



NOV 01 2011

Steve Stewart
Pactiv Corporation
2024 Norris Road
Bakersfield, CA 93308-2297

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # S-892
Project # 1073195**

Dear Mr. Stewart:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Pactiv Corporation for its polystyrene foam products manufacturing operation 2024 Norris Road, Bakersfield CA, California.

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

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

Attachments

C: William Jones, 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
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34946 Flyover Court
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NOV 01 2011

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

**Re: Notice of Preliminary Decision – Title V Permit Renewal
District Facility # S-892
Project # 1073195**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Pactiv Corporation for its polystyrene foam products manufacturing operation 2024 Norris Road, Bakersfield CA, California.

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

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

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NOV 01 2011

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

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # S-892
Project # 1073195**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Pactiv Corporation for its polystyrene foam products manufacturing operation 2024 Norris Road, Bakersfield CA, California.

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

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

David Warner
Director of Permit Services

Attachments

C: William Jones, Permit Services Engineer

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Bakersfield Californian

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

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to Pactiv Corporation for its polystyrene foam products manufacturing operation 2024 Norris Road, Bakersfield CA, California.

The District's analysis of the legal and factual basis for this proposed action, project #1073195, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed renewal of the Federally Mandated Operating permit. If requested by the public, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500. Written comments on the proposed renewed permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation
Pactiv Corporation
S-892

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TITLE V PERMIT RENEWAL EVALUATION
Polystyrene Foam Products Manufacturing

Engineer: William Jones
Date: 10/27/11

Ruk

10-28-11

Facility Number: S-892
Facility Name: Pactiv Corporation
Mailing Address: 2024 Norris Rd
Bakersfield, Ca 93308

Contact Name: Jim Wakeman
Phone: (661) 392-4021

Responsible Official: Steve Stewart
Title: Plant Manager

Project # : S-1073195
Deemed Complete: 6/16/07

I. PROPOSAL

Pactiv Corporation was issued a Title V permit on July 23, 1999. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

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

II. FACILITY LOCATION

Pactiv Corporation is located at 2024 Norris Road, Bakersfield, CA.

III. EQUIPMENT LISTING

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

IV. GENERAL PERMIT TEMPLATE USAGE

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

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

Rules Updated

- District Rule 2020, Exemptions, (Amended December 20, 2007)
- District Rule 2201, New and Modified Stationary Source Review Rule, (Amended April 21, 2008)
- District Rule 4101, Visible Emissions, (Amended February 17, 2005)
- District Rule 4601, Architectural Coatings, (Amended October 31, 2001)
- District Rule 4623, Storage of Organic Liquids, (Amended May 19, 2005)
- District Rule 4682, Polystyrene Foam, polyethylene, and Polypropylene Manufacturing, (Amended September 20, 2007)
- District Rule 4702, Internal Combustion Engines - Phase 2, (Amended August 18, 2011)
- District Rule 8011, General Requirements, (Amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities, (Amended August 19, 2004)
- District Rule 8031, Bulk Materials, (amended August 19, 2004)
- District Rule 8041, Carryout and Track out, (Amended August 19, 2004)
- District Rule 8051, Open Areas, (Amended August 19, 2004)

- District Rule 8061, Paved and Unpaved Roads, (Amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas, (Amended September 16, 2004)
- 40 CFR 82, Subpart F – Stratospheric Ozone
- 40 CFR 82, Subpart B – Servicing of Motor Vehicle Air Conditioners

Rules Not Updated

- District Rule 1081, Source Sampling, (Amended December 16, 1993)
- District Rule 2010, Permits Required, (Amended December 17, 1992)
- District Rule 2031, Transfer of Permits, (Amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications, (Amended December 17, 1992)
- District Rule 2080, Conditional Approval, (Amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits, (Amended June 21, 2001)
- District Rule 4201, Particulate Matter Concentrations (Amended December 17, 1992)
- 40 CFR 61, Subpart M – National Emission Standard for Asbestos
- 40 CFR 68, Chemical Accident Prevention Provisions

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

For this facility, the following are not federally enforceable and will not be discussed in further detail:

- District Rule 1070, Inspections, (Amended December 17, 1992)
- District Rule 1100, Equipment Breakdown, (Amended December 17, 1992)

- District Rule 1160, Emission Statements, (Amended November 18, 1992)
- District Rule 2040, Applications, (Amended December 17, 1992)
- District Rule 4102, Nuisance, (Amended December 17, 1992)
- District Rule 4801, Sulfur Compounds, (Amended December 17, 1992)

VIII. PERMIT REQUIREMENTS

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

A. Rule 2020, Exemptions

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

B. Rule 2201, New And Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.25, defined as an action including at least one of the following items:

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

The amendments to this rule do not affect the overall applicability or requirements as they are applied to sources at this facility. Since the changes included in the latest rule amendment did not result in adding new requirements and/or revising current requirements in the facility-wide permit, no further evaluation is needed.

C. District Rule 4101, Visible Emissions

The purpose of this rule is to prohibit the emissions of visible air contaminants to the atmosphere. The provisions of this rule shall apply to any source operation which emits or may emit air contaminants. This rule was amended on February 17, 2005.

The requirements of this rule prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than the smoke described in Section 5 of Rule 4101.

Section 5 dictates that a person shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant, other than uncombined water vapor, for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:

- As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart as published by the United States Bureau of Mines.
- Of such opacity as to obscure an observer's view to a degree equal to or greater than the No. 1 on the Ringelmann chart smoke.

The following permit requirement will remain on the Title V permit to ensure compliance with this rule:

a) S-892-0-3 FACILITY-WIDE REQUIREMENTS

- Condition 24 on the proposed permit assure compliance with this rule.

Section 6 outlines the allowable test methods for use in proving compliance with the requirements of this rule. Allowable test methods are restricted to the following unless otherwise approved by the APCO and United States Environmental Protection Agency (US EPA):

- US EPA Method 9 for visual determination of the opacity of emissions.
- 40 Code of Federal Regulations (CFR) Part 60 Appendix B Performance Specification 1 for determination of certified, calibrated in-stack opacity monitoring system.

The following permit requirements were added to ensure compliance with this rule:

- a) S-892-2-22 - VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)
- Condition 7 on the proposed permit assure compliance with this rule.
- b) S-892-1-10 - VIRGIN RESIN UNLOADING AND STORAGE INCLUDING RAIL CAR UNLOADING FILTER/RECEIVER WITH 75 HP EXHAUST BLOWER, 60 HP FEED BLOWER, FIVE STORAGE SILOS, AND ONE FABRIC DUST COLLECTOR
- Condition 5 on the proposed permit assure compliance with this rule.
- c) S-892-12-3 - REPROCESSED POLYSTYRENE PELLET (RPP) BOX DUMPER OPERATION (24 TOTAL HP).
- Condition 6 on the proposed permit assure compliance with this rule.

D. District Rule 4601, Architectural Coatings

The purpose of this rule is to limit VOC emissions from architectural coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements. The requirements of this rule are applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District. This rule requires limiting the application of any architectural coating to no more than what is listed in the Table of Standards (Section 5.0). The rule was amended on December 17, 2009. The amendments to this rule do not

affect the overall applicability or requirements as they are applied to sources at this facility. Since the latest rule amendment did not result in adding new requirements and/or revising current requirements in the facility-wide permit, no further evaluation is needed.

E. District Rule 4623, Storage of Organic Liquids

The purpose of this rule is to limit volatile organic compound (VOC) emissions from the storage of organic liquids. This rule limits volatile organic compound (VOC) emissions from the storage of organic liquids. It applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored. The rule was amended in May 19, 2005.

Section 4 of this rule outlines the exemptions to this rule, and dictates that the requirements of this rule do not apply to any of the following:

- Pressure vessels.
- Gasoline storage tanks with a capacity of less than 19,800 gallons that are subject to the requirements of Rule 4621 (Gasoline Transfer Into Stationary Storage Containers, Delivery Vessels, and Bulk Plants).
- Tanks that are used for storage/processing of clean produced water, or other water that meets the VOC standard specified in the definition of "clean produced water" in Rule 1020 (Definitions).
- Tanks used in wine fermentation and for storage of resulting products, by-products, and spirits.

The following permit requirements were added to ensure compliance with this rule:

a) S-892-6-3 - 12,000 GALLON BLOWING AGENT STORAGE VESSEL #1 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE

- Condition 1 on the proposed permit assure compliance with this rule

b) S-892-7-3 - 12,000 GALLON BLOWING AGENT STORAGE VESSEL #2 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE

- Condition 1 on the proposed permit assure compliance with this rule

c) S-892-8-3 - 12,000 GALLON BLOWING AGENT STORAGE VESSEL #3 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE.

