



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

JUN 15 2011

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

**Re: Notice of Re-Proposed 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 located at 5370 E. Home Ave in Fresno, California.

This analysis is being re-noticed due to modifications requested by the applicant.

The notice of re-proposed 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

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

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2700 M Street, Suite 275
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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

JUN 15 2011

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

**Re: Notice of Re-Proposed 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 located at 5370 E. Home Ave in Fresno, California.

This analysis is being re-noticed due to modifications requested by the applicant.

The notice of re-proposed 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

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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

JUN 15 2011

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

**Re: Notice of Re-Proposed 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 located at 5370 E. Home Ave in Fresno, California.

This analysis is being re-noticed due to modifications requested by the applicant.

The notice of re-proposed 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
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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 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: June 10, 2011

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.

The District issued the first preliminary public notice on the proposed Title V permit renewal for this facility on August 13, 2010. Notice of the proposed renewal was mailed to the applicant, and emailed to ARB and EPA on August 10, 2010. During the ensuing comment period the District received comments from the applicant, among them being the fact that the nature of operations at the facility had changed significantly and the proposed renewed Title V permit did not reflect those changes. The applicant had since obtained Authority to

Authority to Construct permits from the District to replace a thermal oxidizer and partially replace the use of a VOC-based blowing agent with non-VOC blowing agent in order to comply with District Rule 4682. After considering the applicant's comments, the District decided that it was not practical to address them through the initially proposed renewed Title V permit. The District has decided instead to re-issue this proposed renewed Title V permit that reflects all the changes that have since been implemented at the facility.

The proposed renewed Title V permit will now include changes authorized through ATCs C-36-2-6, 3-7, 4-6, 5-5, 6-5, 7-6, 8-4, 9-4, 10-6, 11-6, 12-6, 13-5, 14-5, 18-4, 19-5, 20-8, 21-3, 22-3, and 23-4. These ATCs authorized the use of Acetone, CO₂, or Methyl Formate as partial replacement for the VOC-based blowing agent used at the facility. The ATCs were issued with Certificates of Conformity, hence the changes authorized therein may be incorporated into the Title V permit renewal as a final action. The applicant has submitted an administrative amendment application (#C-1103061) to incorporate the changes authorized in these ATCs into the Title V permit. Copies of the ATCs and the administrative amendment application are included as Attachments D and E, respectively. In addition, the applicant requested that certain emission limit permit conditions arising from these ATCs be modified to indicate that the limits are based on averages. The applicant's request and explanation of the clarifications is included as Attachment F. The District modified the subject permit conditions as requested.

The proposed renewed Title V permit will also include changes authorized through ATCs C-36-2-7, 3-8, 4-7, 14-6, 18-5, 19-6, 20-9, 21-4, and 22-4. These ATCs authorized the replacement of the facility's thermal oxidizer. The ATCs were issued with Certificates of Conformity, hence the changes authorized therein may be incorporated into the Title V permit renewal as a final action. The applicant has submitted an administrative amendment application (#C-1100295) to incorporate the changes authorized in these ATCs into the Title V permit. Copies of the ATCs and the administrative amendment application are included as Attachments G and H, respectively.

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 has requested to use the facility-wide umbrella general permit template (SJV-UM-03). Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

- Conditions 1 through 40 of permit unit C-36-0-2, including their underlying applicable requirements, originate from the model general permit template and are not subject to further EPA and Public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

Rules Addressed by General Permit Template

- District Rule 1100, Equipment Breakdown, (amended December 17, 1992)
- District Rule 1160, Emission Statements, (adopted November 18, 1992)
- District Rule 2010, Permits Required, (amended December 17, 1992)
- District Rule 2020, Exemptions, (amended July 21, 1994 ⇒ amended December 20, 2007)
- District Rule 2031, Transfer of Permits, (amended December 17, 1992)
- District Rule 2040, Applications, (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 2520, Federally Mandated Operating Permits, Sections 5.2, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1, 9.13.2, 9.16, and 10.0, (amended June 21, 2001)
- District Rule 4101, Visible Emissions, (amended November 15, 2001 ⇒ amended February 17, 2005)
- District Rule 4601, Architectural Coatings, (amended October 31, 2001 ⇒ amended December 17, 2009)
- 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 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)

Rules Not Addressed by General Permit Template

A. Rules Updated

- 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 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)

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 4201, Particulate Matter Concentration, (amended December 17, 1992)
- District Rule 4202, Particulate Matter Emission Rate, (amended December 17, 1992)

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

- District Rule 4682, Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing, (amended June 16, 1994; ⇒ amended September 20, 2007)

B. Rules Removed

- District Rule 8020, Fugitive Dust Requirements for Control of Fine Particulate Matter PM10 from Construction, Demolition, Excavation, and Extraction Activities, (Amended November 15, 2001)

- District Rule 8030, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Handling and Storage of Bulk Materials, (Amended November 15, 2001)
- District Rule 8060, Fugitive Dust Requirements for Control of Fine Particulate Matter PM10 from Paved and Unpaved Roads, (Amended November 15, 2001)

C. Rules Added

- 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

D. Rules Not Updated

- District Rule 1070, Inspections (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 42 on the proposed renewed permit to operate is based on this rule and is therefore not federally enforceable.

b. C-36-2-5 – POLYSTYRENE FOAM EXTRUSION LINE #1 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO A 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER.

- Conditions 8 and 13 on the proposed renewed permit to operate are based on this rule and are therefore not federally enforceable.

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-36-4-5 – 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.

e. 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 8 on the proposed renewed permits to operate is based on this rule and is therefore not federally enforceable.

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 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.

B. District Rule 2520 – Federally Mandated Operating Permits

Section 9.0 of District Rule 2520 requires certain elements to be contained in each Title V permit, as outlined below:

Section 9.3.2 requires that where applicable requirements do not require periodic testing or instrumental or non-instrumental monitoring, the Title V permit shall contain periodic monitoring requirements to yield reliable data for the relevant time period that are representative of the source's compliance with the permit, as reported pursuant to the requirements of section 9.5 of this rule. This section further states that such monitoring requirements shall assure use of terms, test methods, units, averaging periods, and other statistical conventions consistent with applicable requirement; and that recordkeeping may be sufficient to meet the requirements of this section.

Section 9.4.2 requires retention of 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. This section further states that 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.

Section 13.2 provides that compliance with permit conditions in part 70 permits that expressly state that a permit shield exists shall be deemed compliance with the applicable requirements on which the permit conditions are based.

- a. 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).
 - For this permit unit, conditions 2 through 4 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.
- b. 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.
 - For this permit unit, conditions 13 and 14 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.
- c. C-36-14-4 – #EX-40 RECLAIM EXTRUDER #1 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19) AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17.
 - For this permit unit, conditions 19 through 23 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.
- d. 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.

- For this permit unit, conditions 2, 3, 5 and 6 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.
- e. C-36-18-3 – SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A TORIT FILTER DUST COLLECTION SYSTEM AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
- For the preceding permit unit, conditions 15 through 18 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.
- f. C-36-19-4 – #EX-50 RECLAIM EXTRUDER #2 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14) AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17.
- For this permit unit, conditions 19 through 23 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.
- g. 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.
- For this permit unit, conditions 19 through 23 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.

In addition, there are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

C. 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 of the facility-wide requirements ensures compliance with the requirements of this rule.

