



AUG 10 2010

Chris Berard
Pactiv Corporation
5370 E. Home Ave
Fresno, CA 93727

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # C-36
Project # C-1053827**

Dear Mr. Berard:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Pactiv Corporation for its polystyrene foam extrusion operation which is located at 5370 E. Home Ave in Fresno, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments
C: Jonah Aiyabei, Permit Services Engineer

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



AUG 10 2010

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

**Re: Notice of Preliminary Decision – Title V Permit Renewal
District Facility # C-36
Project # C-1053827**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Pactiv Corporation for its polystyrene foam extrusion operation which is located at 5370 E. Home Ave in Fresno, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

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AUG 10 2010

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # C-36
Project # C-1053827**

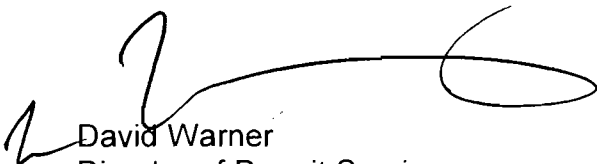
Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Pactiv Corporation for its polystyrene foam extrusion operation which is located at 5370 E. Home Ave in Fresno, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

Attachments

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Fresno Bee

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED RENEWAL OF
THE FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to Pactiv Corporation for its polystyrene foam extrusion operation which is located at 5370 E. Home Ave in Fresno, California.

The District's analysis of the legal and factual basis for this proposed action, project #C-1053827, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed renewal of the Federally Mandated Operating permit. If requested by the public, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on the proposed renewed permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation
PACTIV CORPORATION
C-36**

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PROPOSED TITLE V PERMIT RENEWAL EVALUATION POLYSTYRENE FOAM PRODUCTS PROCESSING PLANT

Engineer: Jonah Aiyabei
Date: July 28, 2010

Facility Number: C-36
Facility Name: Pactiv Corporation
Mailing Address: 5370 E. Home Ave
Fresno, CA 93727

Contact Name: Chris Berard, Plant Manager
Phone: 559-253-3402

Responsible Official: Chris Berard
Title: Plant Manager

Project # : C-1053827
Deemed Complete: September 29, 2005

I. PROPOSAL

Pactiv Corporation was issued a Title V permit on September 3, 2002. As required by District Rule 2520, the applicant has requested a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

Pactiv Corporation is located at 5370 E. Home Ave, Fresno, CA.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant does not propose to use any model general permit templates.

V. SCOPE OF EPA AND PUBLIC REVIEW

Since the applicant is proposing to use any model general permit templates, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

- District Rule 2020, Exemptions
(amended December 21, 1994 ⇒ amended December 19, 2002)
- District Rule 2201, New and Modified Stationary Source Review Rule
(amended December 18, 2008)
- District Rule 2520, Federally Mandated Operating Permits
(adopted June 15, 1995 ⇒ amended June 21, 2001)
- District Rule 4101, Visible Emissions
(amended December 17, 1992 ⇒ amended February 17, 2005)
- District Rule 4623, Storage of Organic Liquids
(amended December 17, 1992 ⇒ amended May 19, 2005)
- District Rule 4662, Organic Solvent Degreasing Operations
(amended September 19, 1991 ⇒ amended September 20, 2007)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
(amended September 18, 2003)

- 40 CFR Part 82, Subpart B, Stratospheric Ozone (amended November 9, 2007)
- 40 CFR Part 82, Subpart F, Stratospheric Ozone (amended June 8, 2008)

The following rules have been amended from previous Non-State Implementation Plan (SIP) versions to correct SIP deficiencies and are now included in SIP:

- District Rule 1081, Source Sampling, (amended December 16, 1993)
- District Rule 2010, Permits Required, (amended December 17, 1992)
- District Rule 2020, Exemptions, (amended December 19, 2002)
- District Rule 2031, Transfer of Permits, (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications, (amended December 17, 1992)
- District Rule 2080, Conditional Approval, (amended December 17, 1992)
- District Rule 4201, Particulate Matter Concentration, (amended December 17, 1992)
- District Rule 4202, Particulate Matter Emission Rate, (amended December 17, 1992)

The following rules have been amended, but the most recently amended version of the rule has not yet been approved into the State Implementation Plan (SIP):

- District Rule 4601, Architectural Coatings, (amended October 31, 2001 ⇒ amended December 17, 2009)
- District Rule 4682, Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing, (amended June 16, 1994; ⇒ amended September 20, 2007)

B. Rules Removed

- District Rule 8020, 8030, and 8060, Fugitive Dust (PM₁₀) Emissions (amended April 25, 1996)

These rules were removed on November 15, 2001 and were replaced with District Rules 8021, 8031, and 8061.

C. Rules Added

- District Rule 8011, General Requirements (Adopted November 15, 2001; amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities (adopted November 15, 2001; amended August 19, 2004)
- District Rule 8031, Bulk Materials (adopted November 15, 2001; amended August 19, 2004)
- District Rule 8041, Carryout and Trackout (adopted November 15, 2001; amended August 19, 2004)
- District Rule 8051, Open Areas (adopted November 15, 2001; amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads (adopted November 15, 2001; amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (adopted November 15, 2001; amended September 16, 2004)
- 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

D. Rules Not Updated

- District Rule 1070, Inspections (amended December 17, 1992)
- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2040, Applications, (amended December 17, 1992)
- District Rule 2301, Emission Reduction Credit Banking (amended December 17, 1992)

- 40 CFR 68 – Chemical Accident Prevention

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

The following rule, which has not been updated since the initial Title V permit was issued, is not federally enforceable and will not be discussed in further detail:

District Rule 4102 – Nuisance

This rule is applicable to any source operation which emits or may emit air contaminants or other materials. This rule stipulates that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such person or the public or which cause or have a natural tendency to cause injury or damage to business or property.

a. C-36-0-2 – Facilitywide Requirements

- Condition 40 on the proposed renewed permit to operate is based on this rule and is therefore not federally enforceable.

b. C-36-23-3 – POLYSTYRENE FOAM PRODUCT STORAGE WAREHOUSE (28,480 SQ FT).

- Condition 4 has been removed since the condition is already on the facilitywide requirements permit unit.

VIII. COMPLIANCE

The purpose of this evaluation is to review the updated changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been updated amended or added since the issuance of the initial Title V permit.

A. District Rule 2010 – Permits Required

District Rule 2010 was approved into the SIP on July 23, 1999 to replace county rules 201 (all eight counties). The rule has not been changed in any other way since the initial Title V permit for this facility was issued.

C-36-0-2 – Facilitywide Requirements

- Condition 4 on the proposed renewed permit to operate ensures compliance with the requirements of this rule.

B. District Rule 2020 – Exemptions

District Rule 2020 lists equipment which is specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any effect on current permit requirements and will therefore not be addressed in this evaluation.

C. District Rule 2201 – New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.26, defined as an action including at least one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable at this time.

The following permit conditions, which are based on the requirements of this rule, have been modified as follows:

C-36-0-2 – Facilitywide Requirements

- Conditions 41 and 42 on the existing permit to operate were deleted since they are more appropriately enforced under permit unit C-36-2, where they are listed as conditions 7 and 8.

D. District Rule 2520 – Federally Mandated Operating Permits

This rule has been amended to incorporate several administrative corrections, clarify rule language, and add procedures for implementing compliance schedules. The only amendments to this rule that will have an effect on current permit requirements are the corrections to Section 9 rule references, as described in the following table:

Old Rule Section	Corrected Rule Section
9.3	9.2
9.4	9.3
9.5	9.4
9.6	9.5
9.7	9.6
9.8	9.7
9.9	9.8
9.10	9.9
9.11	9.10
9.12	9.11
9.13	9.12
9.14	9.13
9.15	9.14
9.16	9.15
9.17	9.16
9.18	9.17
9.19	9.18

Rule 2520, Section 6.4.4, “Other Changes Not Requiring Title V Permit Amendment,” allowed the permittee to implement changes, including the addition of new emissions units, without triggering the permit modification or amendment requirements until the time of Title V permit renewal, provided the conditions described in Sections 6.4.4.1 through 6.4.4.2 were met.

The following permit requirements were added and/or revised to ensure compliance with this rule:

a. C-36-0-2 – Facilitywide Requirements.

- Conditions 5, 8-21, 28 and 35 on the existing permit to operate have been revised to include the updated Section 9 rule references.

b. C-36-1-2 – RAIL CAR UNLOADING, INCLUDING 3 RESIN SILOS, EACH 12 FT DIAM X 47 FT HIGH, PRODUCT SEPARATOR, VACUUM PUMP FILTER AND VACUUM PUMP #VB-01. STORAGE CAPACITY: 15,939 CUFT (119,221 GALLONS).

- Conditions 2, 3 and 4 on the existing permit to operate have been revised to include the updated Section 9 rule references.

c. C-36-2-5 – POLYSTYRENE FOAM EXTRUSION LINE #1, INCLUDING: #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE 1.5 MMBTU/HR CE MODEL 13.6 ROCC98 COMBU-CHANGER REGENERATIVE THERMAL OXIDIZER.

- Conditions 3, 6, 18, 19, 20 and 22 on the existing permit to operate have been revised to include the updated Section 9 rule references.

d. C-36-3-6 – POLYSTYRENE FOAM EXTRUSION LINE #2 CONSISTING OF #EX-20 PRIMARY EXTRUDER, #EX-21 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-11 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.

- Condition 10 on the existing permit to operate has been revised to include the updated Section 9 rule references.

e. C-36-4-5 – POLYSTYRENE FOAM EXTRUSION LINE #3 CONSISTING OF #EX 30 PRIMARY EXTRUDER, #EX-31 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM FEED PUMP #VB-12 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.

- Condition 12 on the existing permit to operate (condition 10 on the proposed renewed permit to operate) has been revised to include the updated Section 9 rule references.

- f. C-36-13-4 – #GR-90 BULK GRINDER WITH BLOWER, #GR-91 BULK GRINDER WITH BLOWER, AND #GR-92 SHEET GRINDER WITH BLOWER EACH FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
- Conditions 4 and 5 on the existing permit to operate have been revised to include the updated Section 9 rule references.
- g. C-36-14-4 – #EX-40 RECLAIM EXTRUDER #1 VENTED TO A SMOG HOG MODEL 20 PE E.P. (SHARED WITH C-36-19) AND A THERMAL OXIDIZER SYSTEM (DESCRIBED IN C-36-2), AND FEEDING SIX RECLAIM SILOS DESCRIBED IN C-36-17.
- Conditions 10, 11, 12 and 13 on the existing permit to operate have been revised to include the updated Section 9 rule references.
- h. C-36-17-3 – 17,960 CU. FT. (134,000 GALLON) RECLAIM STORAGE SILOS INCLUDING (2) 12' DIA. X 30' H WITH 60 DEG. CONES, (2) 12' DIA. X 30' H WITH 8' 45 DEG. CONES, AND (2) 12' DIA. X 32' H WITH 5'8" 45 DEG. CONES, RECEIVING PELLETS FROM RECLAIM EXTRUDERS.
- Conditions 2, 3, 5 and 6 on the existing permit to operate have been revised to include the updated Section 9 rule references.
- i. C-36-18-3 – (6) FLUFF SILOS, 12' DIA. X 30' H, EACH VENTED TO THE TORIT FILTER AND THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2. EACH SILO RECEIVES SHREDDED POLYSTYRENE FOAM FROM GRINDERS.
- Conditions 7, 9, 10, 11 and 12 on the existing permit to operate have been revised to include the updated Section 9 rule references.
- j. C-36-19-4 – #EX-50 RECLAIM EXTRUDER #2 VENTED TO SMOG HOG MODEL 20 PE E.P. (SHARED WITH C-36-14) AND A THERMAL OXIDIZER SYSTEM (DESCRIBED IN C-36-2) FEEDING SIX RECLAIM SILOS DESCRIBED IN C-36-17.
- Conditions 12, 14, 15, 16 and 17 on the existing permit to operate have been revised to include the updated Section 9 rule references.

- k. C-36-20-7 – POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160'W X 22'H AVERAGE) VENTED TO THE THERMAL OXIDIZER DESCRIBED IN C-36-2.
- Condition 5 on the existing permit to operate has been revised to include the updated Section 9 rule references.
- l. C-36-21-2 – POLYSTYRENE EXTRUSION LINE #4 CONSISTING OF #EX-40 PRIMARY EXTRUDER, #EX-41 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-40 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
- Condition 10 on the existing permit to operate has been revised to include the updated Section 9 rule references.
- m. C-36-22-2 – #EX-70 RECLAIM EXTRUDER #3 SERVED BY SMOG HOG MODEL SH20 E.P. AND A THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17.
- Conditions 9, 10, 11, 12 and 13 on the existing permit to operate have been revised to include the updated Section 9 rule references.

E. District Rule 4101 – Visible Emissions

District Rule 4101 was approved by EPA on August 11, 2005 to replace SIP approved Rule 401 (all counties of the SJVUAPCD).

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than the smoke described in Section 5.1 of Rule 4101.

The following permit requirement, which is based on this rule, has been revised as follows:

- a. C-36-0-2 – Facilitywide Requirements
- Condition 22 on the existing permit to operate has been revised to remove the outdated County Rule 401 from the citation section.

b. C-36-23-3 – POLYSTYRENE FOAM PRODUCT STORAGE WAREHOUSE (28,480 SQ FT).

- Condition 2 on the existing permit to operate has been removed because the condition is already on the facilitywide requirements permit unit.

F. District Rule 4623 – Storage of Organic Liquids

District Rule 4623 was approved by EPA on September 13, 2005 to become part of the District's SIP.

This rule applies to the storage of any organic liquid in a tank or container with a capacity of 1,100 gallons or greater. However, section 4.1.1 exempts pressure vessels from the requirements of this rule. A pressure vessel is defined as a tank, reservoir, or container that is capable of maintaining working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. The exemption is not dependent upon the True Vapor Pressure (TVP) of the organic liquid stored.

The following permit requirement, which is based on this rule, has been revised as follows:

C-36-0-2 – Facilitywide Requirements

- Condition 43 on the existing permit to operate has been revised to remove the outdated reference to organic liquid TVP. The rule citation has been revised from section 4.1 to section 4.1.1.

G. District Rule 4601 – Architectural Coatings

The purpose of this rule is to limit VOC emissions from architectural coatings.

The provisions of this rule apply to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.

The SIP version of the rule was last amended on October 31, 2001. The current version of the rule was amended on December 17, 2009 but has not yet been approved into the SIP.

The following analysis shows that the proposed requirements of the current non-SIP version of District Rule 4601 are as stringent as, or more stringent than the requirements of the existing SIP version. Streamlining procedures, as documented in the following steps are utilized to substitute the set of requirements in the current non-SIP version of the rule for the otherwise applicable requirements in the SIP version of the rule.

As analyzed, each amended section of the non-SIP version of the rule is at least as stringent as, or more stringent than the corresponding section of the SIP version of the rule. Therefore, it is concluded that, overall, the non-SIP version of the rule is more stringent than the SIP version of the rule.