- Condition 1 on the proposed permit assure compliance with this rule

d) S-892-22-1 – 18,000 GALLON METHYL FORMATE PRESSURE VESSEL STORAGE TANK

- Condition 2 on the proposed permit assure compliance with this rule

F. District Rule 4682, Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing

The purpose of this rule is to limit emissions of VOC and trichlorofluoromethane (CFC-11) and dichlorofluoromethane (CFC-12) from manufacturing and processing of products composed of polystyrene, polyethylene, or polypropylene and from the storage of VOC blowing agents. The provisions of this rule apply to any manufacturing, processing, and storage of products composed of polystyrene, polyethylene, or polypropylene. The requirements of this rule were amended September 20, 2007.

Section 5 of this rule dictates that no person shall place, hold or store any VOC blowing agent in any stationary tank, reservoir or container having a capacity greater than 200 gallons unless one (1) of the following emission control systems is provided:

- The container is a pressure vessel maintaining a working pressure at all times sufficient to prevent release of VOC emissions to the atmosphere under normal operating conditions; or
- The container is equipped with an emission control device or system which collects and disposes of VOC emissions, and which achieves and maintains a vapor recovery/control efficiency of at least 95 percent by weight.

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

- S-892-4-28, POLYSTYRENE FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE, THREE RECLAIM EXTRUDER LINES, RECLAIMED RESIN STORAGE AND TRANSFER WITH VOC VAPOR COLLECTION AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)
 - Condition 4 on the proposed permit assure compliance with this rule.

- S-892-6-3, 12,000 GALLON BLOWING AGENT STORAGE VESSEL #1 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE
 - Condition 1 on the proposed permit assure compliance with this rule.

- S-892-7-3, 12,000 GALLON BLOWING AGENT STORAGE VESSEL #2 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE
 - Condition 1 on the proposed permit assure compliance with this rule.

- S-892-8-3, 12,000 GALLON BLOWING AGENT STORAGE VESSEL #3 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE
 - Condition 1 on the proposed permit assure compliance with this rule.

To limit VOC emissions from the manufacturing process, Section 5.6 requires that the operator select from one of the reduction methods listed in Section 5.31 through Section 5.3.5.

The operator has selected the option listed in Section 5.3.1: a demonstration that total production emissions not exceed 2.4 pounds of VOC per 100 pounds of total material processed, calculated over a monthly period. Where total product emissions include emissions from the manufacturing operation, after controls, plus the residual blowing agent in the finished product.

- S-892-10-2 POLYSTYRENE FOAM EXTRUSION PROCESS
CONSISTING OF 10 FOAM EXTRUSION LINES

- Conditions 8 and 14 on the proposed permit assure compliance with this rule.

Section 5.6 outlines the compliance plan requirements for compliance with this rule. This section dictates that by no later than March 20, 2009, operators complying with Section 5.3.1, 5.3.4, or 5.3.5 shall submit to the APCO a Compliance Plan which includes all necessary information to show the proposed method of compliance with the applicable section. Such information shall include, but not be limited to:

- 5.6.1 Potential VOC emissions,
- 5.6.2 Overall VOC capture and control efficiency of VOC emission control system,
- 5.6.3 Material VOC content at relevant manufacturing points. The amount of VOC in the material shall be determined using the test method in Section 6.2.4, or other method approved by the APCO and EPA.
- 5.6.4 VOC emission calculation formula which will be used to show compliance, and
- 5.6.5 Operational characteristics of the VOC emission control systems which will be monitored to show continued compliance with the applicable limits.
- 5.6.6 Any operational or equipment limitations that are necessary to make the demonstration enforceable and which will be included as a condition on the appropriate Permit to Operate.

The facility has submitted a compliance plan on 2/17/09 that satisfies the requirements of this section. No further discussion is needed.

Section 6 addresses the record keeping requirements and dictates that any person subject to the provisions of this rule, including exempt facilities, shall maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used.

In addition, section 6 addresses the acceptable test methods for rule compliance and dictates that the control efficiency of the emission control system shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates, and EPA Methods 25, 25A, or 25B for measuring

total gaseous organic concentrations at the inlet and outlet of the control device.

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

- a) S-892-4-28, POLYSTYRENE FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE, THREE RECLAIM EXTRUDER LINES, RECLAIMED RESIN STORAGE AND TRANSFER WITH VOC VAPOR COLLECTION AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)
- Condition 7, 13, 14, 15, 16, 17, and 25 on the proposed permit assure compliance with this rule.

G. District Rule 4702, Internal Combustion Engines - Phase 2

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), and sulfur oxides (SO_x) from internal combustion engines. This rule applies to any internal combustion engine rated at 25 brake horsepower or greater. This rule was amended August 18, 2011

As stated in Section 4.3.1 this project is exempt from all requirements of this rule except for those outlined in Section 6.2.3. As stated in section 4.3.1 of rule 4702 the requirements of this rule do not apply to internal combustion engine that meet the following conditions:

- The engine is operated exclusively to preserve or protect property, human life, or public health during a disaster or state of emergency, such as a fire or flood; and
- Except for operations associated with Section 4.3.1.1, the engine is limited to operate no more than 100 hours per calendar year as determined by an operational non resettable elapsed time meter, for periodic maintenance, periodic readiness testing, and readiness testing during and after repair work of the engine; and
- The engine is operated with an operational non resettable elapsed time meter. In lieu of installing a non-resettable elapsed time meter, the operator of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and EPA. The operator of the engine shall

properly maintain and operate the non-resettable elapsed time meter or alternative device in accordance with the manufacturer's instructions.

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

a) S-892-11-24, 250 BHP CUMMINS MODEL NT-855-11 DIESEL FIRED I.C. ENGINE POWERING AN EMERGENCY FIREWATER PUMP

- Condition 5 on the proposed permit assure compliance with this rule.

Section 6.2.3 outlines the required administrative requirements and dictates that an operator claiming an exemption under Section 4.2 or Section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and provided to the APCO upon request. The records shall include, but are not limited to, the following information:

- Total hours of operation,
- The type of fuel used,
- The purpose for operating the engine,
- For emergency standby engines, all hours of non-emergency and emergency operation shall be reported, and SJVUAPCD 4702 - 23 8/18/11
- Other support documentation necessary to demonstrate claim to the exemption.

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

a) S-892-0-3 FACILITY-WIDE REQUIREMENTS

- Condition 45 on the proposed permit assure compliance with this rule.

b) S-892-11-24, 250 BHP CUMMINS MODEL NT-855-11 DIESEL FIRED I.C. ENGINE POWERING AN EMERGENCY FIREWATER PUMP

- Conditions 4, and 7 on the proposed permit assure compliance with this rule.

H. District Rule 8011, General Requirements

The purpose of Regulation VIII (Fugitive PM10 Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM10) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions.

The provisions of this rule are applicable to specified outdoor fugitive dust sources. The definitions, exemptions, requirements, administrative requirements, recordkeeping requirements, and test methods set forth in this rule are applicable to all Rules under Regulation VIII (Fugitive PM10 Prohibitions) of the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. The rule was amended August 19, 2004. The changes do not affect the overall applicability or requirements as they are applied to sources at this facility. Since the latest rule amendment did not result in adding new requirements and/or revising current requirements in the facility-wide permit, no further evaluation is needed.

The following permit requirement will remain on the permit to ensure compliance with this rule:

a) S-892-0-3 FACILITY-WIDE REQUIREMENTS

- Conditions 31, 32, 33, 34, 35, and 36 on the proposed permit assure compliance with this rule.

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

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

This rule applies to any construction, demolition, excavation, extraction, and other earthmoving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site. This rule was amended August 19, 2004. Since the latest rule amendment did not result in adding new requirements and/or revising current requirements in the facility-wide permit, no further evaluation is needed.

The following permit requirement will remain on the permit to ensure compliance with this rule:

a) S-892-0-3 FACILITY-WIDE REQUIREMENTS

- Condition 31 on the proposed permit assure compliance with this rule.

J. District Rule 8031, Bulk Materials

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

This rule applies to the outdoor handling, storage, and transport of any bulk material. The requirements of this rule were amended August 19, 2004. Since the latest rule amendment did not result in adding new requirements and/or revising current requirements in the facility-wide permit, no further evaluation is needed.

The following permit requirement will remain on the permit to ensure compliance with this rule:

a) S-892-0-3 FACILITY-WIDE REQUIREMENTS

- Condition 32 on the proposed permit assure compliance with this rule.

K. District Rule 8041, Carryout and Track out

The purpose of this rule is to limit fugitive dust emissions from carryout and track out. This rule applies to all sites that are subject to Rules 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), 8031 (Bulk Materials), and 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or track out has occurred or may occur. The requirements of this rule were amended August 19, 2004. Since the latest rule amendment did not result in adding new requirements and/or revising current requirements in the facility-wide permit, no further evaluation is needed.

The following permit requirement will remain on the permit to ensure compliance with this rule:

a) S-892-0-3 FACILITY-WIDE REQUIREMENTS

- Condition 33 on the proposed permit assure compliance with this rule.

