

AKRON REGIONAL AIR QUALITY MANAGEMENT DISTRICT

Division of the Summit County Health District
Summit Counties

TELEPHONE: (330) 375-2480

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June 27, 2012

Linda Denison
Nexeo Solutions, LLC
5200 Blazer Parkway, DS-1
Dublin, Ohio 43017

Re: 2012 Full Compliance Evaluation, Facility ID #1677130036

Dear Linda Denison:

On May 10, 2012 the Akron Regional Air Quality Management District (ARAQMD) conducted a Full Compliance Evaluation (FCE) of the Nexeo Solutions, LLC facilities located at 1610 Highland Road and 1842 Enterprise Parkway in Twinsburg, Ohio. The purpose of the site visits was to evaluate compliance with the terms and conditions of the facility's air permits along with state and federal rules and regulations. I would like to thank you for your cooperation during the inspection.

Compliance was assessed based upon an examination of each non-insignificant emissions unit at the facilities, a review of the monitoring and record keeping files maintained at the facility, and a review of the reports filed with Ohio EPA. Below is a summary of the inspection findings, violations (if any), and action items that need to be addressed.

1. Finding:

The annual reports required by Part II.A.D.3. of emissions unit P011's permit to operate (PTO) #P0103514 were not submitted by the reporting deadline of January 31st each year:

"The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year's activities."

Violation:

Failure to submit reports by the specified deadline is considered a violation of the terms and conditions of PTO #P0103514. Violations of the terms and conditions of an issued PTO are also considered violations of Ohio Revised Code (ORC) 3704.05(C), which states:

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“No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions.”

Requested Action:

PTO #P0103514 expires on January 29, 2013, at which time the renewal permit for emissions unit P011 will be updated with the standard annual permit evaluation reporting terms and conditions to align with the reporting requirements for the rest of the facility. No further action is requested at this time, provided a renewal application is submitted for emissions unit P011 prior to the expiration date.

Please note this determination is based upon a site visit and preliminary review of available records. It does not ensure that you have been or will continue to operate in compliance and in no way limits any liability if violations are discovered for this time period.

If you have any questions concerning this letter or the enclosed report, please contact me at 330-812-3954 or email: kkanoza@schd.org.

Sincerely,



Kelly Kanoza

Air Pollution Control Engineer

Enc: Ohio EPA/DAPC - Facility Inspection Forms