Stringency Comparison of District Rule 4601 Non-SIP Version (12/17/09) to Current SIP Version (10/31/01)

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
2.0 Applicability	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures any architectural coating for use within the District.	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.	No change in the applicability, therefore, non-SIP version of rule is as stringent as SIP version.
4.0 Exemptions	<p>The provisions of this rule shall not apply to:</p> <p>4.1 Any architectural coating that is sold or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.2 Any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less.</p> <p>4.3 Any aerosol coating product.</p>	<p>4.1 The provisions of this rule shall not apply to:</p> <p>4.1.1 Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.1.2 Any aerosol coating product.</p> <p>4.2 With the exception of Section 6.2, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less.</p>	The only change is to require reporting requirements as discussed in Section 6.2 of the non-SIP approved version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
5.0 Requirements	<p>Note: Section 5.0 requirements refer to Table of Standards, Table of Standards 1, and Table of Standards 2. These tables are included as Attachment D.</p>		<p>Sections 5.8 and 8.0 of the SIP version are not included in the non-SIP version. As discussed in corresponding sections the non-SIP version is more stringent. The Table of Standards and Table of Standards 1 have the same VOC limits. Table of Standard 2 is more stringent as discussed below. Therefore, the non-SIP version of the rule is</p>
	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2, 5.3, 5.8 and 8.0, no person shall;</p> <p>5.1.1 manufacture, blend, or repackage for sale within the District;</p> <p>5.1.2 supply, sell, or offer for sale within the district;</p> <p>5.1.3 Solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards, after the specified effective date in the Table of</p>	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, or offer for sale within the District; or solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 or the Table of Standards 2, after the specified effective date in the Table of Standards 1 or the Table of Standards 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Standards.</p> <p>5.2 Most Restrictive VOC Limit: If anywhere on the container of any architectural coating, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed in the Table of Standards, then the most restrictive VOC content limit shall apply. This provision does not apply to the following coating categories:</p> <ul style="list-style-type: none"> 5.2.1 Lacquer coatings (including lacquer sanding sealers) 5.2.2 Metallic pigmented coatings 5.2.3 Shellacs 5.2.4 Fire-retardant coatings 5.2.5 Pretreatment wash primers 5.2.6 Industrial maintenance coatings 5.2.7 Low-solids coatings 5.2.8 Wood preservatives 5.2.9 High temperature coatings 5.2.10 Temperature-indicator safety coatings 5.2.11 Antenna coatings 5.2.12 Antifouling coatings 5.2.13 Flow coatings 5.2.14 Bituminous roof primers 5.2.15 Specialty primers, sealers and undercoaters 	<p>recommendation, excluding any colorant added to tint bases.</p> <p>5.2 Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in the Table of Standards 1 or the Table of Standards 2, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in the Table of Standards 1 or the Table of Standards 2.</p> <p>5.2.1 Effective until December 31, 2010, with the exception of the specialty coating categories specified in Section 5.2.3.1 through 5.2.3.15, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 1, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.2 Effective on and after January 1, 2011, with the exception of the specialty coating categories specified in Sections 5.2.3.2, 5.2.3.3, 5.2.3.5 through 5.2.3.9, and 5.2.3.14 through 5.2.3.18, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 2, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.3 This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p> <ul style="list-style-type: none"> 5.2.3.1 Lacquer coatings (including lacquer sanding sealers) 5.2.3.2 Metallic pigmented coatings 5.2.3.3 Shellacs 5.2.3.4 Fire-retardant coatings 5.2.3.5 Pretreatment wash primers 5.2.3.6 Industrial maintenance coatings 5.2.3.7 Low-solids coatings 5.2.3.8 Wood preservatives 5.2.3.9 High temperature coatings 5.2.3.10 Temperature-indicator 	<p>more stringent than the SIP version of the rule.</p> <p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		safety coatings 5.2.3.11 Antenna coatings 5.2.3.12 Antifouling coatings 5.2.3.13 Flow coatings 5.2.3.14 Bituminous roof primers 5.2.3.15 Specialty primers, sealers and undercoaters 5.2.3.16 Aluminum roof coatings 5.2.3.17 Zinc-rich primers 5.2.3.18 Wood Coatings	
	<p>5.3 Sell-Through of Coatings:</p> <p>5.3.1 A coating manufactured prior to the January 1, 2003 or January 1, 2004 effective date specified for that coating in the Table of Standards may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.</p> <p>5.3.2 A coating included in an approved Averaging Program that does not comply with the specified limit in the Table of Standards may be sold, supplied, or offered for sale for up to three years after the end of the compliance period specified in the approved Averaging Program. In addition, such a coating may be applied at any time, both during and after the compliance period. This Section 5.3.2 does not apply to any coating that does not display on the container either the statement: "This product is subject to architectural coatings averaging provisions in California" or a substitute symbol specified by the Executive Officer of the California Air Resources Board (ARB). This Section 5.3.2 shall remain in effect until January 1, 2008.</p>	<p>5.3 Sell-Through of Coatings:</p> <p>A coating manufactured prior to the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2 may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Section 5.3.2 was removed it is no longer applicable in the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be</p>	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be</p>	<p>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC containing materials used for thinning and cleanup shall also be closed when not in use.	closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.	
	5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards.	5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.	The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
	5.6 Rust Preventative Coatings: Effective January 1, 2004, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards.	5.6 Rust Preventative Coatings: Effective through December 31, 2010, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards 1.	The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
	5.7 Coatings Not Listed in the Table of Standards: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards, the VOC content limit shall be determined by classifying the coating as a flat coating or a nonflat coating, based on its gloss, as defined in Sections 3.21, 3.36 and 3.37 and the corresponding flat or nonflat VOC limit shall apply.	5.7 Coatings Not Listed in the Table of Standards 1 or the Table of Standards 2: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards 1 or the Table of Standards 2, the VOC content limit shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat – High Gloss coating, based on its gloss, and the corresponding Flat, Nonflat, or Nonflat – High Gloss VOC limit in the Table of Standards 1 or the Table of Standards 2 shall apply.	The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
	5.8 Lacquers: Notwithstanding the provisions of Section 3.1, a person or facility may add up to 10 percent by volume of VOC to a lacquer to avoid blushing of the finish during days with relative humidity greater than 70 percent and temperature below 65°F, at the time of application, provided that the coating contains acetone and no more than 550 grams of VOC per liter of coating, less water and exempt compounds, prior to the addition of VOC.	---	This section has been removed. The operation is required to meet the lacquer VOC limit regardless of temperature and humidity. Therefore, non-SIP version of rule is as stringent as SIP version
	5.9 Averaging Compliance Option: On or after January 1, 2003, in lieu of compliance with the specified limits in The Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; bituminous roof coatings; rust preventative	---	This section is removed from the non-SIP version, it is no longer applicable. Therefore, non-SIP version of rule is as stringent as SIP version.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in Section 8.0, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section 5.9 and Section 8.0 shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.</p>		
---		<p>5.8 Prior to January 1, 2011, any coating that meets a definition in Section 3.0 for a coating category listed in the Table of Standards 2 and complies with the applicable VOC limit in the Table of Standards 2 and with Sections 5.2 and 6.1 (including those provision of Section 6.1 otherwise effective on January 1, 2011) shall be considered in compliance with this rule.</p>	<p>Table of Standards 2 is more stringent than the VOC limits of Table of Standards in the SIP-Approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</p>
Table of Standards (See Attachment D for Table)		<p>Table of Standards 1 (Effective through 12/31/10) (See Attachment D for Table)</p>	<p>The non-SIP rule requirements are the same as the Table of Standards in the SIP approved rule, except Table of Standards 1 expires at which time Table of Standards 2 is in effect. As discussed below these standards are more stringent. Therefore, non-SIP version of rule is as stringent as SIP version.</p>
		<p>Table of Standards 2 (Effective on and after 1/1/11) (See Attachment D for Table)</p>	<p>The requirements of Table of Standards 2 are more stringent than the Table of Standards in the SIP rule. Therefore, non-SIP version of rule is as stringent as SIP version.</p>
<p>6.0 Administrative Requirements</p>	<p>6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 6.1.1 through 6.1.9 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code</p>	<p>6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections 6.1.1 through 6.1.14 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be</p>	<p>The non-SIP approved rule contains sections listed in the SIP rule plus additional requirements not found in the SIP version. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display either the maximum or actual VOC content of the coating, as supplied, including the maximum thinning as recommended by the manufacturer. VOC content shall be displayed in grams of VOC per liter of coating. VOC content displayed shall be calculated using product formulation data, or shall be determined using the test methods in Section</p> <p>6.3.1. The equations in Sections 3.25 or 3.26, as appropriate, shall be used to calculate VOC content.</p> <p>6.1.4 Industrial Maintenance Coatings: In addition to the information specified in Sections 6.1.1, 6.1.2 and 6.1.3, each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.4.1 through 6.1.4.3.</p> <p>6.1.4.1 "For industrial use only"</p> <p>6.1.4.2 "For professional use only"</p> <p>6.1.4.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.5 Clear Brushing Lacquers: Effective January 1, 2003, the labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed."</p> <p>6.1.6 Rust Preventative Coatings: Effective January 1, 2003, the labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only"</p>	<p>indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p> <p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p> <p>6.1.3.2 VOC Content, as determined from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.1.4 Faux Finishing Coatings: Effective January 1, 2011, the labels of all clear topcoat Faux Finishing coatings shall prominently display the statement "This product can only be sold or used as part of a Faux Finishing coating system".</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.1.7 Specialty Primers, Sealers and Undercoaters: Effective January 1, 2003, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section</p> <p>6.1.7.1 through 6.1.7.5.</p> <p>6.1.7.1 For blocking stains.</p> <p>6.1.7.2 For fire-damaged substrates.</p> <p>6.1.7.3 For smoke-damaged substrates.</p> <p>6.1.7.4 For water-damaged substrates.</p> <p>6.1.7.5 For excessively chalky substrates.</p> <p>6.1.8 Quick Dry Enamels: Effective January 1, 2003, the labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time.</p> <p>6.1.9 Non-flat – High Gloss Coatings: Effective January 1, 2003, the labels of all non-flat – high gloss coatings shall prominently display the words "High Gloss".</p>	<p>the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</p> <p>6.1.5.1 "For industrial use only"</p> <p>6.1.5.2 "For professional use only"</p> <p>6.1.5.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.6 Clear Brushing Lacquers: The labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed." (Category deleted effective January 1, 2011.)</p> <p>6.1.7 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only".</p> <p>6.1.8 Specialty Primers, Sealers and Undercoaters: Effective until December 31, 2010, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section 6.1.8.1 through 6.1.8.5. Effective on and after January 1, 2011, the labels of all specialty primers, sealers, and undercoaters shall prominently display one or more of the descriptions listed in Sections 6.1.8.1 through 6.1.8.3. On and after January 1, 2011, Sections 6.1.8.4 and 6.1.8.5 will be no longer effective.</p> <p>6.1.8.1 For fire-damaged substrates.</p> <p>6.1.8.2 For smoke-damaged substrates.</p> <p>6.1.8.3 For water-damaged substrates.</p> <p>6.1.8.4 For excessively chalky substrates.</p> <p>6.1.8.5 For blocking stains.</p> <p>6.1.9 Quick Dry Enamels: The labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time. (Category deleted effective January 1, 2011.)</p> <p>6.1.10 Reactive Penetrating Sealers: Effective January 1, 2011, the labels of all Reactive Penetrating Sealers shall prominently display the statement "Reactive Penetrating Sealer."</p> <p>6.1.11 Stone Consolidants: Effective January 1, 2011, the labels of all Stone Consolidants shall prominently display the statement "Stone Consolidant - For</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>Professional Use Only.”</p> <p>6.1.12 Nonflat– High Gloss Coatings: The labels of all Nonflat – high gloss coatings shall prominently display the words “High Gloss.”</p> <p>6.1.13 Wood Coatings: Effective January 1, 2011, the labels of all Wood Coatings shall prominently display the statement “For Wood Substrates Only.”</p> <p>6.1.14 Zinc Rich Primers: Effective January 1, 2011, the labels of all Zinc Rich Primers shall prominently display one or more of the following descriptions listed in Section 6.1.14.1 through 6.1.14.3.</p> <p>6.1.14.1 “For industrial use only”</p> <p>6.1.14.2 “For professional use only”</p> <p>6.1.14.3 “Not for residential use” or “Not intended for residential use”</p>	
	<p>6.2 Reporting Requirements</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used</p>	<p>6.2 Reporting Requirements</p> <p>The reporting requirements specified in Sections 6.2.1 through 6.2.6 shall apply until December 31, 2010.</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of</p>	<p>Until December 31, 2010 both versions of the rule have the same reporting requirements. After that date the non-SIP approved rule includes very specific information to be kept and is required for all architectural coatings. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p> <p>6.2.4.2 the product category listed in the Table of Standards to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p>	<p>specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p> <p>6.2.4.2 the product category listed in the Table of Standards 1 or the Table of Standards 2 to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>calendar year, and shall describe the method used by the manufacturer to calculate state sales.</p> <p>6.2.7 Effective on and after January 1, 2011, Sales Data: All sales data listed in Sections 6.2.7.1 to 6.2.7.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of the ARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17, California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.7.1 through 6.2.7.14:</p> <p>6.2.7.1 the name and mailing address of the manufacturer;</p> <p>6.2.7.2 the name, address and telephone number of a contact person;</p> <p>6.2.7.3 the name of the coating product as it appears on the label and the applicable coating category;</p> <p>6.2.7.4 whether the product is marketed for interior or exterior use or both;</p> <p>6.2.7.5 the number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart);</p> <p>6.2.7.6 the VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</p> <p>6.2.7.7 the names and CAS</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>numbers of the VOC constituents in the product;</p> <p>6.2.7.8 the names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</p> <p>6.2.7.9 whether the product is marketed as solvent-borne, waterborne, or 100% solids;</p> <p>6.2.7.10 description of resin or binder in the product;</p> <p>6.2.7.11 whether the coating is a single-component or multi-component product;</p> <p>6.2.7.12 the density of the product in pounds per gallon;</p> <p>6.2.7.13 the percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and</p> <p>6.2.7.14 the percent by volume of: solids, water, and any compounds in the product specifically exempted from the VOC definition.</p>	
	<p>6.3 Test Methods</p> <p>6.3.1 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.26 and 3.27, the reference method for VOC content is U.S. EPA Method 24, except as provided in Sections 6.3.2 and 6.3.15. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996), incorporated by reference in Section 6.3.14. The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised August 1996), incorporated by reference in Section 6.3.12. To determine the VOC content of a coating, the manufacturer may use U.S. EPA Method 24, or an alternative method as provided in Section 6.3.2, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of a Method 24 test and any other means for</p>	<p>6.3 Test Methods</p> <p>The test methods listed below shall be used to demonstrate compliance with this rule. Alternate equivalent test methods may be used provided the test methods have been approved by the APCO and EPA.</p> <p>6.3.1 Calculation of VOC Content: For the purpose of determining compliance with the VOC content limits in the Table of Standards 1 or the Table of Standards 2, the VOC content of a coating shall be determined as defined in Section 3.77, 3.78, or 3.79 as appropriate. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. If the manufacturer recommends thinning, the VOC Content must be calculated including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multi-component product, the VOC content must be calculated as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that</p>	<p>The non-SIP version includes all the requirements of the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>determining VOC content, the Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.2. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct a Method 24 analysis.</p> <p>6.3.2 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.1, after review and approved in writing by the staffs of the District, the ARB and the U.S. EPA, may also be used.</p> <p>6.3.3 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of U.S. EPA Method 24 (40 CFR 59, subpart D, Appendix A), incorporated by reference in Section 6.3.15. This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.4 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM Designation E 84-99, "Standard Test Method for Surface Burning Characteristics of Building Materials"(see Section 3, Fire-Retardant Coating).</p> <p>6.3.5 Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM Designation E 119-98, "Standard Test Methods for Fire Tests of Building Construction Materials"(see Section 3, Fire-Resistive Coating).</p> <p>6.3.6 Gloss Determination: The gloss of a coating shall be determined by ASTM Designation D 523-89 (1999), "Standard Test Method for Specular Gloss"(see Section 3, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.7 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction,</p>	<p>generate ethanol or other VOC during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.3.2 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.77 and 3.79, the reference method for VOC content is EPA Method 24, except as provided in Sections 6.3.3 and 6.3.16. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996). The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised 1993), BAAQMD Method 43 (Revised 1996), or BAAQMD Method 41 (Revised 1995), as applicable. To determine the VOC content of a coating, the manufacturer may use EPA Method 24, or an alternative method as provided in Section 6.3.3, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of EPA Method 24 test and any other means for determining VOC content, the EPA Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.3. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct an EPA Method 24 analysis.</p> <p>6.3.3 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.2, after review and approved in writing by the staffs of the District, ARB and EPA, may also be used.</p> <p>6.3.4 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of EPA Method 24 (40 CFR 59, subpart D, Appendix A). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p><i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3, Metallic Pigmented Coating).</p> <p>6.3.8 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM Designation D 1613-96, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products"(see Section 3, Pre-Treatment Wash Primer).</p> <p>6.3.9 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM Designation D 1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quickdry enamel coating shall be determined by the Mechanical Test Method of ASTM Designation D 1640-95.</p> <p>6.3.10 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM Designation D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specialty Primer, Sealer and Undercoater).</p> <p>6.3.11 Exempt Compounds— Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.12 Exempt Compounds— Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related</p>	<p>6.3.5 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM E84-07, "Standard Test Method for Surface Burning Characteristics of Building Materials" (see Section 3.0, Fire-Retardant Coating).</p> <p>6.3.6 Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM E119-07, "Standard Test Methods for Fire Tests of Building Construction Materials" (see Section 3.0, Fire-Resistive Coating).</p> <p>6.3.7 Gloss Determination: The gloss of a coating shall be determined by ASTM D523-89 (1999), "Standard Test Method for Specular Gloss" (see Section 3.0, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.8 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Metallic Pigmented Coating, Aluminum Roof Coating and Faux Finish).</p> <p>6.3.9 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM D1613-06, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products" (see Section 3.0, Pre-Treatment Wash Primer).</p> <p>6.3.10 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM D1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3.0, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quick-dry enamel coating shall be determined by the Mechanical Test Method of ASTM D1640-95. (Category deleted effective January 1, 2011.)</p> <p>6.3.11 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.13 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1996), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.14 VOC Content of Coatings: The VOC content of a coating shall be determined by U.S. EPA Method 24 as it exists in appendix A of 40 <i>Code of Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings"(see Section 6.3.1).</p> <p>6.3.15 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 6.3.1).</p> <p>6.3.16 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998) (see Section 6.3.3).</p>	<p>3, Specialty Primer, Sealer and Undercoater). (Category deleted effective January 1, 2011.)</p> <p>6.3.12 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.13 Exempt Compounds—Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.14 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1993), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.15 VOC Content of Coatings: The VOC content of a coating shall be determined by EPA Method 24 as it exists in appendix A of 40 <i>Code of Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.2).</p> <p>6.3.16 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory</i></p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p><i>Methods of Analysis for Enforcement Samples.</i></p> <p>6.3.17 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998).</p> <p>6.3.18 Hydrostatic Pressure for Basement Specialty Coatings: The hydrostatic pressure resistance for basement specialty coatings shall be analyzed using ASTM D7088-04, "Standard Practice for Resistance to Hydrostatic Pressure for Coatings Used in Below Grade Applications Applied to Masonry".</p> <p>6.3.19 Tub and Tile Refinish Coating Adhesion: The adhesion of tub and tile coating shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D3359-02, "Standard Test Methods for Measuring Adhesion by Tape Test".</p> <p>6.3.20 Tub and Tile Refinish Coating Hardness: The hardness of tub and tile refinish coating shall be determined by ASTM D3363-05, "Standard Test Method for Film Hardness by Pencil Test".</p> <p>6.3.21 Tub and Tile Refinish Coating Abrasion Resistance: Abrasion resistance of tub and tile refinish coating shall be analyzed by ASTM D4060-07, "Standard Test Methods for Abrasion Resistance of Organic Coatings by the Taber Abraser".</p> <p>6.3.22 Tub and Tile Refinish Coating Water Resistance: Water resistance of tub and tile refinish coatings shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D714-02e1, "Standard Test Method for Evaluating Degree of Blistering of Paints".</p> <p>6.3.23 Waterproofing Membrane: Waterproofing membrane shall be tested by ASTM C836-06, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>Wearing Course".</p> <p>6.3.24 Mold and Mildew Growth for Basement Specialty Coatings: Mold and mildew growth resistance for basement specialty coatings shall be determined by ASTM D3273-00, "Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an Environmental Chamber" and ASTM D3274-95, "Standard Test Method for Evaluating Degree of Surface Disfigurement of Paint Films by Microbial (Fungal or Algal) Growth or Soil and Dirt Accumulation".</p> <p>6.3.25 Reactive Penetrating Sealer Water Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67-07, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97-02, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-06, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units".</p> <p>6.3.26 Reactive Penetrating Sealer Water Vapor Transmission: Reactive penetrating sealer water vapor transmission shall be analyzed ASTM E96/E96M-05, "Standard Test Method for Water Vapor Transmission of Materials".</p> <p>6.3.27 Reactive Penetrating Sealer - Chloride Screening Applications: Reactive penetrating sealers shall be analyzed by National Cooperative Highway Research Report 244 (1981), "Concrete Sealers for the Protection of Bridge Structures".</p> <p>6.3.28 Stone Consolidants: Stone consolidants shall be tested using ASTM E2167-01, "Standard Guide for Selection and Use of Stone Consolidants".</p>	
7.0 Compliance Schedule	Persons subject to this rule shall be in compliance with this rule by October 31, 2001.	Persons subject to this rule shall be in compliance with this rule by the dates specified within the rule.	No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.
8.0 Averaging Compliance Option	8.1 On or after January 1, 2003, in lieu of compliance with the specified limits in the Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; rust		No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in this Section, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.</p> <p>Per Section 8.1, averaging is no longer applicable. Therefore, Sections 8.2 through 8.14 are not listed.</p>		