L. District Rule 8051, Open Areas

The purpose of this rule is to limit fugitive dust emissions from open areas. This rule applies to any open area having 3.0 acres or more of disturbed surface area that has remained undeveloped, unoccupied, unused, or vacant for more than seven days. The requirements of this rule were amended August 19, 2004. Since the latest rule amendment did not result in adding new requirements and/or revising current requirements in the facility-wide permit, no further evaluation is needed.

The following permit requirement will remain on the permit to ensure compliance with this rule:

a) S-892-0-3 FACILITY-WIDE REQUIREMENTS

- Condition 34 on the proposed permit assure compliance with this rule.

M. District Rule 8061, Paved and Unpaved Roads

The purpose of this rule is to limit fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria. The requirements of this rule apply to any new or existing public or private paved or unpaved road, road construction project, or road modification project. The requirements of this rule were amended August 19, 2004. Since the latest rule amendment did not result in adding new requirements and/or revising current requirements in the facility-wide permit, no further evaluation is needed.

The following permit requirement will remain on the permit to ensure compliance with this rule:

a) S-892-0-3 FACILITY-WIDE REQUIREMENTS

- Condition 35 on the proposed permit assure compliance with this rule.

N. District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas

This rule applies to any unpaved vehicle/equipment traffic area of 1.0 acre or larger. The purpose of this rule is to limit fugitive dust emissions from unpaved vehicle and equipment traffic areas by implementing control

measures and design criteria. The requirements of this Rule were amended August 19, 2004. Since the latest rule amendment did not result in adding new requirements and/or revising current requirements in the facility-wide permit, no further evaluation is needed.

The following permit requirement will remain on the permit to ensure compliance with this rule:

a) S-892-0-3 FACILITY-WIDE REQUIREMENTS

- Condition 36 on the proposed permit assure compliance with this rule.

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

These regulations apply to the servicing of motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2004 and 2008. Since the latest rule amendment did not result in adding new requirements and/or revising current requirements in the facility-wide permit, no further evaluation is needed.

The following permit requirements will remain on the permit to ensure compliance with this rule:

a) S-892-0-3 FACILITY-WIDE REQUIREMENTS

- Condition 29 and 30 on the proposed permit assure compliance with this rule.

P. Federal Compliance Assurance Monitoring (CAM) Applicability

Title 40, Part 64 of the Code of Federal Regulations specifies regulations for the Federal CAM rule.

Section 64.2 states that a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit is subject to the Compliance Assurance Monitoring (CAM) rule if the unit satisfies all of the following criteria:

- The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this Regulation;

- The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in §64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

The applicability of Cam to each permit unit is addressed below:

- a) PERMIT TO OPERATE S-892-1-10 - VIRGIN RESIN UNLOADING AND STORAGE INCLUDING RAIL CAR UNLOADING FILTER/RECEIVER WITH 75 HP EXHAUST BLOWER, 60 HP FEED BLOWER, FIVE STORAGE SILOS, AND ONE FABRIC DUST COLLECTOR

This unit does not have a potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. Therefore CAM is not triggered for this unit

- b) PERMIT TO OPERATE S-892-2-22 - VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

This unit does not have a potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. Therefore CAM is not triggered for this unit

- c) PERMIT TO OPERATE S-892-4-28 - POLYSTYRENE FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE, THREE RECLAIM EXTRUDER LINES, RECLAIMED RESIN STORAGE AND TRANSFER WITH VOC VAPOR COLLECTION AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)

Permit to Operate S-892-4 authorizes the operation of a polystyrene fluff reclaim operation using a regenerative thermal oxidizer (RTO). This RTO meets the definition of a control device as defined in 40 CFR Part 64. The permit unit has a potential to emit greater than the threshold limit of 10 tons of VOC emissions per year should the control device fail. Therefore, the CAM/MACT requirements apply to this emission unit. However, Permit to Operate S-892-4 contains conditions for parameter monitoring and recordkeeping that appear to satisfy the CAM/MACT requirements.

The following permit requirements will remain on the permit to ensure compliance with this rule:

- Conditions 3, 6, 10, 12, 13, 14, 17, 23, 25 and 26 on the proposed permit assure compliance with this rule

- d) S-892-5-23 - RECLAIM SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 11 RECLAIM SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RECLAIM USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

This unit does not have a potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. Therefore CAM is not triggered for this unit

- e) S-892-10-26 - POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES

This unit does not have a potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. Therefore CAM is not triggered for this unit

- f) S-892-11-5 - 250 BHP CUMMINS MODEL NT-855-11 DIESEL FIRED I.C. ENGINE POWERING AN EMERGENCY FIREWATER PUMP

This unit does not have a potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100

percent of the amount, in tons per year, required for a source to be classified as a major source. Therefore CAM is not triggered for this unit

g) S-982-17-24 - THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING THERMOFORMERS, HEAT TUNNELS AND TRIM PRESSES

This unit does not have a potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. Therefore CAM is not triggered for this unit

h) S-982-22-1 - 18,000 GALLON METHYL FORMATE PRESSURE VESSEL STORAGE TANK

This unit does not have a potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. Therefore CAM is not triggered for this unit

IX. PERMIT SHIELD

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

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

A. Requirements Addressed by Model General Permit Templates

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

B. Requirements not Addressed by Model General Permit Templates

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

X. ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List
- D. Permit Condition Clarifications Requested by Application

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: S-892-0-3

EXPIRATION DATE: 01/31/2008

FACILITY-WIDE REQUIREMENTS

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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, 6.0; and Kern County Rule 111] 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; and Kern County Rule 111] Federally Enforceable Through Title V Permit
3. {2287} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (8/18/11). [District Rules 2010, 3.0, 4.0; and 2020, 5.0, 6.0, 7.0] 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, 9.0] 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, 2.0] 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, 3.0] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include, where appropriate: 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, 9.0] Federally Enforceable Through Title V Permit
9. All Title V records required by conditions on this permit shall be readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The results of each source test required by the conditions in this permit, shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.0] 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: 2024 NORRIS RD, BAKERSFIELD, CA 93308-2297
S-892-0-3: Oct 4 2011 3:50PM - JONESW

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11. 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, 9.0] Federally Enforceable Through Title V Permit
12. 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, 9.0] Federally Enforceable Through Title V Permit
13. 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, 9.0; and 1100, 7.0] Federally Enforceable Through Title V Permit
14. 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, 9.0] Federally Enforceable Through Title V Permit
15. 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, 9.0] Federally Enforceable Through Title V Permit
16. 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, 9.0] Federally Enforceable Through Title V Permit
17. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
18. 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, 9.0] Federally Enforceable Through Title V Permit
19. 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, 9.0] Federally Enforceable Through Title V Permit
20. 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, 9.0] Federally Enforceable Through Title V Permit
21. 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, 9.0] Federally Enforceable Through Title V Permit
22. 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, 9.0] Federally Enforceable Through Title V Permit
23. 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, 9.0] 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.

24. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, 5.0; and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
25. 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 the Table of Standards of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.0] Federally Enforceable Through Title V Permit
26. All VOC-containing materials for architectural coatings subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.0] Federally Enforceable Through Title V Permit
27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.0] Federally Enforceable Through Title V Permit
28. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.0 and 10.0] Federally Enforceable Through Title V Permit
29. {2311} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
30. {2312} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
31. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8021, 4.0, 5.0; and 8011 4.0 and 5.0] Federally Enforceable Through Title V Permit
32. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8031, 4.0, 5.0; and 8011, 4.0 and 5.0] Federally Enforceable Through Title V Permit
33. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8041, 4.0, 5.0; and 8011, 4.0, 5.0] Federally Enforceable Through Title V Permit
34. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8051, 4.0, 5.0; and 8011, 4.0, 5.0] Federally Enforceable Through Title V Permit
35. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8061, 4.0, 5.0; and 8011, 4.0, and 5.0] Federally Enforceable Through Title V Permit
36. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 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 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8071, 4.0 and 5.0; and 8011, 4.0 and 5.0] Federally Enforceable Through Title V Permit

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

37. {2319} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
38. 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, 9.0] Federally Enforceable Through Title V Permit
39. 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, 5.0] Federally Enforceable Through Title V Permit
40. 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, 9.0] Federally Enforceable Through Title V Permit
41. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Kern County Rules 111, 407 and 401. A permit shield is granted from these requirements. [District Rule 2520, 13.0] Federally Enforceable Through Title V Permit
42. 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); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4201 (12/17/92); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (12/17/09); 4623 (5/19/05); 4682 sections 5.1 and 5.2 (9/20/07); 4801 (12/17/92); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (8/19/04). A permit shield is granted from these requirements. [District Rule 2520, 13.0] Federally Enforceable Through Title V Permit
43. 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 the individual performing the inspection. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
44. Records of visible emissions inspections shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
45. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request [District Rule 4702, 6.0; and 17 CCR 93115] Federally Enforceable Through Title V Permit
46. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin July 15 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, 9.0] Federally Enforceable Through Title V Permit
47. The facility shall submit to the proper authority a Risk Management Plan, and comply with all the requirements of Program 1, 2, or 3. [40 CFR Part 68] Federally Enforceable Through Title V Permit
48. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102, 4.0]

