San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

SEP 14 2012

Dan Schloss
Foam Fabricators Inc.
301 B 9th Street
Modesto, CA 95351

Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-1904
Project # N-1110671

Dear Mr. Schloss:

Enclosed for your review and comment is the District's analysis of Foam Fabricator's application for the Federally Mandated Operating Permit for its polystyrene products manufacturing facility located at 301 B 9th Street in Modesto, 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. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

cc: James Harader, Permit Services Engineer

Attachments

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
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34946 Flyover Court
Bakersfield, CA 93308-9725
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www.valleyair.org www.healthyairliving.com

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

SEP 1 4 2012

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 - Federally Mandated Operating Permit
District Facility # N-1904
Project # N-1110671

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Foam Fabricator's application for the Federally Mandated Operating Permit for its polystyrene products manufacturing facility located at 301 B 9th Street in Modesto, 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. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

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AIR POLLUTION CONTROL DISTRICT

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SEP 1 4 2012

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

Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-1904
Project # N-1110671

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Foam Fabricator's application for the Federally Mandated Operating Permit for its polystyrene products manufacturing facility located at 301 B 9th Street in Modesto, 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. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

cc: James Harader, Permit Services Engineer

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Modesto Bee

NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
FEDERALLY MANDATED OPERATING PERMITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed issuance of the Federally Mandated Operating permits to Foam Fabricators Inc. for its polystyrene products manufacturing facility located at 301 B 9th Street in Modesto, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1110671, 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 Federally Mandated Operating initial permits. If requested by the public, the District will hold a public hearing regarding issuance of this initial permit. For additional information, please contact Mr. Rupi Gill, Perrnit Services Manager, at (209) 557-6400. Written comments on the proposed initial 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, 4800 ENTERPRISE WAY, MODESTO, CA 95356.

SAN JOAQUIN VALLEY
UNIFIED AIR POLLUTION CONTROL DISTRICT

Foam Fabricators Inc.

PROPOSED INITIAL TV ENGINEERING EVALUATION
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TITLE V APPLICATION REVIEW

Project #: N-1110671
Deemed Complete: June 14, 2011

Engineer: James Harader
Date: June 14, 2012

Facility Number:	N-1904
Facility Name:	Foam Fabricators Inc.
Mailing Address:	301 B 9th Street Modesto, CA 95351
Contact Name:	Dan Schloss
Phone:	(209) 523-7002
Responsible Official:	Dan Schloss
Title:	Regional Operations Manager

I. PROPOSAL

Foam Fabricators Inc. is proposing that an initial Title V permit be issued for its existing foam products manufacturing facility in Modesto, CA. Foam Fabricators Inc. is applying for a Title V permit because it's potential to emit for volatile organic compound (VOC) emissions is greater than the major source threshold.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

This facility was recently issued an Authority to Construct (ATC), N-1904-4-4, to modify the existing boiler permit to incorporate the District Rule 4320 requirements. The Authority to Construct is expected to be converted into a Permit to Operate prior to the issuance of the initial TV permit. Furthermore, the revisions to the boiler permit are necessary to demonstrate compliance with District Rule 4320 requirements. Thus, the changes in ATC N-1904-4-4 will be included as part of this project and the initial TV permit (N-1904-4-3) for the boiler will be based on the ATC requirements.

II. FACILITY LOCATION

Foam Fabricators Inc. is located at 301 B 9th Street in Modesto, CA.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant has requested to utilize model general umbrella template 0-3.

V. SCOPE OF EPA AND PUBLIC REVIEW

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

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

As discussed above, the applicant has requested to utilize general umbrella template 0-3. Permit conditions associated with the use of umbrella template 0-3 are not subject to further EPA and public review.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

The applicant has proposed the use of general umbrella template 0-3. The following applicable requirements are addressed by general umbrella template 0-3.

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

District Rule 1160, Emission Statements (Adopted November 18, 1992)

District Rule 2010, Permits Required (Amended December 17, 1992)

District Rule 2020, Exemptions (Amended August 18, 2011)

District Rule 2031, Transfer of Permits (Amended December 17, 1992)

District Rule 2040, Applications (Amended December 17, 1992)

District Rule 2070, Standards for Granting Applications (Amended December 17, 1992)

District Rule 2080, Conditional Approval (Amended December 17, 1992)

District Rule 2520, Federally Mandated Operating Permits (Amended June 21, 2001) Sections 5.2, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1, 9.13.2, 9.16, and 10.0

District Rule 4101, Visible Emissions (Amended February 17, 2005)

District Rule 4601, Architectural Coatings (Amended December 17, 2009)

District Rule 8021, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM_{10}) from Construction, Demolition, Excavation, and Extraction Activities (Amended August 19, 2004)

District Rule 8031, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM_{10}) from Handling and Storage of Bulk Materials (Amended August 19, 2004)

District Rule 8041, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM_{10}) from Carryout and Trackout (Amended August 19, 2004)

District Rule 8051, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM_{10}) from Open Areas (Amended August 19, 2004)

District Rule 8061, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM_{10}) from Paved and Unpaved Roads (Amended August 19, 2004)

District Rule 8071, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM_{10}) from Unpaved Vehicle/Equipment Areas (Amended September 16, 2004)

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

40 CFR Part 82, Subpart B and F, Stratospheric Ozone

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1070, Inspections (Amended December 17, 1992)

District Rule 1080, Stack Monitoring (Amended December 17, 1992)

District Rule 1081, Source Sampling (Amended December 16, 1993)

District Rule 2201, New and Modified Stationary Source Review Rule (Amended April 21, 2011)

District Rule 2520, Federally Mandated Operating Permits (Amended June 21, 2001) Sections not addressed by Umbrella Template

District Rule 4001, New Source Performance Standards (Amended April 14, 1999)

40 CFR Part 60 Subpart DC, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

40 CFR Part 60 Subpart DDD, Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry

District Rule 4002, National Emission Standards for Hazardous Air Pollutants (Amended May 20, 2004)

40 CFR 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

40 CFR 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources

District Rule 4201, Particulate Matter Concentration (Amended December 17, 1992)

District Rule 4301, Fuel Burning Equipment (Amended 12/17/92)

District Rule 4304, Equipment Tuning Procedures for Boilers, Steam Generators, and Process Heaters (Amended October 19, 1995)

District Rule 4305, Boilers, Steam Generators, and Process Heaters – Phase 2 (Amended August 21, 2003)

District Rule 4306, Boilers, Steam Generators, and Process Heaters – Phase 3 (Amended October 16, 2008)

District Rule 4320, Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (Amended October 16, 2008)

District Rule 4351, Boilers, Steam Generators, and Process Heaters – Phase 1 (Amended August 21, 2003)

District Rule 4682, Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing (Amended December 15, 2011)

District Rule 4801, Sulfur Compounds (Amended December 17, 1992)

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

VIII. 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.

This facility is subject to the following rules that are not currently federally enforceable:

District Rule 4102, Nuisance (amended December 17, 1992)

For this facility, condition 41 of the requirements for facility wide permit N-1904-0-1 is based on the rule listed above and is not Federally Enforceable through Title V.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-3 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements as condition numbers 1 through 40 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Templates

District Rule 2201 - New and Modified Stationary Source Review Rule (District NSR Rule)

a. EXPANDABLE POLYSTYRENE PRE-EXPANSION PROCESS CONSISTING OF A HIRSCH VACUTRANS MODEL 6000 EXPANDER, AND A PRE-PUFF STORAGE/AGING PERMANENT TOTAL ENCLOSURE (PTE) CONTAINING 20 PRE-PUFF STORAGE/AGING BINS. EACH EXPANDER, PRE-PUFF STORAGE/AGING BIN, AND THE PTE ARE SERVED BY A VOC COLLECTION SYSTEM VENTED TO A SHARED 1.2 MMBTU/HR SHIP & SHORE MODEL SSE-5000-RTO NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER (RTO). THE RTO IS SHARED WITH PERMIT UNIT N-1904-2. (Existing Permit N-1904-1-5)

Permit unit N-1904-1-5 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through #19 and #23 through #25 from the existing PTO has been included as conditions #3 through #18, #22, #23, and #27 of the requirements for draft TV permit N-1904-1-6.

b. EXPANDABLE POLYSTYRENE MOLDING OPERATION CONSISTING OF ELEVEN MOLDING PRESSES EACH SERVED BY A VOC COLLECTION SYSTEM VENTED TO A SHARED 1.2 MMBTU/HR SHIP & SHORE MODEL SSE-5000-RTO NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER (RTO). THE RTO IS SHARED WITH PERMIT UNIT N-1904-1. (Existing Permit N-1904-2-3)

Permit unit N-1904-2-3 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through #19 and #24 through #26 from the PTO have been included as conditions #3 through #18, #23, #24 and #28 of the requirements for draft TV permit N-1904-2-4.

c. 12.6 MMBTU/HR NATURAL GAS-FIRED CLEAVER BROOKS MODEL CBLE-700-300-150 BOILER WITH A CLEAVER BROOKS MODEL NTI-300 LOW NOX BURNER WITH FLUE GAS RECIRCULATION

Permit unit N-1904-4-4, still currently an ATC, was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions #4 through #6 from the ATC N-1904-4-4 have been included as conditions #5 through #7 of the requirements of draft TV permit N-1904-4-3.

District Rule 1080 - Stack Monitoring

This rule grants the APCO the authority to request the installation, use maintenance, and inspection of continuous monitoring equipment. The general, source and pollutant specific requirements for continuous monitoring equipment are defined. This rule also specifies the performance standards for the equipment and administrative recordkeeping, reporting, and violation and equipment breakdown notification requirements.

None of the three permit units at this facility are required to install or operate a continuous emission monitoring system (CEMS) for District Rule purposes. Therefore, the requirements of District Rule 1080 are not applicable.

District Rule 1081 - Source Sampling

The purpose of this rule is to ensure that any source operation which emits or may emit air contaminants provides adequate and safe facilities for use in sampling to determine compliance. This rule also specifies methods and procedures for source testing, sample collection, and compliance determination.

a. Permit Unit N-1904-1-6

- Conditions #19 and #20 of the proposed TV permit will assure continued compliance with the requirements of District Rule 1081.

b. Permit Unit N-1904-2-4

- Conditions #19 and #20 of the proposed TV permit will assure continued compliance with the requirements of District Rule 1081.

c. Permit Unit N-1904-4-3

- Conditions #17 and #19 of the proposed TV permit will assure continued compliance with the requirements of District Rule 1081.

District Rule 2520 - Federally Mandated Operating Permits

The requirements of Section 5.2, 9.0, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1, 9.13.2, 9.16, and 10.0 were addressed through the usage of Umbrella Template 0-3. The remaining District Rule 2520 requirements are addressed below.

Section 9.3 requires that periodic monitoring be performed if none is associated with a federally enforceable requirement to assure compliance.

a. Permit Units N-1904-1-6, '-2-4, and '-4-3

No additional conditions were required for these permits.

District Rule 4001 - New Source Performance Standards

District Rule 4001 requires incorporates the provisions of 40 CFR Part 60. Compliance with the subparts of 40 CFR Part 60 is demonstrated as follows.

40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

The following tables demonstrate how the proposed TV permit complies with Subpart Dc requirements.