The following permit requirements were removed and/or revised to ensure compliance with this rule:

C-36-0-2 – Facilitywide Requirements

- Conditions 23 and 26 on the existing permit to operate have been deleted.
- Conditions 24, 25 and 27 on the existing permit to operate (conditions 23, 24 and 25 on the renewed permit) have been edited to reflect the requirements and correct section citations of the updated rule.

H. District Rule 4662 – Organic Solvent Degreasing Operations

The most recent version of District Rule 4662 was approved by EPA on JULY 30, 2009 to become part of the District's SIP.

The purpose of this rule is to limit VOC emissions from organic solvent degreasing operations. The rule includes general operating and control equipment requirements for cold cleaners, open-top vapor degreasers, and conveyORIZED solvent degreasers.

The following permit requirement was revised as shown to ensure compliance with this rule:

C-36-0-2 – Facilitywide Requirements

- Condition 45 on the existing permit to operate (condition 41 on the proposed renewed permit to operate) was revised to remove reference to the outdated rule amendment date in the condition text.

I. District Rule 4682 – Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing

The purpose of this rule is to limit emissions of VOC and trichlorofluoromethane (CFC-11) and dichlorofluoromethane (CFC-12) from manufacturing and processing of products composed of polystyrene, polyethylene, or polypropylene and from the storage of VOC blowing agents.

The provisions of this rule apply to any manufacturing, processing, and storage of products composed of polystyrene, polyethylene, or polypropylene.

The SIP version of the rule was last amended in June 1994. The current version of the rule was amended in September 2007, but has not yet been approved into the SIP.

The following analysis shows that the proposed requirements of the current non-SIP version of District Rule 4682 (amended September 20, 2007), are as stringent as, or more stringent than the requirements of the existing SIP version (amended June 16, 1994), pertaining to VOC emissions. Streamlining procedures, as documented in the following steps are utilized to substitute the set of requirements in the current non-SIP version of the rule for the otherwise applicable requirements in the SIP version of the rule.

Side-by-side Comparison of Applicable Requirements:

Type of Requirement	SIP Version of Rule 4682 (6/16/94)	Non-SIP Version of Rule 4682 (9/20/07)	Conclusion
Emissions Limit/VOC Control – until September 20, 2010	Section 5.1.1 - exclusive use of blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12); OR 5.1.2 - use of collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC	Section 5.1.1 - exclusive use of blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12); OR 5.1.2 - use of collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC	The non-SIP version of Rule 4682 (9/20/07) is as stringent as the SIP version (6/16/94), since the section by section emission limits/VOC control requirements are identical.

Type of Requirement	SIP Version of Rule 4682 (6/16/94)	Non-SIP Version of Rule 4682 (9/20/07)	Conclusion
	emissions by at least 95 percent by weight; OR 5.1.3 - VOC emissions controlled by a method which achieves an emission reduction equivalent to Section 5.1.2 and which does not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12).	emissions by at least 95 percent by weight; OR 5.1.3 - VOC emissions controlled by a method which achieves an emission reduction equivalent to Section 5.1.2 and which does not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12).	
Emissions Limit/VOC Control – after September 20, 2010	Section 5.1.1 - exclusive use of blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12); OR 5.1.2 - use of collection system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95 percent by weight; OR 5.1.3 - VOC emissions controlled by a method which achieves an emission reduction equivalent to Section 5.1.2 and which does not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12)	Section 5.3.2 - exclusive use of blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12); OR 5.3.3 – use of an approved emission control system (with an emission capture system shall that collects at least 90 percent by weight of the emissions; and a control device that reduces emissions from the emission capture system by at least 95 percent, by weight.); manufacturing emissions vented to the approved emission control system; and emissions from the final manufactured product vented to the approved emission control system for at least 48 hours (if more than 800,000 pounds per calendar year of raw material is processed) or 24 hours (for all other operations); OR 5.3.4 - manufacturing emissions are no greater than the facility emissions which would occur under Section 5.3.3, and operations do not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12). OR 5.3.1 - total product emissions do not exceed 2.4 pounds of VOC per 100 pounds of total material processed, calculated over a monthly period. The total product emissions include emissions from the manufacturing operation, after controls, plus the residual blowing agent in the finished product.	When corresponding requirements are compared (sections 5.1:1 through 5.1.3 for the SIP version of the rule vs. sections 5.3.2 through 5.3.4 for the non-SIP version), the non-SIP version is more stringent because it includes a new requirement for the venting of emissions from the finished product into the control system, and also a requirement that the control system must be approved by the APCO. The new compliance option added to the non-SIP version of the rule, section 5.3.1, is less stringent than the existing compliance options. Assuming a typical raw material with 6% VOC, the new option represents an overall emission reduction of 60%; whereas the requirements in the SIP version of the rule would require at least 85% overall control (90% capture and 95% control).
Blowing agent storage	Section 5-2 - no person shall place, hold or store any VOC blowing agent in any stationary tank, reservoir or container having a capacity greater than 200 gallons unless the container is a pressure vessel is equipped with an emission control device or system with a vapor recovery/control efficiency of at least 95 percent by weight.	Section 5-2 - no person shall place, hold or store any VOC blowing agent in any stationary tank, reservoir or container having a capacity greater than 200 gallons unless the container is a pressure vessel is equipped with an emission control device or system with a vapor recovery/control efficiency of at least 95 percent by weight.	The non-SIP version of Rule 4682 (9/20/07) is as stringent as the SIP version (6/16/94), since the section by section emission limits/VOC control requirements are identical.

Type of Requirement	SIP Version of Rule 4682 (6/16/94)	Non-SIP Version of Rule 4682 (9/20/07)	Conclusion
Recordkeeping	<p>Section 6.1.1 - maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used; records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. Such records shall be retained for two years, and be made available upon request.</p> <p>6.1.2 – if using an emissions control system, maintain daily records of key system operating and maintenance procedures which will demonstrate continuous operation and compliance of the emission control device; key system operating parameters are those necessary to ensure compliance with VOC emission requirements such as temperature, pressures, and flowrates. Such records shall be retained for two years, and be made available upon request.</p>	<p>Section 6.1.1 - maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used; records shall be maintained with a minimum monthly totals, with the ability to calculate daily averages in any given month.</p> <p>6.1.2 – if using an emissions control system, maintain daily records of key system operating and maintenance procedures which will demonstrate continuous operation and compliance of the emission control device; Key system operating parameters are those necessary to ensure compliance with VOC emission requirements such as temperature, pressures, and flowrates.</p> <p>6.1.4 - the operator shall keep in the facility all records required to demonstrate compliance with the requirements of this rule for a minimum of five years; records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA; records shall be submitted to the APCO, ARB, or EPA upon request.</p> <p>6.1.3 - Operators complying with Section 5.3.1 shall maintain records necessary to show compliance with that section and shall, once every month, calculate the daily average VOC emissions, based on the records for the preceding monthly period, according to the approved VOC emission calculation formula.</p>	<p>The non-SIP version of Rule 4682 (9/20/07) is more stringent than the SIP version of the rule because it requires records to be retained for a longer period, and provides more specifics regarding the manner in which records must be made available and the agencies to which such records must be made available.</p>
Test Methods	<p>6.2.1 - The control efficiency of any air pollution control equipment shall be determined using EPA Methods 25 and 25A for measuring total gaseous organic concentrations at the inlet and outlet of the control device.</p>	<p>6.2.1 - The control efficiency of the emission control system shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates, and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device.</p> <p>6.2.2 - The capture efficiency of an emission capture control system shall be determined according to EPA's</p>	<p>The non-SIP version of Rule 4682 (9/20/07) is more stringent than the SIP version of the rule since it specifies test methods for three more parameters (flow rates, capture efficiency, and VOC blowing agent contained in polymeric materials) than the SIP version of the rule, which specifies test methods for only two parameters (control efficiency of the control equipment, and exempt</p>

Type of Requirement	SIP Version of Rule 4682 (6/16/94)	Non-SIP Version of Rule 4682 (9/20/07)	Conclusion
	6.2.2 - EPA Method 18 or ARB Test Method 422 for determination of exempt compounds and halogenated blowing agents.	<p>"Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable.</p> <p>6.2.3 - EPA Method 18 or ARB Test Method 422 for determination of exempt compounds and halogenated blowing agents.</p> <p>6.2.4 - The VOC blowing agent contained in polymeric materials shall be determined using South Coast Air Quality Management District (SCAQMD) Method 306 (Analysis of Pentanes in Expandable Styrene Polymers) or Bay Area Air Quality Management District (BAAQMD) Method 45 (Determination of Butanes and Pentanes in Polymeric Materials).</p>	compounds).

As demonstrated in the preceding analysis, the non-SIP version of the rule is as stringent as, or more stringent than the SIP version of the rule in all requirements except the new emission limit of 2.4 lb VOC per 100 lb of material processed that has been added to the non-SIP version of the rule as a compliance option.

This facility will not be using the new compliance option, but will continue to comply with the original requirement of 90% capture and 95% control. The facility's compliance option has been strengthened in the non-SIP version of the rule to include control of emissions from finished product.

By complying with the non-SIP version of the rule, therefore, the facility will be complying with more stringent requirements than those in the SIP version of the rule.

Section 5.1, which is effective until September 20, 2010, requires that no person shall operate controllable VOC emission sources at a polystyrene foam, polyethylene, or polypropylene manufacturing or processing operation unless: (5.1.1) a blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12) is exclusively used; or (5.1.2) a system designed to achieve at least 90 percent VOC capture efficiency, and a thermal oxidizer which abates captured VOC emissions by at least 95 percent by weight is used; or (5.1.3) VOC emissions are controlled by a method which achieves an emission reduction equivalent to Section 5.1.2

and which does not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12), and is approved by the APCO.

