



Environmental Protection Agency

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

12/15/2011

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431152467
Permit Number: P0108712
Permit Type: Renewal
County: Hamilton

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	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)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

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 Hamilton County Dept. of Environmental Services at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb 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: HCDOES



FINAL

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

Facility ID:	1431152467
Permit Number:	P0108712
Permit Type:	Renewal
Issued:	12/15/2011
Effective:	12/15/2011
Expiration:	12/11/2014



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): A0031019, A0031020, A0031021, A0031022, A0042580
Permit Number: P0108712
Permit Description: This is an FEPTIO permit renewal for multiple emissions units at the facility to incorporate terms and conditions agreed upon as part of a permit appeal settlement.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 12/15/2011
Effective Date: 12/15/2011
Expiration Date: 12/11/2014
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.

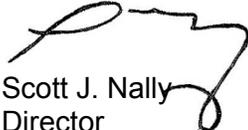
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(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


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108712

Permit Description: This is an FEPTIO permit renewal for multiple emissions units at the facility to incorporate terms and conditions agreed upon as part of a permit appeal settlement.

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: 14-04196
General Permit Category and Type: Not Applicable

Emissions Unit ID: P002
Company Equipment ID: Blend Tank #131
Superseded Permit Number: P0069849
General Permit Category and Type: Not Applicable

Group Name: Filling Lines

Table with 2 columns: Emissions Unit ID and details. Rows include P003 (Corrosive Material Container Filling Line), P004 (South Drum Line), P005 (Food Grade Drumming Line), P006 (Drumming Line for Organic Materials), and P007 (Container Filling Line for Organic Materials).

Group Name: Organic Material Storage Tanks

Table with 2 columns: Emissions Unit ID and details. Rows include T009 (TANK #101) and T010 (TANK 102).

Final Permit-to-Install and Operate

Nexeo Solutions, LLC

Permit Number: P0108712

Facility ID: 1431152467

Effective Date: 12/15/2011

Emissions Unit ID:	T011
Company Equipment ID:	TANK 103
Superseded Permit Number:	P0069863
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T012
Company Equipment ID:	TANK 104
Superseded Permit Number:	P0069864
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T013
Company Equipment ID:	TANK 105
Superseded Permit Number:	P0069865
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T014
Company Equipment ID:	TANK 106
Superseded Permit Number:	P0069866
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T015
Company Equipment ID:	TANK 107
Superseded Permit Number:	P0069867
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T016
Company Equipment ID:	TANK 108
Superseded Permit Number:	P0069868
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T046
Company Equipment ID:	TANK 129
Superseded Permit Number:	P0069898
General Permit Category andType:	Not Applicable
Emissions Unit ID:	T047
Company Equipment ID:	TANK 130
Superseded Permit Number:	P0069899
General Permit Category andType:	Not Applicable

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 Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

Final Permit-to-Install and Operate

Nexeo Solutions, LLC

Permit Number: P0108712

Facility ID: 1431152467

Effective Date: 12/15/2011

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 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.

The permittee has sufficient records to demonstrate compliance with the rolling summation for the previous 12-months.

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 (excursion) 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);
 - 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 (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (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) Annual Permit Evaluation (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 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.

C. Emissions Unit Terms and Conditions

1. J001, Loading Rack for Chemicals

Operations, Property and/or Equipment Description:

Loading rack for chemicals and solvents (modification)

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)	36.96 lbs/hour of volatile organic compounds (VOC). 49.9 tons/year of VOC based on a rolling, 12-month summation. See b)(2)a. & b., and c)(1).

(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 these emission limitations.

b. The annual VOC emission limitation above represents the facility-wide restricted limit. Monitoring, recordkeeping, and reporting requirements are detailed in Section B. of the 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) Annual Permit Evaluation (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 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:

36.96 lbs/hr of VOC.

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 lbs/hr of VOC limit is based on the emissions unit's potential to emit. There are no testing requirements necessary for compliance determination.

Final Permit-to-Install and Operate

Nexeo Solutions, LLC

Permit Number: P0108712

Facility ID: 1431152467

Effective Date: 12/15/2011

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:

49.9 tons/year of VOC 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. of the Facility Wide Terms and Conditions of this permit.

g) Miscellaneous Requirements

(1) None.

2. P002, Blend Tank #131

Operations, Property and/or Equipment Description:

Blend Tank #131 (10,600 gallons).

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)	37.5 lbs/hour of volatile organic compounds (VOC). 49.9 tons/year of VOC based on a rolling, 12-month summation. See b)(2)a. & b., and c)(1).

(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 these emission limitations.

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

c) Operational Restrictions

- (1) All loading operations of the blend take performed at the emissions unit shall employ submerged or bottom 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) 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:

37.5 lbs/hr of VOC.

Applicable Compliance Method:

The hourly allowable emission limitation was established by multiplying a working loss factor (Lw), specific to each material loaded, by the amount of material loaded. The working loss equation from AP-42 5th edition, page 7.1-18 (November, 2006), is expressed as:

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

Where:

Lw = 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 lbs/hr limitation can be determined using USEPA TANKS software program (version III or later). The lbs/hr of VOC limit is based on the

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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:

49.9 tons/year of VOC 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. of the Facility Wide Terms and Conditions of this permit.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Filling Lines: P003,P004,P005,P006,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 – Modification –North Drum Line
P007	Organic tote filling line – Modification – 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.

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)	26.83 lbs/hour of VOC. 49.9 tons/year of VOC based on a rolling, 12-month summation. See b)(2)a. & b.

(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 these emission limitations.

- b. The annual VOC emission limitation above represents the facility-wide restricted limit. Monitoring, recordkeeping, and reporting requirements are detailed in Section B. of the 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) Annual Permit Evaluation (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 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:
26.83 lbs/hr of VOC.

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)

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The lbs/hr 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:

49.9 tons/year of VOC based on a rolling, 12-month summation.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.

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

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. & d)(1).
b.	OAC rule 3745-31-05(A)(3)	49.9 tons/year of VOC based on a rolling, 12-month summation. See b)(2)c. and c)(1).

(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. of the 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, 60.11b(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) 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 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:

49.9 tons/year of VOC 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 B. Facility Wide Terms and Conditions of this permit.

g) Miscellaneous Requirements

(1) None.