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

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-892-1-10

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

VIRGIN RESIN UNLOADING AND STORAGE INCLUDING RAIL CAR UNLOADING FILTER/RECEIVER WITH 75 HP EXHAUST BLOWER, 60 HP FEED BLOWER, FIVE STORAGE SILOS, AND ONE FABRIC DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Virgin resin silo vents shall vent only to fabric dust collector. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Materials collected in fabric dust collector shall be recycled into virgin resin silos or disposed of in a manner preventing emissions to the atmosphere. [District Rule 4102, 4.1]
3. The fabric dust collector shall be maintained in proper working order. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. The facility can demonstrate compliance with this particulate matter emission limit by complying with the maintenance obligations imposed by the other conditions of this unit.. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
5. Visible emissions shall be inspected weekly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rules 2520, 9.0; and 4101, 6.0] Federally Enforceable Through Title V Permit
6. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.0] 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: S-892-2-22

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

PERMIT UNIT REQUIREMENTS

1. Total virgin resin and recycled polystyrene pellet (RPP) throughput for permit unit #'s S-892-2 and S-892-5 shall not exceed 302,400 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm virgin resin. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Operator shall maintain records of monthly amount of weight virgin resin processed and total hours of operation per month and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of daily scheduled hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene foam processed in month) / (total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. The facility can demonstrate compliance with this particulate matter emission limit by complying with the maintenance obligations imposed by the other conditions of this unit. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
7. Visible emissions shall be inspected weekly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rules 1081, 5.0; 2201; 2520, 9.0; 4101, 6.0; and 4201, 4.0] Federally Enforceable Through Title V Permit
8. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.0] 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: S-892-4-28

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

POLYSTYRENE FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE, THREE RECLAIM EXTRUDER LINES, RECLAIMED RESIN STORAGE AND TRANSFER WITH VOC VAPOR COLLECTION AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)

PERMIT UNIT REQUIREMENTS

1. Storage silos shall be gas tight with no visible emissions in excess of 5% opacity (Ringelmann 1/4) from the storage silos. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Trim grinders units and reclaim granulator units shall be vented only to the fluff feed silos with fabric collectors. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Operation shall be equipped with no more than 11 fluff storage silos each with separate fabric collectors, 6 of which have live bottom bins, and all venting to the RTO. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The VOC vapor collection system shall serve 3 fluff feed silo fabric collector exhausts, 3 extruder vents including vapor mix box #MB-2 and vapor booster fan exhausting to mix box #MB-1. [District Rules 2201; and 4682, 5.0] Federally Enforceable Through Title V Permit
5. Operation shall include no more than 3 reclaim extruder lines with underwater pelletizer systems, air driers, and 3 pelletizer blowers. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Operation shall include VOC vapor collection system exhausting to RTO serving 11 fluff storage silos including mix box #MB-1. [District Rule 2201] Federally Enforceable Through Title V Permit
7. RTO shall be equipped with 3 heat exchanger beds filled with ceramic media, combustion chamber, two 8 MMBtu/hr burners, combustion air fan and induced draft exhaust fan. [District Rules 2201; and 4682, 6.0] Federally Enforceable Through Title V Permit
8. RTO beds smokeless burnout system shall include burnout fan and ducting from outlet side of heat exchanger beds to combustion chamber. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Fluff transfer and reclaim resin storage operation shall not operate or produce VOC emissions during RTO burnout process. [District Rule 2201] Federally Enforceable Through Title V Permit
10. RTO burners shall be fired exclusively with PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Fuel gas sulfur content shall not exceed 0.25 grain per 100 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Fuel gas flowrate to RTO burners shall not exceed 16,000 scf per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
13. RTO combustion chamber temperature shall be maintained at no less than 1350 deg. F. [District Rule 4682, 6.0] 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.

14. The blowing agent vapor residence time in RTO firebox shall be maintained at no less than 1.0 second. [District Rule 4682, 6.0] Federally Enforceable Through Title V Permit
15. The blowing agent vapor collection and incineration efficiency shall be maintained at no less than 95% by weight. [District Rule 4682, 6.0] Federally Enforceable Through Title V Permit
16. Ambient air flow into vapor control system shall be regulated at mix boxes and shall not exceed amount required to maintain vapor concentration below lower explosive limit (LEL). [District Rules 2201; and 4682, 6.0] Federally Enforceable Through Title V Permit
17. Permittee shall maintain accurate records of vapor control system operation conditions (RTO operating temperature, fuel gas flowrate, etc.). [District Rule 4682, 6.0] Federally Enforceable Through Title V Permit
18. Particulate matter (PM10) emission rate at RTO exhaust shall not exceed 14.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Maximum emission rate of SO_x (as SO₂) shall not exceed 0.01 pound per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Maximum emission rate of volatile organic compounds (VOC) shall not exceed 7.69 pounds per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Maximum emission rate of oxides of nitrogen (NO_x) shall not exceed 2.24 pounds per hour (as NO₂). [District Rule 2201] Federally Enforceable Through Title V Permit
22. Maximum emission rate of carbon monoxide (CO) shall not exceed 0.56 pounds per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
23. District witnessed source testing to demonstrate compliance with VOC and sulfur compound emission limits and RTO control efficiency shall be conducted by independent testing laboratory annually 60 days prior to permit anniversary date. [District Rules 2201; and 1081, 7.0] Federally Enforceable Through Title V Permit
24. Visible emissions shall be inspected weekly during operation. If visible emissions are present, the facility will conduct a EPA Method 9 test to determine whether emissions are in excess of Ringlemann 1 or 20% opacity. Upon detection of visible emissions greater than Ringlemann 1 or 20% opacity, District-witnessed source testing by independent testing laboratory shall be conducted to verify compliance with the particulate matter emission limit. [District Rules 2201; and 1081, 6.0]
25. Source testing to demonstrate compliance with District Rule 4682 shall be performed using EPA Methods 25 and 25A for gaseous organics at inlet/outlet of RTO. [District Rule 4682, 6.0] Federally Enforceable Through Title V Permit
26. RTO outlet shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-5-23

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

RECLAIM SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 11 RECLAIM SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RECLAIM USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

PERMIT UNIT REQUIREMENTS

1. Reclaimed Polystyrene Pellet (RPP) conveying system shall be equipped with no more than 3 static baghouses. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total virgin resin and recycled polystyrene pellet (RPP) throughput for permit unit #'s S-892-2 and S-892-5 shall not exceed 302,400 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm RPP. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of monthly amount of weight RPP processed and total hours of operation per month and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Operator shall maintain records of daily scheduled hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene foam processed in month) / (total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
7. Visible emissions shall be inspected weekly during operation. If visible emissions are present, the facility will conduct a USEPA Method 9 test. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rules 2201; and 1081, 5.0] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. The facility can demonstrate compliance with this particulate matter emission limit by complying with the maintenance obligations imposed by the other conditions of this unit. [District Rule 4201, 3.0; and Kern County Rule 404] Federally Enforceable Through Title V Permit
9. Dust collectors shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken, such as bughouse maintenance, cleaning, or replacement of bags as needed [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
10. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.0] 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: S-892-6-3

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

12,000 GALLON BLOWING AGENT STORAGE VESSEL #1 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE

EXPIRATION DATE: 01/31/2008

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PERMIT UNIT REQUIREMENTS

1. Pressure/vacuum relief valve shall be set at 14 psig and shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 4623, 4.0; 4682, 5.0] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-892-7-3

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

12,000 GALLON BLOWING AGENT STORAGE VESSEL #2 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE

PERMIT UNIT REQUIREMENTS

1. Pressure/vacuum relief valve shall be set at 14 psig and shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 4623, 4.0; and 4682, 5.0] 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: S-892-8-3

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

12,000 GALLON BLOWING AGENT STORAGE VESSEL #3 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE.

