) shall not exceed 1,788,750 gallons per calendar month for emissions units P004, P005, and P006, combined.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the operational restriction above based on the record keeping requirements established in d)(1).

b. Operational Restriction:

The total throughput for methylene chloride shall not exceed 573,750 gallons per calendar month for emissions unit P004.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the operational restriction above based on the record keeping requirements established in d)(1).

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - Fill Lines: P008, P009 and P010

EU ID	Operations, Property and/or Equipment Description
P008	Submerged fill drumming line, for filling 55-gallon drums. consisting of a drumming station, hard and flexible piping and electric pumps (located at the Enterprise Drive facility)
P009	Splash fill drumming line, for filling 55-gallon drums, consisting of a drumming station, hard and flexible piping and electric pumps (located at the Enterprise Drive facility)
P010	Splash fill tote and pail filling line, for filling 350 and 550-gallon totes and smaller containers, consisting of a filling station, hard and flexible piping and electric pumps (located at the Enterprise Drive facility)

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 in this permit 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 in this permit 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 operations(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. 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)	Compliance with the special terms and conditions of this permit.

(2) Additional Terms and Conditions

a. None

c) Operational Restrictions

(1) All loading operations performed at emissions unit P008 shall employ submerged or bottom fill. Emissions units P009 and P010 are splash fill.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director 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.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute," ORC 3704.03(F)(4)(b), was not necessary because the emissions units' maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.