40 CFR 60 – Subpart DC Requirements	Method of Compliance
Section 60.40c(a) states that an affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (100 MMBtu/hr) or less, but greater than 2.9 MW (10 MMBtu/hr).	The only boiler at this facility, N-1904-4, is a gaseous fired unit that is rated at 12.6 MMBtu/hr and installed after June 9, 1989. Therefore, 40 CFR 60 Subpart DC requirements are applicable to this unit.
60.42c – Standard for Sulfur Dioxide (SO_2)	
Section 60.42c(a) lists the emission standard for sulfur dioxide (SO_2) for affected units that combust only coal.	The boiler, N-1904-4, is not fired on coal. Therefore, the standards of this section are not applicable.
Section 60.42c(b) lists the emission standard for sulfur dioxide (SO_2) for affected units that combust only coal refuse alone in a fluidized bed combustion steam generator, or combusts only coal and uses an emerging technology for control of SO_2 emissions.	The boiler, N-1904-4, is not fired on coal or coal refuse. Therefore, the standards of this section are not applicable.
Section 60.42c(c) lists the emission standard for sulfur dioxide (SO_2) for affected units that combust coal, alone or in combination with any other fuel	The boiler, N-1904-4, is not fired on coal. Therefore, the standards of this section are not applicable.
Section 60.42c(d) lists the emission standard for sulfur dioxide (SO_2) for affected units that combust oil.	The boiler, N-1904-4, is not fired on oil. Therefore, the standards of this section are not applicable.
Section 60.42c(e) lists the emission standard for sulfur dioxide (SO_2) for affected units that combust coal, oil, or coal and oil with any other fuel.	The boiler, N-1904-4, is not fired on coal or oil. Therefore, the standards of this section are not applicable.
Section 60.42c(f) states that the reduction in potential SO_2 emission rate through fuel treatment is not credited toward the percent reduction in (b)(2) of Section 60.42c.	The boiler is not subject to any SO_2 standards in 60.42c. Therefore, this requirement is not applicable.
Section 60.42c(g) states, except as provided in paragraph (h) of this section, compliance with the percent reduction requirements, fuel oil sulfur limits must be determined on a 30-day rolling basis.	The boiler is not subject to any SO_2 standards in 60.42c. Therefore, this requirement is not applicable.
Section 60.42c(h) allows compliance with the emission limits or fuel oil sulfur limits to be determined based on certification from the fuel supplier.	The boiler is not subject to any SO_2 standards in 60.42c. Therefore, this requirement is not applicable.
Section 60.42c(i) states that the SO_2 emission limits, fuel oil sulfur limits, and percent reduction requirements of this Section apply at all times, including start-up, shutdown, and malfunction.	The boiler is not subject to any SO_2 standards in 60.42c. Therefore, this requirement is not applicable.
Section 60.42c(j) states that for facilities located in the noncontinental areas and affected facilities complying with the percent reduction standard, only the heat input supplied to the affected unit from the combustion of coal and oil is counted under this section.	The boiler is not subject to any SO_2 standards in 60.42c. Therefore, this requirement is not applicable.
Continued on Next Page	

40 CFR 60 – Subpart DC Requirements	Method of Compliance
60.43c – Standard for Particulate Matter (PM)	
Section 60.43c(a) lists the emission standards for particulate matter for affected units that combust coal or combusts mixtures of coal with other fuels, commences construction, modification, or reconstruction on or before February 28, 2005, and has a heat input capacity of 30 MMbtu/hr or greater.	The boiler, N-1904-4, is not fired on coal. Therefore, the standards of this section are not applicable.
Section 60.43c(b) lists the emission standards for particulate matter for affected units that combust wood or combusts mixtures of wood with other fuels, commences construction, modification, or reconstruction on or before February 28, 2005, and has a heat input capacity of 30 MMbtu/hr or greater.	The boiler, N-1904-4, is not fired on wood. Therefore, the standards of this section are not applicable.
Section 60.43c(c) lists the emission standards for particulate matter for affected units that combust coal, wood, or oil, and has a heat input capacity of 30 MMbtu/hr or greater.	The boiler, N-1904-4, is not fired on coal, wood, or oil. Therefore, the standards of this section are not applicable.
Section 60.43c(d) states that the PM and opacity standards of this section applies at all times, except during periods of start-up, shutdown, or malfunction.	The boiler is not subject to any PM or opacity standards in 60.43c. Therefore, this requirement is not applicable.
Section 60.43c(e)(1) lists the emission standard for particulate matter for affected units that combust coal or combusts mixtures of coal, oil, wood, a mixture of these fuels, or a mixtures of these fuels with any other fuels, commences construction, modification, or reconstruction after February 28, 2005, and has a heat input capacity of 30 MMbtu/hr or greater.	The boiler, N-1904-4, is not fired on coal, oil, or wood. Therefore, the standards of this section are not applicable.
60.44c – Compliance and Performance Test Methods and Procedures for Sulfur Dioxide	
Section 60.44c(a) states that performance tests required under Section 60.8 must be conducted following the procedures specified in paragraph's (b), (c), (d), (e), and (f) of this Section, as applicable.	The boiler was determined to not be subject to any emission standards or percent reduction requirements under Section 60.42c, and is not fired on coal or oil. Thus, Section 60.44c testing requirements are not applicable to the boiler.
Section 60.44c(b) states that the initial performance test required under Section 60.8 must be conducted over 30 consecutive operating days of the steam generating unit. Compliance with the percent reduction requirements and SO2 emission limits under 60.42c must be determined using a 30-day average.	
Section 60.44c(c) states that after the initial performance test is conducted, compliance with the percent reduction requirements and SO_2 emission limits under Section 60.42c is based on the average percent reduction and the average SO2 emission rates for 30 consecutive steam generating unit operating days.	
Section 60.44c(d) lists SO_2 testing requirements for affected facilities that combust only coal, oil, or a mixture of oil and coal.	
Section 60.44c(e) lists SO_2 testing requirements for affected facilities that combust coal, oil, or coal and oil with other fuels.	
Section 60.44c(f) lists SO_2 testing requirements for facilities that are subject to percent reduction requirements under Section 60.42c.	
Section 60.44c(g) lists SO_2 testing requirements for facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under 60.42c based on shipment fuel sampling.	
Section 60.44c(h) lists SO_2 testing requirements for affected facilities subject to 60.42c(h)(1), (2), or (3).	
Section 60.44c(i) lists SO_2 testing requirements for affected facilities seeking to demonstrate compliance with the SO_2 standards under Section 60.42c(c)(2).	
Section 60.44c(j) states that the operator must use valid SO_2 emission data in performing the necessary calculations for Sections (d), (e), or (f) of this section.	

Continued on Next Page

40 CFR 60 – Subpart DC Requirements	Method of Compliance
60.45c – Compliance and Performance Test Methods and Procedures for Particulate Matter	
Section 60.45c(a) states that an owner or operator of an affected facility subject to the PM and/or opacity standards of 60.43c must conduct an initial performance test as required under Section 60.8 and lists further testing requirements.	The boiler was determined to not be subject to any of the emission standards or opacity requirements listed under Section 60.43c of this subpart. Thus, the Section 60.45c testing requirements are not applicable to the boiler.
Section 60.45c(b) lists PM testing requirements for the owner or operator of an affected facility seeking to demonstrate compliance with Section 60.43c(b)(2).	
Section 60.45c(c) states that in place of PM testing with Method 5 or Method 5B of this part, or Method 17 of this part, an owner or operator may elect to install, calibrate, and operate a CEMS for monitoring PM emissions.	
Section 60.45c(d) lists PM testing requirements for facilities seeking to demonstrate compliance under 60.43c(e)(4).	
60.46c – Emission Monitoring for Sulfur Dioxide	
Section 60.46c(a) states, except as provided in paragraphs (d) and (e) of this Section, an affected facility subject to the SO_2 emission limits under 60.42c must install, calibrate, maintain, and operate a CEMS for measuring SO_2 concentrations.	The emission requirements of Section 60.42c were determined to not apply to the boiler at this facility. Therefore, a CEMs is not required and alternative monitoring need not be elected. None of the requirements of Section 60.46c are applicable to the boiler.
Section 60.46c(b) states that the CEMS must measure the 1-hou average SO_2 emission rates and be expressed in lb/MMBtu heat input or ng/J units.	
Section 60.46c(c) states that the procedures in Section 60.13 must be followed for the installation, evaluation, and operation of the CEMS.	
Section 60.46c(d) states that as an alternative to operating a CEMS at the inlet to the SO_2 control device (or outlet if no SO_2 control device is used), an owner or operator may elect to determine the SO_2 emission rate by sampling fuel prior to combustion.	
Section 60.46c(e) states that the monitoring requirements of paragraphs (a) through (d) of this section do not apply to units subject to Section 60.42c(h)(1), (2), or (3).	
Section 60.46c(f) states that the owner or operator of an affected facility operating a CEMS pursuant to paragraph (a) of this section , or conducted as-fired fuel sampling pursuant to paragraph (d)(1) of this section, must obtain emission data for at least 75% of the operating hours in at least 22 out of 30 successive steam generating unit operating days.	
Continued on Next Page	

40 CFR 60 – Subpart DC Requirements	Method of Compliance
60.47c – Emission Monitoring for Particulate Matter	
Section 60.47c(a) states, except as provided in paragraphs (c), (d), (e), (f), and (g) of this section, the owner or operator of an affected facility combusting coal, oil, or wood that is subject to the opacity standards under Section 60.43c must install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS).	The boiler is not subject to any of the emission and opacity requirements of Section 60.42c and the boiler is not fired on coal, oil, or wood. Therefore, a COMs is not required, a CEMs is not required, and any alternative monitoring methods need not be elected. None of the requirements of Section 60.47c are applicable to the boiler.
Section 60.47c(b) states that all COMS must be operate in accordance with Performance Specification 1 of Appendix B of this Part.	
Section 60.47c(c) states that owners of an affected facility that burns only distillate oil that contains no more than 0.5% by weight sulfur, and/or gaseous fuels with potential sulfur dioxide emission rates of 26 ng/J (0.060 lb/MMBtu) heat input or less and that do not use post-combust technology are not required to install a COMs if they follow the applicable procedures of 60.48c(f).	
Section 60.47c(d) states that owners or operators complying with the PM emission limit by using a PM CEMS must calibrate, maintain, operate, and record the output of the PM emissions discharged to the atmosphere as specified in Section 60.45c(c).	
Section 60.47c(e) states that owners and operators of an affected facility that is subject to an opacity standard in Section 60.43c(c) and that does not use post combustion technology (except for a wet scrubber) for reducing PM, SO_2, or CO emissions, burns only gaseous fuels or fuel oils that contain less than or equal to 0.5 weight percent sulfur, and is operated such that emissions of CO are less than 0.15 lb/MMbtu is not required to install a COMs.	
Section 60.47c(f) states that owners and operators of an affected facility that is subject to an opacity standard in 60.43c(c) and that uses a bag leak detection system to monitor performance of the fabric filter is not required to install a COMS.	
Section 60.47c(g) states that owners and operators of an affected facility that is subject to an opacity standard in Section 60.43c(c) and that only burns gaseous fuels or oils that contain less than 0.5% by weight percent sulfur and operates according to a written site-specific monitoring plan approved by the permitting authority is not required to operate a COMS.	
60.48c – Reporting and Recordkeeping Requirements	
Section 60.48c(a) states that the owner or operator of each affected facility must submit notification of the date of construction or reconstruction and actual startup.	This requirement was satisfied upon the initial startup of the unit. A permit condition is not required.
Section 60.48c(b) requires the owner or operator of each affected facility that is subject to the SO_2 requirements of Section 60.42c to submit the performance test results to the administrator.	This boiler is not subject to the SO_2 requirements of Section 60.42c; therefore, this requirement is not applicable.
Section 60.48c(c) states that the owner or operator of an affected facility subject to the opacity limits in 60.43c(c) must submit excess emission reports for the unit.	The boiler is not subject to the opacity limits in Section 60.43c(c); therefore, this requirement is not applicable.
Section 60.48c(d) requires the owner or operator of each affected facility subject to the SO_2 emission limits, fuel oil sulfur limits, or percent reduction requirements of Section 60.42c to submit reports to the administrator.	The boiler is not subject to the SO_2 emission limits, fuel oil sulfur limits, and the percent reduction requirements of Section 60.42(c); therefore, this requirement is not applicable.

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40 CFR 60 – Subpart DC Requirements	Method of Compliance
60.48c – Reporting and Recordkeeping Requirements - Continued	
Section 60.48c(e) specifies the records that must be kept and included in the reports submitted for units subject to the reporting requirement in Section 60.48c(d).	This boiler is not subject to the reporting requirement of Section 60.48c(d); therefore, the requirements of Section 60.48c(e) do not apply.
60.48c(f) lists the requirements for facilities that are required to supply fuel certification information.	The boiler is not required to supply fuel certification information; therefore, the requirements of Section 60.48c(f) are not applicable.
Except as provided in paragraphs 60.48c(g)(2) or g(3) of this Section, Section 60.48c(g)(1) requires the owner or operator of an affected facility to keep daily records of the quantity of each type of fuel consumed. Section 60.48c(g)(2) allows units fired solely on natural gas to only keep monthly records of fuel usage.	N-1904-4-3 This recordkeeping requirement is included as condition #25 on the proposed TV Permit.
Section 60.48c(h) requires the owner and operator of each affected facility that is subject to an annual capacity factor to calculate the annual capacity factor individually for each fuel combusted.	This boiler is not subject to an annual capacity factor requirement; therefore, the requirements of Section 60.48c(h) are not applicable.
Section 60.48c(i) states that all records required under this section must be maintained by the owner or operator for a minimum period of two years.	District Rules require records to be kept for five years. N-1904-4-3 This recordkeeping requirement is included as condition #26 on the proposed TV Permit.
Section 60.48c(j) states that the reporting period for reports required under this subpart is each six-month period.	The boiler is not subject to any of the reporting requirements of this Subpart. Therefore, this requirement is not applicable.