Section 5.2 requires that no person shall place, hold or store any VOC blowing agent in any stationary tank, reservoir or container having a capacity greater than 200 gallons unless: (5.2.1) the container is a pressure vessel maintaining a working pressure at all times sufficient to prevent release of VOC emissions to the atmosphere under normal operating conditions; or (5.2.2) the container is equipped with an emission control device or system which collects and disposes of VOC emissions, and which achieves and maintains a vapor recovery/control efficiency of at least 95 percent by weight.

Section 5.3, which takes effect on September 20, 2010, requires that the operator shall not conduct any manufacturing operations unless: (5.3.1) the operator demonstrates, to the satisfaction of the APCO, that the total product emissions, including emissions from the manufacturing operation, after controls, plus the residual blowing agent in the finished product, do not exceed 2.4 pounds of VOC per 100 pounds of total material processed, calculated over a monthly period; or (5.3.2) a blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorofluoromethane (CFC-12) is exclusively used; or (5.3.3) an approved emission control system is installed and operated with manufacturing emissions vented only to the approved emission control system; and emissions from the final manufactured product vented only to the approved emission control system for at least 48 hours in the case of expandable polystyrene molding operations that process more than 800,000 pounds per calendar year of raw material or 24 hours in the case of all other manufacturing operations; or (5.3.4) the operator demonstrates to the satisfaction of the APCO that the manufacturing emissions are no greater than the facility emissions which would occur under section 5.3.3, and which does not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12).

Section 5.3.5 states that a control system in which: (5.3.5.1) the beads used in manufacturing have an annual-average VOC content of less than 4.2% per weight; and (5.3.5.2) the manufacturing emissions (not including finished product storage emissions) are controlled with an overall capture and control efficiency of at least 93% by weight shall be deemed as meeting the requirements of Section 5.3.4.

Section 5.4 states that operators subject to the provisions of section 5.3.1, who exceed the limit based on the monthly calculation, shall be considered to have been in violation for each day of that monthly period.

Section 5.5 provides the formula for calculating facility emissions that would occur under section 5.3.3.

Section 5.6 requires operators complying with section 5.3.1, 5.3.4, or 5.3.5 to submit to the APCO a compliance plan which includes all necessary information to show the proposed method of compliance with the applicable section no later than March 20, 2009.

Section 6.1.1 requires any person subject to the provisions of this rule, including exempt facilities, to maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used. Records shall be maintained with a minimum of monthly totals, with the ability to calculate daily averages in any given month.

Section 6.1.2 requires any person using an emissions control system as a means of complying with this rule to maintain daily records of key system operating and maintenance procedures which will demonstrate continuous operation and compliance of the emission control device. Key system operating parameters are those necessary to ensure compliance with VOC emission requirements such as temperature, pressures, and flow rates.

Section 6.1.3 requires operators complying with Section 5.3.1 to maintain records necessary to show compliance with that section and to, once every month, calculate the daily average VOC emissions, based on the records for the preceding monthly period, according to the approved VOC emission calculation formula.

Section 6.1.4 requires the operator to keep in the facility all records required to demonstrate compliance with the requirements of this rule for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA. The records shall be submitted to the APCO, ARB, or EPA upon request.

Section 6.2.1 through 6.2.4 specifies that test methods which shall be used for determining the control efficiency of the emission control system, the capture efficiency of an emission capture control system, exempt compounds and halogenated blowing agents, and the VOC blowing agent contained in polymeric materials.

Section 6.2.5 states that when more than one test method or set of test methods is specified for any testing, a violation of any requirement of this rule established by any one of the specified test methods or set of test methods shall constitute a violation of this rule.

The following permit requirements were addressed as shown to ensure compliance with this rule:

a. C-36-0-2 – Facilitywide Requirements

- Condition 39 on the existing permit to operate (condition 37 on the proposed renewed permit to operate) was revised to remove reference to the outdated rule amendment date in the condition text.
- Condition 43 on the existing permit to operate (condition 39 on the proposed renewed permit to operate) ensures compliance with the requirements of section 5.2. This condition was not revised.

b. C-36-2-5 – POLYSTYRENE FOAM EXTRUSION LINE #1, INCLUDING: #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE 1.5 MMBTU/HR CE MODEL 13.6 ROCC98 COMBU-CHANGER REGENERATIVE THERMAL OXIDIZER.

- Conditions 4 and 5 on the existing permit to operate have been revised to indicate that the emission capture system must collect at least 90% of emissions by weight. Condition 5 has been revised to indicate that effective September 20, 2010, emissions from the final manufactured product must be vented to the thermal oxidizer for at least 48 hours. These conditions, in conjunction with condition 15, ensure compliance with sections 5.1 and 5.3 of the rule. Appropriate rule sections have been added to the citation.
- Condition 15 on the existing permit to operate has been revised to indicate that the thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent, by weight. This condition, in conjunction with conditions 4 and 5, ensure compliance with sections 5.1 and 5.3 of the rule. The appropriate rule sections have been added to the citation. In addition, partial control efficiency test methods previously included in this condition were removed and included in a new separate condition 25.
- Condition 18 on the existing permit to operate has been revised to reflect updated record keeping language of section 6.1.1. This condition ensures compliance with section 6.1.1 of the rule. The clause requiring records to be retained and provided to the District upon request has been removed from this condition and included in a new condition 26.

- Condition 22 on the existing permit to operate has been revised to remove District Rule 4682 from the citation because the requirements stated in this condition are not based on District Rule 4682.
 - Condition 23 on the existing permit to operate has been revised to remove the outdated rule amendment year referenced in the condition text.
 - A new condition 24 has been added to the proposed renewed permit to operate. This condition, which requires the facility to maintain daily records of key system operating and maintenance procedures for the emission control system, ensures compliance with section 6.1.2 of the rule.
 - A new condition 25 has been added to the proposed renewed permit to operate. The new condition specifies the source testing methods pursuant to section 6.2.1 of the rule.
 - A new condition 26 has been added to the proposed renewed permit to operate. The new condition requires the operator to retain records on-site for at least five years and provide them to the EPA, ARB and the District upon request. The new condition ensures compliance with section 6.1.4 of the rule.
- c. C-36-3-6 – POLYSTYRENE FOAM EXTRUSION LINE #2 CONSISTING OF #EX-20 PRIMARY EXTRUDER, #EX-21 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-11 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
- d. C-36-21-2 – POLYSTYRENE EXTRUSION LINE #4 CONSISTING OF #EX-40 PRIMARY EXTRUDER, #EX-41 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-40 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
- Condition 6 on the existing permit to operate for unit 3-6 and condition 7 on the existing permit to operate for unit 21-2 have been revised to indicate that the emission capture system must collect at least 90% of emissions by weight, the thermal oxidizer must reduce emissions from the emission capture system by at least 95 percent, and effective September 20, 2010, emissions from the final manufactured product must be vented to the thermal oxidizer for at least 48 hours. These

conditions ensure compliance with sections 5.1 and 5.3 of the rule. Appropriate rule sections have been added to the citations. For unit 21-2, the revised condition will be listed as condition 6 on the proposed renewed permit to operate.

- Condition 10 on the existing permit to operate has been revised to reflect updated record keeping language of section 6.1.1. This condition ensures compliance with section 6.1.1 of the rule. The clause requiring records to be retained and provided to the District upon request has been removed from this condition and included in a new condition 12.
- Condition 11 on the existing permit to operate has been revised to remove the outdated rule amendment year referenced in the condition text.
- A new condition 12 has been added to the proposed renewed permit to operate. The new condition requires the operator to retain records on-site for at least five years and provide them to the EPA, ARB and the District upon request. The new condition ensures compliance with section 6.1.4 of the rule.

d. C-36-4-5 – POLYSTYRENE FOAM EXTRUSION LINE #3 CONSISTING OF #EX 30 PRIMARY EXTRUDER, #EX-31 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM FEED PUMP #VB-12 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.

- Condition 5 on the existing permit to operate has been revised to indicate that the emission capture system must collect at least 90% of emissions by weight, the thermal oxidizer must reduce emissions from the emission capture system by at least 95 percent, and effective September 20, 2010, emissions from the final manufactured product must be vented to the thermal oxidizer for at least 48 hours. This condition ensures compliance with sections 5.1 and 5.3 of the rule. Appropriate rule sections have been added to the citation.
- Condition 6 on the existing permit to operate has been removed because the shutdown requirement for the shared thermal oxidizer is already enforced under permit unit C-36-3-6.
- Condition 8 on the existing permit to operate has been removed because it is a startup requirement that is no longer valid.

- Condition 12 on the existing permit to operate (condition 10 on the proposed renewed permit to operate) has been revised to reflect updated record keeping language of section 6.1.1. This condition ensures compliance with section 6.1.1 of the rule. The clause requiring records to be retained and provided to the District upon request has been removed from this condition and included in a new condition 12.
 - Condition 13 on the existing permit to operate (condition 11 on the renewed permit to operate) has been revised to remove the outdated rule amendment year referenced in the condition text.
 - A new condition 12 has been added to the proposed renewed permit to operate. The new condition requires the operator to retain records on-site for at least five years and provide them to the EPA, ARB and the District upon request. The new condition ensures compliance with section 6.1.4 of the rule.
- e. C-36-5-4 – #G-91 THERMOFORMER LINE CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING 6 FLUFF SILOS DESCRIBED IN C-36-18.
- f. C-36-6-4 – #G-92 THERMOFORMER LINE CONSISTING OF GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE FLUFF SILOS DESCRIBED IN C-36-18.
- g. C-36-7-5 – #G-93 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING (6) FLUFF SILOS DESCRIBED IN C-36-18.
- h. C-36-8-3 – #G-94 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.
- i. C-36-9-3 – #G-95 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.
- j. C-36-10-5 – #G-96 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.
- k. C-36-11-5 – #G-97 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN PERMIT C-36-18.

I. C-36-12-5 – #G-98 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.

- Condition 1 on the existing permit to operate has been revised to indicate that the emission capture system must collect at least 90% of emissions, by weight; and that the thermal oxidizer must reduce emissions from the emission capture system by at least 95 percent. This condition, in conjunction with condition 2, ensures compliance with the requirements of section 5.1 and 5.3.
- Condition 2 on the existing permit to operate has been revised to indicate that, effective September 20, 2010, emissions from the final manufactured product must be vented to an emission control system for at least 48 hours. This condition, in conjunction with condition 1, ensures compliance with the requirements of sections 5.1 and 5.3.
- Condition 5 on the existing permit to operate has been revised to separate the records retention clause. This condition ensures compliance with section 6.1.1. The records retention clause has been included as a new condition 7.
- Condition 6 on the existing permit to operate has been revised to remove the outdated rule amendment year referenced in the condition text.
- A new condition 7 has been added to the proposed renewed permit to operate. The new condition requires the operator to retain records on-site for at least five years and provide them to the EPA, ARB and the District upon request. The new condition ensures compliance with section 6.1.4 of the rule.

m. C-36-13-4 – #GR-90 BULK GRINDER WITH BLOWER, #GR-91 BULK GRINDER WITH BLOWER, AND #GR-92 SHEET GRINDER WITH BLOWER EACH FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

- Condition 1 on the existing permit to operate has been revised to indicate that the emission capture system must collect at least 90% of emissions by weight, the thermal oxidizer must reduce emissions from the emission capture system by at least 95 percent, and effective September 20, 2010, emissions from the final manufactured product must be vented to emission control system for at least 48 hours. This

condition ensures compliance with the requirements of sections 5.1 and 5.3.

- Condition 6 on the existing permit to operate has been revised to remove the outdated rule amendment year referenced in the condition text.
- A new condition 7 has been added to the proposed renewed permit to operate. This condition requires the maintenance of records of operation pursuant to section 6.1.1 of the rule.
- A new condition 8 has been added to the proposed renewed permit to operate. This condition ensures compliance with the records retention requirements pursuant to section 6.1.4 of the rule.

n. C-36-14-4 – #EX-40 RECLAIM EXTRUDER #1 VENTED TO A SMOG HOG MODEL 20 PE E.P. (SHARED WITH C-36-19) AND A THERMAL OXIDIZER SYSTEM (DESCRIBED IN C-36-2), AND FEEDING SIX RECLAIM SILOS DESCRIBED IN C-36-17.

- Condition 2 on the existing permit to operate has been revised to indicate that the emission capture system must collect at least 90% of emissions by weight, the thermal oxidizer must reduce emissions from the emission capture system by at least 95 percent, and effective September 20, 2010, emissions from the final manufactured product must be vented to an emission control system for at least 48 hours. This condition ensures compliance with the requirements of sections 5.1 and 5.3.
- Condition 5 on the existing permit to operate has been removed because it is subsumed by the revised condition 2.
- Condition 9 on the existing permit to operate (condition 8 on the proposed renewed permit to operate) has been revised to reflect updated record keeping language of section 6.1.1. This condition ensures compliance with section 6.1.1 of the rule. The clause requiring records to be retained and provided to the District upon request has been removed from this condition and included in a new condition 14.
- Condition 14 on the existing permit to operate (condition 13 on the proposed renewed permit to operate) has been revised to remove the outdated rule amendment year referenced in the condition text.

- A new condition 14 has been added to the proposed renewed permit to operate. The new condition requires the operator to retain records on-site for at least five years and provide them to the EPA, ARB and the District upon request. The new condition ensures compliance with section 6.1.4 of the rule.
- o. C-36-18-3 – (6) FLUFF SILOS, 12' DIA. X 30' H, EACH VENTED TO THE TORIT FILTER AND THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2. EACH SILO RECEIVES SHREDDED POLYSTYRENE FOAM FROM GRINDERS.
- Condition 2 on the existing permit to operate has been revised to indicate that the emission capture system must collect at least 90% of emissions by weight, the thermal oxidizer must reduce emissions from the emission capture system by at least 95 percent, and effective September 20, 2010, emissions from the final manufactured product must be vented to emission control system for at least 48 hours. This condition ensures compliance with the requirements of sections 5.1 and 5.3.
 - Condition 3 on the existing permit to operate has been removed because it is subsumed by the revised condition 2.
 - Condition 7 on the existing permit to operate (condition 6 on the proposed renewed permit to operate) has been revised to reflect updated record keeping language of section 6.1.1. This condition ensures compliance with section 6.1.1 of the rule. The clause requiring records to be retained and provided to the District upon request has been removed from this condition and included in a new condition 13.
 - Condition 13 on the existing permit to operate (condition 12 on the proposed renewed permit to operate) has been revised to remove the outdated rule amendment year referenced in the condition text.
 - A new condition 13 has been added to the proposed renewed permit to operate. The new condition requires the operator to retain records on-site for at least five years and provide them to the EPA, ARB and the District upon request. The new condition ensures compliance with section 6.1.4 of the rule.
- p. C-36-19-4 – #EX-50 RECLAIM EXTRUDER #2 VENTED TO SMOG HOG MODEL 20 PE E.P. (SHARED WITH C-36-14) AND A THERMAL

OXIDIZER SYSTEM (DESCRIBED IN C-36-2) FEEDING SIX RECLAIM SILOS DESCRIBED IN C-36-17.

