



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SEP 14 2011

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

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

Dear Mr. Berard:

The District has issued the Final Title V Permit for Pactiv Corporation. The preliminary decision for this project was made on June 15, 2011. A summary of the comments and the District's response to each comment is included with the Renewed Final Title V Permit and public notice to be published approximately three days from the date of this letter.

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

Sincerely,

David Warner
Director of Permit Services

Attachments

cc: Jonah Aiyabei, Permit Services Engineer

Seyed Sadredin

Executive Director/Air Pollution Control Officer

Northern Region

4800 Enterprise Way
Modesto, CA 95356-8718

Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)

1990 E. Gettysburg Avenue
Fresno, CA 93726-0244

Tel: (559) 230-6000 FAX: (559) 230-6061
www.valleyair.org

Southern Region

2700 M Street, Suite 275
Bakersfield, CA 93301-2373

Tel: (661) 326-6900 FAX: (661) 326-6985



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SEP 14 2011

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

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

Dear Mr. Rios:

The District has issued the Final Title V Permit Renewal for Pactiv Corporation. The preliminary decision for this project was made on June 15, 2011. A summary of the comments and the District's response to each comment is included with the Renewed Final Title V Permit and public notice to be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments

cc: Jonah Aiyabei, Permit Services Engineer

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San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

SEP 14 2011

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

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

Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for Pactiv Corporation. The preliminary decision for this project was made on June 15, 2011. A summary of the comments and the District's response to each comment is included with the Renewed Final Title V Permit and public notice to be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments

cc: Jonah Aiyabei, Permit Services Engineer

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Fresno Bee

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT
NOTICE OF FINAL DECISION TO ISSUE
RENEWED FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the renewed Federally Mandated Operating Permit to Pactiv Corporation for its polystyrene foam extrusion operation 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. For additional information regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900, or contact David Warner, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

PACTIV CORPORATION

FACILITY ID: C-36

PROJECT #: C-1053827 (TITLE V PERMIT RENEWAL)

FACILITY COMMENTS AND DISTRICT RESPONSES

Comment 1

C-36-1-2: For consistency with all other permits, Pactiv recommends adding a condition 5 that reads: “Records shall be maintained 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”

District Response

The record retention condition will be added as suggested, but will be cited under Rule 2520 since this permit unit is not currently subject to the NSR Rule or Rule 4682.

Comment 2

C-36-2-5, Condition 9: Pactiv’s suggested compliance demonstration will be an annual letter with a certification or other suitable documentation from the gas supplier.

District Response

The District has no objection to the proposed compliance demonstration method.

Comment 3

C-36-2-5, Condition 13: The annual limit has been identified as being incorrect. Pactiv has filed for a short term variance and has submitted an application for permit language change to read “The maximum total Methylformate blowing agent consumption for the entire facility shall not exceed the following limits: 1,500 lb/day or 547,500 lb/year. [District Rule 4102]”

District Response

The increase in blowing agent usage limit cannot be made through a Title V permit renewal. The increase will be made through the implementation of ATC C-36-2-9.

Comment 4

C-36-2-5, Condition 17: Pactiv's intended compliance demonstration for this permit condition will be compliance with condition 9 above.

District Response

The District has no objection to the proposed compliance demonstration method.

Comment 5

C-36-2-5, Condition 19: The language in condition 19 should be changed to be consistent with ATC C-36-2-7. Suggested language for condition 19: "The combustion zone for the thermal oxidizer shall be maintained at a minimum of 1500 degrees Fahrenheit."

District Response

The District has made the suggested change.

Comment 6

C-36-2-5, Condition 20: Pactiv intends to comply with this requirement by using manufacturer specifications for thermocouples and follow the recommended maintenance plan as per the O&M manual. Thermocouples will be replaced annually and a copy of accuracy certification will be maintained.

District Response

The District has no objection to the proposed compliance demonstration method.

Comment 7

C-36-2-5, Condition 21: Condition 21 was not included in the ATC C-36-2-7 but should read: "The maximum air flow rate through the thermal oxidizer shall not exceed 20,000 scfm."

District Response

The District concurs that the higher flow rate of 20,000 scfm was erroneously omitted from ATC C-36-2-7. The District has made the appropriate correction.

Comment 8

C-36-2-5, Condition 23: For clarification, Pactiv will demonstrate compliance with this permit condition through compliance with condition 25.