D. 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 of the facility-wide requirements ensures compliance with the requirements of this rule.

E. 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 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 5.1.1 - 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).	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.
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;	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 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	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.

Type of Requirement	SIP Version of Rule 4682 (6/16/94)	Non-SIP Version of Rule 4682 (9/20/07)	Conclusion
	<p>OR</p> <p>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)</p>	<p>hours (for all other operations);</p> <p>OR</p> <p>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).</p> <p>OR</p> <p>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.</p>	
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.
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</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.

Type of Requirement	SIP Version of Rule 4682 (6/16/94)	Non-SIP Version of Rule 4682 (9/20/07)	Conclusion
		<p>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>	
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>6.2.2 - EPA Method 18 or ARB Test Method 422 for determination of exempt compounds and halogenated blowing agents.</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 "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>	<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 compounds).</p>

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. 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 5.2 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 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; 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 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 6.1.3 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

- For this permit unit, condition 43 on the proposed renewed Permit to Operate ensures compliance with the requirements of this rule.

b. C-36-2-5 – POLYSTYRENE FOAM EXTRUSION LINE #1 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO A 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER.

- For the preceding permit unit, conditions 4, 16, 24, 27 through 31, 34 and 37 on the proposed renewed Permit to Operate ensure compliance with the requirements of this 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-36-4-5 – 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.

- For the preceding permit units, conditions 11, 12, 14 through 17, 20 and 22 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.
- e. C-36-5-4 – #G-91 THERMOFORMER LINE CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING THE SIX 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 THE SIX 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 SIX 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 SIX 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 SIX 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 SIX FLUFF SILOS DESCRIBED IN PERMIT C-36-18.
- l. C-36-12-5 – #G-98 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
- For the preceding permit units, conditions 5, 6, 8, 9, 12 and 14 on the proposed renewed Permit to Operate ensure compliance with the requirements of this 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.
- For the preceding permit unit, conditions 4, 5, 7, 8, 11 and 15 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.
- n. C-36-14-4 – #EX-40 RECLAIM EXTRUDER #1 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19) AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17.
- For the preceding permit unit, conditions 8, 9, 11 through 14, 25 and 27 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.
- o. C-36-18-3 – SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A TORIT FILTER DUST COLLECTION SYSTEM AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
- For the preceding permit unit, conditions 7, 8, 10, 11, 20 and 22 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.
- p. C-36-19-4 – #EX-50 RECLAIM EXTRUDER #2 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14) AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17.
- For the preceding permit unit, conditions 8, 9, 11 through 14, 25 and 27 on the proposed renewed Permit to Operate ensure compliance with the requirements of this 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.
- For the preceding permit unit, conditions 5, 6, 8, 9, 12 and 14 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.

- r. 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.
- For the preceding permit unit, conditions 11, 12, 14 through 17, 20 and 22 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.
- s. 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.
- For the preceding permit unit, conditions 8, 9, 11 through 14, 25 and 27 on the proposed renewed Permit to Operate ensure compliance with the requirements of this rule.

F. 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 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO A 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER 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-36-14-4 – #EX-40 RECLAIM EXTRUDER #1 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19) AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17.
- e. C-36-18-3 – SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A TORIT FILTER DUST COLLECTION SYSTEM AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
- f. C-36-19-4 – #EX-50 RECLAIM EXTRUDER #2 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14) AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17.
- g. 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.
- h. 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.
- i. 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.

The preceding permit 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 418 lb/day, which is equivalent to 152,570 lb/year. Since the post-control VOC limit already exceeds the VOC major source threshold of 20,000 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 combustion chamber temperature will be maintained at a minimum of 1400 degrees F. 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 at least every 15 minutes. The thermal oxidizer combustion bed is equipped with a thermocouple which continuously measures the combustion bed temperature; hence the monitoring frequency requirement is satisfied.

In addition, the thermal oxidizer thermocouples will be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within $\pm 0.75\%$ of the temperature being measured expressed in degrees Fahrenheit.

- Conditions 18 through 20 on permit unit C-36-2-5 ensures compliance with the requirements of this rule.

In addition, permit units C-36-14-4, 19-4, and 22-2 have emission limits and add-control devices for PM10. These units are equipped with an electrostatic precipitator, and have an emission limit of 0.0486 lb per 1,000 lb of throughput. Of the three units, unit 22-2 has the highest throughput limit at 48,000 lb/day. The annual Potential to Emit (PE) for this unit is 851 lb/year (0.0486 lb/1,000 lb x 48,000 lb/day x 365 days/yr). Assuming the electrostatic precipitator to have a control efficiency of 99%, the pre-control PE is 85,100 lb/yr (851 lb/yr /0.01). Since the pre-control PE for the unit with the highest throughput limit is less than the PM10 major source threshold of 140,000 lb/yr, the pre-control PEs for the other units served by the electrostatic precipitator are also less than the major source thresholds, and hence all three units are not subject to CAM for PM10.

- j. 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).
- k. C-36-5-4 – #G-91 THERMOFORMER LINE CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

- l. 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.
- m. C-36-7-5 – #G-93 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
- n. C-36-8-3 – #G-94 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
- o. C-36-9-3 – #G-95 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
- p. C-36-10-5 – #G-96 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
- q. C-36-11-5 – #G-97 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN PERMIT C-36-18.
- r. C-36-12-5 – #G-98 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
- s. 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.
- t. 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.
- u. C-36-23-3 – POLYSTYRENE FOAM PRODUCT STORAGE WAREHOUSE (28,480 SQ FT).
 - The preceding permit units are not equipped with any add-con controls and are therefore not subject to CAM.

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 permit shields for requirements addressed by the umbrella template are included in conditions 39 and 40 under permit unit C-36-0-2.

B. Requirements Addressed by Model General Permit Templates

The permit shields for requirements not addressed by the umbrella template are included in condition 41 under permit unit C-36-0-2.

X. PERMIT CONDITIONS

The Draft Renewed Title V Operating Permit is included as Attachment A.

XI. ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List
- D. ATCs for Administrative Amendment Project #C-1103061
- E. Application for Administrative Amendment Project #C-1103061
- F. Permit Condition Clarifications Requested by Applicant
- G. ATCs for Administrative Amendment Project #C-1100295
- H. Application for Administrative Amendment Project #C-1100295

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. {4362} 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. {4363} 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. {4364} 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. {4365} 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 Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} 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 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} 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. {4368} 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. {4369} 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

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-36-0-2: Mar 23 2011 8:17AM - AIYABEU

9. {4370} 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
10. {4371} 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. {4372} 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. {4373} 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. {4374} 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. {4375} 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. {4376} 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. {4377} 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. {4378} 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. {4379} 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. {4380} 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. {4381} 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. {4382} 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

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

22. {4383} 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 (02/17/05). 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, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, 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. {4387} 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. {4388} 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
28. {4389} 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
29. {4390} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

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

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. 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 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. {4396} 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
36. {4397} 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
37. {4398} 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
38. {4399} 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
39. {4400} 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
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in 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); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 1070 (12/17/ 92), District Rule 1081 (12/16/ 93), District Rule 2301 (12/17/ 92), District Rule 2520 (6/21/01), District Rule 4102 (12/17/ 92), District Rule 4201 (12/17/ 92), District Rule 4202 (12/17/ 92), District Rule 4623 (5/19/05), District Rule 4662 (9/20/07), and 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
42. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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, 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
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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

45. 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
46. 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

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, 9.3.2] 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

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 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO A 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER.