40 CFR 60 - Subpart DDD Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry

40 CFR 60, Subpart DDD applies to facilities involved in the manufacture of polypropylene, polyethylene, polystyrene or poly (thylene terephthalate) as defined in section 60.561 of this subpart. Foam Fabricators Inc. receives pre-manufactured polystyrene pellets, melts those pellets, and expands the pellets to form pre-expanded polystyrene material. The final product is then molded out of the pre-expanded polystyrene material. Foam Fabricators is not involved in the actual manufacturing of polystyrene. They are only involved in transforming pre-manufactured polystyrene pellets into molded polystyrene products. Therefore, this subpart is not applicable to Foam Fabricators Inc. and no further discussion is required.

District Rule 4002 - National Emission Standards for Hazardous Air Pollutants (NESHAP's)

This rule incorporates NESHAPs from 40 CFR Part 61 and the NESHAPs from 40 CFR Part 63. No Subparts of Parts 61 and 63 are applicable to the foam production units. 40 CFR 63 Subpart DDDDD may apply to the boiler, N-1904-4 and is addressed below.

40 CFR 63 - Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

Section 63.7485 states that Subpart DDDDD is applicable to owners and operators of an industrial, commercial, or institutional boiler or process heater that is located at, or is part of, a major source of Hazardous Air Pollutant (HAP) emissions. Pursuant to calculations in Appendix D of this evaluation, Foam Fabricators Inc. is not a Major Source of HAP emissions. Therefore, 40 CFR 63 Subpart DDDDD requirements are not applicable.

40 CFR 63 - Subpart JJJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters Area Sources

Section 63.11195(e) states that gas-fired boilers are not subject to the requirements of this Subpart. The boiler at this facility is fired exclusively on natural gas. Therefore, the requirements of this Subpart are not applicable.

District Rule 4201 - Particulate Matter Concentration

Section 3.1 of District Rule 4201 requires emissions to be at or below 0.1 grains of particulate matter per dry standard cubic foot of exhaust gas. This requirement applies to all of the permit units operated by this facility.

a. Permit Units N-1904-1-6, '-2-4, and '-4-3

- Condition 1 of each of proposed TV permit will assure continued compliance.

District Rule 4301 - Fuel Burning Equipment

The boiler, N-1904-4, is the only emission unit that is Subject to District Rule 4301 requirements. District Rule 4301 requires the following:

1. The emission concentration of combustion contaminants must not exceed 0.1 grain per cubic foot of gas, calculated to 12% of carbon dioxide at standard conditions.

2. Emissions must not exceed 200 pounds per hour of sulfur compounds (calculated as sulfur dioxide), 140 pounds of nitrogen oxides (calculated as nitrogen dioxide) and 10 pounds of combustion contaminants (PM).

Conditions #1 through #3 of proposed TV permit N-1904-4-3 enforce the requirements of District Rule 4301.

District Rule 4305 – Boilers, Steam Generators, and Process Heaters - Phase 2

The following tables demonstrate how the proposed TV permit will ensure compliance with District Rule 4305.

Rule 4305 Requirements	Method of Compliance
Section 2.0 states that this rule applies to any gaseous fuel or liquid fuel fired boiler with a rated heat input greater than 5 MMBtu/hr.	The only boiler at this facility, N-1904-4, is a gaseous fired unit that is rated at 12.6 MMBtu/hr. Therefore, District Rule 4305 requirements are applicable to this unit.
Section 5.1 states that for all unit, except for box and cabin type units and vertical cylindrical process heaters, the NOx emissions must not exceed 30 ppmv at 3% O_2 or 0.036 lb/MMBtu, when fired on gaseous fuel.	N-1904-4-3 Condition #7 of the proposed TV permit enforces this requirement by limiting the boiler to 9 ppmvd NOx @ 3% O_2.
Section 5.2 states requirements for units that are limited to a heat input of less than 30 billion Btu/year.	The permit for unit N-1904-4-3 does not limit the heat input to less than 30 billion Btu/year. Therefore, the requirements of Section 5.2 are not applicable.
Section 5.3 limits CO emissions to 400 ppmv @ 3% O_2.	N-1904-4-3 Condition #7 of the proposed TV permit enforces this requirement by limiting the boiler to 50 ppmvd CO @ 3% O_2.
Section 5.4.1 states that any unit that simultaneously fires on gaseous and liquid fuels must be equipped with an operational, non-resettable totalizing mass or volumetric flow meter in each fuel line to the unit.	This unit is fired solely on gaseous fuel. Therefore, this requirement is not applicable.
Section 5.4.2 states that a unit subject to the emission limits in 5.1, 5.2.3, or 5.3 must be equipped with either an operational APCO approved Continuous Emissions Monitoring System for NOx, CO and Oxygen, or be equipped with an APCO-approved alternate monitoring system.	N-1904-4-3 The boiler is equipped with an APCO-approved alternate monitoring system. Conditions #20 through #23 of the proposed TV permit enforce this requirement.
Section 5.4.3 states that for units subject to the requirements of Section 5.2.1 or 5.2.2, the operator must monitor the operational characteristics recommended by the manufacturer and approved by the APCO.	This boiler is not subject to the requirements of Sections 5.2.1 or 5.2.2; therefore, the requirements of Section 5.4.3 are not applicable.
Section 5.4.4 states that any unit subject to Section 5.2.1 or 5.2.2 must be equipped with an operational, non-resettable totalizing mass or volumetric flow meter in each fuel line to the unit.	This boiler is not subject to the requirements of Sections 5.2.1 or 5.2.2; therefore, the requirements of Section 5.4.4 are not applicable.

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Rule 4305 Requirements	Method of Compliance
Section 5.5.1 states that an operator of any unit has the option of complying with either the heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.1.	N-1904-4-3 Condition #18 of the proposed TV permit enforces this requirement.
Section 5.5.2 stats that all emissions measurements must be made with the unit operating at either conditions representative of normal operations or conditions specified in the Permit to Operate.	N-1904-4-3 Condition #15 of the proposed TV permit enforces this requirement.
Section 5.5.3 states that all continuous emission monitoring system (CEMS) measurements must be averaged over a period of 15 consecutive minutes.	The boiler is not equipped with a CEMS; therefore, this requirement is not applicable.
Section 5.5.4 states that for emissions monitoring pursuant to 5.4.2, 5.4.2.1, and 6.3.1 using a portable NOx analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings must be averaged over a 15 minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings evenly spaced out over the 15-consecutive minute period.	N-1904-4-3 Condition #22 of the proposed TV permit enforces this requirement.
Section 5.5.5 states that for emission source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard of this Rule, the arithmetic average of three 30-minute consecutive-minute test runs shall apply. If two of the three runs are above an applicable limit, the test cannot be used to determine compliance with an applicable limit.	N-1904-4-3 Condition #16 of the proposed TV permit enforces this requirement.
Section 5.5.6 lists startup and shutdown requirements.	The permit for the boiler does not include any relief from the permitted emission limits during startup and shutdown periods. Therefore, the startup and shutdown requirements are not applicable to the boiler.
Section 5.6 lists requirements for the operator of any functionally identical replacement for a box or cabin type unit.	This facility is not operating any functionally identical replacement units. Therefore, this requirement is not applicable.
Section 6.1 states that the records required by Sections 6.1.1 through 6.1.5 must be maintained for five calendar years and be made available to the APCO upon request.	N-1904-4-3 Condition #26 of the proposed TV permit enforces this requirement.
Section 6.1.1 lists recordkeeping requirements for any unit operated under the exemption of Section 4.2 of the Rule.	This facility does not operate any units that were exempted under Section 4.2 of the Rule. Therefore, the requirements of Section 6.1.1 are not applicable.
Section 6.1.2 lists recordkeeping requirements for any unit operated under the exemption of Section 4.3 of the Rule.	This facility does not operate any units that were exempted under Section 4.3 of the Rule. Therefore, the requirements of Section 6.1.2 are not applicable.
Section 6.1.3 lists recordkeeping requirements for any unit subject to Sections 5.2.1 or 5.2.2 of the Rule.	This facility does not operate any units that are subject to either Sections 5.2.1 or 5.2.2 of the Rule. Therefore, the requirements of Section 6.1.3 are not applicable.

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Rule 4305 Requirements	Method of Compliance
Section 6.1.4 lists recordkeeping requirements for units that are required to either be tuned up or for units where monthly operational characteristics must be monitored.	The boiler at this facility is not required to be tuned up and monthly operational characteristics are not required to be monitored for this unit. Therefore, the recordkeeping requirements of Section 6.1.4 are not applicable.
Section 6.1.5 requires the operator of any unit performing start-up or shutdown pursuant to Section 5.5.6 to keep records of the duration of the start-up or shutdown.	The boiler at this facility is not subject to Section 5.5.6 requirements. Therefore, this requirement is not applicable.
Section 6.2.2 states that the oxides of nitrogen (ppmv) must be determined using EPA Method 7E or ARB Method 100.	N-1904-4-3 Condition #9 of the proposed TV permit enforces this requirement.
Section 6.2.3 states that carbon monoxide (ppmv) must be determined using EPA Method 10 or ARB Method 100.	N-1904-4-3 Condition #10 of the proposed TV permit enforces this requirement.
Section 6.2.4 requires stack gas oxygen be determined using EPA Method 3 or 3A, or ARB Method 100.	N-1904-4-3 Condition #11 of the proposed TV permit enforces this requirement.
Section 6.2.5 requires the NOx emission (lb/MMBtu) be determined using EPA Method 19.	N-1904-4-3 Condition #9 of the proposed TV permit enforces this requirement.
Section 6.2.6 requires the stack gas velocity be determined using EPA Method 2.	N-1904-4-3 Condition #13 of the proposed TV permit enforces this requirement
Section 6.2.7 requires the stack gas moisture content be determined using EPA Method 4.	N-1904-4-3 Condition #14 of the proposed TV permit enforces this requirement
Section 6.3.1 requires each unit be source tested to determine compliance at least once every 12 months. For gaseous fired units demonstrating compliance on two consecutive 12-month tests, the next test may be deferred for up to 36 months. During the 36 month source test interval, the operator must tune the unit in accordance, unless monitoring with a CEMS or APCO approved monitoring system where the applicable emission limits are periodically monitored.	N-1904-4-3 The facility uses a portable analyzer to measure emissions monthly, thus tuning is not required. Condition #8 of the proposed TV permit enforces this requirement
Sections 6.4, 7.0, and 8.0 list emission control plan, compliance schedule, and calculation requirements.	These requirements have all been satisfied and will not be included on the TV permit.

District Rule 4306 – Boilers, Steam Generators, and Process Heaters – Phase 3

The following tables demonstrate how the proposed TV permit will ensure compliance with District Rule 4306.

Rule 4306 Requirements	Method of Compliance
Section 2.0 states that this rule applies to any gaseous fuel or liquid fuel fired boiler, process heater, or steam generator with a total rated heat input greater than 5 million Btu per hour.	The only boiler at this facility, N-1904-4, is a gaseous fired unit that is rated at 12.6 MMBtu/hr. Therefore, District Rule 4306 requirements are applicable to this unit.
Section 5.1.1, Table 1, Category A states the following emission limits for all units with a rated heat input equal to or less than 20 MMBtu/hr, except units subject to Categories C, D, E, F, G, H, or I. NOx: 15 ppmv @ 3% O_2 or 0.018 lb/MMBtu CO: 400 ppmv @ 3% O_2	N-1904-4-3 Condition #7 of the proposed TV permit enforces these requirements by limiting the boiler to 9 ppmvd NOx @ 3% O_2 and 50 ppmvd CO @ 3% O_2.
Section 5.1.2 provides an equation for determining the NOx emission limit for units fired on combinations of gas and liquid fuel.	Unit N-1904-4 is not fired on liquid fuel. Therefore, this requirement is not applicable.
Section 5.2 lists requirements for units limited to less than 9 billion Btu per calendar year.	Unit N-1904-4 is not limited to 9 billion Btu per calendar year. Therefore, the requirements of Section 5.2 are not applicable.
Section 5.3 lists startup and shutdown requirements.	The permit for the boiler does not include any relief from the permitted emission limits during startup and shutdown periods. Therefore, the startup and shutdown requirements are not applicable to the boiler.
Section 5.4.1 states that any unit that simultaneously fires on gaseous and liquid fuels must be equipped with an operational, non-resettable totalizing mass or volumetric flow meter in each fuel line to the unit.	This unit is fired solely on gaseous fuel. Therefore, this requirement is not applicable.
Section 5.4.2 states that a unit subject to the emission limits in 5.1, 5.2.3, or 5.3 must be equipped with either an operational APCO approved Continuous Emissions Monitoring System for NOx, CO and Oxygen, or be equipped with an APCO-approved alternate monitoring system.	N-1904-4-3 The boiler is equipped with an APCO-approved alternate monitoring system. Conditions #20 through #23 of the proposed TV permit enforce this requirement.
Section 5.4.3 states that for units subject to the requirements of Section 5.2.1 or 5.2.2, the operator must monitor the operational characteristics recommended by the manufacturer and approved by the APCO.	This boiler is not subject to the requirements of Sections 5.2.1 or 5.2.2; therefore, the requirements of Section 5.4.3 are not applicable.
Section 5.4.4 states that any unit that is a Category H unit (limited between 9 and 30 billion Btu/year) or subject to Section 5.2.1 or 5.2.2 must be equipped with an operational, non-resettable totalizing mass or volumetric flow meter in each fuel line to the unit.	This boiler is not subject to the requirements of Sections 5.2.1 or 5.2.2 and is a Category A unit; therefore, the requirements of Section 5.4.4 are not applicable.
Section 5.4.5 states that the APCO must not approve an alternative monitoring system unless it is documented that continued operation within the ranges of specified emissions-related performance indicators or operations characteristics provides a reasonable assurance of compliance with the applicable emission limits.	The approved APCO monitoring system measures emissions directly, using a portable analyzer. This condition is satisfied.