- Condition 2 on the existing permit to operate has been revised to indicate that the emission capture system must collect at least 90% of emissions by weight, the thermal oxidizer must reduce emissions from the emission capture system by at least 95 percent, and effective September 20, 2010, emissions from the final manufactured product must be vented to emission control system for at least 48 hours. This condition ensures compliance with the requirements of sections 5.1 and 5.3.
 - Condition 5 on the existing permit to operate has been removed because it is subsumed by the revised condition 2.
 - Condition 9 on the existing permit to operate has been removed because it is subsumed by the revised condition 10.
 - Condition 12 on the existing permit to operate (condition 10 on the proposed renewed permit to operate) has been revised to reflect updated record keeping language of section 6.1.1. This condition ensures compliance with section 6.1.1 of the rule. The clause requiring records to be retained and provided to the District upon request has been removed from this condition and included in a new condition 17.
 - Condition 18 on the existing permit to operate (condition 16 on the proposed renewed permit to operate) has been revised to remove the outdated rule amendment year referenced in the condition text.
 - A new condition 17 has been added to the proposed renewed permit to operate. The new condition requires the operator to retain records on-site for at least five years and provide them to the EPA, ARB and the District upon request. The new condition ensures compliance with section 6.1.4 of the rule.
- q. C-36-20-7 – POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160'W X 22'H AVERAGE) VENTED TO THE THERMAL OXIDIZER DESCRIBED IN C-36-2.
- Condition 1 on the existing permit to operate has been revised to indicate that the emission capture system must collect at least 90% of emissions by weight, the thermal oxidizer must reduce emissions from the emission capture system by at least 95 percent, and effective

September 20, 2010, emissions from the final manufactured product must be vented to emission control system for at least 48 hours. This condition ensures compliance with the requirements of section 5.1 and 5.3.

- Condition 5 on the existing permit to operate has been revised to reflect updated record keeping language of section 6.1.1. This condition ensures compliance with section 6.1.1 of the rule. The clause requiring records to be retained and provided to the District upon request has been removed from this condition and included in a new condition 7.
 - Condition 6 on the existing permit to operate has been revised to remove the outdated rule amendment year referenced in the condition text.
 - A new condition 7 has been added to the proposed renewed permit to operate. The new condition requires the operator to retain records on-site for at least five years and provide them to the EPA, ARB and the District upon request. The new condition ensures compliance with section 6.1.4 of the rule.
- r. C-36-22-2 – #EX-70 RECLAIM EXTRUDER #3 SERVED BY SMOG HOG MODEL SH20 E.P. AND A THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17.
- Condition 2 on the existing permit to operate has been revised to indicate that the emission capture system must collect at least 90% of emissions by weight, the thermal oxidizer must reduce emissions from the emission capture system by at least 95 percent, and effective September 20, 2010, emissions from the final manufactured product must be vented to emission control system for at least 48 hours. This condition ensures compliance with the requirements of sections 5.1 and 5.3.
 - Condition 5 on the existing permit to operate has been removed because it is subsumed by the revised condition 2.
 - Condition 9 on the existing permit to operate (condition 8 on the proposed renewed permit to operate) has been revised to reflect updated record keeping language of section 6.1.1. This condition ensures compliance with section 6.1.1 of the rule. The clause requiring

records to be retained and provided to the District upon request has been removed from this condition and included in a new condition 14.

- Condition 15 on the existing permit to operate (condition 16 on the proposed renewed permit to operate) has been revised to remove the outdated rule amendment year referenced in the condition text.
- A new condition 14 has been added to the proposed renewed permit to operate. The new condition requires the operator to retain records on-site for at least five years and provide them to the EPA, ARB and the District upon request. The new condition ensures compliance with section 6.1.4 of the rule.

J. District Rule 8011 – General Requirements

The purpose of Regulation VIII (Fugitive PM10 Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM10) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The rules contained in this regulation have been developed pursuant to United States Environmental Protection Agency guidance for Serious PM10 Nonattainment Areas. The rules are applicable to specified anthropogenic fugitive dust sources. Fugitive dust contains PM10 and particles larger than PM10. Controlling fugitive dust emissions when visible emissions are detected will not prevent all PM10 emissions, but will substantially reduce PM10 emissions.

The provisions of this rule are applicable to specified outdoor fugitive dust sources. The definitions, exemptions, requirements, administrative requirements, recordkeeping requirements, and test methods set forth in this rule are applicable to all rules under Regulation VIII (Fugitive PM10 Prohibitions) of the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District.

The following permit conditions, which are based on the requirements of this rule, have been modified as follows:

C-36-0-2 – Facilitywide Requirements

- Conditions 31 through 33 on the existing permit to operate (conditions 29 through 31 on the proposed renewed permit to operate) were replaced with the updated conditions that include the requirements of District rule 8011.

- New conditions 43 through 45 that include new requirements based on District Rule 8011 were added to the proposed renewed permit to operate.
- Condition 39 on the existing permit to operate (condition 37 on the proposed renewed permit to operate) was revised to include a permit shield for rule 8011.

K. District Rule 8021 – Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities

The purpose of this rule is to limit fugitive dust emissions from construction, demolition, excavation, extraction, and other earthmoving activities.

This rule applies to any construction, demolition, excavation, extraction, and other earthmoving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site. This rule also applies to the construction of new landfill disposal sites or modification to existing landfill disposal sites prior to commencement of landfilling activities.

Section 5.0 requires that no person shall perform any construction, demolition, excavation, extraction, or other earthmoving activities unless the appropriate requirements in sections 5.1 and 5.2 are sufficiently implemented to limit VDE to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

The following permit conditions, which are based on the requirements of this rule, have been modified as follows:

C-36-0-2 – Facilitywide Requirements

- Condition 31 on the existing permit to operate (condition 29 on the proposed renewed permit to operate) was replaced with the updated condition that includes the requirements of District rule 8021.
- Condition 39 on the existing permit to operate (condition 37 on the proposed renewed permit to operate) was revised to include a permit shield for rule 8021.

L. District Rule 8031 – Bulk Materials

The purpose of this rule is to limit fugitive dust emissions from the outdoor handling, storage, and transport of bulk materials.

This rule applies to the outdoor handling, storage, and transport of any bulk material.

Section 5.0 requires that no person shall perform any outdoor handling, storage, and transport of bulk materials unless the appropriate requirements in Table 8031-1 of this rule are sufficiently implemented to limit VDE to 20% opacity or to comply with the conditions for a stabilized surface as defined in Rule 8011. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

The following permit conditions, which are based on the requirements of this rule, have been modified as follows:

C-36-0-2 – Facilitywide Requirements

- Condition 32 on the existing permit to operate (condition 30 on the proposed renewed permit to operate) was replaced with the updated condition that includes the requirements of District rule 8031.
- Condition 39 on the existing permit to operate (condition 37 on the proposed renewed permit to operate) was revised to include a permit shield for rule 8031.

M. District Rule 8041 – Carryout and Trackout

The purpose of this rule is to limit fugitive dust emissions from carryout and trackout.

This rule applies to all sites that are subject to Rules 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), 8031 (Bulk Materials), and 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or trackout has occurred or may occur.

Section 5.0 requires that an owner/operator shall sufficiently prevent or cleanup carryout and trackout as specified in sections 5.1 through 5.8. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII. The use of blower devices, or dry rotary brushes or brooms, for removal of carryout and trackout on public roads is expressly prohibited. The removal of carryout and trackout from paved public roads does not exempt an owner/operator from obtaining state or local agency permits which may be required for the cleanup of mud and dirt on paved public roads.

The following permit conditions, which are based on the requirements of this rule, have been modified as follows:

C-36-0-2 – Facilitywide Requirements

- New condition 43, which includes the requirements for District Rule 8041, was added to the proposed renewed permit to operate.
- Condition 39 on the existing permit to operate (condition 37 on the proposed renewed permit to operate) was revised to include a permit shield for rule 8041.

N. District Rule 8051 – Open Areas

The purpose of this rule is to limit fugitive dust emissions from open areas.

This rule applies to any open area having 3.0 acres or more of disturbed surface area that has remained undeveloped, unoccupied, unused, or vacant for more than seven days.

Section 5.0 requires that whenever open areas are disturbed or vehicles are used in open areas, the owner/operator shall implement one or a combination of control measures indicated in Table 8051-1 to comply with the conditions of a stabilized surface at all times and to limit VDE to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

The following permit conditions, which are based on the requirements of this rule, have been modified as follows:

C-36-0-2 – Facilitywide Requirements

- New condition 44, which includes the requirements for District Rule 8051, was added to the proposed renewed permit to operate.
- Condition 39 on the existing permit to operate (condition 37 on the proposed renewed permit to operate) was revised to include a permit shield for rule 8051.

O. District Rule 8061 – Paved and Unpaved Roads

The purpose of this rule is to limit fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria.

This rule applies to any new or existing public or private paved or unpaved road, road construction project, or road modification project.

C-36-0-2 – Facilitywide Requirements

- Condition 33 on the existing permit to operate (condition 31 on the proposed renewed permit to operate) was replaced with the updated condition that includes the requirements of District rule 8061.
- Condition 39 on the existing permit to operate (condition 37 on the proposed renewed permit to operate) was revised to include a permit shield for rule 8061.

P. District Rule 8071 – Unpaved Vehicle/Equipment Traffic Area

The purpose of this rule is to limit fugitive dust emissions from unpaved vehicle and equipment traffic areas by implementing control measures and design criteria.

This rule applies to any unpaved vehicle/equipment traffic area of 1.0 acre or larger.

The following permit conditions, which are based on the requirements of this rule, have been modified as follows:

C-36-0-2 – Facilitywide Requirements

- New condition 45, which includes the requirements for District Rule 8071, was added to the proposed renewed permit to operate.
- Condition 39 on the existing permit to operate (condition 37 on the proposed renewed permit to operate) was revised to include a permit shield for rule 8071.

Q. 40 CFR Part 64 – Compliance Assurance Monitoring

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant (devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers); and

- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.
- a. C-36-2-5 – POLYSTYRENE FOAM EXTRUSION LINE #1, INCLUDING: #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE 1.5 MMBTU/HR CE MODEL 13.6 ROCC98 COMBU-CHANGER REGENERATIVE THERMAL OXIDIZER.
 - b. C-36-3-6 – POLYSTYRENE FOAM EXTRUSION LINE #2 CONSISTING OF #EX-20 PRIMARY EXTRUDER, #EX-21 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-11 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
 - c. C-36-4-5 – POLYSTYRENE FOAM EXTRUSION LINE #3 CONSISTING OF #EX 30 PRIMARY EXTRUDER, #EX-31 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM FEED PUMP #VB-12 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
 - d. C-36-5-4 – #G-91 THERMOFORMER LINE CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING 6 FLUFF SILOS DESCRIBED IN C-36-18.
 - e. C-36-6-4 – #G-92 THERMOFORMER LINE CONSISTING OF GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE FLUFF SILOS DESCRIBED IN C-36-18.
 - f. C-36-7-5 – #G-93 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING (6) FLUFF SILOS DESCRIBED IN C-36-18.
 - g. C-36-8-3 – #G-94 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.
 - h. C-36-9-3 – #G-95 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.

- i. C-36-10-5 – #G-96 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.
- j. C-36-11-5 – #G-97 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN PERMIT C-36-18.
- k. C-36-12-5 – #G-98 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.
- l. C-36-13-4 – #GR-90 BULK GRINDER WITH BLOWER, #GR-91 BULK GRINDER WITH BLOWER, AND #GR-92 SHEET GRINDER WITH BLOWER EACH FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
- m. C-36-14-4 – #EX-40 RECLAIM EXTRUDER #1 VENTED TO A SMOG HOG MODEL 20 PE E.P. (SHARED WITH C-36-19) AND A THERMAL OXIDIZER SYSTEM (DESCRIBED IN C-36-2), AND FEEDING SIX RECLAIM SILOS DESCRIBED IN C-36-17.
- n. C-36-18-3 – (6) FLUFF SILOS, 12' DIA. X 30' H, EACH VENTED TO THE TORIT FILTER AND THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2. EACH SILO RECEIVES SHREDDED POLYSTYRENE FOAM FROM GRINDERS.
- o. C-36-19-4 – #EX-50 RECLAIM EXTRUDER #2 VENTED TO SMOG HOG MODEL 20 PE E.P. (SHARED WITH C-36-14) AND A THERMAL OXIDIZER SYSTEM (DESCRIBED IN C-36-2) FEEDING SIX RECLAIM SILOS DESCRIBED IN C-36-17.
- p. C-36-20-7 – POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160'W X 22'H AVERAGE) VENTED TO THE THERMAL OXIDIZER DESCRIBED IN C-36-2.
- q. C-36-21-2 – POLYSTYRENE EXTRUSION LINE #4 CONSISTING OF #EX-40 PRIMARY EXTRUDER, #EX-41 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-40 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
- r. C-36-22-2 – #EX-70 RECLAIM EXTRUDER #3 SERVED BY SMOG HOG MODEL SH20 E.P. AND A THERMAL OXIDIZER SYSTEM DESCRIBED

IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17.

These units are all served by a thermal oxidizer, which is an add-on control for VOC. The units also have a collective post-control VOC emission limit of 538 lb/day, which is equivalent to 196,370 lb/year. Since the post-control VOC limit already exceeds the VOC major source threshold of 50,000 lb/year, the pre-control potential to emit is also greater than the major source threshold. These units are therefore subject to CAM because they meet all three criteria for triggering CAM.

CAM is satisfied by monitoring of the thermal oxidizer combustion bed temperature, which is a surrogate parameter for proper thermal oxidizer operation. The thermal oxidizer combustion bed is equipped with a thermocouple which continuously measures the combustion bed temperature. The existing permit requires that the measured combustion bed temperature be recorded every four hours. However, since the permit units' potential to emit after control is greater than the Major Source threshold, monitoring data must be collected every 15 minutes.

The facility will install an automated temperature logger to record the temperature at least once every 15 minutes.

The following permit condition has been modified as shown to enforce CAM requirements:

- Condition 3 on the existing permit for unit C-36-2-5 has been revised to state that the temperature of the combustion zone shall be recorded every 15 minutes. 40 CFR 64 has been added to the citation section.
- Condition 11 on the existing permit for unit C-36-2-5 has been revised to include 40 CFR 64 in the citation section.

As previously discussed, the rest of the emission units that are subject to CAM are tied to the thermal oxidizer under 2-5 and therefore have no thermal oxidizer conditions that require modification due to CAM requirements.

R. 40 CFR Part 61, Subpart M – National Emission Standard for Asbestos

These regulations apply to demolition or renovation activity, as defined in 40 CFR 61.141. 40 CFR Section 61.150 of this Subpart was amended September 18, 2003.

Condition 32 on the proposed modified permit to operate (C-36-0-2) ensures compliance with this requirement.

S. 40 CFR Part 82, Subparts B and F – Stratospheric Ozone

These regulations apply to servicing motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2007 and 2008.

Conditions 27 and 28 on the proposed modified permit to operate (C-36-0-2) ensure compliance with these requirements.

IX. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

The applicant has requested a permit shield for all applicable federally enforceable requirements and non-federally-enforceable requirements, as well as requirements listed in the permit application but not included in the Title V permit because they do not apply to this facility.

A. Requirements Addressed by Model General Permit Templates

The applicant does not propose to use any model general permit templates.

B. Federally Enforceable Requirements

The permit shields for federally enforceable requirements are included as conditions 36 and 37 under permit unit C-36-0-2; condition 5 under permit unit C-36-1-2; condition 23 under permit unit C-36-2-5; condition 11 under permit units C-36-3-6, C-36-4-5, and C-36-21-2; condition 6 under permit units C-36-5-4 through C-36-13-4, and C-36-20-7; condition 13 under permit units C-36-14-4 and C-36-18-3; condition 7 under permit unit C-36-17-3; condition 16 under permit unit C-36-19-4; condition 14 under permit unit C-36-22-2; and condition 12 under permit unit C-36-23-3.