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. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
3. 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
4. The thermal oxidizer and associated ventilation system shall be in use, except during routine maintenance, whenever any of the following equipment is in operation: extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. [District NSR Rule and Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
5. 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] Federally Enforceable Through Title V Permit
6. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
7. The destruction efficiency of the thermal oxidizer shall be maintained at a minimum of 95%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rules 1081 and 2301] Federally Enforceable Through Title V Permit
8. The exhaust stack of the thermal oxidizer shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
9. The RTO shall only be fired on PUC-regulated natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The VOC blowing agent consumption for the entire facility shall not exceed an average of 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The VOC blowing agent consumption for the entire facility shall not exceed an average of 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: an average of 1,500 lb/day or 164,250 lb/year. [District Rule 4102]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
17. Emissions from the combustion of natural gas in the RTO burner shall not exceed any of the following limits: 0.10 lb-NO_x/MMBtu; 0.084 lb-CO/MMBtu; 0.0076 lb-PM₁₀/MMBtu; or 0.00285 lb-SO_x/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
18. The permittee shall maintain the thermal oxidizer in accordance with the manufacturer's instructions. A copy of the manufacturer's instructions shall be kept onsite and made available for inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
19. 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
20. The thermal oxidizer shall be equipped with a thermocouple to continuously measure the temperature in the combustion zone and it shall be recorded every fifteen minutes. [District NSR Rule and 40 CFR 64] Federally Enforceable Through Title V Permit *At least*
21. The maximum air flow rate through the thermal oxidizer shall not exceed 15,000 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
22. 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
23. The permittee shall maintain the following minimum air flow rates (scfm) from the respective production areas to the thermal oxidizer when in production: 3500 from the roll storage warehouse; 528 from each foam extrusion die hood; and 203 from each reclaim line smog hog. [District NSR Rule] Federally Enforceable Through Title V Permit
24. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
25. Source testing to measure the minimum destruction efficiency of the thermal oxidizer and the minimum air flow rates from each production area shall be conducted at least once every twelve months. [District NSR Rule] Federally Enforceable Through Title V Permit
26. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
27. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682, 5.3.1] 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.

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 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO A 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER.

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. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
3. 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
4. The thermal oxidizer and associated ventilation system shall be in use, except during routine maintenance, whenever any of the following equipment is in operation: extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. [District NSR Rule and Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
5. 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] Federally Enforceable Through Title V Permit
6. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
7. The destruction efficiency of the thermal oxidizer shall be maintained at a minimum of 95%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rules 1081 and 2301] Federally Enforceable Through Title V Permit
8. The exhaust stack of the thermal oxidizer shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
9. The RTO shall only be fired on PUC-regulated natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The VOC blowing agent consumption for the entire facility shall not exceed an average of 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The VOC blowing agent consumption for the entire facility shall not exceed an average of 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: an average of 1,500 lb/day or 164,250 lb/year. [District Rule 4102]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
17. Emissions from the combustion of natural gas in the RTO burner shall not exceed any of the following limits: 0.10 lb-NO_x/MMBtu; 0.084 lb-CO/MMBtu; 0.0076 lb-PM₁₀/MMBtu; or 0.00285 lb-SO_x/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
18. The permittee shall maintain the thermal oxidizer in accordance with the manufacturer's instructions. A copy of the manufacturer's instructions shall be kept onsite and made available for inspection upon request. [District NSR Rule and 40 CFR 64] Federally Enforceable Through Title V Permit
19. The combustion zones 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
20. The thermal oxidizer shall be equipped with thermocouples to continuously measure the temperature in the combustion zones, which shall be recorded at least every fifteen minutes. The thermal oxidizer thermocouples shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within $\pm 0.75\%$ of the temperature being measured expressed in degrees Fahrenheit. [District NSR Rule and 40 CFR 64] Federally Enforceable Through Title V Permit
21. The maximum air flow rate through the thermal oxidizer shall not exceed 15,000 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit
22. 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
23. The permittee shall maintain the following minimum air flow rates (scfm) from the respective production areas to the thermal oxidizer when in production: 3500 from the roll storage warehouse; 528 from each foam extrusion die hood; and 203 from each reclaim line smog hog. [District NSR Rule] Federally Enforceable Through Title V Permit
24. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
25. Source testing to measure the minimum destruction efficiency of the thermal oxidizer and the minimum air flow rates from each production area shall be conducted at least once every twelve months. [District NSR Rule] Federally Enforceable Through Title V Permit
26. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
27. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682, 5.3.1] 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.

28. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
29. The following test methods shall be used: air flow rates - EPA Method 1 or 2; stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC - EPA Method 25 or 25A or ARB Method 100, referenced as methane; exempt VOC compounds - EPA Method 18, or alternative equivalent District and EPA approved test methods. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
30. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
31. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be calculated using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \left[\frac{\text{TVI} - \text{CVT} - \text{VRFP}}{\text{TVI}} \right] \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
32. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
34. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
35. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
36. The permittee shall maintain accurate daily records of the thermal oxidizer combustion temperature. [District NSR Rule and District Rule 4682, 6.1.2] Federally Enforceable Through Title V Permit
37. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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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28. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
29. The following test methods shall be used: air flow rates - EPA Method 1 or 2; stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC - EPA Method 25 or 25A or ARB Method 100, referenced as methane; exempt VOC compounds - EPA Method 18, or alternative equivalent District and EPA approved test methods. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
30. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
31. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be calculated using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = \frac{(\text{TVI} - \text{CVT} - \text{VRFP})}{\text{TVI}} \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
32. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
33. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
34. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
35. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
36. The permittee shall maintain accurate daily records of the thermal oxidizer combustion temperature. [District NSR Rule and District Rule 4682, 6.1.2] Federally Enforceable Through Title V Permit
37. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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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. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The VOC blowing agent consumption for the entire facility shall not exceed an average of 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The VOC blowing agent consumption for the entire facility shall not exceed an average of 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: an average of 1,500 lb/day or 164,250 lb/year. [District Rule 4102]
9. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
12. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] 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. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
14. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
15. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
16. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
17. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI}] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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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. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The VOC blowing agent consumption for the entire facility shall not exceed an average of 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The VOC blowing agent consumption for the entire facility shall not exceed an average of 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: an average of 1,500 lb/day or 164,250 lb/year. [District Rule 4102]
9. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
12. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] 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. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
14. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
15. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
16. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
17. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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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 THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. 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
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.31] 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.

9. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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-36-6-4

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 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
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] 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.

9. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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-36-7-5

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. 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
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] 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.

9. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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-36-8-3

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. 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
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] 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.

9. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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-36-9-3

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. 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
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] 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.

9. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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-36-10-5

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. 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
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] 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.

9. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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-36-11-5

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. 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
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] 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.

9. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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-36-12-5

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

1. 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
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] 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.

9. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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-36-13-4

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 overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
2. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
5. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
7. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] 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.

9. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
10. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
11. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Each grinder and its associated ductwork shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Records of grinder 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
15. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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-36-14-4

EXPIRATION DATE: 04/30/2006

EQUIPMENT DESCRIPTION:

#EX-40 RECLAIM EXTRUDER #1 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19) AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17.