District Response

The District objects to the proposed compliance demonstration method since conditions 23 and 25 address two separate requirements. Condition 25 establishes that the equipment is meeting the minimum flow rates through source testing, whereas condition 23 requires that those flow rates be maintained throughout operation; i.e. a successful annual source test will not absolve the operator of the obligation to ensure that the equipment maintains the minimum flow rates throughout the year.

Comment 9

C-36-2-5, Conditions 30 and 31: Since these conditions were intended to mandate initial startup or one time testing, there may be a potential for misinterpretation in the future if left as currently worded. For clarification, Pactiv suggests changing the permit language to read: "During any required source testing..." for conditions 30 and 31. Regardless of any language changes, these source tests will only be conducted if and when any changes outlined in conditions 27 and 28 occur.

District Response

The District has made the requested clarifications.

Comment 10

C-36-2-5, Condition 31: The formula for calculating overall VOC capture efficiency is incorrect. It should read $1 - [(TVI - CVI - VRFP)/TVI] \times 100\%$.

District Response

The District has noted this typographical error and had made the appropriate correction.

Comment 11

C-36-4-5 and 21-2, Condition 8: The annual limit has been identified as being incorrect. Pactiv has filed for a short term variance and has submitted an application for permit language change to read "The maximum total Methylformate blowing agent consumption for the entire facility shall not exceed the following limits: 1,500 lb/day or 547,500 lb/year. [District Rule 4102]"

District Response

Refer to comment 3.

Comment 12

C-36-4-5 and 21-2, Conditions 16 and 17: Since these conditions were intended to mandate initial startup or one time testing, there may be a potential for misinterpretation in the future if left as currently worded. For clarification, Pactiv suggests changing the permit language to read: “During any required source testing...” for conditions 16 and 17. Regardless of any language changes, these source tests will only be conducted if and when any changes outlined in conditions 14 and 15 occur.

District Response

The District has made the requested clarifications.

Comment 13

C-36-4-5 and 21-2, Condition 17: The formula for calculating overall VOC capture efficiency is incorrect. It should read $1 - [(TVI - CVI - VRFP)/TVI] \times 100\%$.

District Response

The District has noted this typographical error and had made the appropriate correction.

Comment 14

C-36-5-4, 6-4, 7-5, 8-3, 9-3, 10-5, 11-5 and 12-5, Condition 9: Since this condition was intended to mandate initial startup or one time testing, there may be a potential for misinterpretation in the future if left as currently worded. For clarification, Pactiv suggests changing the permit language to read: “During any required source testing...” for condition 9. Regardless of any language changes, these source tests will only be conducted if and when any changes outlined in condition 8 occur.

District Response

The District has made the requested clarifications.

Comment 15

C-36-5-4, 6-4, 7-5, 8-3, 9-3, 10-5, 11-5 and 12-5, Condition 9: The formula for calculating overall VOC capture efficiency is incorrect. It should read $1 - [(TVI - CVI - VRFP)/TVI] \times 100\%$.

District Response

The District has noted this typographical error and had made the appropriate correction.

Comment 16

C-36-13-4, Condition 8: Since this condition was intended to mandate initial startup or one time testing, there may be a potential for misinterpretation in the future if left as currently worded. For clarification, Pactiv suggests changing the permit language to read: “During any required source testing...” for condition 8. Regardless of any language changes, these source tests will only be conducted if and when any changes outlined in condition 7 occur.

District Response

The District has made the requested clarifications.

Comment 17

C-36-13-4, Condition 8: The formula for calculating overall VOC capture efficiency is incorrect. It should read $1 - [(TVI - CVI - VRFP)/TVI] \times 100\%$.

District Response

The District has noted this typographical error and had made the appropriate correction.

Comment 18

C-36-14-4, Conditions 13 and 14: Since these conditions were intended to mandate initial startup or one time testing, there may be a potential for misinterpretation in the future if left as currently worded. For clarification, Pactiv suggests changing the permit language to read: “During any required source testing...” for conditions 13 and 14. Regardless of any language changes, these source tests will only be conducted if and when any changes outlined in conditions 11 and 12 occur.

District Response

The District has made the requested clarifications.

Comment 19

C-36-14-4, Condition 14: The formula for calculating overall VOC capture efficiency is incorrect. It should read $1 - [(TVI - CVI - VRFP)/TVI] \times 100\%$.