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Rule 4306 Requirements	Method of Compliance
Section 5.5.1 states that an operator of any unit has the option of complying with either the heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.1.	N-1904-4-3 Condition #18 of the proposed TV permit enforces this requirement.
Section 5.5.2 stats that all emissions measurements must be made with the unit operating at either conditions representative of normal operations or conditions specified in the Permit to Operate.	N-1904-4-3 Condition #15 of the proposed TV permit enforces this requirement.
Section 5.5.3 states that all continuous emission monitoring system (CEMS) measurements must be averaged over a period of 15 consecutive minutes.	The boiler is not equipped with a CEMS; therefore, this requirement is not applicable.
Section 5.5.4 states that for emissions monitoring pursuant to 5.4.2, 5.4.2.1, and 6.3.1 using a portable NOx analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings must be averaged over a 15 minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings evenly spaced out over the 15-consecutive minute period.	N-1904-4-3 Condition #20 of the proposed TV permit enforces this requirement.
Section 5.5.5 states that for emission source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard of this Rule, the arithmetic average of three 30-minute consecutive-minute test runs shall apply. If two of the three runs are above an applicable limit, the test cannot be used to determine compliance with an applicable limit.	N-1904-4-3 Condition #16 of the proposed TV permit enforces this requirement.
Section 6.1 states that the records required by Sections 6.1.1 through 6.1.4 must be maintained for five calendar years and be made available to the APCO upon request.	N-1904-4-3 Condition #26 of the proposed TV permit enforces this requirement.
Section 6.1.1 lists recordkeeping requirements for any unit operated under the exemption of Section 4.2 of the Rule.	This facility does not operate any units that were exempted under Section 4.2 of the Rule. Therefore, the requirements of Section 6.1.1 are not applicable.
Section 6.1.2 lists recordkeeping requirements for any unit that is a Category H unit listed in Section 5.1.1 Table 1 or any unit that is subject to the requirements of Section 5.2.	This facility does not operate any Category H units or units subject to Section 5.2. Therefore, the requirements of Section 6.1.2 are not applicable.
Section 6.1.3 lists recordkeeping requirements for units that are required to either be tuned up or for units where monthly operational characteristics must be monitored.	The boiler at this facility is not required to be tuned up and monthly operational characteristics are not required to be monitored for this unit. Therefore, the recordkeeping requirements of Section 6.1.3 are not applicable.
Section 6.1.4 requires the operator of any unit performing start-up or shutdown keep records of the duration of the start-up or shutdown.	The boiler at this facility is not subject to start-up or shutdown requirements. Therefore, this requirement is not applicable.

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Rule 4306 Requirements	Method of Compliance
Section 6.2.1 states that the fuel higher heating value (HHV) be certified by a third party fuel supplier or determined by 1. ASTM D 240-87 or D 2382-88 for liquid hydrocarbon fuels 2. ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels.	N-1904-4-3 Condition #12 of the proposed TV permit enforces this requirement.
Section 6.2.2 states that the oxides of nitrogen (ppmv) must be determined using EPA Method 7E or ARB Method 100.	N-1904-4-3 Condition #9 of the proposed TV permit enforces this requirement.
Section 6.2.3 states that carbon monoxide (ppmv) must be determined using EPA Method 10 or ARB Method 100.	N-1904-4-3 Condition #10 of the proposed TV permit enforces this requirement.
Section 6.2.4 requires stack gas oxygen be determined using EPA Method 3 or 3A, or ARB Method 100.	N-1904-4-3 Condition #11 of the proposed TV permit enforces this requirement.
Section 6.2.5 requires the NOx emission (lb/MMBtu) be determined using EPA Method 19.	N-1904-4-3 Condition #9 of the proposed TV permit enforces this requirement.
Section 6.2.6 requires the stack gas velocity be determined using EPA Method 2.	N-1904-4-3 Condition #13 of the proposed TV permit enforces this requirement
Section 6.2.7 requires the stack gas moisture content be determined using EPA Method 4.	N-1904-4-3 Condition #14 of the proposed TV permit enforces this requirement
Section 6.3.1 requires each unit be source tested to determine compliance at least once every 12 months. For gaseous fired units demonstrating compliance on two consecutive 12-month tests, the next test may be deferred for up to 36 months. During the 36 month source test interval, the operator must tune the unit in accordance, unless monitoring with a CEMS or APCO approved monitoring system where the applicable emission limits are periodically monitored.	N-1904-4-3 The facility uses a portable analyzer to measure emissions monthly, thus tuning is not required. Condition #8 of the proposed TV permit enforces this requirement
Section 6.3.2 lists alternatives to complying with Section 6.3.1	The facility has chosen to comply with Section 6.3.1; therefore, Section 6.3.2 requirements are not applicable.
Sections 6.4, 7.0, and 8.0 and 9.0 list emission control plan, compliance schedule, calculation, alternative emission control requirements.	These requirements are administrative and either don't apply or have already been satisfied. No conditions will be added to the Title V permit.

District Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr

The following tables demonstrate how the proposed TV permit will ensure compliance with District Rule 4320.

Rule 4320 Requirements	Method of Compliance
Section 2.0 states that this rule applies to any gaseous fuel or liquid fuel fired boiler, process heater, or steam generator with a total rated heat input greater than 5 million Btu per hour.	The only boiler at this facility, N-1904-4, is a gaseous fired unit that is rated at 12.6 MMBtu/hr. Therefore, District Rule 4320 requirements are applicable to this unit.
Section 5.1 states that an operator of a unit subject to this rule must comply with all applicable requirements of the rule and one of the following, on a unit-by-unit basis: 1. Operate the unit to comply with the emission limits of Sections 5.2 and 5.4; or 2. Pay an annual emission fee to the District as specified in Section 5.3 and comply with the control requirements as specified in Section 5.4; or 3. Comply with the applicable Low-use Unit requirements of Section 5.5.	This facility chose option number 1, to comply with the emission limits of Sections 5.2 and 5.4.
Section 5.2.1 states that boilers must not be operated in a manner which exceeds a carbon monoxide emissions limit of 400 ppmv.	N-1904-4-3 Condition #7 of the proposed TV permit enforces this requirement by limiting the boiler to 50 ppmvd CO @ 3% O_2.
Section 5.2.2 states that no unit fired on liquid fuel may be operated in a manner to exceed emissions of 40 ppmv NOx or 400 ppmv CO.	This unit is only fired on gaseous fuel; therefore, this requirement is not applicable.
Section 5.2.3 Table 1 lists the following NOx emission limit for a boiler rated greater than 5.0 MMBtu/hr and less than or equal to 20 MMBtu/hr: NOx: 9 ppmv @ 3% O_2 or 0.011 lb/MMBtu	N-1904-4-3 Condition #7 of the proposed TV permit enforces this requirement by limiting the boiler to 9 ppmvd NOx @ 3% O_2.
Section 5.2.4 lists an equation to use if the boiler is operated on combinations of gaseous and liquid fuel.	This unit is only fired on gaseous fuel; therefore, this requirement is not applicable.
Section 5.2.5 lists requirements for units that are designated to comply with a staged enhanced schedule limit for NOx.	This unit is not designated to comply with a staged enhanced schedule NOx limit. Thus, this requirement is not applicable.
Section 5.3 lists requirements for annual fees calculations.	The operator chose to comply with the emission limits of Sections 5.2 and 5.4 rather than pay emission fees. Therefore, the requirements of Section 5.3 are not applicable to this unit.

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Rule 4320 Requirements	Method of Compliance
Section 5.4.1 states that the operator must comply with one of the following requirements: 1. Fire the unit exclusively on PUC-quality natural gas, commercial propane, or a combination of such gases; or 2. Limit fuel sulfur content to no more than five grains of total sulfur per 100 standard cubic feet; or 3. Install and properly operate an emission control system that reduces SO_2 emissions by at least 95% by weight or limit exhaust SO_2 to less than or equal to 9 ppmv corrected to 3.0 % O_2.	N-1904-4-3 The boiler is only operated on PUC-quality natural gas. Condition #6 of the proposed TV permit enforces this requirement.
Section 5.4.2 states that liquid fuel may only be used during PUC quality natural gas curtailment and further outlines requirements for the liquid fuel.	This boiler does not operate using liquid fuel; therefore, the requirements of Section 5.4.2 are not applicable.
Section 5.5 lists requirements for low-use units limited to less than 1.8 billion Btu per calendar year.	This unit is not limited to 1.8 billion Btu per calendar year. Therefore, the requirements of Section 5.5 are not applicable.
Section 5.6 lists startup and shutdown requirements.	The permit for the boiler does not include any relief from the permitted emission limits during startup and shutdown periods. Therefore, the startup and shutdown requirements are not applicable to the boiler.
Section 5.7.1 states that an unit subject to the emission limits in Section 5.2, must be equipped with either an operational APCO approved Continuous Emissions Monitoring System for NOx, CO and Oxygen, or be equipped with an APCO-approved alternate monitoring system.	N-1904-4-3 The boiler is equipped with an APCO-approved alternate monitoring system. Conditions #20 through #23 of the proposed TV permit enforce this requirement.
Section 5.7.2 states that for units subject to the requirements of Section 5.5.1 or 5.5.2, the operator must monitor the operational characteristics recommended by the manufacturer and approved by the APCO.	This boiler is not subject to the requirements of Sections 5.5.1 or 5.5.2; therefore, the requirements of Section 5.7.2 are not applicable.
Section 5.7.3 states that any unit subject to Section 5.5 must install and maintain an operational non-resettable, totalizing mass or volumetric flow line to each unit.	This boiler is not subject to Section 5.5; therefore, this requirement is not applicable.
Section 5.7.4 states that units operated at seasonal sources that are subject to the requirements of 40 CFR 60 Subpart Db may implement an APCO approved parametric monitoring system (PMS) in lieu of a CEMS, provided certain conditions are met.	This boiler is not subject to 40 CFR 60 Subpart Db; therefore, this requirement is not applicable.
Section 5.7.5 states that the APCO must not approve an alternative monitoring system unless it is documented that continued operation within the ranges of specified emissions-related performance indicators or operations characteristics provides a reasonable assurance of compliance with the applicable emission limits.	The approved APCO monitoring system measures emissions directly, using a portable analyzer. This condition is satisfied.