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through reclaim extruder #1 shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
4. 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
5. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90%. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
9. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
10. 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 NSR Rule and District Rules 1081, 7.1] 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. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
12. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
13. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
14. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = \frac{(\text{TVI} - \text{CVT} - \text{VRFP})}{\text{TVI}} \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
17. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District NSR Rule] Federally Enforceable Through Title V Permit
18. 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
19. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. 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
21. 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 particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired 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.

23. Records of dust collector and electrostatic precipitator inspections, 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
24. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #1 (in pounds), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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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, 9.3.2] 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

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:

SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A TORIT FILTER DUST COLLECTION SYSTEM AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.

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. Each fluff silo shall be vented to the dust collection system and then to the thermal oxidizer listed on permit C-36-2. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The VOC capture efficiency of the fluff silos shall be maintained at a minimum of 90%. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
9. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
10. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] 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. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] 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. 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
15. The fluff silos shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. 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
17. Dust collector system 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 particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. Records of dust collector and associated ductwork 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
19. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14) AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17.

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through reclaim extruder #2 shall not exceed 28,800 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
4. 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
5. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90%. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
9. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
10. 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 NSR Rule and District Rules 1081, 7.1] 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. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
12. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
13. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
14. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = \frac{(\text{TVI} - \text{CVT} - \text{VRFP})}{\text{TVI}} \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
17. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District NSR Rule] Federally Enforceable Through Title V Permit
18. 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
19. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. 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
21. 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 particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired 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.

23. Records of dust collector and electrostatic precipitator inspections, 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
24. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #2 (in pounds), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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. Roll storage area shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] 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.

9. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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-36-21-2

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. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The VOC blowing agent consumption for the entire facility shall not exceed an average of 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The VOC blowing agent consumption for the entire facility shall not exceed an average of 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: an average of 1,500 lb/day or 164,250 lb/year. [District Rule 4102]
9. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
12. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] 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. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
14. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
15. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
16. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials), South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
17. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \frac{(\text{TVI} - \text{CVT} - \text{VRFP})}{\text{TVI}} \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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 reclaim extruder #3 shall not exceed 48,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
4. 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
5. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90% [District NSR Rule] Federally Enforceable Through Title V Permit
6. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
9. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
10. 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 NSR Rule and District Rules 1081, 7.1] 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. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
12. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
13. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
14. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $VOC \text{ Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
17. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District NSR Rule] Federally Enforceable Through Title V Permit
18. 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
19. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. 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
21. 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 particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired 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.

23. Records of dust collector and electrostatic precipitator inspections, 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
24. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #3 (in pounds), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and 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).

DRAFT

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

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

DRAFT

ATTACHMENT B

Previous Title V Operating Permit



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.

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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: Mar 23 2011 8:32AM - AIYABEU

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

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

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

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

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

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

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 5592517351	TYPE: TOXIC ID:	TitleV 40004	EXPIRE ON: AREA: INSP. DATE:	04/30/2006 4 / 03/11
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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

ATTACHMENT D

ATCs for Administrative Amendment Project
#C-1103061



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-2-6

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FOAM EXTRUSION LINE #1 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO A 1.5 MMBTU/HR CE MODEL 13.6 ROCC98 COMBU-CHANGER REGENERATIVE THERMAL OXIDIZER: ALLOW USE OF ACETONE, CO2, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. 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

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-36-2-6: Nov 13 2009 8:07AM - BROWNND : Joint Inspection Required with BROWNND

6. The thermal oxidizer and associated ventilation system shall be in use, except during routine maintenance, whenever any of the following equipment is in operation: extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. [District NSR Rule and Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. 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] Federally Enforceable Through Title V Permit
8. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
9. The destruction efficiency of the thermal oxidizer shall be maintained at a minimum of 95%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rules 1081, 2301 and 4682] Federally Enforceable Through Title V Permit
10. The exhaust stack of the thermal oxidizer shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
11. The RTO shall only be fired on PUC-regulated natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The maximum total VOC blowing agent consumption for the entire facility shall not exceed 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The average total VOC blowing agent consumption for the entire facility shall not exceed 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 1,500 lb/day or 164,250 lb/year. [District Rule 4102]
16. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
17. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
18. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
19. Emissions from the combustion of natural gas in the RTO burner shall not exceed any of the following limits: 0.10 lb-NO_x/MMBtu; 0.084 lb-CO/MMBtu; 0.0076 lb-PM₁₀/MMBtu; or 0.00285 lb-SO_x/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The permittee shall maintain the thermal oxidizer in accordance with the manufacturer's instructions. A copy of the manufacturer's instructions shall be kept onsite and made available for inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
21. 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
22. The thermal oxidizer shall be equipped with a thermocouple to continuously measure the temperature in the combustion zone and it shall be recorded every four hours. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The maximum air flow rate through the thermal oxidizer shall not exceed 15,000 scfm. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

24. 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
25. The permittee shall maintain the following minimum air flow rates (scfm) from the respective production areas to the thermal oxidizer when in production: 3500 from the roll storage warehouse; 528 from each foam extrusion die hood; and 203 from each reclaim line smog hog. [District NSR Rule] Federally Enforceable Through Title V Permit
26. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
27. Source testing to measure the minimum destruction efficiency of the thermal oxidizer and the minimum air flow rates from each production area shall be conducted at least once every twelve months. [District NSR Rule] Federally Enforceable Through Title V Permit
28. The permittee shall perform VOC blowing agent retention test(s) on representative finished products at the packing table and on the reprocessed resin pellets utilized in the reclaim system within 60 days of initial startup. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
29. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
30. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
31. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
32. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
33. The following test methods shall be used: air flow rates - EPA Method 1 or 2; stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC - EPA Method 25 or 25A or ARB Method 100, referenced as methane; exempt VOC compounds - EPA Method 18, or alternative equivalent District and EPA approved test methods. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
34. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule] Federally Enforceable Through Title V Permit
35. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be calculated using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \left[\frac{(\text{TVI} - \text{CVT} - \text{VRFP})}{\text{TVI}} \right] \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

36. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
37. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
38. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
39. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
40. The permittee shall maintain accurate daily records of the thermal oxidizer combustion temperature. [District NSR Rule and District Rule 4682, 6.1.2] Federally Enforceable Through Title V Permit
41. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-3-7

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF 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: ALLOW USE OF ACETONE, CO₂, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. 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
5. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule and Rule 4682] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

C-36-3-7; Nov 13 2009 9:07AM - BROWND : Joint Inspection Required with BROWND

6. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
7. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The maximum total VOC blowing agent consumption for the entire facility shall not exceed 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The average total VOC blowing agent consumption for the entire facility shall not exceed 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 1,500 lb/day or 164,250 lb/year. [District Rule 4102]
11. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
14. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
15. The permittee shall perform VOC blowing agent retention test(s) on representative finished products at the packing table and on the reprocessed resin pellets utilized in the reclaim system within 60 days of initial startup. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
16. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
17. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
18. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
19. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule] Federally Enforceable Through Title V Permit
21. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \frac{[(\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI}] \times 100\%}{}$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
23. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
24. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-4-6

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF 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: ALLOW USE OF ACETONE, CO2, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. 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
5. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule and Rule 4682] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

