



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

NOV 20 2012

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

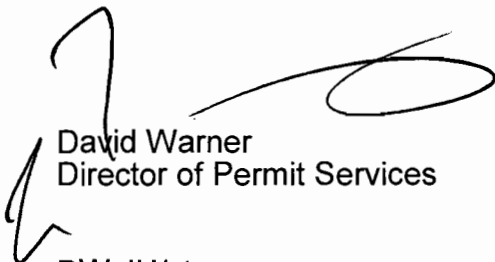
**Re: Notice of Final Action - Title V Permit
District Facility # N-1904
Project # N-1110671**

Dear Mr. Schloss:

The District has issued the Final Title V Permit for Foam Fabricators Inc.. The preliminary decision for this project was made on September 19, 2012. No comments were received subsequent to the District preliminary decision. Enclosed are the Final Title V Permit and public notice to be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,



David Warner
Director of Permit Services

DW:JH/st

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



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

**Re: Notice of Final Action - Title V Permit
District Facility # N-1904
Project # N-1110671**

Dear Mr. Rios:

The District has issued the Final Title V Permit for Foam Fabricators Inc.. The preliminary decision for this project was made on September 19, 2012. No comments were received subsequent to the District preliminary decision. Enclosed are the Final Title V Permit and public notice to be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Rupl Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW:JH/st

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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

NOV 20 2012

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

**Re: Notice of Final Action - Title V Permit
District Facility # N-1904
Project # N-1110671**

Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for Foam Fabricators Inc.. The preliminary decision for this project was made on September 19, 2012. No comments were received subsequent to the District preliminary decision. Enclosed are the Final Title V Permit and public notice to be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW:JH/st

Enclosure

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Modesto Bee

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

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the initial Federally Mandated Operating Permit to Foam Fabricators Inc. for its polysterene products manufacturing operation 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. For additional information regarding this matter, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400, or contact David Warner, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.



Permit to Operate

FACILITY: N-1904

EXPIRATION DATE: 09/30/2017

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

FACILITY LOCATION: 301 B 9TH ST
MODESTO, CA 95351

FACILITY DESCRIPTION: PLASTICS, FOAM PRODUCTS MANUFACTURING

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

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

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1904-1-6

EXPIRATION DATE: 09/30/2017

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

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

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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1904-4-3

EXPIRATION DATE: 09/30/2017

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 (NO_x) 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 NO_x @ 3% O₂ or 0.011 lb-NO_x/MMBtu, 0.00285 lb-SO_x/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 NO_x 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. NO_x 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
These terms and conditions are part of the Facility-wide Permit to Operate.

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 NO_x, 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 NO_x 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 NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x 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

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

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

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