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Rule 4320 Requirements	Method of Compliance
Section 5.8.1 states that an operator of any unit has the option of complying with either the heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.1.	N-1904-4-3 Condition #18 of the proposed TV permit enforces this requirement.
Section 5.8.2 states that all emissions measurements must be made with the unit operating at either conditions representative of normal operations or conditions specified in the Permit to Operate.	N-1904-4-3 Condition #15 of the proposed TV permit enforces this requirement.
Section 5.8.3 states that all continuous emission monitoring system (CEMS) measurements must be averaged over a period of 15 consecutive minutes.	The boiler is not equipped with a CEMS; therefore, this requirement is not applicable.
Section 5.8.4 states that for emissions monitoring pursuant to 5.7.1 and 6.3.1 using a portable NOx analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings must be averaged over a 15 minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings evenly spaced out over the 15-consecutive minute period.	N-1904-4-3 Condition #22 of the proposed TV permit enforces this requirement.
Section 5.8.5 states that for emission source testing performed pursuant to Section 6.3.1 for the purpose of determining compliance with an applicable standard of this Rule, the arithmetic average of three 30-minute consecutive-minute test runs shall apply. If two of the three runs are above an applicable limit, the test cannot be used to determine compliance with an applicable limit.	N-1904-4-3 Condition #16 of the proposed TV permit enforces this requirement.
Section 6.1 states that the records required by Sections 6.1.1 through 6.1.5 must be maintained for five calendar years and be made available to the APCO upon request.	N-1904-4-3 Condition #26 of the proposed TV permit enforces this requirement.
Section 6.1.1 lists recordkeeping requirements for any unit operated under the exemption of Section 4.2 of the Rule.	This facility does not operate any units that were exempted under Section 4.2 of the Rule. Therefore, the requirements of Section 6.1.1 are not applicable.
Section 6.1.2 lists recordkeeping requirements for any unit that is a Section 5.5.	This unit is not subject to Section 5.5; therefore, the requirements of Section 6.1.2 are not applicable.
Section 6.1.3 lists recordkeeping requirements for units that are required to either be tuned up or for units where monthly operational characteristics must be monitored.	The boiler at this facility is not required to be tuned up and monthly operational characteristics are not required to be monitored for this unit. Therefore, the recordkeeping requirements of Section 6.1.3 are not applicable.
Section 6.1.4 requires the operator of any unit performing start-up or shutdown keep records of the duration of the start-up or shutdown.	This boiler is not subject to start-up or shutdown requirements. Therefore, this requirement is not applicable.
Section 6.1.5 requires the operator of any unit firing on liquid fuel during a PUC-quality natural gas curtailment to record the sulfur content of the fuel used, and duration of the natural gas curtailment period.	This boiler is not permitted to operate on a liquid fuel during natural gas curtailment periods. Therefore, the recordkeeping requirements of this section are not applicable.

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Rule 4320 Requirements	Method of Compliance
Section 6.2.1 states that the fuel higher heating value (HHV) be certified by a third party fuel supplier or determined by 1. ASTM D 240-87 or D 2382-88 for liquid hydrocarbon fuels 2. ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels.	N-1904-4-3 Condition #12 of the proposed TV permit enforces this requirement.
Section 6.2.2 states that the oxides of nitrogen (ppmv) must be determined using EPA Method 7E or ARB Method 100.	N-1904-4-3 Condition #9 of the proposed TV permit enforces this requirement.
Section 6.2.3 states that carbon monoxide (ppmv) must be determined using EPA Method 10 or ARB Method 100.	N-1904-4-3 Condition #10 of the proposed TV permit enforces this requirement.
Section 6.2.4 requires stack gas oxygen be determined using EPA Method 3 or 3A, or ARB Method 100.	N-1904-4-3 Condition #11 of the proposed TV permit enforces this requirement.
Section 6.2.5 requires the NOx emission (lb/MMBtu) be determined using EPA Method 19.	N-1904-4-3 Condition #9 of the proposed TV permit enforces this requirement.
Section 6.2.6 requires the stack gas velocity be determined using EPA Method 2.	N-1904-4-3 Condition #13 of the proposed TV permit enforces this requirement
Section 6.2.7 requires the stack gas moisture content be determined using EPA Method 4.	N-1904-4-3 Condition #14 of the proposed TV permit enforces this requirement
Sections 6.2.8 through 6.2.10 list approved methods for determining the oxides of sulfur, fuel H_2S content, and sulfur content of liquid fuels.	This boiler is fired on PUC-quality natural gas. Testing for sulfur emissions is not required for units firing solely on PUC-quality natural gas; therefore, these requirements will not be listed on the proposed TV permit.
Section 6.3.1 requires each unit be source tested to determine compliance at least once every 12 months. For gaseous fired units demonstrating compliance on two consecutive 12-month tests, the next test may be deferred for up to 36 months. During the 36 month source test interval, the operator must tune the unit in accordance, unless monitoring with a CEMS or APCO approved monitoring system where the applicable emission limits are periodically monitored.	N-1904-4-3 The facility uses a portable analyzer to measure emissions monthly, thus tuning is not required. Condition #8 of the proposed TV permit enforces this requirement
Section 6.3.2 lists alternatives to complying with Section 6.3.1	The facility has chosen to comply with Section 6.3.1; therefore, Section 6.3.2 requirements are not applicable.
Sections 6.4, 7.0, and 8.0 list emission control plan, compliance schedule, and calculation requirements.	These requirements have all been satisfied and will not be included on the TV permit.

District Rule 4351 - Boilers, Steam Generators, and Process Heaters – Phase 1

Pursuant to Section 2.0, District Rule 4351 applies to any boiler, steam generator, or process heater with a rated heated input greater than 5 MMBtu/hr that is fired with gaseous and/or liquid fuels, and that is included in a Major NOx Source. Pursuant to the engineering evaluation for District Project N-1093987, the stationary source potential to emit for NOx is 2,631 lb/year. Since the stationary source potential to emit is less than the NOx Major Source threshold of 20,000 lb/year, the boiler at this facility is not included in a Major NOx source and District Rule 4351 requirements are not applicable.

District Rule 4682 - Polystyrene, Polyethylene, and Polypropylene Manufacturing

Rule 4682 Requirements	Method of Compliance
Section 2.0 states that District Rule 4682 requirements apply to any manufacturing, processing, and storage of products composed of polystyrene, polyethylene, or polypropylene.	Units N-1904-1 and N-1904-2 are subject to the requirements of District Rule 4682.
Section 5.1 states that no person may place, hold, or store any VOC blowing agent in a stationary tank, reservoir, or container having a capacity greater than 200 gallons or less unless one of the emission control systems listed in Sections 5.1.1 or 5.1.2 are utilized.	Pursuant to the application review for District Project N-1093987, this facility does not hold or store any VOC blowing agents on-site in a stationary tank, reservoir or container. The expandable polystyrene beads are pre-impregnated with pentane blowing agent, which does not get released until the beads are expanded. Therefore, it was determined that Section 5.1 requirements are not applicable to the operations at this facility.
Section 5.2 states that an operator must not conduct any manufacturing operations, as defined in Section 3.0, unless one of the following emission reduction methods is met: 1. Effective until December 31, 2012, the operator must demonstrate that the total product emissions to not exceed 2.4 pounds of VOC per 100 pounds of total material processed, calculated over a monthly period. The total product emissions include emissions from the manufacturing operation, after controls, plus the residual blowing agent in the finished product. 2. Effective on and after January 1, 2013, the operator of an extrusion facility must demonstrate that the total product emissions do not exceed 2.4 pounds of VOC per 100 pounds of total material processed, calculated over a monthly period. 3. Effective on and after January 1, 2013, the operator of an expandable polystyrene molding facility must demonstrate that the total product emissions do not exceed the following:	Both units N-1904-1 and N-1904-2 comply with the requirements of option 5, shown on the next page. An "approvable emission control device" is defined in Sections 3.2.1 and 3.2.2 as a control system that attains at least 90% capture and reduces captured emissions by at least 95% by weight. Option 5c is applicable, since the highest concentration of blowing agent in the product is 1.8 percent or less within 15 minutes after completion of the final processing step. N-1904-1-6 Conditions #6 and #7 of the proposed TV permit will require 100% capture and 95% destruction efficiency. Therefore, Section 5.3 requirements are satisfied for this unit and included on the proposed permit. There is no final product storage associated with this unit, as all materials from this unit must be molded by unit N-1904-2.

a. 3.4 pounds of VOC per 100 pounds of total material processed, calculated daily; and b. 2.4 pounds of VOC per 100 pounds of total material processed, calculated monthly. 4. A blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorofluoromethane (CFC-12) is exclusively used. 5. An approved emission control system is installed and operated with the manufacturing emissions vented only to the approved emission control device and emissions from the final product vented only to the emission control device for at least: a. 48 hours, in the case of expandable polystyrene molding operations that process more than 800,000 pounds per calendar year b. 24 hours in the case of all other manufacturing operations c. The provisions of 5.a and 5.b are not required for any facility that only manufactures polystyrene products and the highest concentration of the blowing agent in the product is 1.8 percent or less by weight, within 15 minutes after completion of the final processing step, prior to any finished product storage. Verification of the concentration must be demonstrated annually. 6. The operator demonstrates to the satisfaction of the APCO that the manufacturing emissions are no greater than the facility emissions which would occur under Section 5.3.3, as calculated according to Section 5.5, and which does not include the use of trichloromethane (CFC-11) or dichlorodifluoromethane (CFC-12), or 7. A control system that meets all of the following requirement may be deemed as meeting the requirements of Section 5.3.4, unless the APCO determines additional controls are required: a. The beads used in manufacturing have an annual-average VOC content of less than 4.2% per weight; and b. The manufacturing emissions (not including the finished product storage emissions) are controlled with an overall capture and control efficiency of at least 93% by weight.	N-1904-2-4 Conditions #6 and #7 of the proposed TV permit will require 100% capture and 95% destruction efficiency. Therefore, Section 5.3 requirements are satisfied for this unit and included on the proposed permit. The concentration of the blowing agent in the final product is less than 1.8% or less by weight, within 15 minutes after completing the final processing step. Therefore, further control of the final product emissions is not required. Conditions #12 and #23 of the proposed TV permit enforce this requirement.

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Rule 4682 Requirements	Method of Compliance
Section 5.3 states that operators subject to the provisions of Section 5.2.1, 5.2.2 or 5.2.3, who exceed the limit based on a monthly calculation, will be considered to have been in violation for each day of that monthly period.	These operations are Subject to Section 5.2.1, 5.2.2 or 5.2.3; therefore, this requirement is not applicable to these units.
Section 5.4 states that facility emissions that would occur under Section 5.2.5 must be calculated using the following formula: FE = [1-(0.90 x 0.95)] x [(P1 + AS - P2) + (P2 – P3)	These calculations are only necessary if using Section 5.2.6 to comply with Section 5.2 requirements. These units are not utilizing Section 5.2.6 to comply, therefore, these calculations are not necessary and the requirements of Section 5.4 are not applicable..
Section 5.6 states that operators must submit District Rule 4682 compliance plan no later than March 20, 2009.	This requirement has already been satisfied; therefore, no conditions are required on the permits to ensure compliance.
Section 6.1.1 states that any person subject to the provisions of this rule must maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of blowing agent used. Records must be maintained with a minimum of monthly totals with the ability to calculate daily averages in a given month.	N-1904-1-6 Condition #22 of the proposed TV operating permit enforces this requirement. N-1904-2-4 Condition #23 of the proposed TV operating permit enforces this requirement.
Section 6.1.2 states that any person using an emission control device as a means of complying with this Rule must maintain daily records of key system operating and maintenance procedures that will demonstrate continuous compliance of the emission control device.	Units N-1904-1 and N-1904-2 share a regenerative thermal oxidizer. The key system operating parameter chosen is the regenerative thermal oxidizer combustion chamber temperature. N-1904-1-6 Condition #23 of the proposed TV operating permit enforces this requirement. N-1904-2-4 Condition #24 of the proposed TV operating permit enforces this requirement.
Section 6.1.3 states that operators complying with Sections 5.2.1, 5.2.2, or 5.2.3 must maintain records necessary to show compliance with that section.	The operator is not using any of these Rule sections to comply with the control requirements of Rule 4682. Thus, this requirement is not applicable.