C-36-4-6: NOV 23 2009 8:07AM - BROWND : Joint Inspection Required with BROWND

6. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
7. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The maximum total VOC blowing agent consumption for the entire facility shall not exceed 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The average total VOC blowing agent consumption for the entire facility shall not exceed 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 1,500 lb/day or 164,250 lb/year. [District Rule 4102]
11. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
14. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
15. The permittee shall perform VOC blowing agent retention test(s) on representative finished products at the packing table and on the reprocessed resin pellets utilized in the reclaim system within 60 days of initial startup. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
16. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
17. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
18. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
19. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule] Federally Enforceable Through Title V Permit
21. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
23. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
24. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-5-5

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #G-91 THERMOFORMER LINE CONSISTING OF A THERMOFORMER, TRIM PRÉSS, GRINDER AND BLOWER FEEDING SIX FLUFF SILOS DESCRIBED IN C-36-18; ALLOW USE OF ACETONE, CO2, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. 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
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
C-36-5-5; Nov 13 2009 8:08AM - BROW/ND : Joint Inspection Required with BROW/ND

6. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
9. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
11. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \left[\frac{(\text{TVI} - \text{CVT} - \text{VRFP})}{\text{TVI}} \right] \times 100\%$$
where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-6-5

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #G-92 THERMOFORMER LINE CONSISTING OF GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING SIX FLUFF SILOS DESCRIBED IN C-36-18: ALLOW USE OF ACETONE, CO2, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682


CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. 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
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-36-6-5: Nov 13 2009 8:08AM - BROWID : Joint Inspection Required with BROWND

6. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
9. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
11. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \left[\frac{\text{TVI} - \text{CVT} - \text{VRFP}}{\text{TVI}} \right] \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-7-6

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
 FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
 FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #G-93 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING SIX FLUFF SILOS DESCRIBED IN C-36-18: ALLOW USE OF ACETONE, CO2, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. 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
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services
 C-36-7-6 - Nov 13 2009 8:08AM - BROWND - Joint Inspection Required with BROWND

6. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
9. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
11. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \frac{[\text{TVI} - \text{CVT} - \text{VRFP}]}{\text{TVI}} \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-8-4

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #G-94 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18: ALLOW USE OF ACETONE, CO₂, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. 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
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

C-36-8-4: Nov 13 2009 8:08AM - BROWNHD : Joint Inspection Required with BROWNHD

6. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
9. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
11. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \frac{(\text{TVI} - \text{CVT} - \text{VRFP})}{\text{TVI}} \times 100\%$$
where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-9-4

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #G-95 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18: ALLOW USE OF ACETONE, CO₂, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. 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
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
C-36-9-4 : Nov 13 2009 8:08AM - BROWND : Joint Inspection Required with BROWND

6. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
9. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
11. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \frac{(\text{TVI} - \text{CVT} - \text{VRFP})}{\text{TVI}} \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-10-6

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #G-96 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18: ALLOW USE OF ACETONE, CO2, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. 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
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

C-36-10-6 - Nov 13 2009 8:08AM - BROWND : Joint Inspection Required with BROWND

6. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
9. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
11. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \frac{(\text{TVI} - \text{CVT} - \text{VRFP})}{\text{TVI}} \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-11-6

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #G-97 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN PERMIT C-36-18: ALLOW USE OF ACETONE, CO2, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. 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
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

C-36-11-6 : Nov 13 2009 8:08AM - BROWND : Joint Inspection Required with BROWND

6. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass-balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
9. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
11. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \frac{[\text{TVI} - \text{CVT} - \text{VRFP}]}{\text{TVI}} \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-12-6

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #G-98 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18: ALLOW USE OF ACETONE, CO₂, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. 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
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

C-36-12-6; Nov 13 2009 8:08AM - BROWND : Joint Inspection Required with BROWND

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

6. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
9. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
11. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$$
where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-13-5

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #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: ALLOW USE OF ACETONE, CO2, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
4. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

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6. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
8. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
9. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
10. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
11. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \left[\frac{\text{TVI} - \text{CVT} - \text{VRFP}}{\text{TVI}} \right] \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
14. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Each grinder and its associated ductwork shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. Records of grinder 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
18. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-14-5

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #EX-40 RECLAIM EXTRUDER #1 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19) AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17: ALLOW USE OF ACETONE, CO₂, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682


CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The quantity of polystyrene to be processed through reclaim extruder #1 shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-36-14-5 : Nov 13 2009 8:08AM - BROWND : Joint Inspection Required with BROWND

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. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90%. [District NSR Rule and Rule 4682] Federally Enforceable Through Title V Permit
8. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
11. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The permittee shall perform VOC blowing agent retention test(s) on representative finished products at the packing table and on the reprocessed resin pellets utilized in the reclaim system within 60 days of initial startup. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
14. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
15. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
16. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
17. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials), South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI) - CVT - VRFP] / TVI \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
21. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District NSR Rule] Federally Enforceable Through Title V Permit
22. 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
23. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. 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
25. 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 particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. Records of dust collector and electrostatic precipitator inspections, 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
28. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #1 (in pounds), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-18-4

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A TORIT FILTER DUST COLLECTION SYSTEM AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2: ALLOW USE OF ACETONE, CO2, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Maintain the fluff storage silos at a negative pressure or in a sealed position. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Each fluff silo shall be vented to the dust collection system and then to the thermal oxidizer listed on permit C-36-2. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The VOC capture efficiency of the fluff silos shall be maintained at a minimum of 90%. [District NSR Rule and Rule 4682] Federally Enforceable Through Title V Permit
6. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

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7. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
10. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
11. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
12. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
13. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
14. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$$
where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
17. 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
18. The fluff silos shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. 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
20. Dust collector system 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 particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. Records of dust collector and associated ductwork 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
22. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
24. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-19-5

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #EX-50 RECLAIM EXTRUDER #2 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14) AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17: ALLOW USE OF ACETONE, CO₂, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The quantity of polystyrene to be processed through reclaim extruder #2 shall not exceed 28,800 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-36-19-5: Nov 13 2009 8:08AM - BROWND : Joint Inspection Required with BROWND

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. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90%. [District NSR Rule and Rule 4682] Federally Enforceable Through Title V Permit
8. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
11. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The permittee shall perform VOC blowing agent retention test(s) on representative finished products at the packing table and on the reprocessed resin pellets utilized in the reclaim system within 60 days of initial startup. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
14. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
15. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
16. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
17. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials), South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
21. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District NSR Rule] Federally Enforceable Through Title V Permit
22. 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
23. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. 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
25. 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 particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. Records of dust collector and electrostatic precipitator inspections, 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
28. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #2 (in pounds), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-20-8

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160'W X 22'H AVERAGE) VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2: ALLOW USE OF ACETONE, CO₂, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Roll storage area shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
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6. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
9. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
10. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
11. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \frac{(\text{TVI} - \text{CVT} - \text{VRFP})}{\text{TVI}} \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-21-3

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF 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: ALLOW USE OF ACETONE, CO₂, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. 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
5. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule and Rule 4682] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-36-21-3 - Nov 13 2009 8:08AM - BROWND - Joint Inspection Required with BROWND