PERMIT UNIT REQUIREMENTS

1. Pressure/vacuum relief valve shall be set at 14 psig and shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 4623, 4.0; and 4682, 5.0] 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: S-892-10-26

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES

PERMIT UNIT REQUIREMENTS

1. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Blowing agent shall consist of isopentane, 10% or greater CO₂ by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.3.1 on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
3. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
4. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm polystyrene foam processed. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Facility TMI shall not exceed 151.2 tons per day (calculated on a monthly average). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The lifetime emissions from total material input (TMI) shall not exceed 2.4 lb VOC/100 lb TMI (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. Total VOC emissions from polystyrene foam processing, forming and on-site storage operations shall not exceed 1,233.8 lbs/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. Total VOC blowing agent consumption for the entire facility shall not exceed 8,867.9 lb/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
11. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
12. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] 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. VOC emissions from polystyrene foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: $\text{lbs VOC emitted per ton of TMI} = (2000)[\text{BAI} - (\text{PFP} \cdot \text{BAR}) - \text{BAD} + \text{WH}]/\text{TMI}$ where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of polystyrene foam produced/month, BAR = weight fraction of VOC blowing agent retained in finished product, BAD = pounds of VOC blowing agent destroyed/month in the RTO, WH = pounds of onsite warehouse emissions, and TMI = total materials input/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
14. Lifetime emissions of VOC (LE) from total material input (TMI) shall be calculated on a monthly basis using the following equation: $\text{LE (lb VOC/100 lb TMI)} = 100 \times [\text{BAI} - (\text{RECOLL} \cdot \text{EFF})]/\text{TMI}$ where BAI = pounds VOC blowing agent used/month, RECOLL = pounds blowing agent captured/month from reclaim operations, EFF = control efficiency of thermal oxidizer, and TMI is the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) processed/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. Quantity of VOCs from the extruders, captured from reclaim operations, RECOLL, shall be calculated on a monthly basis using the following equation: $\text{RECOLL} = (\text{SCRAPBA} - \text{RPPBA})$ where SCRAPBA = pounds of thermoformer and extruder scrap VOCs entering the reclaim operations per month from the extruders and RPPBA is the pounds/month RPP VOCs (VOCs in reclaimed polystyrene pellets) made from thermoformer and extruder scrap from the extruders. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
16. VOC content of thermoformed products and reclaimed polystyrene pellets (RPP) shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
17. RTO control efficiency shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Based on 2002 source test, RTO capture efficiency for calculational purposes shall be 100%. RTO capture efficiency shall be recalculated within 60 days of any change in equipment or process design. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Visible emissions shall be inspected weekly during operation. If visible emissions are present, the facility will conduct a USEPA Method 9 test within 48 hours. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct a EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit.. [District 2201 Rule and District Rule 1081] Federally Enforceable Through Title V Permit
20. Records of visible emissions inspections shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. By the end of each calendar month, the permittee shall record the following information for the previous calendar month: pounds of all blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. The average daily VOC emissions for the month shall be calculated using this data. Such records shall be made readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
22. Operator shall maintain records of mass balance calculations to verify compliance with daily VOC emission limit (calculated on a monthly average) and make such records readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
23. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Average daily amount of material input to extruders shall be calculated as follows: $(\text{actual daily hours}) \times ((\text{total polystyrene foam processed in month})/(\text{total hours of operation in month}))$. [District Rule 2201] 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.

25. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-11-5

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

250 BHP CUMMINS MODEL NT-855-11 DIESEL FIRED I.C. ENGINE POWERING AN EMERGENCY FIREWATER PUMP

EXPIRATION DATE: 01/31/2008

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PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. The facility can demonstrate compliance with this particulate matter emission limit by complying with the maintenance obligations imposed by the other conditions of this unit. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
2. Compliance with Kern County Rule 407 and District Rule 4801 may be demonstrated by either using Air Resources Board regulated diesel fuel or by testing the sulfur content of each load of fuel and showing the sulfur content to be less than 3.0% by weight. [District Rule 2520, 9.0] Federally Enforceable Through Title V Permit
3. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201; 4801, 3.0; and 17 CCR 93115] Federally Enforceable Through Title V Permit
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 2201; and 4702, 5.0, and 6.0] Federally Enforceable Through Title V Permit
5. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, 4.0; and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115] Federally Enforceable Through Title V Permit
7. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain readily accessible written record of the automated testing schedule. [District Rules 4702, 6.0; and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-892-12-3

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

REPROCESSED POLYSTYRENE PELLET (RPP) BOX DUMPER OPERATION (24 TOTAL HP)

PERMIT UNIT REQUIREMENTS

1. Box dumper system shall be equipped with one 20 hp Sutorbilt model 6MVF blower. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Box dumper system shall be equipped with no more than two 75 cubic foot bins, each with a 1 hp hydraulic dumper and a 1 hp rotary airlock. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Box dumper operation shall not process more than 60,000 lbm recycled polystyrene pellets (RPP) per day and 7,200,000 lbm RPP per year. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter (PM-10) emissions shall not exceed 0.15 lb per 1,000 lbm RPP processed. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Operator shall maintain daily records of process weight rate and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions shall be inspected weekly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rules 1081, 5.0; 2201; 2520, 9.0; and 4101, 6.0] 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: S-892-17-24

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING THERMOFORMERS, HEAT TUNNELS AND TRIM PRESSES

PERMIT UNIT REQUIREMENTS

1. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
3. At the end of each calendar month, the permittee shall record the following information for that calendar month: pounds of VOC blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. Such records shall be made readily available for District inspection upon request. [District Rule 2201, 1070 and 4682] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Average daily amount of material input to extruders shall be calculated as follows: (actual daily hours) x ((total polystyrene foam processed in month)/(total hours of operation in month)). [District Rule 2201] Federally Enforceable Through Title V Permit
6. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
7. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
8. Operator shall maintain records of mass balance calculations to verify compliance with VOC emission limit and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC emissions from polystyrene foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: lbs VOC emitted per ton of TMI = (2000)[BAI - (PFP*BAR) - BAD+WH]/TMI where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of polystyrene foam produced/month, BAR = weight fraction of VOC blowing agent retained in finished product, BAD = pounds of VOC blowing agent destroyed/month in the RTO, WH = pounds of onsite warehouse emissions, and TMI = total materials input/month. [District Rules 2201 and 4682] 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.

10. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] Federally Enforceable Through Title V Permit
11. Visible emissions shall be inspected weekly during operation. If visible emissions are present, the facility will conduct a USEPA Method 9 test within 48 hours. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct a EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rule 2201 and 1081] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-892-22-1

EXPIRATION DATE: 01/31/2008

EQUIPMENT DESCRIPTION:

18,000 GALLON METHYL FORMATE PRESSURE VESSEL STORAGE TANK

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PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. This pressure vessel shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rule 2201; and 4623, 4.0] Federally Enforceable Through Title V Permit

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

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ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: S-892-0-2

EXPIRATION DATE: 01/31/2008

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 and Kern County Rule 111] 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 and Kern County Rule 111] 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 (3/21/02). [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, 9.8.1 and 9.12.1] 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, where appropriate: 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: 2024 NORRIS RD, BAKERSFIELD, CA 93308-2297
S-892-0-2: Oct 4 2011 3:55PM - JONESV

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 (11/15/01). 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 the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) 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 (10/31/01). [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 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 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [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 (11/15/01) or Rule 8011 (11/15/01). [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 (11/15/01) or Rule 8011 (11/15/01). [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 (11/15/01) or Rule 8011 (11/15/01). [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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 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 (11/15/01) or Rule 8011 (11/15/01). [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: Kern County Rules 111 and 401. 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 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin July 15 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, 9.4.2] Federally Enforceable Through Title V Permit
42. The facility shall submit to the proper authority a Risk Management Plan, and comply with all the requirements of Program 1, 2, or 3. [40 CFR Part 68] Federally Enforceable Through Title V Permit
43. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-1-9

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

VIRGIN RESIN UNLOADING AND STORAGE INCLUDING RAIL CAR UNLOADING FILTER/RECEIVER WITH 75 HP EXHAUST BLOWER, 60 HP FEED BLOWER, FOUR STORAGE SILOS, AND ONE FABRIC DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Any pneumatic or mechanical resin conveying systems lines or opening remaining which were previously serving the removed fifth silo shall themselves be removed or blinded off. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Virgin resin silo vents shall vent only to fabric dust collector. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Materials collected in fabric dust collector shall be recycled into virgin resin silos or disposed of in a manner preventing emissions to the atmosphere. [District Rule 4102]
4. The fabric dust collector shall be maintained in proper working order. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
7. Visible emissions shall be inspected weekly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If 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
8. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. 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 the individual performing the inspection. [District Rule 2520, 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: S-892-2-21

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

PERMIT UNIT REQUIREMENTS

1. Total virgin resin and recycled polystyrene pellet (RPP) throughput for permit unit #'s S-892-2 and S-892-5 shall not exceed 302,400 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm virgin resin. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Operator shall maintain records of monthly amount of weight virgin resin processed and total hours of operation per month and make such records readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of daily scheduled hours of operation and make such records readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene foam processed in month) / (total hours of operation in month)). [District NSR Rule] Federally Enforceable Through Title V Permit
6. 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
7. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
9. Visible emissions shall be inspected weekly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rules 2520, 9.3.2, 1081 and NSR] Federally Enforceable Through Title V Permit
10. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. 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 the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-4-20

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

POLYSTYRENE FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE, THREE RECLAIM EXTRUDER LINES, RECLAIMED RESIN STORAGE AND TRANSFER WITH VOC VAPOR COLLECTION AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)