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Rule 4682 Requirements	Method of Compliance
Section 6.1.4 states that operators complying with Section 5.2.3 must maintain records to show compliance with that section.	The operator is not using this Rule section to comply with the control requirements of Rule 4682. Thus, this requirement is not applicable.
Section 6.15 states that the operator must keep in the facility all records to demonstrate compliance with the requirements of Rule 4682 for a minimum of five years, and make such records available at the facility during normal business hours, or submit them to the APCO upon request.	N-1904-1-6 Condition #27 of the proposed TV operating permit enforces this requirement. N-1904-2-4 Condition #28 of the proposed TV operating permit enforces this requirement.
Section 6.2.1 states that control efficiency of the emission control system must 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.	N-1904-1-6 Condition #21 of the proposed TV operating permit enforces this requirement. N-1904-2-4 Condition #21 of the proposed TV operating permit enforces this requirement.
Section 6.2.2 states that the capture efficiency of an emission capture control system must be determined according to EPA's "Guidelines for Determining Capture Efficiency," January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable.	The capture efficiency for both units was determined upon startup using the applicable methods of Section 6.2.2. Further capture efficiency testing is not required by Rule 4682 and was not required for NSR, therefore, this requirement will not be included as a condition on the permits.
Section 6.2.4 states that the VOC blowing agent contained in polymeric materials must be determined using South Coast Air Quality Management District (SCAQMD) Method 306 (Analysis of Pentanes in Expandable Styrene Polymers) or Bay Air Air Quality Management District (BAAQMD) Method 45 (Determination of Butanes and Pentanes in Polymeric Materials).	This testing is only required for unit N-1904-2-4, to determine the concentration of residual blowing agent in the manufactured product. N-1904-2-4 Condition #22 of the proposed TV operating permit enforces this requirement

District Rule 4801 - Sulfur Compounds

This rule is applicable to units that emit sulfur compounds. The thermal oxidizer listed on proposed TV permits N-1904-1-6 and '-2-4, and the boiler listed on proposed TV permit N-1904-4-3 are each expected to emit sulfur compounds. District Rule 4801 was last amended on December 17, 1992, and has been submitted to the EPA to replace Stanislaus County Rule 407 in the SIP. This District Rule is at least as stringent as the county rule, as demonstrated by the following comparison:

Comparison of District Rule 4801 and Stanislaus County Rule 407		
REQUIREMENT	**Rule 4801**	**Rule 407**
A person shall not discharge into the atmosphere sulfur compounds exceeding in concentration at the point of discharge 0.2 percent by volume calculated as sulfur dioxide on a dry basis averaged over 15 consecutive minutes.	✓	✓
EPA Method 8 and ARB Method 1-100 shall be used to determine such emissions.	✓	

For natural gas combustion at a reference state of 60 °F, the Rule 4801 limit of 2,000 ppmvd is equivalent to:

$$\frac{(2000\ \text{ppmvd})\left(8{,}578\frac{\text{dscf}}{\text{MMBtu}}\right)\left(64\frac{\text{lb}-\text{SO}_x}{\text{lb}-\text{mol}}\right)}{\left(379.5\frac{\text{dscf}}{\text{lb}-\text{mol}}\right)(10^6)} \cong 2.9\frac{\text{lb}-\text{SO}_x}{\text{MMBtu}}$$

The thermal oxidizer and boiler SO_x emissions are both due to combusting natural gas with a total fuel sulfur (S) content of 1.0 grain per 100 scf (PUC-Quality natural gas), which results in a SO_x emission rate of 0.00285 lb/MMBtu. Therefore, it is expected that each unit will have a SO_x emission concentration less than the 2000 ppmvd.

Condition #2 of proposed TV operating permit N-1904-1-6 enforces this requirement.
Condition #2 of proposed TV operating permit N-1904-2-4 enforces this requirement.
Condition #4 of proposed TV operating permit N-1904-4-3 enforces this requirement.

40 CFR 64 - Compliance Assurance Monitoring (CAM)

§64.2 – Applicability

This section requires Compliance Assurance Monitoring (CAM) for units that meet the following criteria:

1) the facility must be a major source
2) the unit must have an emission limit for the pollutant;
3) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
4) the unit must have a pre-control potential to emit of greater than the major source thresholds.

Pollutant	Major Source Threshold (lb/year)
VOC	20,000
NO_X	20,000
CO	200,000
PM_{10}	140,000
SO_X	140,000

a. Permit Units N-1904-1-6 and -2-4

The polystyrene expansion lines, N-1904-1-6 and -2-4, only emit VOCs and are served by a shared thermal oxidizer that is used to reduce VOC emissions. Additionally, each of these units has a pre-control potential to emit greater than 20,000 lb-VOC/year and each of these permits includes VOC emission limits. Therefore, the polystyrene expansion lines N-1904-1 and '-2 each trigger CAM requirements for VOC emissions.

b. Permit Unit N-1904-4-3

The boiler emits NOx, SOx, PM10, CO and VOC emissions; however, the only control device installed on the boiler is flue gas recirculation that controls NOx emissions. Since there are no emission controls for SOx, PM10, CO and VOC, CAM cannot be triggered for those pollutants.

The boiler achieves 9 ppmvd NOx through the use of flue gas recirculation. The uncontrolled emission rate is estimated to be 30 ppmvd NOx @ 3% O_2, equivalent to 0.036 lb/MMBtu. Based on this emission rate, the uncontrolled potential to emit for NOx is:

$PE_{uncontrolled}$ = 0.036 lb/MMBtu x 12.6 MMBtu/hour x 8,760 hours/year

$PE_{uncontrolled}$ = 3,974 lb-NOx/year

Since the uncontrolled emissions for NOx do not exceed the Major Source threshold of 20,000 lb-NOx/year, CAM is also not triggered for NOx. In summary, CAM is not triggered and no further discussion is required for the boiler.

§64.3 - Monitoring Design Criteria

This section specifies the design criteria for the CAM system. Paragraph (a) (General criteria) requires that the CAM system be designed to obtain data for one or more appropriate indicators of emission control system performance and requires the owner to establish appropriate ranges or designated conditions for the selected indicators such that operation within the ranges provides a reasonable assurance of ongoing compliance with emission limitations or standards for the anticipated range of operating conditions.

As shown above, each of the polystyrene extrusion lines, N-1904-1 and N-1904-2, triggers CAM for VOC emissions. A regenerative thermal oxidizer (RTO) operates as a shared external control device to reduce VOC emissions through combustion of those compounds.

Foam Fabricators has chosen to satisfy CAM requirements by utilizing a previously installed temperature monitor that continuously records and measures the combustion temperature within the regenerative thermal oxidizer. The minimum combustion chamber temperature will be maintained at or above 1400 degrees Fahrenheit.

Paragraph (b) (*Performance criteria)* requires the owner or operator to establish and maintain the following:

- Specifications to ensure that representative data are collected

  The existing temperature monitor continuously records the representative data.

- Verification procedures for startup of new monitoring equipment

  The temperature monitor is already operating and recording temperature. Furthermore, source testing has already verified that maintaining the 1400 degrees Fahrenheit correlates with maintaining the required VOC destruction efficiency from the permit.

- Quality assurance and control practices to ensure continuing validity of data

  Periodic VOC destruction efficiency testing is required every 12 months. These periodic direct emission measurements ensure that the oxidizer continues to operate properly.

- Data collection frequency and procedures

  Since the post-control VOC emissions from units N-1904-1 and 1904-2 exceed 20,000 lb-VOC/year, measurements must be made at least every 15 minutes. The proposed temperature monitoring system continuously records the thermal oxidizer chamber temperature at a much higher frequency. Therefore, compliance with this requirement is expected. Thermal oxidizer chamber temperature records will be maintained by the facility and will be made available upon request.

Paragraph (c) (Evaluation factors) requires the owner or operator to take into account site specific factors in the design of the CAM system.

(c) Evaluation factors. In designing monitoring to meet the requirements of this section, the owner or operator shall take into account site-specific factors including the applicability of existing monitoring equipment and procedures, the ability of the monitoring to account for process and control device operational variability, the reliability and latitude built into the control technology, and the level of actual emissions relative to the compliance limitation.

No additional site specific information will need to be accounted for in the design of the proposed CAM system.

(d) Special criteria for the use of continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS) or predictive emission monitoring system (PEMS)

A CEMS, COMS, or PEMS is not necessary or required for the subject emission unit. Therefore, the requirements of this section are not applicable and no further discussion is required.

§64.4 - Submittal Requirements

This section specifies submittal requirements for the owner or operator which ensure the CAM system will comply with the design criteria of §64.3. Foam Fabricators has submitted a complete CAM system proposal that specifies the parameters to be monitored in accordance with §64.3 above. Therefore, Foam Fabricators has satisfied the requirements of the submittal requirements of this section.

§64.5 - Deadlines for Submittals

This section specifies required timing for submittals required under §64.4.

Large pollutant-specific emissions units (those with controlled emissions exceeding major source thresholds) are required to make the submittals as a part of the initial Title V permit application where the application has either not been filed or has not been deemed complete. Where the initial Title V permit has been issued without implementation of 40 CFR 64, the owner or operator must make the required submittals as a part of a subsequent application for any significant permit revision. If the required information is not submitted by either of these deadlines, it must be submitted as a part of the application for the Title V permit renewal.

Foam Fabricators submitted their CAM proposal with their Initial Title V application. Therefore, Foam Fabricators has satisfied the submittal deadline requirements of this section.

§64.6 - Approval of Monitoring

This section stipulates the following:

- A requirement that the permitting authority act to approve the proposed monitoring by confirming that the monitoring submitted complies with the requirements of §64.3.
- An allowance for the permitting authority to condition the approval based on collecting additional data on the indicators to be monitored, including performance or compliance testing.
- The minimum conditions that must be placed on the permit in the event that the proposed monitoring is approved by the permitting authority including a milestone schedule for completion of any conditional approval actions required by the owner or operator, such as installations, testing, or verification of operational status.
- Actions required by the permitting authority in the event that the proposed monitoring is not approved.

The CAM submittal requirements and stipulations for approval of such submittals pursuant to §64.4, §64.5, and §64.6 have been completed in conjunction with the application and review process for this Title V permit application. Therefore, Foam Fabricators is in compliance with the requirements of this section.

§64.7 - Operation of Approved Monitoring

This section stipulates the following:

- Requirements that the owner or operator 1) commence the monitoring upon receipt of a Title V permit that includes such monitoring, 2) properly maintain the monitoring system, and 3) conduct all monitoring in a continuous mode with the exception of outage periods associated with monitor malfunction and repair and with quality assurance and control activities.
- Actions required by the owner or operator in response to excursions or exceedances.
- A requirement for the owner or operator to document any need for improved monitoring based upon either an identification of a failure of the monitoring system to identify an excursion or exceedance or upon the results of compliance or performance testing that identifies a need to modify the monitoring.

§64.8 - Quality Improvement Plan (QIP) Requirements

This section stipulates that the Administrator or the permitting authority may require that the facility develop and implement a QIP in the event of a determination of a need for improved monitoring pursuant to §64.7. §64.8 also identifies the minimum elements required in the QIP, and requires that the facility implement the QIP as expeditiously as possible, with implementation not exceeding 180 days after the date that the need for implementation was identified unless the permitting authority is notified.

§64.9 - Reporting and Recordkeeping Requirements

This section stipulates the minimum reporting and recordkeeping requirements for facilities subject to 40 CFR 64.

CAM Summary

N-1904-1-6

Conditions #8, #9, and #23 through #26 of the proposed TV permit enforce the CAM plan requirements.

N-1904-2-4

Conditions #8, #9, and #24 through #27 of the proposed TV permit enforce the CAM plan requirements.

X. PERMIT SHIELDS

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.

A. Requirements Addressed by Model General Permit Templates

By using the model general permit template(s) listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template(s). The basis for each permit shield is discussed in the Permit Shield section of each template.

B. Requirements not Addressed by Model General Permit Templates

The applicant is not proposing any additional permit shields.

XI. PERMIT CONDITIONS

See Draft Title V operating permits beginning on the following page.

San Joaquin Valley
Air Pollution Control District

FACILITY: N-1904-0-1 **EXPIRATION DATE:** 09/30/2012

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; Stanislaus County Rule 110] 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; Stanislaus County Rule 110)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit

11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit

12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit

13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit

14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit

15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit

16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit

17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit

18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit

19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit

20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit

21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101; Stanislaus County Rule 401] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit

24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit

25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit

26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit

27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit

28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit

29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit

30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit

31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit

32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit

33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit

35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit

37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit

38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit

39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Stanislaus County Rules 401, 110, and 202. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

41. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1904-1-6 **EXPIRATION DATE:** 09/30/2012