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6. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
7. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The maximum total VOC blowing agent consumption for the entire facility shall not exceed 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The average total VOC blowing agent consumption for the entire facility shall not exceed 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 1,500 lb/day or 164,250 lb/year. [District Rule 4102]
11. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
14. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
15. The permittee shall perform VOC blowing agent retention test(s) on representative finished products at the packing table and on the reprocessed resin pellets utilized in the reclaim system within 60 days of initial startup. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
16. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
17. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
18. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
19. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule] Federally Enforceable Through Title V Permit
21. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
23. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
24. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-22-3

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #EX-70 RECLAIM EXTRUDER #3 SERVED BY A SMOG HOG MODEL SH20 ELECTROSTATIC PRECIPITATOR AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17: ALLOW USE OF ACETONE, CO₂, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682


CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The quantity of polystyrene to be processed through reclaim extruder #3 shall not exceed 48,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

C-36-22-3: Nov 13 2009 8 08AM - BROWND : Joint Inspection Required with BROWND

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

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. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90% [District NSR Rule and Rule 4682] Federally Enforceable Through Title V Permit
8. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
11. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. Source testing to demonstrate compliance with the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be performed within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The permittee shall perform VOC blowing agent retention test(s) on representative finished products at the packing table and on the reprocessed resin pellets utilized in the reclaim system within 60 days of initial startup. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
14. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
15. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
16. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
17. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials), South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
21. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District NSR Rule] Federally Enforceable Through Title V Permit
22. 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
23. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. 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
25. 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 particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
27. Records of dust collector and electrostatic precipitator inspections, 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
28. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #3 (in pounds), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
31. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-23-4

ISSUANCE DATE: 11/13/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FOAM PRODUCT STORAGE WAREHOUSE (28,480 SQ FT): ALLOW USE OF ACETONE, CO2, OR METHYL FORMATE AS ALTERNATIVE NON-VOC BLOWING AGENTS AND INSTALLATION OF ASSOCIATED EQUIPMENT FOR BLOWING AGENT INJECTION IN ORDER TO COMPLY WITH RULE 4682

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. 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
4. The maximum amount of polystyrene foam stored in the finished product warehouse 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
5. The average amount of polystyrene foam stored in the finished product warehouse shall not exceed 266,000 pounds/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The maximum on-site VOC emissions from final product storage shall not exceed 254.6 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services
C-36-23-4 : Nov-13-2009 8:08AM - BROWND : Joint Inspection Required with BROWND

7. The average on-site VOC emissions from final product storage shall not exceed 182.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
9. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur in the approved mass balance model, the permittee shall notify the District and have the mass balance emissions model re-approved. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The permittee shall perform VOC blowing agent retention test(s) on representative finished products stored in the finished product warehouse within 60 days of initial startup. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule] Federally Enforceable Through Title V Permit
12. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
13. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials), South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the following: maximum on-site storage VOC emission rate (lb/day), the amount of product in storage, the amount of product shipped, the amount of product entering storage, and the lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of the calendar quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

ATTACHMENT E

Application for Administrative Amendment
Project #C-1103061

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

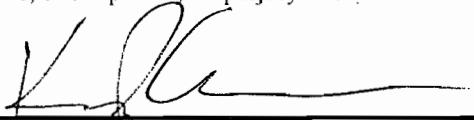
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Pactiv Corporation	FACILITY ID: C - 36
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Pactiv Corporation	
3. Agent to the Owner: Chris Berard	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

Kevin Quinn

Name of Responsible Official (please print)

VP - Operations

Title of Responsible Official (please print)

9/17/10

Date

ATTACHMENT F

Permit Condition Clarifications Requested by
Applicant

JA



Mr. Jonah Aiyabei, Permit Services
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244

November 17, 2010

NOV 18 2010
Permits Srvc
SJVAPCD

**RE: Pactiv Comments - Notice of Preliminary Decision -Title V Permit Renewal
District Facility # C-36
Project # C-1053827
Addendum 1**

Pactiv Corporation (Pactiv) respectfully submits the following additional comments and recommendations regarding the proposed Title V renewal for the Pactiv manufacturing facility located at 5370 E. Home Ave Fresno, CA 93727.

During a recent site visit to the facility by Lupe Jauregui and Dustin Brown, a need for clarification was discussed. Usage and emission calculations have always been interpreted to be calculated based on daily averages for the calendar month or calendar quarter. When the ATCs for the new Rule 4682 compliance project, the word 'average' was lost in the new ATCs. Lupe and Dustin agreed that this slight change could lead to misinterpretation in the future.

Based on this potential for future misinterpretation, Pactiv is recommending that the language for the new PTOs and the renewed Title V be clarified as indicated below in order to retain the original intent and interpretation and to preclude any potential for misinterpretation.

Current ATC language (permit #s from C-36-2-6 used as the sample)

- 13. The maximum total VOC blowing agent consumption for the entire facility shall not exceed 8,500 lb/day, calculated on a monthly basis.
- 14. The average total VOC blowing agent consumption for the entire facility shall not exceed 3,400 lb/day, calculated on a calendar quarter basis,
- 15. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 1,500 lb/day or 164,250 lb/year.
- 16. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis.
- 17. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418 lb/day, calculated on a calendar quarter basis.

These same conditions (and language) appear in the following ATCs

C-36-2-6	C-36-12-6
C-36-3-7	C-36-13-5
C-36-4-6	C-36-14-5
C-36-5-5	C-36-18-4
C-36-6-5	C-36-19-5
C-36-7-6	C-36-20-8
C-36-8-4	C-36-21-3
C-36-9-4	C-36-22-3
C-36-10-6	C-36-23-4
C-36-11-6	

Proposed language for renewed Title V and new PTOs (permit #s from C-36-2-6 used as the sample)

13. The VOC blowing agent consumption for the entire facility shall not exceed **an average of** 8,500 lb/day, calculated on a monthly basis.

14. The VOC blowing agent consumption for the entire facility shall not exceed **an average of** 3,400 lb/day, calculated on a calendar quarter basis,

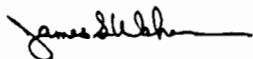
15. The methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: **an average of** 1.500 lb/day or 164,250 lb/year.

16. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed **an average of** 1,045.0 lb/day, calculated on a monthly basis.

17. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed **an average of** 418.0 lb/day, calculated on a calendar quarter basis.

As always, thank you for your time and consideration regarding this correspondence. Should you have any questions regarding this matter, please call me at 661-392-4021.