C. Requirements Not Federally Enforceable

The permit shield for District Rule 4102, which is not federally enforceable, is included in condition 37 under permit unit C-36-0-2.

D. Obsolete Permit Shields

The permit shield for County Rule 401 (all eight counties), which was previously included in condition 36 of permit unit C-36-0-2, has become obsolete since County Rule 401 has been replaced by District Rule 4101 in the SIP. This permit shield has been deleted and replaced with a permit shield for the new rule.

The permit shields for District Rules 8020, 8030 and 8060 have become obsolete since these rules have been deleted and replaced by new rules 8021, 8031 and 8061. The obsolete permit shields were replaced by permit shields for the new rules

X. PERMIT CONDITIONS

See Attachment A – Draft Renewed Title V Operating Permit.

XI. ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: C-36-0-2

EXPIRATION DATE: 04/30/2006

FACILITY-WIDE REQUIREMENTS

1. {2285} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {2286} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {2287} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rules 2010, 3.0 & 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2031, 2.0, 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. {2290} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {2291} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {2292} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. {2293} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: PACTIV CORPORATION
Location: 5370 E HOME AVE, FRESNO, CA 93727
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10. {2294} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {2295} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {2296} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {2297} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {2298} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {2299} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {2300} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {2301} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {2302} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {2303} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {2304} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {2305} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

23. {4384} No person shall manufacture, blend, repack, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {2310} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {2311} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {2312} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
31. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8061 and Rule 8011] Federally Enforceable Through Title V Permit
32. {2319} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
33. {2320} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
34. {2321} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
35. {2322} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

36. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
37. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4102 (12/17/92); 4601 (12/17/09); 4623 (12/17/92), section 4.1; 4662 (9/19/91); 8011 (8/19/04); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (9/16/04). A permit shield is granted from these requirements, as well as requirements identified in the permit application but determined by the District not to be applicable to this particular facility. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
38. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
39. All tanks, reservoirs or other containers which are pressure vessels having a capacity greater than 200 gallons, used to store or hold VOC containing blowing agents or organic liquids, shall maintain a working pressure sufficient at all times to prevent organic liquid loss or release of VOC emissions to the atmosphere under normal working conditions. [District Rule 4623 section 4.1.1 and District Rule 4682 section 5.2.1] Federally Enforceable Through Title V Permit
40. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
41. The operator shall ensure compliance with all applicable requirements of District Rule 4662, Organic Solvent Degreasing Operations, including but not limited to, general operating and control equipment requirements for cold cleaners, open-top vapor degreaser and conveyORIZED solvent degreasers. [District Rule 4662] Federally Enforceable Through Title V Permit
42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin on September 30 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
43. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
44. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
45. Any unpaved vehicle/equipment area that has an annual average of 50 or more vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that is utilized intermittently for a period of 30 days or less during the calendar year and has more than 150 vehicle trips per day during the period of use shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more vehicle trips occur on any unpaved vehicle/equipment area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day that 50 or more vehicle trips, or 25 or more vehicle trips with 3 or more axles, originates from within and remains exclusively within an unpaved vehicle/equipment traffic area, the owner/operator may apply/reapply water to limit Visible Dust Emissions to 20% opacity. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/04) or Rule 8011 (8/19/04).. [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-1-2

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

RAIL CAR UNLOADING, INCLUDING 3 RESIN SILOS, EACH 12 FT DIAM X 47 FT HIGH, PRODUCT SEPARATOR, VACUUM PUMP FILTER AND VACUUM PUMP #VB-01. STORAGE CAPACITY: 15,939 CUFT (119,221 GALLONS).

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.2.2] Federally Enforceable Through Title V Permit
3. Dust collector filters shall be inspected at least annually when the unit is not operation for tears, scuffs, abrasions or holes which may interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.2.2] Federally Enforceable Through Title V Permit
4. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirement: District Rule 4201 (12/17/ 92). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-2-5

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION LINE #1, INCLUDING: #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE 1.5 MMBTU/HR CE MODEL 13.6 ROCC98 COMBU-CHANGER REGENERATIVE THERMAL OXIDIZER.

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The thermal oxidizer shall be equipped with a thermocouple to continuously measure the temperature in the combustion zone, which shall be recorded every fifteen minutes. [District NSR Rule, District Rule 2520, sections 9.3 & 9.4, and 40 CFR 64] Federally Enforceable Through Title V Permit
4. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, grinders, reclaim extruders, or the fluff silos. [District NSR Rule and Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
5. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shut downs. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
6. Shut down of the thermal oxidizer for routine maintenance shall be recorded and shall not exceed a total of 20 hours per calendar year. [District NSR Rule and Rule 2520, sections 9.3 & 9.4] Federally Enforceable Through Title V Permit
7. Total VOC blowing agent consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Only isobutane or n-butane shall be used as VOC blowing agent. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Maintain the thermal oxidizer as per manufacturer's instructions. Copy of manufacturer's instructions shall be kept onsite and made available for inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The combustion zone of the thermal oxidizer shall be maintained at a minimum of 1400 degrees Fahrenheit. [District NSR Rule and 40 CFR 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. The maximum air flow rate through the thermal oxidizer shall not exceed 15,000 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The minimum retention time in the combustion zone of the thermal oxidizer shall be 0.3 seconds. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Maintain the following minimum air flow rates (scfm) from the respective production areas to the thermal oxidizer when in production: 3500 from the rolled storage warehouse, 528 from each foam extrusion die hood, 203 from each reclaim line smog hog. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent, by weight, to maintain ERCs resulting from the installation of the thermal oxidizer. [District NSR Rule, Rule 1081, Rule 2301 and Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
16. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
17. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
18. The owner/operator shall maintain records of operation, including but not limited to the daily records of blowing agent and polystyrene usage, type of blowing agent and equipment used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. [District NSR Rule; Rule 4682, 6.1.1; and Rule 2520, 9.3.2 & 9.4.2] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081 section 7.1, 2520 sections 9.3.2 & 9.4.2 and NSR Rule] Federally Enforceable Through Title V Permit
20. Source testing to measure the minimum destruction efficiency of the thermal oxidizer shall be conducted at least once every twelve months. [District Rule 2520 sections 9.3.2 & 9.4.2 and NSR Rule] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081 section 7.3] Federally Enforceable Through Title V Permit
22. Maintain records of production rates from all production equipment, air flow rates from each controlled area, and total air flow to the oxidizer during source testing of facility-wide capture efficiency, and during annual source testing of the oxidizer destruction efficiency. [District NSR Rule and Rule 2520 sections 9.3.2 & 9.4.2] Federally Enforceable Through Title V Permit
23. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 1081 (12/16/92); 2301 (12/17/92), 4682 (9/20/07); and 40 CFR 64. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
24. The operator shall maintain daily records of key emission control system operating and maintenance procedures which will demonstrate continuous operation and compliance of the emission control device. Key system operating parameters are those necessary to ensure compliance with VOC emission requirements such as temperature, pressures, and flowrates. [District Rule 4682, 6.1.2]
25. The control efficiency of the emission control system shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates, and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4682, 6.2.1]
26. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4]

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-3-6

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION LINE #2 CONSISTING OF #EX-20 PRIMARY EXTRUDER, #EX-21 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-11 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Maintain the air flow rate from the secondary extrusion die hood to the thermal oxidizer greater than or equal to 528 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Total VOC blowing agent consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shut downs. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
7. Only isobutane or n-butane shall be used as VOC blowing agents. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
9. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The owner/operator shall maintain records of operation, including but not limited to the daily records of blowing agent and polystyrene usage, type of blowing agent and equipment used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. [District NSR Rule; District Rule 4682, 6.1.1 and District Rule 2520, 9.3.2 & 9.4.2] Federally Enforceable Through Title V Permit
11. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirement: District Rule 4682 (9/20/07). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4]

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-4-5

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION LINE #3 CONSISTING OF #EX 30 PRIMARY EXTRUDER, #EX-31 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM FEED PUMP #VB-12 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Total VOC blowing agent consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shut downs. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
6. Only isobutane or n-butane shall be used as VOC blowing agents. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The facility-wide VOC capture efficiency shall not be less than 77.5%, as measured by mass balance, to maintain ERCs resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
8. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
9. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The owner/operator shall maintain records of operation, including but not limited to the daily records of blowing agent and polystyrene usage, type of blowing agent and equipment used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. [District NSR Rule; District Rule 4682, 6.1.1 and District Rule 2520 sections 9.3.2 and 9.4.2] Federally Enforceable Through Title V Permit
11. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 2301 (12/17/92) and 4682 (9/20/07). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-5-4

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-91 THERMOFORMER LINE CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING 6 FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained. [District Rules 1070 and 4682, 6.1.1] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 1070 (12/17/92) and 4682 (9/20/07). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-6-4

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-92 THERMOFORMER LINE CONSISTING OF GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained. [District Rules 1070 and 4682, 6.1.1] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 1070 (12/17/92) and 4682 (9/20/07). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-7-5

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-93 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING (6) FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained. [District Rules 1070 and 4682, 6.1.1] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 1070 (12/17/92) and 4682 (9/20/07). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-8-3

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-94 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained. [District Rules 1070 and 4682, 6.1.1] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 1070 (12/17/92) and 4682 (9/20/07). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-9-3

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-95 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained. [District Rules 1070 and 4682, 6.1.1] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirement: District Rule 4682 (9/20/07). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-10-5

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-96 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained. [District Rules 1070 and 4682, 6.1.1] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirement: District Rule 4682 (9/20/07). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-11-5

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-97 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN PERMIT C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained. [District Rules 1070 and 4682, 6.1.1] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 1070 (12/17/92) and 4682 (9/20/07). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-12-5

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-98 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained. [District Rules 1070 and 4682, 6.1.1] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 1070 (12/17/92) and 4682 (9/20/07). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-13-4

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#GR-90 BULK GRINDER WITH BLOWER, #GR-91 BULK GRINDER WITH BLOWER, AND #GR-92 SHEET GRINDER WITH BLOWER EACH FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
2. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
3. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
5. Records of enclosure maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirement: District Rule 4682 (9/20/07). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. The operator shall maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. [District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit
8. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-14-4

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#EX-40 RECLAIM EXTRUDER #1 VENTED TO A SMOG HOG MODEL 20 PE E.P. (SHARED WITH C-36-19) AND A THERMAL OXIDIZER SYSTEM (DESCRIBED IN C-36-2), AND FEEDING SIX RECLAIM SILOS DESCRIBED IN C-36-17.

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through the #1 reclaim extruder shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
3. Emissions from the reclaim extruder vent shall be vented to and controlled by the "Smog Hog Model SH 20 PE Electrostatic Precipitator" and the thermal oxidizer (#C-36-2) at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Maintain the air flow rate from the "smog hog" to the thermal oxidizer greater than or equal to 203 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emissions from the feed hopper shall be vented to and controlled by the 42 inch cyclone with bag filter. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day based on a calendar quarter average. [District NSR Rule] Federally Enforceable Through Title V Permit
7. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. [District RuleS 1070 and 4682, 6.1.1] Federally Enforceable Through Title V Permit
9. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.2.2] Federally Enforceable Through Title V Permit
10. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.2.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

11. Dust collector filters shall be inspected at least annually when the unit is not in operation for tears, scuffs, abrasions or holes which may interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.2.2] Federally Enforceable Through Title V Permit
12. Records of dust collector and enclosure maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
13. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 4201 (12/17/ 92); 4202 (12/17/92) and 4682 (9/20/07). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
14. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-17-3

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

17,960 CU. FT. (134,000 GALLON) RECLAIM STORAGE SILOS INCLUDING (2) 12' DIA. X 30' H WITH 60 DEG. CONES, (2) 12' DIA. X 30' H WITH 8' 45 DEG. CONES, AND (2) 12' DIA. X 32' H WITH 5'8" 45 DEG. CONES, RECEIVING PELLETS FROM RECLAIM EXTRUDERS.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Owner/operator shall maintain accurate records indicating the type and quantity of polystyrene used, visible emissions checks and maintenance inspections. The records are to kept on site at all times and supplied to the District upon request for a period of five years. [District NSR Rule and District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
3. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.2.2] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
5. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.2.2] Federally Enforceable Through Title V Permit
6. Records of enclosure maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
7. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4201 (12/17/ 92) and 4202 (12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-18-3

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

(6) FLUFF SILOS, 12' DIA. X 30' H, EACH VENTED TO THE TORIT FILTER AND THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2. EACH SILO RECEIVES SHREDDED POLYSTYRENE FOAM FROM GRINDERS.

PERMIT UNIT REQUIREMENTS

1. Maintain the fluff storage silos at a negative pressure or in a sealed position. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day based on a calendar quarter average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. The operator shall maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. [District Rules 2520, 9.3.2 and 9.4.2 and 4682, 6.1.1] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
8. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.2.2] Federally Enforceable Through Title V Permit
9. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.2.2] Federally Enforceable Through Title V Permit
10. Dust collector filters shall be inspected at least annually when the unit is not in operation for tears, scuffs, abrasions or holes which may interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.2.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

11. Records of dust collector and enclosure maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520 section 9.2.2] Federally Enforceable Through Title V Permit
12. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 4201 (12/17/ 92); 4202 (12/17/92) and 4682 (9/20/07). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
13. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-19-4

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#EX-50 RECLAIM EXTRUDER #2 VENTED TO SMOG HOG MODEL 20 PE E.P. (SHARED WITH C-36-14) AND A THERMAL OXIDIZER SYSTEM (DESCRIBED IN C-36-2) FEEDING SIX RECLAIM SILOS DESCRIBED IN C-36-17.

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through the #2 reclaim extruder shall not exceed 28,800 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
3. Emissions from the reclaim extruder vent shall be vented to and controlled by the "Smog Hog Model SH 20 PE Electrostatic Precipitator" and the thermal oxidizer (#C-36-2) at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Maintain the air flow rate from the "smog hog" to the thermal oxidizer greater than or equal to 203 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emissions from the feed hopper shall be vented to and controlled by the 42-inch cyclone with bag filter. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day based on a calendar quarter average. [District NSR Rule] Federally Enforceable Through Title V Permit
7. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. Emissions of PM10 from feed hopper shall not exceed 1.4 pounds/day. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The operator shall maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. [District Rules 1070; 4682, 6.1.1; and 2520, 9.3.2 & 9.4.2] Federally Enforceable Through Title V Permit
11. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.2.2] Federally Enforceable Through Title V Permit
13. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.2.2] Federally Enforceable Through Title V Permit
14. Dust collector filters shall be inspected at least annually when the unit is not in operation for tears, scuffs, abrasions or holes which may interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.2.2] Federally Enforceable Through Title V Permit
15. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
16. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 1070 (12/17/92), 4201 (12/17/92); 4202 (12/17/92), and 4682 (9/20/07). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
17. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-20-7

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160'W X 22'H AVERAGE) VENTED TO THE THERMAL OXIDIZER DESCRIBED IN C-36-2.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shut downs. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
2. Maintain a minimum air flow-rate of 3500 scfm from the rolled storage warehouse to the thermal oxidizer when the thermal oxidizer is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The operator shall maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. [District NSR Rule; District Rule 4682, 6.1.1; and 2520, 9.3.2 & 9.4.2] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirement: District Rule 4682 (9/20/07). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-21-2

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

POLYSTYRENE EXTRUSION LINE #4 CONSISTING OF #EX-40 PRIMARY EXTRUDER, #EX-41 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-40 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Maintain the air flow rate from the secondary extrusion die hood to the thermal oxidizer greater than or equal to 528 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Total VOC blowing agent consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shut downs. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule and District Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
7. Only isobutane or n-butane shall be used as VOC blowing agents. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
9. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The owner/operator shall maintain records of operation, including but not limited to the daily records of blowing agent and polystyrene usage, type of blowing agent and equipment used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. [District NSR Rule; District Rule 4682, 6.1.1 and District Rule 2520, 9.3.2 & 9.4.2] Federally Enforceable Through Title V Permit
11. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirement: District Rule 4682 (9/20/07). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-22-2

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#EX-70 RECLAIM EXTRUDER #3 SERVED BY SMOG HOG MODEL SH20 E.P. AND A THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17.