EQUIPMENT DESCRIPTION:
EXPANDABLE POLYSTYRENE PRE-EXPANSION PROCESS CONSISTING OF A HIRSCH VACUTRANS MODEL 6000 EXPANDER, AND A PRE-PUFF STORAGE/AGING PERMANENT TOTAL ENCLOSURE (PTE) CONTAINING 20 PRE-PUFF STORAGE/AGING BINS. EACH EXPANDER, PRE-PUFF STORAGE/AGING BIN, AND THE PTE ARE SERVED BY A VOC COLLECTION SYSTEM VENTED TO A SHARED 1.2 MMBTU/HR SHIP & SHORE MODEL SSE-5000-RTO NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER (RTO). THE RTO IS SHARED WITH PERMIT UNIT N-1904-2.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The concentration of sulfur compounds in the exhaust of the thermal oxidizer shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [District Rule 4801] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The regenerative thermal oxidizer (RTO) shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Each expander, pre-puff storage/aging bin, and permanent total enclosure shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times when expandable polystyrene (EPS) materials are processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. The VOC collection system serving the expander, pre-puff storage/aging bins, and permanent total enclosure shall be operated and maintained at a capture efficiency of 100%. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. The regenerative thermal oxidizer (RTO) shall be operated with a minimum VOC destruction efficiency of 95%. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
8. The combustion zone of the regenerative thermal oxidizer (RTO) shall be operated at a minimum temperature of 1,400 degrees Fahrenheit. The combustion zone of the RTO shall be pre-heated to 1,400 degrees Fahrenheit prior to the start-up of this EPS materials pre-expansion operation. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
9. The regenerative thermal oxidizer (RTO) shall be equipped with an operational continuous temperature monitoring and recording instrument to measure and record the temperature of the RTO combustion zone. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. No more than 36,000 pounds of expandable polystyrene (EPS) materials shall be processed through the expander and conveyed into the pre-puff storage/aging bins in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC emissions from the expander shall not exceed 0.00059 pounds per pound of EPS materials processed. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. VOC emissions from the pre-puff storage/aging bins shall not exceed 0.00047 pounds per pound of EPS materials processed. [District Rule 2201] Federally Enforceable Through Title V Permit
13. NOx emissions from the regenerative thermal oxidizer (RTO) shall not exceed 50 ppmvd @ 3% O2 (referenced as NO2) or 0.0607 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. CO emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.084 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. PM10 emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. SOx emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Source testing to demonstrate compliance with the VOC destruction efficiency of the regenerative thermal oxidizer (RTO) shall be performed at least once every 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. 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
21. Source testing to demonstrate the destruction efficiency of the regenerative thermal oxidizer (RTO) shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates, and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4682] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of the following: (a). Total quantity of expandable polystyrene (EPS) materials processed through the expander (in pounds per day); (b). Total quantity of expanded EPS materials conveyed to the pre-puff storage/aging bins (in pounds per day); (c). Type and concentration (in percent by weight) of the blowing agent contained in the received EPS materials. Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. [District Rules 1070, 2201, and 4682] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of the continuous readings of the thermal oxidizer chamber temperature. [District Rules 2201 and 4682, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
24. The permittee shall comply with the compliance assurance monitoring and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
25. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit
26. The permittee shall comply with all recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit
27. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4682] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1904-2-4 **EXPIRATION DATE:** 09/30/2012

EQUIPMENT DESCRIPTION:
EXPANDABLE POLYSTYRENE MOLDING OPERATION CONSISTING OF ELEVEN MOLDING PRESSES EACH SERVED BY A VOC COLLECTION SYSTEM VENTED TO A SHARED 1.2 MMBTU/HR SHIP & SHORE MODEL SSE-5000-RTO NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER (RTO). THE RTO IS SHARED WITH PERMIT UNIT N-1904-1.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The concentration of sulfur compounds in the exhaust of the thermal oxidizer shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period [District Rule 4801] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The regenerative thermal oxidizer (RTO) shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Each molding press shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times when expanded polystyrene materials are processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. The VOC collection system serving the molding presses shall be operated and maintained at a capture efficiency of 100%. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. The regenerative thermal oxidizer (RTO) shall be operated with a minimum VOC destruction efficiency of 95%. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
8. The combustion zone of the regenerative thermal oxidizer (RTO) shall be operated at a minimum temperature of 1,400 degrees Fahrenheit. The combustion zone of the RTO shall be pre-heated to 1,400 degrees Fahrenheit prior to the start-up of this expanded polystyrene materials molding operation. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
9. The regenerative thermal oxidizer (RTO) shall be equipped with an operational continuous temperature monitoring and recording instrument to measure and record the temperature of the RTO combustion zone. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. No more than 60,000 pounds of expanded polystyrene materials shall be processed through the molding presses in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. VOC emissions from the molding presses and product storage shall not exceed 0.0014 pounds per pound of expanded polystyrene materials processed. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The highest concentration of the blowing agent in the manufactured products shall be 1.8 percent or less by weight, within 15 minutes after removing the product from the molding press, prior to any finished product storage. Verification of the concentration shall be demonstrated annually, pursuant to a protocol submitted to the District for review and approval. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. NOx emissions from the regenerative thermal oxidizer (RTO) shall not exceed 50 ppmvd @ 3% O2 (referenced as NO2) or 0.0607 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. CO emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.084 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.0055 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. PM10 emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. SOx emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Source testing to demonstrate compliance with the VOC destruction efficiency of the regenerative thermal oxidizer (RTO) shall be performed at least once every 12 months. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
20. 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
21. Source testing to demonstrate the destruction efficiency of the regenerative thermal oxidizer (RTO) shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates, and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4682] Federally Enforceable Through Title V Permit
22. Source testing to determine the concentration of the blowing agent contained in the manufactured products shall be conducted using South Coast Air Quality Management District (SCAQMD) Method 306 (Analysis of Pentane in Expandable Styrene Polymers) or Bay Area Air Quality Management District (BAAQMD) Method 45 (Determination of Butanes and Pentanes in Polymeric Materials). [District Rule 4682] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of the following: (a). Total quantity of expanded polystyrene materials processed through the molding presses (in pounds per day); (b). Type and concentration (in percent by weight) of the blowing agent contained in the manufactured products, within 15 minutes after removing the product from the molding press, prior to any finished product storage (on an annual basis). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. [District Rules 1070, 2201, and 4682] Federally Enforceable Through Title V Permit
24. The permittee shall maintain records of the continuous readings of the thermal oxidizer chamber temperature. [District Rules 2201 and 4682, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
25. The permittee shall comply with the compliance assurance monitoring and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
26. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit
27. The permittee shall comply with all recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4682] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1904-4-3 **EXPIRATION DATE:** 09/30/2012

EQUIPMENT DESCRIPTION:
12.6 MMBTU/HR NATURAL GAS-FIRED CLEAVER BROOKS MODEL CBLE-700-300-150 BOILER WITH A CLEAVER BROOKS MODEL NTI-300 LOW NOX BURNER WITH FLUE GAS RECIRCULATION

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201 and 4301] Federally Enforceable Through Title V Permit
2. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr. [District Rule 4301] Federally Enforceable Through Title V Permit
3. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. [District Rule 4301] Federally Enforceable Through Title V Permit
4. Sulfur compound emissions shall not exceed 0.2% by volume, 2,000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and County Rule 407 (Stanislaus)] Federally Enforceable Through Title V Permit
5. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. [District Rule 2201 and 40 CFR 60.48(c)(g)] Federally Enforceable Through Title V Permit
6. The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. Emissions from the boiler shall not exceed any of the following limits: 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
8. Source testing to measure NOx and CO emissions from the boiler shall be conducted at least once every 12 months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every 12 months. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
9. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
10. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
11. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
12. Fuel HHV shall be certified by a third party fuel supplier or determined by ASTM D 1826-88 or ASTM D 1945-81 in conjunction with ASTM D 3588-89 for gaseous fuels. [District Rule 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. Stack gas velocities shall be determined using EPA Method 2. [District Rule 4320] Federally Enforceable Through Title V Permit
14. Stack Gas moisture content shall be determined using EPA Method 4. [District Rule 4320] Federally Enforceable Through Title V Permit
15. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
18. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
20. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

24. Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit

25. Permittee shall maintain records of the amount of fuel combusted each calendar month. [40 CFR 60.48(c)(g)(2)] Federally Enforceable Through Title V Permit

26. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

Attachment A

Detailed Facility Printout

Detailed Facility Report

For Facility=1904

Sorted by Facility Name and Permit Number

FOAM FABRICATORS, INC
301 B 9TH ST
MODESTO, CA 95351

FAC #: N 1904
STATUS: A
TELEPHONE: 2095237002

TYPE: TitleV
TOXIC ID: 10399

EXPIRE ON: 09/30/2012
AREA: 16 /
INSP. DATE: 05/13

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-1904-1-5	0.6 MMBtu/hr (1/2 Shared RTO Heat Input Rating)	3020-02 C	1	197.00	197.00	A	EXPANDABLE POLYSTYRENE PRE-EXPANSION PROCESS CONSISTING OF A HIRSCH VACUTRANS MODEL 6000 EXPANDER, AND A PRE-PUFF STORAGE/AGING PERMANENT TOTAL ENCLOSURE (PTE) CONTAINING 20 PRE-PUFF STORAGE/AGING BINS. EACH EXPANDER, PRE-PUFF STORAGE/AGING BIN, AND THE PTE ARE SERVED BY A VOC COLLECTION SYSTEM VENTED TO A SHARED 1.2 MMBTU/HR SHIP & SHORE MODEL SSE-5000-RTO NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER (RTO). THE RTO IS SHARED WITH PERMIT UNIT N-1904-2.
N-1904-2-3	0.6 MMBtu/hr (1/2 Shared RTO Heat Input Rating)	3020-02 C	1	197.00	197.00	A	EXPANDABLE POLYSTYRENE MOLDING OPERATION CONSISTING OF ELEVEN MOLDING PRESSES EACH SERVED BY A VOC COLLECTION SYSTEM VENTED TO A SHARED 1.2 MMBTU/HR SHIP & SHORE MODEL SSE-5000-RTO NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER (RTO). THE RTO IS SHARED WITH PERMIT UNIT N-1904-1.
N-1904-3-0	8,700 KBTU/HR	3020-02 G	1	815.00	815.00	D	ONE (1) JOHNSON BOILER WITH A 8.7 MMBTU/HR NATURAL GAS FIRED BURNER. *** DELETE PERMIT 10/13/2000 - FJC ***
N-1904-4-2	12,500 KBTU/HR BOILER	3020-02 G	1	815.00	815.00	A	12.6 MMBTU/HR NATURAL GAS-FIRED CLEAVER BROOKS MODEL CBLE-700-300-150 BOILER WITH A CLEAVER BROOKS MODEL NTI-300 LOW NOX BURNER WITH FLUE GAS RECIRCULATION

Number of Facilities Reported: 1

Attachment B

Exempt Equipment

The following exempt equipment was identified by the applicant on TVFORM-003, Insignificant Activities:

Exemption Category	Rule 2020 Citation	✓
Structure or incinerator associated with a structure designed as a dwelling for 4 families or less.	4.1	
Locomotives, airplanes, and watercraft used to transport passengers or freight.	4.4	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less.	6.1.1	
Piston-type internal combustion engine with maximum continuous rating of 50 braking horsepower (bhp) or less.	6.1.2	
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less.	6.1.3	
Space heating equipment other than boilers.	6.1.4	
Cooling towers with a circulation rate less than 10,000 gal/min.	6.2	
Use of less than 2 gal/day of graphic arts materials.	6.3	
Equipment at retail establishments used to prepare food for human consumption.	6.4.1	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by Section 5.1.1.	6.4.2	
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plasticizer or blowing agent is used.	6.5	
Containers used to store clean produced water.	6.6.1	
Containers ≤100 bbl used to store oil with specific gravity ≥ 0.8762.	6.6.2	
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762.	6.6.3	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature <150 F.	6.6.4	
Containers used to store unheated organic material with an initial boiling point ≥ 302 F.	6.6.5	
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥0.9042.	6.6.6	
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251.	6.6.7	
Containers used to store refined lubricating oils.	6.6.8	
Unvented pressure vessels used exclusively to store liquefied gases or associated with exempt equipment.	6.6.9 or 6.13	✓
Portable tanks used exclusively to store produced fluids for ≤ six months.	6.6.10	

Continued on Next Page

Exemption Category	Rule 2020 Citation	✓
Mobile transport tanks on vehicles for delivery of VOCs.	6.6.11	
Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251.	6.7.1.1	
Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762.	6.7.1.2	
Equipment used exclusively for the transfer of refined lubricating oil.	6.7.2	
Equipment used to apply architectural coatings.	6.8.1	
Unheated, non-conveyorized degreasers < 10 ft^2 open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr evaporative losses.	6.9	
Brazing, soldering, or welding equipment.	6.10	✓
Equipment used to compress natural gas.	6.11	
Fugitive emissions sources associated with exempt equipment.	6.12	
Pits and Ponds as defined in Rule 1020.	6.15	
On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Emissions less than 2 lb/day from units not included above.	6.19	
Venting PUC quality natural gas for the sole purpose of pipeline and compressor repair and or maintenance	7.2	
Non-structural repairs & maintenance to permitted equipment.	7.3	
Detonation of explosives ≤ 100 lb/day and 1,000 lb/day	7.4	

Attachment C

Existing SJVUAPCD Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1904-1-5 **EXPIRATION DATE:** 09/30/2012

EQUIPMENT DESCRIPTION:
EXPANDABLE POLYSTYRENE PRE-EXPANSION PROCESS CONSISTING OF A HIRSCH VACUTRANS MODEL 6000 EXPANDER, AND A PRE-PUFF STORAGE/AGING PERMANENT TOTAL ENCLOSURE (PTE) CONTAINING 20 PRE-PUFF STORAGE/AGING BINS. EACH EXPANDER, PRE-PUFF STORAGE/AGING BIN, AND THE PTE ARE SERVED BY A VOC COLLECTION SYSTEM VENTED TO A SHARED 1.2 MMBTU/HR SHIP & SHORE MODEL SSE-5000-RTO NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER (RTO). THE RTO IS SHARED WITH PERMIT UNIT N-1904-2.