Respectfully



James G Wakeman
Pactiv Corporation

CC: Chris Berard - Pactiv
Dustin Brown - SJVAPCD
Jim Swaney - SJVAPCD
Lupe Jaugegui - SJVAPCD

ATTACHMENT G

ATCs for Administrative Amendment Project
#C-1100295



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-2-7

ISSUANCE DATE: 11/10/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION
MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FOAM EXTRUSION LINE #1 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD VENTED TO A 1.5 MMBTU/HR CE MODEL 13.6 ROCC98 COMBU-CHANGER REGENERATIVE THERMAL OXIDIZER: REPLACE EXISTING THERMAL OXIDIZER WITH A NEW 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This Authority to Construct (ATC) shall be implemented prior to, or concurrently with, the modification and startup of the equipment authorized by ATC C-36-2-6. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. 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

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadrebin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-36-2-7, Nov 10 2009 12:51 PM - BRCVND - John Inspection NOT Required

7. The thermal oxidizer and associated ventilation system shall be in use, except during routine maintenance or breakdown, whenever any of the following equipment is in operation: extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. [District NSR Rule and Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. 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] Federally Enforceable Through Title V Permit
9. The VOC capture efficiency of the extrusion operation shall be maintained at a minimum of 90%. [District Rule 4682, 5.1] Federally Enforceable Through Title V Permit
10. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 230.1] Federally Enforceable Through Title V Permit
11. The destruction efficiency of the thermal oxidizer shall be maintained at a minimum of 95%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rules 1081, 2301 and 4682] Federally Enforceable Through Title V Permit
12. The exhaust stack of the thermal oxidizer shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 41.02]
13. The thermal oxidizer shall only be fired on PUC-regulated natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Only isobutane or n-butane shall be used as VOC blowing agents. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The maximum total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The average total VOC blowing agent consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
17. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,345.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
18. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 538.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
19. VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be determined as follows: $(\text{butane usage, lb/day}) \times (1 - 0.49) \times \{(1 - 0.775) + (0.775 \times (1 - 0.95))\} + \{(\text{butane usage during thermal oxidizer downtime, lb/day}) \times (1 - 0.49)\}$. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Emissions from the combustion of natural gas in the thermal oxidizer burner shall not exceed any of the following limits: 0.10 lb-NOx/MMBtu; 0.084 lb-CO/MMBtu; 0.0076 lb-PM10/MMBtu; or 0.00285 lb-SOx/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The permittee shall maintain the thermal oxidizer in accordance with the manufacturer's instructions. A copy of the manufacturer's instructions shall be kept onsite and made available for inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The combustion zone of the thermal oxidizer shall be maintained at a minimum of 1,500 degrees Fahrenheit. [District NSR Rule] Federally Enforceable Through Title V Permit
23. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device, in operation at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
24. The permittee shall maintain the following minimum air flow rates (scfm) from the respective production areas to the thermal oxidizer when in production: 3500 from the roll storage warehouse; 528 from each foam extrusion die hood; and 203 from each reclaim line smog hog. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. Initial source testing to measure the minimum destruction efficiency of the thermal oxidizer shall be conducted within 60 days after initial start-up. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
26. Source testing to measure the minimum destruction efficiency of the thermal oxidizer shall be conducted at least once every twelve months. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
27. 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 NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
28. The following test methods shall be used: stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC - EPA Method 25 or 25A, ARB Method 100 or EPA Method 18, referenced as methane, or an alternative equivalent District and EPA approved test method. [District NSR Rule] Federally Enforceable Through Title V Permit
29. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, and maximum on-site process VOC emission rate (lb/day). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
31. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
32. The permittee shall maintain accurate daily records of the thermal oxidizer combustion temperature. [District NSR Rule and District Rule 4682, 6.1.2] Federally Enforceable Through Title V Permit
33. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-3-8

ISSUANCE DATE: 11/10/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF 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: REPLACE EXISTING THERMAL OXIDIZER WITH A NEW 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER

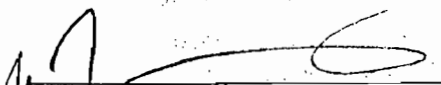
CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This Authority to Construct (ATC) shall be implemented prior to, or concurrently with, the modification and startup of the equipment authorized by ATC C-36-3-7. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. 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
6. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule and Rule 4682, 5.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

C-36-3-8: 11/10/2009 12:51PM - BROWND : Joint Inspection NOT Required

7. The VOC capture efficiency of the extrusion operation shall be maintained at a minimum of 90%. [District Rule 4682, 5.1] Federally Enforceable Through Title V Permit
8. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
9. Only isobutane or n-butane shall be used as VOC blowing agents. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The maximum total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The average total VOC blowing agent consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,345.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 538.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
14. VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be determined as follows: (butane usage, lb/day) $\times (1 - 0.49) \times \{(1 - 0.775) + (0.775 \times (1 - 0.95))\} + \{(butane usage during thermal oxidizer downtime, lb/day) \times (1 - 0.49)\}$. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, and maximum on-site process VOC emission rate (lb/day). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-4-7

ISSUANCE DATE: 11/10/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION
MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF 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: REPLACE EXISTING THERMAL OXIDIZER WITH A NEW 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This Authority to Construct (ATC) shall be implemented prior to, or concurrently with, the modification and startup of the equipment authorized by ATC C-36-4-6. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. 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
6. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule and Rule 4682, 5.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-36-4-7, Nov 10 2009 12:51PM - BROWND - Joint Inspection NOT Required

7. The VOC capture efficiency of the extrusion operation shall be maintained at a minimum of 90%. [District Rule 4682, 5.1] Federally Enforceable Through Title V Permit
8. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
9. Only isobutane or n-butane shall be used as VOC blowing agents. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The maximum total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The average total VOC blowing agent consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,345.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 538.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
14. VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be determined as follows: $(\text{butane usage, lb/day}) \times (1 - 0.49) \times \{(1 - 0.775) + (0.775 \times (1 - 0.95))\} + \{(\text{butane usage during thermal oxidizer downtime, lb/day}) \times (1 - 0.49)\}$. [District NSR Rule] Federally Enforceable Through Title V Permit
15. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, and maximum on-site process VOC emission rate (lb/day). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-14-6

ISSUANCE DATE: 11/10/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #EX-40 RECLAIM EXTRUDER #1 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19) AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17: REPLACE EXISTING THERMAL OXIDIZER WITH A NEW 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER

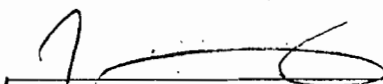
CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This Authority to Construct (ATC) shall be implemented prior to, or concurrently with, the modification and startup of the equipment authorized by ATC C-36-14-5. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The quantity of polystyrene to be processed through reclaim extruder #1 shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

C-36-14-6; Nov 10 2009 12:52PM - BROWND; Joint Inspection NOT Required

6. The VOC capture efficiency of the reclaim extrusion operation shall be maintained at a minimum of 90%. [District Rule 4682, 5.1] Federally Enforceable Through Title V Permit
7. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
8. 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
9. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90%. [District NSR Rule and Rule 4682] Federally Enforceable Through Title V Permit
10. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,345.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 538.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
12. VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area 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
13. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
14. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District NSR Rule] Federally Enforceable Through Title V Permit
15. 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
16. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. 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
18. 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 particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. Records of dust collector and electrostatic precipitator inspections, 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
21. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #1 (in pounds), type and amount of each blowing agent used, and maximum on-site process VOC emission rate (lb/day). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-18-5

ISSUANCE DATE: 11/10/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION
MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A TORIT FILTER DUST COLLECTION SYSTEM AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2: REPLACE EXISTING THERMAL OXIDIZER WITH A NEW 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER

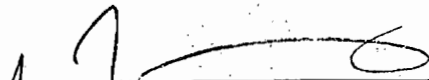
CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This Authority to Construct (ATC) shall be implemented prior to, or concurrently with, the modification and startup of the equipment authorized by ATC C-36-18-4. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Maintain the fluff storage silos at a negative pressure or in a sealed position. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Each fluff silo shall be vented to the dust collection system and then to the thermal oxidizer listed on permit C-36-2. [District NSR Rule and District Rule 4682, 5.1] Federally Enforceable Through Title V Permit
6. The VOC capture efficiency of the fluff silos shall be maintained at a minimum of 90%. [District NSR Rule and Rule 4682, 5.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-36-18-5 - Nov 10 2009 12:57PM - BROWN/D - Joint Inspection NOT Required

7. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
8. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,345.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 538.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area 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
11. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
12. 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
13. The fluff silos shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. 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
15. Dust collector system 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 particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Records of dust collector and associated ductwork 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
17. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, and maximum on-site process VOC emission rate (lb/day). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
18. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-19-6

ISSUANCE DATE: 11/10/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #EX-50 RECLAIM EXTRUDER #2 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14) AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17; REPLACE EXISTING THERMAL OXIDIZER WITH A NEW 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER

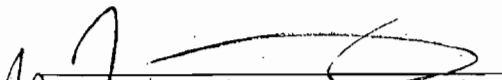
CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit.
3. This Authority to Construct (ATC) shall be implemented prior to, or concurrently with, the modification and startup of the equipment authorized by ATC C-36-19-5. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The quantity of polystyrene to be processed through reclaim extruder #2 shall not exceed 28,800 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District NSR Rule and District Rule 4682, 5.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-36-19-6 - Nov 10 2009 12:52PM - BROWND - Joint Inspection NOT Required

6. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
7. 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
8. The VOC capture efficiency from the reclaim extrusion operation shall be maintained at a minimum of 90%. [District NSR Rule and Rule 4682, 5.1] Federally Enforceable Through Title V Permit
9. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,345.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 538.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
11. VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area 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
12. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
13. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District NSR Rule] Federally Enforceable Through Title V Permit
14. 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
15. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. 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
17. 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 particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. Records of dust collector and electrostatic precipitator inspections, 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
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #2 (in pounds), type and amount of each blowing agent used, and maximum on-site process VOC emission rate (lb/day). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-20-9

ISSUANCE DATE: 11/10/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160'W X 22'H AVERAGE) VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2: REPLACE EXISTING THERMAL OXIDIZER WITH A NEW 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This Authority to Construct (ATC) shall be implemented prior to, or concurrently with, the modification and startup of the equipment authorized by ATC C-36-20-8. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Roll storage area shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
5. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

C-36-20-9: Nov 10 2009 12:52PM -- BROWND : Joint Inspection NOT Required

6. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,345.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 538.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be determined as follows: $(\text{butane usage, lb/day}) \times (1 - 0.49) \times \{(1 - 0.775) + (0.775 \times (1 - 0.95))\} + \{(\text{butane usage during thermal oxidizer downtime, lb/day}) \times (1 - 0.49)\}$. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, and maximum on-site process VOC emission rate (lb/day). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
10. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-21-4

ISSUANCE DATE: 11/10/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION
MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF 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: REPLACE EXISTING THERMAL OXIDIZER WITH A NEW 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This Authority to Construct (ATC) shall be implemented prior to, or concurrently with, the modification and startup of the equipment authorized by ATC C-36-21-3. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. 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
6. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule and Rule 4682, 5.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-36-21-4 : Nov 10 2009 12:52PM - BROWND : Joint Inspection NOT Required

7. The VOC capture efficiency of the extrusion operation shall be maintained at a minimum of 90%. [District Rule 4682, 5.1] Federally Enforceable Through Title V Permit
8. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
9. Only isobutane or n-butane shall be used as VOC blowing agents. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The maximum total VOC blowing agent consumption for the entire facility shall not exceed 10,000 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The average total VOC blowing agent consumption for the entire facility shall not exceed 4,000 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,345.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 538.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
14. VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area 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
15. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, and maximum on-site process VOC emission rate (lb/day). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
16. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-36-22-4

ISSUANCE DATE: 11/10/2009

LEGAL OWNER OR OPERATOR: PACTIV CORPORATION

MAILING ADDRESS: 5370 E HOME AVE
FRESNO, CA 93727

LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:

MODIFICATION OF #EX-70 RECLAIM EXTRUDER #3 SERVED BY A SMOG HOG MODEL SH20 ELECTROSTATIC PRECIPITATOR AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17; REPLACE EXISTING THERMAL OXIDIZER WITH A NEW 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This Authority to Construct (ATC) shall be implemented prior to, or concurrently with, the modification and startup of the equipment authorized by ATC C-36-22-3. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The quantity of polystyrene to be processed through reclaim extruder #3 shall not exceed 48,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

C-36-22-4 - Nov 10 2009 12:52PM - BROWND : Job Inspection NOT Required

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6. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District NSR Rule and District Rule 4682, 5.1] Federally Enforceable Through Title V Permit
7. 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
8. The VOC capture efficiency from the reclaim extrusion operation shall be maintained at a minimum of 90% [District NSR Rule and Rule 4682, 5.1] Federally Enforceable Through Title V Permit
9. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,345.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 538.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
11. VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area 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
12. Particulate matter emissions shall not exceed 0.1 grains/dscf.in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
13. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District NSR Rule] Federally Enforceable Through Title V Permit
14. 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
15. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. 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
17. 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 particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. Records of dust collector and electrostatic precipitator inspections, 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
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #3 (in pounds), type and amount of each blowing agent used, and maximum on-site process VOC emission rate (lb/day). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

ATTACHMENT H

Application for Administrative Amendment
Project #C-1100295

RECEIVED

San Joaquin Valley Air Pollution Control District

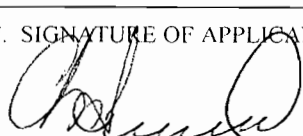
www.valleyair.org

FEB 01 2010

Permits Srvc
SJVAPCD

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Pactiv Corporation</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>5370 E Home Avenue</u> CITY: <u>Fresno</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93727</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>5370 E Home Avenue</u> CITY: <u>Fresno</u> _____ 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: <p style="text-align: center;">1/28/10</p>
4. GENERAL NATURE OF BUSINESS: <p style="text-align: center;">Foam Manufacturing</p>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Project # 1093375 Permits C-36-2-7, '-3-8, '-4-7, '-14-6, '-18-5, '-19-6, '-20-9, '-21-4 and '-22-4 Replacement of the existing 1.5 MMBtu/hr natural gas fired regenerative thermal oxidizer with a new 5.78 MMBtu/hr natural gas fired regenerative thermal oxidizer.	
6. TYPE OR PRINT NAME OF APPLICANT: Chris Berard	TITLE OF APPLICANT: Plant Manager
7. SIGNATURE OF APPLICANT: 	DATE: <u>1/28/10</u> PHONE: (559) 251-7351 FAX: (559) 251-6968 EMAIL: cberard@pactiv.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ <u>0</u>	CHECK#: <u>—</u>
	DATE PAID: <u>—</u>	

PROJECT NO: C-1100295

FACILITY ID: C-36

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

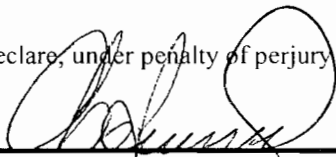
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Pactiv Corporation	FACILITY ID: C - 36
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Pactiv Corporation	
3. Agent to the Owner: Chris Berard	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

1/28/10

Date

Chris Berard

Name of Responsible Official (please print)

Plant Manager

Title of Responsible Official (please print)