District Response

The District has noted this typographical error and had made the appropriate correction.

Comment 20

C-36-17-3: For consistency with all other permits, Pactiv recommends adding a condition 7 that reads: “Records shall be maintained 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”

District Response

Condition 2 on this permit unit already addresses the record retention requirement.

Comment 21

C-36-18-3, Condition 11: Since this condition was intended to mandate initial startup or one time testing, there may be a potential for misinterpretation in the future if left as currently worded. For clarification, Pactiv suggests changing the permit language to read: “During any required source testing...” for condition 11. Regardless of any language changes, these source tests will only be conducted if and when any changes outlined in condition 10 occur.

District Response

The District has made the requested clarifications.

Comment 22

C-36-18-3, Condition 11: The formula for calculating overall VOC capture efficiency is incorrect. It should read $1 - [(TVI - CVI - VRFP)/TVI] \times 100\%$.

District Response

The District has noted this typographical error and had made the appropriate correction.

Comment 23

C-36-19-4, Conditions 13 and 14: Since these conditions were intended to mandate initial startup or one time testing, there may be a potential for misinterpretation in the future if left as currently worded. For clarification, Pactiv suggests changing the permit language to read: “During any required source testing...” for conditions 13 and 14. Regardless of any language changes, these source tests will only be conducted if and when any changes outlined in conditions 11 and 12 occur.

District Response

The District has made the requested clarifications.

Comment 24

C-36-19-4, Condition 14: The formula for calculating overall VOC capture efficiency is incorrect. It should read $1 - [(TVI - CVI - VRFP)/TVI] \times 100\%$.

District Response

The District has noted this typographical error and had made the appropriate correction.

Comment 25

C-36-20-7, Condition 1: The current language might leave room for misinterpretation during power outages and maintenance. Pactiv recommends that the language be amended to read as follows: "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 maintenance or complete production shutdowns. [District NSR Rule] Federally Enforceable Through Title V Permit."

District Response

Power outages are addressed via the breakdown procedures outlined in the facility-wide permit. Condition 4 on permit unit C-36-2-5 sufficiently addresses the maintenance and shutdown concerns raised in this comment.

Comment 26

C-36-20-7, Condition 9: Since this condition was intended to mandate initial startup or one time testing, there may be a potential for misinterpretation in the future if left as currently worded. For clarification, Pactiv suggests changing the permit language to read: "During any required source testing..." for condition 9. Regardless of any language changes, these source tests will only be conducted if and when any changes outlined in condition 8 occur.

District Response

The District has made the requested clarifications.

Comment 27

C-36-20-7, Condition 9: The formula for calculating overall VOC capture efficiency is incorrect. It should read $1 - [(TVI - CVI - VRFP)/TVI] \times 100\%$.

District Response

The District has noted this typographical error and had made the appropriate correction.

Comment 28

C-36-22-2, Conditions 13 and 14: Since these conditions were intended to mandate initial startup or one time testing, there may be a potential for misinterpretation in the future if left as currently worded. For clarification, Pactiv suggests changing the permit language to read: “During any required source testing...” for conditions 13 and 14. Regardless of any language changes, these source tests will only be conducted if and when any changes outlined in conditions 11 and 12 occur.

District Response

The District has made the requested clarifications.

Comment 29

C-36-22-2, Condition 14: The formula for calculating overall VOC capture efficiency is incorrect. It should read $1 - [(TVI - CVI - VRFP)/TVI] \times 100\%$.

District Response

The District has noted this typographical error and had made the appropriate correction.

Comment 30

C-36-23-3, Condition 3: This condition was not in the ATC C-36-23-4. It is part of the “old” calculation model that has been replaced by a new District approved mass balance model. This requirement is no longer pertinent and Pactiv recommends that it be deleted.

District Response

This condition will be omitted when old conditions on permit unit C-36-23-3 are replaced with the revised conditions from ATC C-36-23-4.

Comment 31

C-36-23-3, Condition 4: Pactiv recommends that this permit condition language be changed to be consistent with other permits in this Title V. The condition should read: “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 Response

This condition will be omitted when old conditions on permit unit C-36-23-3 are replaced with the revised conditions from ATC C-36-23-4.