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
5. The regenerative thermal oxidizer (RTO) shall only be fired on PUC-regulated natural gas. [District Rule 2201]
6. Each expander, pre-puff storage/aging bin, and permanent total enclosure shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times when expandable polystyrene (EPS) materials are processed. [District Rules 2201 and 4682]
7. The VOC collection system serving the expander, pre-puff storage/aging bins, and permanent total enclosure shall be operated and maintained at a capture efficiency of 100%. [District Rules 2201 and 4682]
8. The regenerative thermal oxidizer (RTO) shall be operated with a minimum VOC destruction efficiency of 95%. [District Rules 2201 and 4682]
9. The combustion zone of the regenerative thermal oxidizer (RTO) shall be operated at a minimum temperature of 1,400 degrees Fahrenheit. The combustion zone of the RTO shall be pre-heated to 1,400 degrees Fahrenheit prior to the start-up of this EPS materials pre-expansion operation. [District Rule 2201]
10. The regenerative thermal oxidizer (RTO) shall be equipped with an operational continuous temperature monitoring and recording instrument to measure and record the temperature of the RTO combustion zone. [District Rule 2201]
11. No more than 36,000 pounds of expandable polystyrene (EPS) materials shall be processed through the expander and conveyed into the pre-puff storage/aging bins in any one day. [District Rule 2201]
12. VOC emissions from the expander shall not exceed 0.00059 pounds per pound of EPS materials processed. [District Rule 2201]
13. VOC emissions from the pre-puff storage/aging bins shall not exceed 0.00047 pounds per pound of EPS materials processed. [District Rule 2201]
14. NOx emissions from the regenerative thermal oxidizer (RTO) shall not exceed 50 ppmvd @ 3% O2 (referenced as NO2) or 0.0607 lb/MMBtu. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

15. CO emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.084 lb/MMBtu. [District Rule 2201]
16. VOC emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.0055 lb/MMBtu. [District Rule 2201]
17. PM10 emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.0076 lb/MMBtu. [District Rule 2201]
18. SOx emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
19. Source testing to demonstrate compliance with the VOC destruction efficiency of the regenerative thermal oxidizer (RTO) shall be performed at least once every 12 months. [District Rule 2201]
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
22. Source testing to demonstrate the destruction efficiency of the regenerative thermal oxidizer (RTO) shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates, and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4682]
23. The permittee shall maintain records of the following: (a). Total quantity of expandable polystyrene (EPS) materials processed through the expander (in pounds per day); (b). Total quantity of expanded EPS materials conveyed to the pre-puff storage/aging bins (in pounds per day); (c). Type and concentration (in percent by weight) of the blowing agent contained in the received EPS materials. Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. [District Rules 1070, 2201, and 4682]
24. The permittee shall maintain daily records of the operational temperature of the regenerative thermal oxidizer. [District Rules 2201 and 4682]
25. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4682]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1904-2-3 **EXPIRATION DATE:** 09/30/2012

EQUIPMENT DESCRIPTION:
EXPANDABLE POLYSTYRENE MOLDING OPERATION CONSISTING OF ELEVEN MOLDING PRESSES EACH SERVED BY A VOC COLLECTION SYSTEM VENTED TO A SHARED 1.2 MMBTU/HR SHIP & SHORE MODEL SSE-5000-RTO NATURAL GAS FIRED REGENERATIVE THERMAL OXIDIZER (RTO). THE RTO IS SHARED WITH PERMIT UNIT N-1904-1.

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
5. The regenerative thermal oxidizer (RTO) shall only be fired on PUC-regulated natural gas. [District Rule 2201]
6. Each molding press shall be maintained under negative pressure and shall be vented through the regenerative thermal oxidizer at all times when expanded polystyrene materials are processed. [District Rules 2201 and 4682]
7. The VOC collection system serving the molding presses shall be operated and maintained at a capture efficiency of 100%. [District Rules 2201 and 4682]
8. The regenerative thermal oxidizer (RTO) shall be operated with a minimum VOC destruction efficiency of 95%. [District Rules 2201 and 4682]
9. The combustion zone of the regenerative thermal oxidizer (RTO) shall be operated at a minimum temperature of 1,400 degrees Fahrenheit. The combustion zone of the RTO shall be pre-heated to 1,400 degrees Fahrenheit prior to the start-up of this expanded polystyrene materials molding operation. [District Rule 2201]
10. The regenerative thermal oxidizer (RTO) shall be equipped with an operational continuous temperature monitoring and recording instrument to measure and record the temperature of the RTO combustion zone. [District Rule 2201]
11. No more than 60,000 pounds of expanded polystyrene materials shall be processed through the molding presses in any one day. [District Rule 2201]
12. VOC emissions from the molding presses and product storage shall not exceed 0.0014 pounds per pound of expanded polystyrene materials processed. [District Rule 2201]
13. The highest concentration of the blowing agent in the manufactured products shall be 1.8 percent or less by weight, within 15 minutes after removing the product from the molding press, prior to any finished product storage. Verification of the concentration shall be demonstrated annually, pursuant to a protocol submitted to the District for review and approval. [District Rules 2201 and 4682]
14. NOx emissions from the regenerative thermal oxidizer (RTO) shall not exceed 50 ppmvd @ 3% O2 (referenced as NO2) or 0.0607 lb/MMBtu. [District Rule 2201]
15. CO emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.084 lb/MMBtu. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

16. VOC emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.0055 lb/MMBtu. [District Rule 2201]
17. PM10 emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.0076 lb/MMBtu. [District Rule 2201]
18. SOx emissions from the regenerative thermal oxidizer (RTO) shall not exceed 0.00285 lb/MMBtu. [District Rule 2201]
19. Source testing to demonstrate compliance with the VOC destruction efficiency of the regenerative thermal oxidizer (RTO) shall be performed at least once every 12 months. [District Rule 2201]
20. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
21. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
22. Source testing to demonstrate the destruction efficiency of the regenerative thermal oxidizer (RTO) shall be conducted using EPA Methods 2, 2A, or 2D for measuring flow rates, and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. [District Rule 4682]
23. Source testing to determine the concentration of the blowing agent contained in the manufactured products shall be conducted using South Coast Air Quality Management District (SCAQMD) Method 306 (Analysis of Pentane in Expandable Styrene Polymers) or Bay Area Air Quality Management District (BAAQMD) Method 45 (Determination of Butanes and Pentanes in Polymeric Materials). [District Rule 4682]
24. The permittee shall maintain records of the following: (a). Total quantity of expanded polystyrene materials processed through the molding presses (in pounds per day); (b). Type and concentration (in percent by weight) of the blowing agent contained in the manufactured products, within 15 minutes after removing the product from the molding press, prior to any finished product storage (on an annual basis). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. [District Rules 1070, 2201, and 4682]
25. The permittee shall maintain daily records of the operational temperature of the regenerative thermal oxidizer. [District Rules 2201 and 4682]
26. All records shall be maintained and retained on-site for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4682]

CONDITIONS FOR APPLICATION N-1904-4-4

INSPECTION

ISSUANCE DATE: 06/11/2012

LEGAL OWNER OR OPERATOR: FOAM FABRICATORS, INC
MAILING ADDRESS: 301 B 9TH ST
MODESTO, CA 95351

WORKSHEET

LOCATION: 301 B 9TH ST
MODESTO, CA 95351

INSPECT PROGRAM PARTICIPANT: NO

EQUIPMENT DESCRIPTION:
MODIFICATION OF 12.6 MMBTU/HR NATURAL GAS-FIRED CLEAVER BROOKS MODEL CBLE-700-300-150 BOILER WITH A CLEAVER BROOKS MODEL NTI-300 LOW NOX BURNER WITH FLUE GAS RECIRCULATION: TO TUNE THE BOILER AND REDUCE THE NOX EMISSION LIMIT FOR RULE 4320 COMPLIANCE

CONDITIONS

1. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. [District Rule 2201 and 40 CFR 60.48(c)(g)]
5. {4355} The unit shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4320]
6. Emissions from the boiler shall not exceed any of the following limits: 9 ppmvd NOx @ 3% O2 or 0.011 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 50 ppmvd CO @ 3% O2 or 0.037 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320]
7. Source testing to measure the NOx and CO emissions from the boiler shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320]
8. Source testing to measure NOx and CO emissions from the boiler shall be conducted at least once every 12 months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every 12 months. [District Rules 4305, 4306, and 4320]
9. {4346} NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320]
10. {4347} CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320]
11. {4348} Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320]
12. {4351} All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320]
13. {4352} For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320]
14. {109} Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]

15. {4350} The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320]
16. {110} The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
17. {4315} The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320]
18. {4316} If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320]
19. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320]
20. {4318} The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320]
21. {4356} Permittee shall determine sulfur content of combusted gas annually or shall demonstrate that the combusted gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320]
22. Permittee shall maintain records of the amount of fuel combusted each calendar month. [40 CFR 60.48(c)(g)(2)]
23. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320]

Attachment D

Hazardous Air Pollutant Calculations

Hazardous Air Pollutant (HAP) Emission Calculations

HAP emission calculations are necessary to determine whether the facility is a Major Source of HAPs or an Area Source of HAPs. The facility includes foam fabrication equipment, a thermal oxidizer, and a small boiler.

Foam Fabrication Equipment HAP Emissions

The only pollutant emitted from the foam fabrication process is pentane, which is not listed as a Hazardous Air Pollutant. Therefore, there is no HAP emissions from the foam fabrication processes.

Thermal Oxidizer HAP Emissions

The California Air Toxics Emission Factor (CATEF) database does not include toxics emission factors for thermal oxidizers; however, the CATEF database does include toxics emission factors for boilers fired on natural gas and thermal oxidizer toxics emissions are expected to be similar. The following table summarizes the toxic emission factors listed in the CATEF database:

Toxic Substance	Emission Factor (lb/MMScf)
Acetaldehyde	0.0147
Benzaldehyde	0.0272
Benzene	0.0087
Formaldehyde	0.672

The oxidizer is rated at 1.2 MMBtu/hr and can operate up to 8,760 hours/year. Assuming a higher heating value of 1,000 MMBtu/MMScf for natural gas, the potential annual fuel usage is:

Natural Gas Fuel Usage = 1.2 MMBtu/hr x 8,760 hr/year x MMScf/1000 MMBtu
Natural Gas Fuel Usage = 11 MMScf/year

The following table shows the results of the HAP emission calculations, which used the following formula:

PE = EF (lb/MMScf) x Fuel Usage (MMScf/year)

HAP	EF (lb/MMScf)	MMScf/year	PE (lb/year)
Acetaldehyde	0.0147	11	0.2
Benzaldehyde	0.0272	11	0.3
Benzene	0.00870	11	0.1
Formaldehyde	0.672	11	7.4
		Total	**8.0**

Boiler HAP Emissions

The CATEF database does include toxics emission factors for boilers fired on natural gas. The following table summarizes the toxic emission factors listed in the CATEF database:

Toxic Substance	Emission Factor (lb/MMScf)
Acetaldehyde	0.0147
Benzaldehyde	0.0272
Benzene	0.0087
Formaldehyde	0.672

The boiler is rated at 12.6 MMBtu/hr and can operate up to 8,760 hours/year. Assuming a higher heating value of 1,000 MMBtu/MMScf for natural gas, the potential annual fuel usage is:

Natural Gas Fuel Usage = 12.6 MMBtu/hr x 8,760 hr/year x MMScf/1000 MMBtu
Natural Gas Fuel Usage = 110 MMScf/year

The following table shows the results of the HAP emission calculations, which used the following formula:

PE = EF (lb/MMScf) x Fuel Usage (MMScf/year)

HAP	EF (lb/MMScf)	MMScf/year	PE (lb/year)
Acetaldehyde	0.0147	110	1.6
Benzaldehyde	0.0272	110	3.0
Benzene	0.00870	110	1.0
Formaldehyde	0.672	110	73.9
		Total	**79.5**

Total Facility HAP Emissions

The following table shows the calculated total facility HAP emissions.

HAP	PE (lb/year)
Acetaldehyde	1.8
Benzaldehyde	3.3
Benzene	1.1
Formaldehyde	81.3
Total	**87.5**

HAP Major Source Determination

The trigger threshold for being considered a Major Source of HAP emissions is 10 tons of any one HAP or 25 tons of total HAP emissions. The HAP emissions for this facility is much less than the Major Source HAP threshold. Therefore, this facility is an Area Source of HAP emissions, and is not a Major Source of HAP emissions.