PERMIT UNIT REQUIREMENTS

1. Storage silos shall be gas tight with no visible emissions in excess of 5% opacity (Ringelmann 1/4) from the storage silos. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Trim grinders units and reclaim granulator units shall be vented only to the fluff feed silos with fabric collectors. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Operation shall be equipped with no more than 11 fluff storage silos each with separate fabric collectors, 6 of which have live bottom bins, and all venting to the RTO. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The VOC vapor collection system shall serve 3 fluff feed silo fabric collector exhausts, 3 extruder vents including vapor mix box #MB-2 and vapor booster fan exhausting to mix box #MB-1. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
5. Operation shall include no more than 3 reclaim extruder lines with underwater pelletizer systems, air driers, and 3 pelletizer blowers. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Operation shall include VOC vapor collection system exhausting to RTO serving 11 fluff storage silos including mix box #MB-1. [District NSR Rule] Federally Enforceable Through Title V Permit
7. RTO shall be equipped with 3 heat exchanger beds filled with ceramic media, combustion chamber, two 8 MMBtu/hr burners, combustion air fan and induced draft exhaust fan. [District NSR Rule and District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit
8. RTO beds smokeless burnout system shall include burnout fan and ducting from outlet side of heat exchanger beds to combustion chamber. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Fluff transfer and reclaim resin storage operation shall not operate or produce VOC emissions during RTO burnout process. [District NSR Rule] Federally Enforceable Through Title V Permit
10. RTO burners shall be fired exclusively with PUC-regulated natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Fuel gas sulfur content shall not exceed 0.25 grain per 100 scf. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Fuel gas flowrate to RTO burners shall not exceed 16,000 scf per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
13. RTO combustion chamber temperature shall be maintained at no less than 1350 deg. F. [District Rule 4682, 6.1.1] 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.

14. The blowing agent vapor residence time in RTO firebox shall be maintained at no less than 1.0 second. [District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit
15. The blowing agent vapor collection and incineration efficiency shall be maintained at no less than 95% by weight. [District Rule 4682] Federally Enforceable Through Title V Permit
16. Ambient air flow into vapor control system shall be regulated at mix boxes and shall not exceed amount required to maintain vapor concentration below lower explosive limit (LEL). [District NSR Rule and District Rule 4682, 6.1.1] Federally Enforceable Through Title V Permit
17. Permittee shall maintain accurate records of vapor control system operation conditions (RTO operating temperature, fuel gas flowrate, etc.). [District Rule 4682] Federally Enforceable Through Title V Permit
18. Records required by conditions on this permit shall be made readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Particulate matter (PM10) emission rate at RTO exhaust shall not exceed 14.6 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Maximum emission rate of SOx (as SO2) shall not exceed 0.01 pound per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Maximum emission rate of volatile organic compounds (VOC) shall not exceed 7.69 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Maximum emission rate of oxides of nitrogen (NOx) shall not exceed 2.24 pounds per hour (as NO2). [District NSR Rule] Federally Enforceable Through Title V Permit
23. Maximum emission rate of carbon monoxide (CO) shall not exceed 0.56 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
24. District witnessed source testing to demonstrate compliance with VOC and sulfur compound emission limits and RTO control efficiency shall be conducted by independent testing laboratory annually 60 days prior to permit anniversary date. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
25. The facility shall conduct weekly visual inspections to determine whether visible emissions are present. If visible emissions are present, the facility will conduct a EPA Method 9 test to determine whether emissions are in excess of Ringelmann 1 or 20% opacity. Upon detection of visible emissions greater than Ringelmann 1 or 20% opacity, District-witnessed source testing by independent testing laboratory shall be conducted to verify compliance with PM, NOx, and CO emission limits. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
26. Results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Source testing to demonstrate compliance with District Rule 4682 shall be performed using EPA Methods 25 and 25A for gaseous organics at inlet/outlet of RTO. [District Rule 4682] Federally Enforceable Through Title V Permit
28. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4682. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
29. RTO outlet shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
30. Records of control system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
31. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 4201, section 3.0 (12/17/92) and 4682, sections 5.1 and 5.2 (6/16/94). [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-5-22

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

RECLAIM SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 11 RECLAIM SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RECLAIM USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)

PERMIT UNIT REQUIREMENTS

1. Reclaimed Polystyrene Pellet (RPP) conveying system shall be equipped with no more than 3 static baghouses. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Total virgin resin and recycled polystyrene pellet (RPP) throughput for permit unit #'s S-892-2 and S-892-5 shall not exceed 302,400 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm RPP. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of monthly amount of weight RPP processed and total hours of operation per month and make such records readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Operator shall maintain records of daily scheduled hours of operation and make such records readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Daily records shall be calculated by the following equation: (scheduled daily hours) x ((total polystyrene foam processed in month) / (total hours of operation in month)). [District NSR Rule] Federally Enforceable Through Title V Permit
7. The facility shall conduct weekly visual inspections to determine whether visible emissions are present. If visible emissions are present, the facility will conduct a USEPA Method 9 test. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
8. 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
9. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201 and Kern County Rule 404] Federally Enforceable Through Title V Permit
10. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201 and Kern County Rule 404. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
11. Dust collectors shall be inspected weekly while in operation for visible emissions. If excessive visible emissions are observed, appropriate action shall be taken, such as baghouse maintenance, cleaning, or replacement of bags as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. Dust collector filters shall be inspected at least quarterly when the unit is not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. 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 the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

**San Joaquin Valley
Air Pollution Control District**

PERMIT UNIT: S-892-6-2

EXPIRATION DATE: 01/31/2008

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

12,000 GALLON BLOWING AGENT STORAGE VESSEL #1 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE

PERMIT UNIT REQUIREMENTS

1. Pressure/vacuum relief valve shall be set at 14 psig and shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 4623, 4.1.1 and 4682, 5.2.1] Federally Enforceable Through Title V Permit
2. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rules 4682 and 4623. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-7-2

EXPIRATION DATE: 01/31/2008

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

12,000 GALLON BLOWING AGENT STORAGE VESSEL #2 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE

PERMIT UNIT REQUIREMENTS

1. Pressure/vacuum relief valve shall be set at 14 psig and shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 4623, 4.1.1 and 4682, 5.2.1] Federally Enforceable Through Title V Permit
2. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rules 4682 and 4623. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-8-2

EXPIRATION DATE: 01/31/2008

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

12,000 GALLON BLOWING AGENT STORAGE VESSEL #3 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE.

PERMIT UNIT REQUIREMENTS

1. Pressure/vacuum relief valve shall be set at 14 psig and shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rules 4623, 4.1.1 and 4682, 5.2.1] Federally Enforceable Through Title V Permit
2. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rules 4682 and 4623. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-10-27

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES

PERMIT UNIT REQUIREMENTS

1. Operation shall be equipped with roll storage area. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Blowing agent shall consist of isopentane, 10% or greater CO₂ by weight, and methyl formate in amounts necessary to comply with District Rule 4682, Section 5.3.1 on a monthly basis. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
3. Methyl Formate usage shall not exceed 1,975 lb/day. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
4. Particulate matter (PM-10) emissions shall not exceed 0.008 lbm PM-10 per 1,000 lbm polystyrene foam processed. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Facility TMI shall not exceed 151.2 tons per day (calculated on a monthly average). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The lifetime emissions from total material input (TMI) shall not exceed 2.4 lb VOC/100 lb TMI (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. Total VOC emissions from polystyrene foam processing, forming and on-site storage operations shall not exceed 1,233.8 lbs/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. Total VOC blowing agent consumption for the entire facility shall not exceed 8,867.9 lb/day (calculated on a monthly average). [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
11. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
12. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] 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. VOC emissions from polystyrene foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: $\text{lbs VOC emitted per ton of TMI} = (2000)[\text{BAI} - (\text{PFP} \cdot \text{BAR}) - \text{BAD} + \text{WH}]/\text{TMI}$ where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of polystyrene foam produced/month, BAR = weight fraction of VOC blowing agent retained in finished product, BAD = pounds of VOC blowing agent destroyed/month in the RTO, WH = pounds of onsite warehouse emissions, and TMI = total materials input/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
14. Lifetime emissions of VOC (LE) from total material input (TMI) shall be calculated on a monthly basis using the following equation: $\text{LE (lb VOC/100 lb TMI)} = 100 \times [\text{BAI} - (\text{RECOLL} \cdot \text{EFF})]/\text{TMI}$ where BAI = pounds VOC blowing agent used/month, RECOLL = pounds blowing agent captured/month from reclaim operations, EFF = control efficiency of thermal oxidizer, and TMI is the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) processed/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. Quantity of VOCs from the extruders, captured from reclaim operations, RECOLL, shall be calculated on a monthly basis using the following equation: $\text{RECOLL} = (\text{SCRAPBA} - \text{RPPBA})$ where SCRAPBA = pounds of thermoformer and extruder scrap VOCs entering the reclaim operations per month from the extruders and RPPBA is the pounds/month RPP VOCs (VOCs in reclaimed polystyrene pellets) made from thermoformer and extruder scrap from the extruders. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
16. VOC content of thermoformed products and reclaimed polystyrene pellets (RPP) shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
17. RTO control efficiency shall be determined on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Based on 2002 source test, RTO capture efficiency for calculational purposes shall be 100%. RTO capture efficiency shall be recalculated within 60 days of any change in equipment or process design. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The facility shall conduct weekly visual inspections to determine whether visible emissions are present. If visible emissions are present, the facility will conduct a USEPA Method 9 test within 48 hours. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct a EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
20. Records of visible emissions inspections shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. By the end of each calendar month, the permittee shall record the following information for the previous calendar month: pounds of all blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. The average daily VOC emissions for the month shall be calculated using this data. Such records shall be made readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
22. Operator shall maintain records of mass balance calculations to verify compliance with daily VOC emission limit (calculated on a monthly average) and make such records readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
23. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Average daily amount of material input to extruders shall be calculated as follows: $(\text{actual daily hours}) \times ((\text{total polystyrene foam processed in month})/(\text{total hours of operation in month}))$. [District Rule 2201] 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.

25. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] 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: S-892-11-4

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

250 BHP CUMMINS MODEL NT-855-11 DIESEL FIRED I.C. ENGINE POWERING AN EMERGENCY FIREWATER PUMP

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. The facility can demonstrate compliance with this particulate matter emission limit by complying with the maintenance obligations imposed by the other conditions of this unit. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Compliance with Kern County Rule 407 and District Rule 4801 may be demonstrated by either using Air Resources Board regulated diesel fuel or by testing the sulfur content of each load of fuel and showing the sulfur content to be less than 3.0% by weight. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, District Rule 4801, and Kern County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
4. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201, 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District NSR Rule and District Rule 4702] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [17 CCR 93115] Federally Enforceable Through Title V Permit
8. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115] 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: S-892-12-2

EXPIRATION DATE: 01/31/2008

SECTION: NE10 TOWNSHIP: 29S RANGE: 27E

EQUIPMENT DESCRIPTION:

REPROCESSED POLYSTYRENE PELLET (RPP) BOX DUMPER OPERATION (24 TOTAL HP)

PERMIT UNIT REQUIREMENTS

1. Box dumper system shall be equipped with one 20 hp Sutorbilt model 6MVF blower. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Box dumper system shall be equipped with no more than two 75 cubic foot bins, each with a 1 hp hydraulic dumper and a 1 hp rotary airlock. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Box dumper operation shall not process more than 60,000 lbm recycled polystyrene pellets (RPP) per day and 7,200,000 lbm RPP per year. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Particulate matter (PM-10) emissions shall not exceed 0.15 lb per 1,000 lbm RPP processed. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Applicant shall maintain daily records of process weight rate and make such records readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Visible emissions shall be inspected weekly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. If the Method 9 test indicates that visible emissions are in excess of 1/4 Ringelmann or 5% opacity, the facility will conduct an EPA Method 5 test within 30 days of detection of visible emissions to demonstrate compliance with the particulate matter emission limit. [District Rules 2520, 9.3.2, 1081 and NSR] Federally Enforceable Through Title V Permit
7. Records of visible emissions inspections shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-892-17-25

EXPIRATION DATE: 01/31/2008

SECTION: NE10 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:

THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING THERMOFORMERS, HEAT TUNNELS AND TRIM PRESSES

PERMIT UNIT REQUIREMENTS

1. Total Materials Input (TMI) shall include the total material (including virgin and recycled polystyrene, nucleator, colorant and any other solid additives, and all the blowing agents) fed into the extruders or used in making the final product. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Total VOC emissions from polystyrene foam processing, forming, and on-site storage operations S-892-10 and S-892-17 shall not exceed 8.2 lb per ton of TMI. This emission limit is shared between S-892-10 and S-892-17. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
3. By the end of each calendar month, the permittee shall record the following information for the previous calendar month: pounds of all blowing agent introduced into the process; pounds of polystyrene foam produced, pounds of thermoformer and extruder scrap entering reclaim operations, pounds of RPP produced, and total hours of operation. The average daily VOC emissions for the month shall be calculated using this data. Such records shall be made readily available for District inspection upon request. [District Rules 1070, 2201 and 4682] Federally Enforceable Through Title V Permit
4. Operator shall maintain records of daily actual hours of operation and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Weight of VOC blowing agent retained in finished product shall be determined using test method ASTM-D7132-05. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
6. Permittee shall perform blowing agent retention testing on an annual basis. Such results will be used to calculate emissions for both the 8.2 lb per ton TMI and 2.4 lb/100 lb TMI emissions limits. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Operator shall maintain records of mass balance calculations to verify compliance with VOC emission limit and make such records readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC emissions from polystyrene foam processing, forming, and on-site storage operations, per ton of TMI shall be calculated on a monthly basis, using the following equation: $\text{lbs VOC emitted per ton of TMI} = (2000)[\text{BAI} - (\text{PFP} \cdot \text{BAR}) - \text{BAD} + \text{WH}] / \text{TMI}$ where BAI = pounds VOC blowing agent introduced/month, PFP = pounds of polystyrene foam produced/month, BAR = weight fraction of VOC blowing agent retained in finished product, BAD = pounds of VOC blowing agent destroyed/month in the RTO, WH = pounds of onsite warehouse emissions, and TMI = total materials input/month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. Annual records of VOC content of thermoformed products, VOC content of RPP, and RTO control efficiency shall be made available for District inspection upon request for a period of 5 years. [District Rule 1070] 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: S-892-22-0

EXPIRATION DATE: 01/31/2008

EQUIPMENT DESCRIPTION:

18,000 GALLON METHYL FORMATE PRESSURE VESSEL STORAGE TANK

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. This pressure vessel shall maintain working pressures sufficient to prevent organic liquid loss or VOC loss to the atmosphere at all times. [District Rule 2201] Federally Enforceable Through Title V Permit

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

Facility Name: PACTIV CORPORATION

Location: 2024 NORRIS RD, BAKERSFIELD, CA 93308-2297

S-892-22-0: Oct 4 2011 3:56PM -- JONESW

ATTACHMENT C

Detailed Facility List

Detailed Facility Report
For Facility=892
Sorted by Facility Name and Permit Number

PACTIV CORPORATION 2024 NORRIS RD BAKERSFIELD, CA 93308-2297	FAC # STATUS: TELEPHONE:	S 892 A 6613924028	TYPE: TOXIC ID:	TitleV 50160	EXPIRE ON: AREA: INSP. DATE:	01/31/2008 81 / 08/12
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-892-1-9	135 electric horsepower	3020-01 D	1	314.00	314.00	A	VIRGIN RESIN UNLOADING AND STORAGE INCLUDING RAIL CAR UNLOADING FILTER/RECEIVER WITH 75 HP EXHAUST BLOWER, 60 HP FEED BLOWER, FOUR STORAGE SILOS, AND ONE FABRIC DUST COLLECTOR
S-892-2-21	70 hp	3020-01 C	1	197.00	197.00	A	VIRGIN RESIN STORAGE TO EXTRUDERS TRANSFER OPERATION INCLUDING AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 AND 60 HP) AND 10 VIRGIN RESIN USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)
S-892-4-20	16,000,000 BTU/HR	3020-02 H	1	1,030.00	1,030.00	A	POLYSTYRENE FLUFF RECLAIM OPERATION INCLUDING 17 TRIM GRINDERS, SIX RECLAIM GRANULATORS, FLUFF TRANSFER AND STORAGE, THREE RECLAIM EXTRUDER LINES, RECLAIMED RESIN STORAGE AND TRANSFER WITH VOC VAPOR COLLECTION AND SMITH ENGINEERING REGENERATIVE THERMAL OXIDIZER (RTO)
S-892-5-22	60 hp	3020-01 C	1	197.00	197.00	A	RECLAIM SILOS TO EXTRUDERS TRANSFER OPERATION INCLUDING 11 RECLAIM SILOS, 3 STATIC BAGHOUSES, UNLOADING/AEF MODEL FR-14-9 BAGHOUSE, TWO BLOWERS (30 HP AND 50 HP), AND 10 RECLAIM USE BINS (WITH FILTERS LOCATED NEXT TO EXTRUDER #S 501, 502, 503, 504, 505, 506, 507, 508, 509, AND 510)
S-892-6-2	12,000 Gallon Storage Vessel	3020-05 B	1	93.00	93.00	A	12,000 GALLON BLOWING AGENT STORAGE VESSEL #1 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE
S-892-7-2	12,000 Gallon Storage Vessel	3020-05 B	1	93.00	93.00	A	12,000 GALLON BLOWING AGENT STORAGE VESSEL #2 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE
S-892-8-2	12,000 Gallon Storage Vessel	3020-05 B	1	93.00	93.00	A	12,000 GALLON BLOWING AGENT STORAGE VESSEL #3 INCLUDING INJECTION PUMP AND PRESSURE/VACUUM RELIEF VALVE
S-892-10-27	> 1,600 electric motor horsepower	3020-01 H	1	1,030.00	1,030.00	A	POLYSTYRENE FOAM EXTRUSION PROCESS CONSISTING OF 10 FOAM EXTRUSION LINES
S-892-11-4	250 hp IC engine	3020-10 C	1	240.00	240.00	A	250 BHP CUMMINS MODEL NT-855-11 DIESEL FIRED I.C. ENGINE POWERING AN EMERGENCY FIREWATER PUMP
S-892-12-2	24 Electric Hp	3020-01 A	1	87.00	87.00	A	REPROCESSED POLYSTYRENE PELLETT (RPP) BOX DUMPER OPERATION (24 TOTAL HP)
S-892-14-1	2670.5 GALLONS	3020-05 A	1	75.00	75.00	D	2,670.5 GALLON REPROCESSED POLYSTYRENE PELLETT (RPP) STORAGE SILO WITH FABRIC FILTER.
S-892-15-1	2670.5 GALLONS	3020-05 A	1	75.00	75.00	D	2,670.5 GALLON REPROCESSED POLYSTYRENE PELLETT (RPP) STORAGE SILO WITH FABRIC FILTER.
S-892-16-1	2670.5 GALLONS	3020-05 A	1	75.00	75.00	D	2,670.5 GALLON REPROCESSED POLYSTYRENE PELLETT (RPP) STORAGE SILO WITH FABRIC FILTER.