Comment 32

C-36-23-3, Condition 10: Pactiv has developed and submitted to the District the spreadsheet mentioned in this permit condition. The spreadsheet has been reviewed and approved and has been in use for several years. Pactiv suggests changing the permit condition to read: "The permittee shall use the District approved spreadsheet for calculating the VOC emissions as outlined on this permit. The spreadsheet shall contain all data used in the calculations."

District Response

This condition will be omitted when old conditions on permit unit C-36-23-3 are replaced with the revised conditions from ATC C-36-23-4.

Comment 33

C-36-23-3: For consistency with all other permits, Pactiv recommends adding a condition 12 that reads: "Records shall be maintained 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"

District Response

This condition will be included when old conditions on permit unit C-36-23-3 are replaced with the revised conditions from ATC C-36-23-4.

Comment 34

C-36-24-0: Pactiv recommends that this finalized ATC activated by Pactiv on January 28, 2010 be included in this permit renewal. A copy of the administrative amendment is attached.

District Response

This unit will be incorporated into the Title V permit through a separate administrative amendment project. The required administrative amendment application is already on file with the District and will be acted upon as soon as the Title V permit renewal is finalized.



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

Permit to Operate

FACILITY: C-36

EXPIRATION DATE: 04/30/2016

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

FACILITY LOCATION: 5370 E HOME AVE
FRESNO, CA 93727

FACILITY DESCRIPTION: PLASTIC FOAM PRODUCTS

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

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

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: C-36-0-2

EXPIRATION DATE: 04/30/2016

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 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 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) 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, 9.4.1] 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, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: PACTIV CORPORATION
Location: 5370 E HOME AVE, FRESNO, CA 93727
C-36-0-2 : Aug 30 2011 1:50PM - AIYABEN

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, 9.5.1] 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 (6/21/01). [District Rules 2520, 9.5.2 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, 9.7] 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, 9.8.2] 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, 9.8.3] 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, 9.8.4] 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, 9.8.5] 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, 9.9] 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, 9.13.2.1] 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, 9.13.2.2] 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, 9.13.2.3] 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, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. 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. 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. 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. 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. 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. 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. 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. 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. 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. 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. 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
34. 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. 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

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 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. 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. 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. 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. 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. 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
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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-1-2

EXPIRATION DATE: 04/30/2016

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. The records shall be maintained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 2520 section 9.3.2] 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: 04/30/2016

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 1500 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 20,000 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 any required 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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-3-6

EXPIRATION DATE: 04/30/2016

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:
$$\text{VOC Capture Efficiency} = [(TVI - CVT - VRFP) / TVI] \times 100\%$$
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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-4-5

EXPIRATION DATE: 04/30/2016

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 any required 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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-5-4

EXPIRATION DATE: 04/30/2016

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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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
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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-6-4

EXPIRATION DATE: 04/30/2016

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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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
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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-7-5

EXPIRATION DATE: 04/30/2016

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

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

9. During any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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
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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-8-3

EXPIRATION DATE: 04/30/2016

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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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
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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-9-3

EXPIRATION DATE: 04/30/2016

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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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
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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-10-5

EXPIRATION DATE: 04/30/2016

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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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
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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-11-5

EXPIRATION DATE: 04/30/2016

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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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
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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-12-5

EXPIRATION DATE: 04/30/2016

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

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

9. During any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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
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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-13-4

EXPIRATION DATE: 04/30/2016

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 any required 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: $VOC \text{ Capture Efficiency} = [1 - ((TVI - CVT - VRFP) / TVI)] \times 100\%$, 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-14-4

EXPIRATION DATE: 04/30/2016

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 any required 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 any required 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: $VOC \text{ Capture Efficiency} = [1 - ((TVI - CVT - VRFP) / TVI)] \times 100\%$, 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 #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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-17-3

EXPIRATION DATE: 04/30/2016

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: 04/30/2016

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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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
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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-19-4

EXPIRATION DATE: 04/30/2016

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
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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 any required 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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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

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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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-20-7

EXPIRATION DATE: 04/30/2016

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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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
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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-21-2

EXPIRATION DATE: 04/30/2016

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

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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 any required 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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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-36-22-2

EXPIRATION DATE: 04/30/2016

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 any required 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 any required 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: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, 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
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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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-23-3

EXPIRATION DATE: 04/30/2016

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 NSR Rule] Federally Enforceable Through Title V Permit
2. 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
3. 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
4. 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
5. 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
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] 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 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
8. 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
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. During any required 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
11. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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12. 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
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 the calendar 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

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