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through the #3 reclaim extruder shall not exceed 48,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The thermal oxidizer and associated ventilation or emission capture system, which shall be designed and operated to collect at least 90 percent by weight of the emissions, shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. The thermal oxidizer shall reduce emissions from the emission capture system by at least 95 percent by weight. Effective September 20, 2010, emissions from the final manufactured products shall be vented to thermal oxidizer for at least 48 hours. [District NSR Rule; and Rule 4682, 5.1.2 & 5.3.3] Federally Enforceable Through Title V Permit
3. Emissions from the reclaim extruder vent shall be vented to and controlled by the "Smog Hog Model SH 20 PE Electrostatic Precipitator" and the thermal oxidizer (#C-36-2) at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Maintain the air flow rate from the "smog hog" to the thermal oxidizer greater than or equal to 203 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emissions from the feed hopper shall be vented to and controlled by the MAC Model #39AVRC14 baghouse. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day based on a calendar quarter average. [District NSR Rule] Federally Enforceable Through Title V Permit
7. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used. Records shall be maintained with a minimum monthly totals with the ability to calculate daily averages in any given month. [District Rule 4682, 6.1.1 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
10. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

11. Dust collector filters shall be inspected at least annually while not in operation for any tears, holes, abrasions, and scuffs which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Records of dust collector inspection, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and name of the personnel performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
14. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 4201 (12/17/ 92) and 4682 (9/20/07). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
15. The operator shall keep in the facility all records required to demonstrate compliance with the permit and rule requirements for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA, and shall be submitted to the APCO, ARB, or EPA upon request. [District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-23-3

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM PRODUCT STORAGE WAREHOUSE (28,480 SQ FT).

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PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. The blowing agent retention in the finished product shall not be less than 49%, as measured by District-approved test methods. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The facility-wide VOC capture efficiency shall not be less than 77.5%, as measured by mass balance, to maintain ERCs resulting from the installation of the thermal oxidizer. [District NSR Rule and Rule 2301] Federally Enforceable Through Title V Permit
5. The amount of polystyrene foam in storage on-site shall not exceed 529,000 pounds on a daily basis (previous day-end storage total, minus amount shipped from storage today, plus amount produced and sent to storage today). [District NSR Rule] Federally Enforceable Through Title V Permit
6. The amount of polystyrene foam in storage on-site shall not exceed 266,000 pounds on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
7. VOC emissions from final product storage on-site shall not exceed 332.0 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. VOC emissions from final product storage on-site shall not exceed 237.2 lb/day, based on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
9. VOC emissions from final product storage shall be determined as the product of the following: $0.05 \times b \times t(\exp 0.5)$, where "t" is the weighted average number of days the finished products have been in storage, and "b" is the average daily blowing agent used in the last "t" days (minus amount recycled). [District NSR Rule] Federally Enforceable Through Title V Permit
10. The permittee shall develop a spreadsheet for calculating the VOC emissions as outlined on this permit, and shall submit it for District approval within 30 days of the issuance of this permit. The spreadsheet shall contain all data used in the calculations. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The permittee shall maintain and retain records of VOC emissions from product storage, the amount of product in storage, amount shipped, and amount entering storage, on a daily basis. Such records, including daily spreadsheet calculations, shall be retained on site for a period of at least five years and shall be made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rules 2301 (12/17/92) and 4201 (12/17/ 92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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ATTACHMENT B

Previous Title V Operating Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

Permit to Operate

FACILITY: C-36

EXPIRATION DATE: 04/30/2006

LEGAL OWNER OR OPERATOR:
MAILING ADDRESS:

PACTIV CORPORATION
5370 E HOME AVE
FRESNO, CA 93727

FACILITY LOCATION:

5370 E HOME AVE
FRESNO, CA 93727

FACILITY DESCRIPTION:

PLASTIC FOAM PRODUCTS

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: C-36-0-1

EXPIRATION DATE: 04/30/2006

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (7/21/94). [District Rule 2010, 3.0 and 4.0; 2020; and County Rule 201 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2031, 2.0, 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) (Permits Required) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: PACTIV CORPORATION
Location: 5370 E HOME AVE, FRESNO, CA 93727
C-36-0-1: Jul 27 2009 8:08AM - AIYABEJ

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.6.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520(6/15/95) [District Rules 2520, 9.6.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.8] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.9.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.9.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.9.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.9.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.10] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.14.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.14.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.14.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.14.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (12/17/92), by using EPA method 9. If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

23. No person shall supply, sell, solicit or apply any architectural coating, except specialty coatings, that contains more than 250 grams of VOC per liter of coating (less water and exempt compounds, and excluding any colorant added to tint bases), or manufacture, blend, or repackage such coating with more than 250 grams of VOC per liter (less water and exempt compounds, and excluding any colorant added to tint bases) for use within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. No person shall apply, sell, solicit, or offer for sale any specialty architectural coating listed in the Table of Standards (District Rule 4601, Table 1 (12/17/92)), nor manufacture, blend, or repackage such coating for use within the District, which contains VOCs (less water and exempt compounds, excluding any colorant added to tint bases) in excess of the specified limits listed in Table 1 of Rule 4601 (12/17/92). [District Rule 4601, 5.2] Federally Enforceable Through Title V Permit
25. All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to: being accessed, filled, emptied, maintained or repaired. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
26. A person shall not use VOCs for the cleanup of spray equipment unless equipment for collection of the cleaning compounds and minimizing its evaporation to the atmosphere is used. [District Rule 4601, 5.5] Federally Enforceable Through Title V Permit
27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.2 (12/17/92). [District Rule 4601, 6.1 and 6.2] Federally Enforceable Through Title V Permit
28. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.14.1 and 10.0] Federally Enforceable Through Title V Permit
29. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
30. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
31. Disturbances of soil related to any construction, demolition, excavation, extraction, or water mining activities shall comply with the requirements for fugitive dust control in SJVUAPCD District Rule 8020 (4/25/96) unless specifically exempted under section 4 of Rule 8020 (4/25/96). [District Rule 8020] Federally Enforceable Through Title V Permit
32. Outdoor handling and storage of any bulk material which emits dust shall comply with the requirements of SJVUAPCD Rule 8030 (4/25/96), unless specifically exempted under section 4 of Rule 8030 (4/25/96). [District Rule 8030] Federally Enforceable Through Title V Permit
33. Any paved road over 3 miles in length, and any unpaved roads over half a mile in length, constructed after December 10, 1993 shall use the design criteria and dust control measures of, and comply with the administrative requirements of, SJVUAPCD Rule 8060 (4/25/96) unless specifically exempted under section 4 of Rule 8060 (4/25/96). [District Rule 8060] Federally Enforceable Through Title V Permit
34. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
35. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.17] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
37. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permit shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
38. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rules 201, 202, 203, 204, 208, and 209 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin) and Rule 423 (Kern, Fresno, Stanislaus, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (12/17/92); 4601, sections 5.1, 5.2, 5.4, 5.5, 6.1, and 6.2 (12/17/92); 4623 (12/17/92), section 4.1; 4662 (9/19/91); 4682 (5/21/92), section 5.2; 8020 (4/25/96); 8030 (4/25/96); 8060 (4/25/96). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
41. Total VOC consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
42. Total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
43. All tanks, reservoirs or other containers which are pressure vessels having a capacity greater than 200 gallons, used to store or hold VOC containing blowing agents or organic liquids with a true vapor pressure greater than 1.5 psia, shall maintain a working pressure sufficient at all times to prevent organic liquid loss or release of VOC emissions to the atmosphere under normal working conditions. [District Rule 4623 section 4.1 and District Rule 4682 section 5.2.1] Federally Enforceable Through Title V Permit
44. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
45. The operator shall ensure compliance with all applicable requirements of District Rule 4662, Organic Solvent Degreasing Operations (as Amended 12/17/92), including but not limited to, general operating and control equipment requirements for cold cleaners, open-top vapor degreaser and conveyORIZED solvent degreasers. [District Rule 4662] Federally Enforceable Through Title V Permit
46. On September 30, 2002, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-1-1

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

RAIL CAR UNLOADING, INCLUDING 3 RESIN SILOS, EACH 12 FT DIAM X 47 FT HIGH, PRODUCT SEPARATOR, VACUUM PUMP FILTER AND VACUUM PUMP #VB-01. STORAGE CAPACITY: 15,939 CUFT (119,221 GALLONS).

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Dust collector filters shall be inspected at least annually when the unit is not operation for tears, scuffs, abrasions or holes which may interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4201 (12/17/ 92). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-2-3

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION LINE #1, INCLUDING: #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE 1.5 MMBTU/HR CE MODEL 13.6 ROCC98 COMBU-CHANGER REGENERATIVE THERMAL OXIDIZER.

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The thermal oxidizer shall be equipped with a thermocouple to continuously measure the temperature in the combustion zone and shall be recorded every four hours. [District NSR Rule and District Rule 2520, sections 9.4 & 9.5] Federally Enforceable Through Title V Permit
4. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, grinders, reclaim extruders, or the fluff silos. [District NSR Rule and Rule 4682, section 5.1] Federally Enforceable Through Title V Permit
5. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shut downs. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Shut down of the thermal oxidizer for routine maintenance shall be recorded and shall not exceed a total of 20 hours per calendar year. [District NSR Rule and Rule 2520, sections 9.4 & 9.5] Federally Enforceable Through Title V Permit
7. Total VOC blowing agent consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Only isobutane or n-butane shall be used as VOC blowing agent. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Maintain the thermal oxidizer as per manufacturer's instructions. Copy of manufacturer's instructions shall be kept onsite and made available for inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The combustion zone of the thermal oxidizer shall be maintained at a minimum of 1400 degrees Fahrenheit. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The maximum air flow rate through the thermal oxidizer shall not exceed 15,000 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. The minimum retention time in the combustion zone of the thermal oxidizer shall be 0.3 seconds. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Maintain the following minimum air flow rates (scfm) from the respective production areas to the thermal oxidizer when in production: 3500 from the rolled storage warehouse, 528 from each foam extrusion die hood, 203 from each reclaim line smog hog. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The destruction efficiency of the thermal oxidizer shall not be less than 95%, as measured by EPA Test Method 25 or 25A, to maintain ERCs resulting from the installation of the thermal oxidizer. [District NSR Rule, Rule 1081, Rule 2301 and Rule 4682] Federally Enforceable Through Title V Permit
16. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
17. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
18. The owner/operator shall maintain daily records of blowing agent and polystyrene usage. Records shall be made available to the District upon request. These records shall be retained on site for five years. [District NSR Rule; Rule 4682 section 6.1, and Rule 2520 sections 9.4.2 & 9.5.2] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081 section 7.1, 2520 sections 9.4.2 & 9.5.2 and NSR Rule] Federally Enforceable Through Title V Permit
20. Source testing to measure the minimum destruction efficiency of the thermal oxidizer shall be conducted at least once every twelve months. [District Rule 2520 sections 9.4.2 & 9.5.2 and NSR Rule] Federally Enforceable Through Title V Permit
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081 section 7.3] Federally Enforceable Through Title V Permit
22. Maintain records of production rates from all production equipment, air flow rates from each controlled area, and total air flow to the oxidizer during source testing of facility-wide capture efficiency, and during annual source testing of the oxidizer destruction efficiency. [District NSR Rule, Rule 4682 section 6.1, and Rule 2520 sections 9.4.2 & 9.5.2] Federally Enforceable Through Title V Permit
23. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 1081 (12/16/92); 4201 (12/17/ 92); 4202 (12/17/92) and 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-3-5

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION LINE #2 CONSISTING OF #EX-20 PRIMARY EXTRUDER, #EX-21 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-11 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Maintain the air flow rate from the secondary extrusion die hood to the thermal oxidizer greater than or equal to 528 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Total VOC blowing agent consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shut downs. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Only isobutane or n-butane shall be used as VOC blowing agents. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
9. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The owner/operator shall maintain daily records of blowing agent and polystyrene usage. Records shall be made available to the District upon request. These records shall be retained on site for five years. [District NSR Rule; District Rule 4682 section 6.1 and District Rule 2520 sections 9.4.2 and 9.5.2] Federally Enforceable Through Title V Permit
11. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4202 (12/17/92) and 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-4-3

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION LINE #3 CONSISTING OF #EX 30 PRIMARY EXTRUDER, #EX-31 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM FEED PUMP #VB-12 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Total VOC blowing agent consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shut downs. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Shut down of the thermal oxidizer for routine maintenance shall be recorded and shall not exceed a total of 20 hours per calendar year. [District NSR Rule and District Rule 2520, section 9.4 and 9.5] Federally Enforceable Through Title V Permit
7. Only isobutane or n-butane shall be used as VOC blowing agents. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The blowing agent retention in the finished product shall be recorded during startup source testing and shall not be less than 49%, as measured by PACTIV's "Methods for Acquiring Samples for Gas Chromatography Testing" (Test #A-100, revised 3/29/99) and "Method for Determining Residual Blowing Agents in Polystyrene Foam by Gas Chromatography (Test #A-71, revised 3/98). [District NSR Rule and District Rule 2520, section 9.4 and 9.5] Federally Enforceable Through Title V Permit
9. The facility-wide VOC capture efficiency shall not be less than 77.5%, as measured by mass balance, to maintain ERCs resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
10. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
11. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. The owner/operator shall maintain daily records of blowing agent and polystyrene usage. Records shall be made available to the District upon request. These records shall be retained on site for five years. [District NSR Rule; District Rule 4682 section 6.1 and District Rule 2520 sections 9.4.2 and 9.5.2] Federally Enforceable Through Title V Permit
13. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4202 (12/17/92) and 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-5-1

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-91 THERMOFORMER LINE CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING 6 FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-6-2

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-92 THERMOFORMER LINE CONSISTING OF GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-7-4

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-93 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING (6) FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-8-1

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-94 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-9-1

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-95 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-10-4

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-96 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-11-4

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-97 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN PERMIT C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-12-4

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#G-98 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records of the type and quantity of polystyrene thermoformed shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-13-1

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#GR-90 BULK GRINDER WITH BLOWER, #GR-91 BULK GRINDER WITH BLOWER, AND #GR-92 SHEET GRINDER WITH BLOWER EACH FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
3. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.4.2] Federally Enforceable Through Title V Permit
5. Records of enclosure maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520 section 9.4.2] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-14-2

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#EX-40 RECLAIM EXTRUDER #1 VENTED TO A SMOG HOG MODEL 20 PE E.P. (SHARED WITH C-36-19) AND A THERMAL OXIDIZER SYSTEM (DESCRIBED IN C-36-2), AND FEEDING SIX RECLAIM SILOS DESCRIBED IN C-36-17

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through the #1 reclaim extruder shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Emissions from the reclaim extruder vent shall be vented to and controlled by the "Smog Hog Model SH 20 PE Electrostatic Precipitator" and the thermal oxidizer (#C-36-2) at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Maintain the air flow rate from the "smog hog" to the thermal oxidizer greater than or equal to 203 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The reclaim extruder shall be operated to achieve at least 90% VOC emission capture efficiency. [District NSR Rule and Rule 4682] Federally Enforceable Through Title V Permit
6. Emissions from the feed hopper shall be vented to and controlled by the 42 inch cyclone with bag filter. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day based on a calendar quarter average. [District NSR Rule] Federally Enforceable Through Title V Permit
8. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Daily records of type and amount of polystyrene processed shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
10. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
11. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Dust collector filters shall be inspected at least annually when the unit is not operation for tears, scuffs, abrasions or holes which may interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. Records of dust collector and enclosure maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520 section 9.4.2] Federally Enforceable Through Title V Permit
14. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4201 (12/17/ 92); 4202 (12/17/92) and 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-17-2

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

17,960 CU. FT. (134,000 GALLON) RECLAIM STORAGE SILOS INCLUDING (2) 12' DIA. X 30' H WITH 60 DEG. CONES, (2) 12' DIA. X 30' H WITH 8' 45 DEG. CONES, AND (2) 12' DIA. X 32' H WITH 5'8" 45 DEG. CONES, RECEIVING PELLETS FROM RECLAIM EXTRUDERS.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Owner/operator shall maintain accurate records indicating the type and quantity of polystyrene used, visible emissions checks and maintenance inspections. The records are to kept on site at all times and supplied to the District upon request for a period of five years. [District NSR Rule and District Rule 2520 section 9.4.2] Federally Enforceable Through Title V Permit
3. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
5. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
6. Records of enclosure maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520 section 9.4.2] Federally Enforceable Through Title V Permit
7. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4201 (12/17/ 92) and 4202 (12/17/92). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-18-1

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

(6) FLUFF SILOS, 12' DIA. X 30' H, EACH VENTED TO THE TORIT FILTER AND THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2. EACH SILO RECEIVES SHREDDED POLYSTYRENE FOAM FROM GRINDERS.