Detailed Facility Report

For Facility=892

Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-892-17-25	> 1,600 electric motor horsepower	3020-01 H	1	1,030.00	1,030.00	A	THERMOFORMING OPERATION WITH 17 THERMOFORMING LINES INCLUDING THERMOFORMERS, HEAT TUNNELS AND TRIM PRESSES
S-892-18-0	2610 bhp	3020-10 F	1	749.00	749.00	D	2,610 BHP CATERPILLAR MODEL 3516B DIESEL-FIRED EMERGENCY IC ENGINE WITH TURBOCHARGER AND AFTERCOOLER POWERING AN 1880 KW EMERGENCY GENERATOR
S-892-19-0	2610 bhp	3020-10 F	1	749.00	749.00	D	2,610 BHP CATERPILLAR MODEL 3516B DIESEL-FIRED EMERGENCY IC ENGINE WITH TURBOCHARGER AND AFTERCOOLER POWERING AN 1880 KW EMERGENCY GENERATOR
S-892-20-0	2610 bhp	3020-10 F	1	749.00	749.00	D	2,610 BHP CATERPILLAR MODEL 3516B DIESEL-FIRED EMERGENCY IC ENGINE WITH TURBOCHARGER AND AFTERCOOLER POWERING AN 1880 KW EMERGENCY GENERATOR
S-892-21-0	2610 bhp	3020-10 F	1	749.00	749.00	D	2,610 BHP CATERPILLAR MODEL 3516B DIESEL-FIRED EMERGENCY IC ENGINE WITH TURBOCHARGER AND AFTERCOOLER POWERING AN 1880 KW EMERGENCY GENERATOR
S-892-22-0	18,000 gallon	3020-05 B	1	93.00	93.00	A	18,000 GALLON METHYL FORMATE PRESSURE VESSEL STORAGE TANK

Number of Facilities Reported: 1

ATTACHMENT D

Permit Condition Clarifications Requested by
Application

Pactiv Facility S-892**Summary of Changes**

Permit Condition	Condition Comment
S-892-0-2 #40	Revise condition. Revision proposed to make combined condition to address all requirements covered under permit shield.
S-892-0-2 #42	Revise condition. Revision proposed to correct typographical error.
S-892-0-2 #44	Add condition. This condition exists in other permit units and is proposed to be moved to the facility-wide permit. Records to validate condition requirements are required facility-wide.
S-892-0-2 #45	Add condition. This condition exists in other permit units and is proposed to be moved to the facility-wide permit. Records to validate condition requirements are required facility-wide.
S-892-1-7 #4	Revise condition. Revision proposed to make consistent with other similar conditions on the permit.
S-892-1-7 #5	Delete this condition. Declarations are proposed to be included in one combined condition of facility-wide permit.
S-892-2-16 #6	Delete this condition. It references submittal requirements for source tests that are not specifically required by the permit.
S-892-2-16 #7	Revise condition. Revision proposed to make consistent with other similar conditions on the permit.
S-892-2-16 #8	Delete this condition. Declarations are proposed to be included in one combined condition of facility-wide permit.
S-892-2-16 #9	Revise condition. Revision proposed to make consistent with other similar conditions on the permit.
S-892-4-20 #18	Move this condition to the facility-wide permit. Records to validate condition requirements are required facility-wide.
S-892-4-20 #25	Revise condition. Revision proposed to make consistent with other similar conditions on the permit, correct typo, and to correct reference to irrelevant emissions.
S-892-4-20 #27	Revise condition. Revision proposed to correct typographical error.
S-892-4-20 #28	Delete this condition. Declarations are proposed to be included in one combined condition of facility-wide permit.
S-892-4-20 #31	Delete this condition. Declarations are proposed to be included in one combined condition of facility-wide permit.
S-892-5-17 #7	Revise condition. Revision proposed to make consistent with other similar conditions on the permit.
S-892-5-17 #8	Delete this condition. It references submittal requirements for source tests that are not specifically required by the permit.
S-892-5-17 #9	Revise condition. Revision proposed to make consistent with other similar conditions on the permit.
S-892-5-17 #10	Delete this condition. Declarations are proposed to be included in one combined condition of facility-wide permit.
S-892-5-17 #11	Revise condition. Revision proposed to correct typographical error.
S-892-5-17 #12	Revise condition. Revision proposed to make consistent with other similar conditions on the permit.
S-892-6-2 #2	Delete this condition. Declarations are proposed to be included in one combined condition of facility-wide permit.
S-892-7-2 #2	Delete this condition. Declarations are proposed to be included in one combined condition of facility-wide permit.

Pactiv Facility S-892

Permit Condition	Condition Comment
S-892-8-2 #2	Delete this condition. Declarations are proposed to be included in one combined condition of facility-wide permit.
S-892-10-21 #4	Revise rule reference. Revision proposed to make consistent with other rule references on the permit.
S-892-10-21 #6	Revise rule reference. Revision proposed to make consistent with other rule references on the permit.
S-892-10-21 #7	Revise condition. Revision proposed to correct typographical error.
S-892-10-21 #8	Revise rule reference. Revision proposed to make consistent with other rule references on the permit.
S-892-10-21 #9	Revise condition. Revision proposed to correct typographical error.
S-892-10-21 #12	Revise rule reference. Revision proposed to make consistent with other rule references on the permit.
S-892-10-21 #13	Revise rule reference. Revision proposed to make consistent with other rule references on the permit.
S-892-10-21 #15	Comment to Pactiv: This condition references new extruders as 9-12, whereas 9 & 10 are referenced elsewhere in permit. Revise rule reference. Revision proposed to make consistent with other rule references on the permit.
S-892-10-21 #16	Revise rule reference. Revision proposed to make consistent with other rule references on the permit.
S-892-10-21 #17	Revise rule reference. Revision proposed to make consistent with other rule references on the permit.
S-892-10-21 #18	Revise rule reference. Revision proposed to make consistent with other rule references on the permit.
S-892-10-21 #19	Revise condition. Revision proposed to correct typographical error. Revise rule reference. Revision proposed to make consistent with other rule references on the permit.
S-892-10-21 #20	Revise condition. Revision proposed to make consistent with other similar conditions on the permit.
S-892-10-21 #21	Move this condition to the facility-wide permit. Records to validate condition requirements are required facility-wide.
S-892-10-21 #22	Revise condition. Revision proposed to correct typographical error.
S-892-11-4 #3	Delete this condition. Declarations are proposed to be included in one combined condition of facility-wide permit.
S-892-11-4 #4	Revise rule reference. Revision proposed to make consistent with other rule references on the permit.
S-892-11-4 #5	Revise condition. Revision proposed to correct typographical error.
S-892-11-4 #7	Revise federal enforceability reference. California only regulations should not be identified as federally enforceable.
S-892-11-4 #8	Revise condition. Revision proposed to correct typographical error.
S-892-11-4 #9	Delete this condition. It is already otherwise required on Facility-wide permit.
S-892-12-2 #1	Revise condition. Revision proposed to correct typographical error.
S-892-12-2 #4	Revise condition. Revision proposed to correct typographical error.
S-892-12-2 #5	Revise condition. Revision proposed to make consistent with other similar conditions on the permit.
S-892-12-2 #7	Move this condition to the facility-wide permit. Records to validate condition requirements are required facility-wide.

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Permit Condition	Condition Comment
S-892-17-17 #1	Revise rule reference. Revision proposed to make consistent with other rule references on the permit.
S-892-17-17 #3	Revise condition. Revision proposed to correct typographical error.
S-892-17-17 #7	Revise rule reference. Revision proposed to make consistent with other rule references on the permit.