PERMIT UNIT REQUIREMENTS

1. Maintain the fluff storage silos at a negative pressure or in a sealed position. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The fluff silos shall be operated to achieve at least 90% VOC emission capture efficiency. [District NSR Rule and Rule 4682] Federally Enforceable Through Title V Permit
4. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day based on a calendar quarter average. [District NSR Rule] Federally Enforceable Through Title V Permit
5. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. The owner/operator shall maintain daily records of the type and quantity of polystyrene used. Records shall be made available to the District upon request. These records shall be retained on site for five years. [District Rule 4682 section 6.1; District Rule 2520 sections 9.4.2 and 9.5.2] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
9. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
10. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Dust collector filters shall be inspected at least annually when the unit is not operation for tears, scuffs, abrasions or holes which may interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Records of dust collector and enclosure maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4201 (12/17/ 92); 4202 (12/17/92) and 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-19-1

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#EX-50 RECLAIM EXTRUDER #2 VENTED TO SMOG HOG MODEL 20 PE E.P. (SHARED WITH C-36-14) AND A THERMAL OXIDIZER SYSTEM (DESCRIBED IN C-36-2) FEEDING SIX RECLAIM SILOS DESCRIBED IN C-36-17

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through the #2 reclaim extruder shall not exceed 28,800 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Emissions from the reclaim extruder vent shall be vented to and controlled by the "Smog Hog Model SH 20 PE Electrostatic Precipitator" and the thermal oxidizer (#C-36-2) at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Maintain the air flow rate from the "smog hog" to the thermal oxidizer greater than or equal to 203 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The reclaim extruder shall be operated to achieve at least 90% VOC emission capture efficiency. [District NSR Rule and Rule 4682] Federally Enforceable Through Title V Permit
6. Emissions from the feed hopper shall be vented to and controlled by the 42-inch cyclone with bag filter. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day based on a calendar quarter average. [District NSR Rule] Federally Enforceable Through Title V Permit
8. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Daily records of type and amount of polystyrene processed shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
10. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
11. Emissions of PM10 from feed hopper shall not exceed 1.4 pounds/day. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The owner/operator shall maintain daily records of type and amount of blowing agent and polystyrene used. Records shall be made available to the District upon request. These records shall be retained on site for five years. [District NSR Rule; District Rule 4682 section 6.1; District Rule 2520 sections 9.4.2 and 9.5.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
14. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
15. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Dust collector filters shall be inspected at least annually when the unit is not operation for tears, scuffs, abrasions or holes which may interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520 section 9.4.2] Federally Enforceable Through Title V Permit
18. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4201 (12/17/ 92); 4202 (12/17/92) and 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-20-4

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160'W X 22'H AVERAGE) VENTED TO THE THERMAL OXIDIZER DESCRIBED IN C-36-2

PERMIT UNIT REQUIREMENTS

1. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shut downs. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Maintain a minimum air flow-rate of 3500 scfm from the rolled storage warehouse to the thermal oxidizer when the thermal oxidizer is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The owner/operator shall maintain daily records of type and amount of blowing agent and polystyrene used. Records shall be made available to the District upon request. These records shall be retained on site for five years. [District NSR Rule; District Rule 4682 section 6.1; District Rule 2520 sections 9.4.2 and 9.5.2] Federally Enforceable Through Title V Permit
6. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-21-1

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

POLYSTYRENE EXTRUSION LINE #4 CONSISTING OF #EX-40 PRIMARY EXTRUDER, #EX-41 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-40 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Maintain the air flow rate from the secondary extrusion die hood to the thermal oxidizer greater than or equal to 528 scfm. [District NSR Rule]
4. Total VOC blowing agent consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Only isobutane or n-butane shall be used as VOC blowing agents. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shut downs. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day, calculated on a quarterly average. [District NSR Rule] Federally Enforceable Through Title V Permit
9. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The owner/operator shall maintain daily records of blowing agent and polystyrene usage. Records shall be made available to the District upon request. These records shall be retained on site for five years. [District NSR Rule; District Rule 4682 section 6.1 and District Rule 2520 sections 9.4.2 and 9.5.2] Federally Enforceable Through Title V Permit
11. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-22-1

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#EX-70 RECLAIM EXTRUDER #3 SERVED BY SMOG HOG MODEL SH20 E.P. AND A THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17.

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through the #3 reclaim extruder shall not exceed 48,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Emissions from the reclaim extruder vent shall be vented to and controlled by the "Smog Hog Model SH 20 PE Electrostatic Precipitator" and the thermal oxidizer (#C-36-2) at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Maintain the air flow rate from the "smog hog" to the thermal oxidizer greater than or equal to 203 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The reclaim extruder shall be operated to achieve at least 90% VOC emission capture efficiency. [District NSR Rule and Rule 4682] Federally Enforceable Through Title V Permit
6. Emissions from the feed hopper shall be vented to and controlled by the MAC Model #39AVRC14 baghouse. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Total VOC emissions from the extrusion operations (including rollstock storage) shall not exceed 538 lb/day based on a calendar quarter average. [District NSR Rule] Federally Enforceable Through Title V Permit
8. VOC emissions from the extrusion operations, including rollstock storage, shall be determined as follows: (butane usage, lb/day) x (1 - 0.49) x {(1 - 0.775) + (0.775 x (1 - 0.95))} + {(butane usage during thermal oxidizer downtime, lb/day) x (1 - 0.49)}. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The owner/operator shall keep daily records of the type and quantity of blowing agent and polystyrene used shall be maintained, retained on the premises for a period of at least five years, and made available for District inspection upon request. [District Rule 4682 section 6.1 and 2520 section 9.5.2] Federally Enforceable Through Title V Permit
10. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.4.2] Federally Enforceable Through Title V Permit
11. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Dust collector filters shall be inspected at least annually while not in operation for any tears, holes, abrasions, and scuffs which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. Records of dust collector inspection, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and name of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
15. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 4201 (12/17/ 92); 4202 (12/17/92) and 4682 (6/16/94). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-23-1

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM PRODUCT STORAGE WAREHOUSE (28,480 SQ FT).

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The blowing agent retention in the finished product shall not be less than 49%, as measured by District-approved test methods. [District Rule 2201]
6. The facility-wide VOC capture efficiency shall not be less than 77.5%, as measured by mass balance, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 & 2301]
7. The amount of polystyrene foam in storage on-site shall not exceed 529,000 pounds on a daily basis (previous day-end storage total, minus amount shipped from storage today, plus amount produced and sent to storage today). [District Rule 2201]
8. The amount of polystyrene foam in storage on-site shall not exceed 266,000 pounds on a quarterly average. [District Rule 2201]
9. VOC emissions from final product storage on-site shall not exceed 332.0 lb/day. [District Rule 2201]
10. VOC emissions from final product storage on-site shall not exceed 237.2 lb/day, based on a quarterly average. [District Rule 2201]
11. VOC emissions from final product storage shall be determined as the product of the following: $0.05 \times b \times t(\exp 0.5)$, where "t" is the weighted average number of days the finished products have been in storage, and "b" is the average daily blowing agent used in the last "t" days (minus amount recycled). [District Rule 2201]
12. The permittee shall develop a spreadsheet for calculating the VOC emissions as outlined on this permit, and shall submit it for District approval within 30 days of the issuance of this permit. The spreadsheet shall contain all data used in the calculations. [District Rule 2201]
13. The permittee shall maintain and retain records of VOC emissions from product storage, the amount of product in storage, amount shipped, and amount entering storage, on a daily basis. Such records, including daily spreadsheet calculations, shall be retained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rule 2201]

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT C

Detailed Facility List

Detailed Facility Report
For Facility=36
Sorted by Facility Name and Permit Number

PACTIV CORPORATION 5370 E HOME AVE FRESNO, CA 93727	FAC # STATUS TELEPHONE	C 36 A (559) 251-7351	TYPE TOXIC ID	Title V 40004	EXPIRE ON AREA INSP DATE	04/30/2006 8/ 09/09
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-36-1-1	119.0 KGAL UNLOADING	3020-05 E	1	246.00	246.00	A	RAIL CAR UNLOADING, INCLUDING 3 RESIN SILOS, EACH 12 FT DIAM X 47 FT HIGH, PRODUCT SEPARATOR, VACUUM PUMP FILTER AND VACUUM PUMP #VB-01. STORAGE CAPACITY: 15,939 CUFT (119,221 GALLONS).
C-36-2-3	EXTRUSION LINE #1	3020-01 E	1	412.00	412.00	A	POLYSTYRENE FOAM EXTRUSION LINE #1, INCLUDING: #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE 1.5 MMBTU/HR CE MODEL 13.6 ROCC98 COMBU-CHANGER REGENERATIVE THERMAL OXIDIZER.
C-36-3-5	Extrusion Line #2	3020-01 E	1	412.00	412.00	A	POLYSTYRENE FOAM EXTRUSION LINE #2 CONSISTING OF #EX-20 PRIMARY EXTRUDER, #EX-21 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-11 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
C-36-4-3	EXTRUSION LINE #3	3020-01 E	1	412.00	412.00	A	POLYSTYRENE FOAM EXTRUSION LINE #3 CONSISTING OF #EX 30 PRIMARY EXTRUDER, #EX-31 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM FEED PUMP #VB-12 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
C-36-5-1	#G-91 THERMOFORMER	3020-01 A	1	87.00	87.00	A	#G-91 THERMOFORMER LINE CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING 6 FLUFF SILOS DESCRIBED IN C-36-18.
C-36-6-2	#G-92 GRINDER	3020-01 A	1	87.00	87.00	A	#G-92 THERMOFORMER LINE CONSISTING OF GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE FLUFF SILOS DESCRIBED IN C-36-18.
C-36-7-4	#G-93 Grinder	3020-01 A	1	87.00	87.00	A	#G-93 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING (6) FLUFF SILOS DESCRIBED IN C-36-18.
C-36-8-1	#G-94 GRINDER	3020-01 A	1	87.00	87.00	A	#G-94 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.
C-36-9-1	#G-95 GRINDER	3020-01 A	1	87.00	87.00	A	#G-95 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.
C-36-10-4	#G-96 Grinder	3020-01 B	1	117.00	117.00	A	#G-96 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.
C-36-11-4	#G-97 Grinder	3020-01 A	1	87.00	87.00	A	#G-97 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN PERMIT C-36-18.

Detailed Facility Report
For Facility=36
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-36-12-4	#G-98 Grinder	3020-01 A	1	87.00	87.00	A	#G-98 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE (6) FLUFF SILOS DESCRIBED IN C-36-18.
C-36-13-1	GR-90,91,92 GRINDERS	3020-01 E	1	412.00	412.00	A	#GR-90 BULK GRINDER WITH BLOWER, #GR-91 BULK GRINDER WITH BLOWER, AND #GR-92 SHEET GRINDER WITH BLOWER EACH FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
C-36-14-2	RECLAIM EXTRUSION LINE1	3020-01 E	1	412.00	412.00	A	#EX-40 RECLAIM EXTRUDER #1 VENTED TO A SMOG HOG MODEL 20 PE E.P. (SHARED WITH C-36-19) AND A THERMAL OXIDIZER SYSTEM (DESCRIBED IN C-36-2), AND FEEDING SIX RECLAIM SILOS DESCRIBED IN C-36-17
C-36-15-0	105.0 HP #2RECLAIMEXT	3020-01 D	1	314.00	314.00	D	#2 RECLAIM EXTRUDER
C-36-16-0	80.0 HP #3RECLAIMEXT	3020-01 C	1	197.00	197.00	D	RECLAIM EXTRUDER #3.
C-36-17-2	134 KGAL STORAGE	3020-05 E	1	246.00	246.00	A	17,960 CU. FT. (134,000 GALLON) RECLAIM STORAGE SILOS INCLUDING (2) 12' DIA. X 30' H WITH 60 DEG. CONES, (2) 12' DIA. X 30' H WITH 8' 45 DEG. CONES, AND (2) 12' DIA. X 32' H WITH 5'8" 45 DEG. CONES, RECEIVING PELLETS FROM RECLAIM EXTRUDERS.
C-36-18-1	152.0 KGAL FLUFF SILOS	3020-05 E	1	246.00	246.00	A	(6) FLUFF SILOS, 12' DIA. X 30' H, EACH VENTED TO THE TORIT FILTER AND THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2. EACH SILO RECEIVES SHREDDED POLYSTYRENE FOAM FROM GRINDERS.
C-36-19-1	Reclaim Extrusion Line	3020-01 E	1	412.00	412.00	A	#EX-50 RECLAIM EXTRUDER #2 VENTED TO SMOG HOG MODEL 20 PE E.P. (SHARED WITH C-36-14) AND A THERMAL OXIDIZER SYSTEM (DESCRIBED IN C-36-2) FEEDING SIX RECLAIM SILOS DESCRIBED IN C-36-17
C-36-20-4	roll storage area	3020-01 D	1	314.00	314.00	A	POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160'W X 22'H AVERAGE) VENTED TO THE THERMAL OXIDIZER DESCRIBED IN C-36-2
C-36-21-1	Extrusion line #4	3020-01 E	1	412.00	412.00	A	POLYSTYRENE EXTRUSION LINE #4 CONSISTING OF #EX-40 PRIMARY EXTRUDER, #EX-41 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-40 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
C-36-22-1	reclaim extrusion line #3	3020-01 E	1	412.00	412.00	A	#EX-70 RECLAIM EXTRUDER #3 SERVED BY SMOG HOG MODEL SH20 E.P. AND A THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17.
C-36-23-1	foam product storage	3020-06	1	105.00	105.00	A	POLYSTYRENE FOAM PRODUCT STORAGE WAREHOUSE (28,480 SQ FT).

Number of Facilities Reported: 1