



**OCT 07 2016**

Mr. Ron Crookham  
Dart Container Corporation  
1400 E Victor Rd  
Lodi, CA 95240

**Re: Notice of Preliminary Decision – Title V Permit Renewal  
District Facility # N-257  
Project # N-1153016**


Dear Mr. Crookham:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Dart Container Corporation at 1400 E Victor Rd, Lodi, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

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

Sincerely,

  
Arnaud Marjollet  
Director of Permit Services

Enclosures

cc: Tung Le, CARB (w/enclosure) via email  
cc: Gerardo C. Rios, EPA (w/enclosure) via email

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**

**Proposed Title V Permit Renewal Evaluation  
Dart Container Corporation  
N-257**

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# TITLE V PERMIT RENEWAL EVALUATION

## Styrofoam Cup and Container Manufacturing

**Engineer:** Jagmeet Kahlon  
**Date:** September 28, 2016

**Facility Number:** N-257  
**Facility Name:** Dart Container Corporation  
**Mailing Address:** 1400 E Victor Rd  
Lodi, CA 95240

**Contact Name:** Ron Crookham  
**Title:** Plant Manager  
**Phone:** (209) 333-8088

**Responsible Official:** Ron Crookham  
**Title:** Plant Manager

**Project #:** N-1153016  
**Deemed Complete:** October 6, 2015

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### I. PROPOSAL

Dart Container Corporation submitted a permit application to renew their Title V permit. During this renewal process, the existing permits will be reviewed and revised to include up to date requirements of all applicable District, State and Federal rules that were adopted or amended since the issuance of the previous Title V permit on April 26, 2011.

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

### II. FACILITY LOCATION

The facility is located at 1400 E Victor Rd, Lodi, California.

### III. EQUIPMENT LISTING

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

#### **IV. GENERAL PERMIT TEMPLATE USAGE**

The applicant has requested to use the following model general permit templates:

##### **A. Template SJV-UM-03 Facility-wide Umbrella**

The applicant has requested to utilize template SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

#### **V. SCOPE OF EPA AND PUBLIC REVIEW**

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

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

Conditions 1 through 40 in facility-wide permit requirement permit N-257-0-3 including their underlying applicable requirements originate from template SJV-UM-0-3 and are not subject to further EPA or public review.

#### **VI. FEDERALLY ENFORCEABLE REQUIREMENTS**

##### **A. Rules Updated**

The following rules are updated since the previous Title renewal on April 26, 2011.

- District Rule 2020, Exemptions  
(Amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule  
(Amended February 18, 2016)

- District Rule 2410, Prevention of Significant Deterioration  
(Effective November 26, 2012)
- District Rule 4682, Polystyrene, Polyethylene, and Polypropylene Products Manufacturing  
(Amended December 15, 2011)
- 40 CFR Part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units  
(Amended February 16, 2012)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners  
(Amended June 25, 2013)
- 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction  
(Amended June 25, 2013)
- 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

**B. Rules Removed**

There are no applicable rules that were removed since the previous Title V renewal.

**C. Rules Added**

None

**D. Rules Not Updated**

- 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 1100, Equipment Breakdown  
(Amended December 17, 1992)
- District Rule 2010, Permits Required  
(Amended December 17, 1992)

- 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)
- District Rule 4101, Visible Emissions  
(Amended February 17, 2005)
- District Rule 4201, Particulate Matter Concentration  
(Amended December 17, 1992)
- District Rule 4305, Boilers, Steam Generators, and Process Heaters – Phase 2  
(Amended August 21, 2003)
- District Rule 4305, 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  
(Adopted October 16, 2008)
- District Rule 4601, Architectural Coatings  
(Amended December 17, 2009)
- District Rule 4607, Graphic Arts and Paper, Film, Foil and Fabric Coatings  
(Amended December 18, 2008)
- District Rule 4801, Sulfur Compounds  
(Amended December 17, 1992)

- District Rule 8011, General Requirements  
(Amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction and Other Earthmoving Activities  
(Amended August 19, 2004)
- District Rule 8031, Bulk Materials  
(Amended August 19, 2004)
- District Rule 8041, Carryout and Trackout  
(Amended August 19, 2004)
- District Rule 8051, Open Areas  
(Amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads  
(Amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas  
(Amended August 19, 2004)

## **VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE**

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

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

### **A. Rules Added**

None

### **B. Rules Not Updated**

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

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

## VIII. PERMIT REQUIREMENTS

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

### **District Rule 2020, Exemptions**

The proposed rule amendment in District Rule 2020 (12/18/2014) Final draft staff report ([http://www.valleyair.org/Workshops/postings/2014/12-18-14\\_2020/Rule-2020-final-draft-staff-report\\_\(2014-11-18\).pdf](http://www.valleyair.org/Workshops/postings/2014/12-18-14_2020/Rule-2020-final-draft-staff-report_(2014-11-18).pdf), Page 7 & 8) were reviewed; none of these amendments require any changes to the permit requirements for this facility. Therefore, no further discussion is required.

### **District Rule 2201, New and Modified Stationary Source Review Rule**

This rule applies to all new stationary sources and all modifications to existing stationary sources which are subject to the District permit requirements and after construction emit or may emit one or more affected pollutant. The requirements of this rule in effect on the date the application is determined to be complete by the Air Pollution Control Officer (APCO) shall apply to such application.

District Rule 2201 has been amended since this facility's previous Title V permit was issued. However, the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit. Therefore, the requirements for new and modified units to which this version of the rule applies are up-to-date, and no additional conditions are required.

### **District Rule 2410, Prevention of Significant Deterioration**

The provisions of this rule shall apply to any source and the owner or operator of any source subject to any requirement under Title 40 Code of Federal Regulations (40 CFR) Part 52.21 as incorporated into this rule.



Section 4.1 of the rule states that an owner or operator must obtain a PSD permit pursuant to this Rule before beginning actual construction of a new major stationary source, a major modification, or a plant wide applicability limitation (PAL) major modification, as defined in 40 CFR 52.21(b).

District Rule 2410 has been newly adopted since this Title V permit was last renewed. However the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any PSD permit actions have already been incorporated into the current Title V permit. Therefore, the current permits are up-to-date, and no additional permit conditions are required.

**District Rule 4682, Polystyrene, Polyethylene, and Polypropylene Products Manufacturing**

*Section 2.0 - Applicability*

The provisions of this rule shall apply to any manufacturing, processing, and storage of products composed of polystyrene, polyethylene, or polypropylene.

This facility use pre-manufactured expandable polystyrene beads at this site. Therefore, they are subject to the requirements of this Rule.

*Section 5.0 – Requirements*

Section 5.1 states that no operator shall place, hold, or store any VOC blowing agent in any stationary tank, reservoir or container having a capacity greater than 200 gallons unless one (1) of the following emission control systems is provided:

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

Dart does not store any VOC blowing agents at this site. Therefore, the above section is not applicable and no further discussion is required.

Section 5.2 requires that the operator shall not conduct any manufacturing operations, as defined in Section 3.0, unless one of the emission reduction methods in section 5.2.1 through 5.2.7 is met.

Section 5.2.3 states that effective on and after January 1, 2013, the operator of an expandable polystyrene molding facility shall demonstrate, to the satisfaction of the APCO, that the total product emissions do not exceed the following:

- 3.4 pounds of VOC per 100 pounds of total material processed, calculated daily, and
- 2.4 pounds of VOC per 100 pounds of total material processed, calculated over a monthly period.

The following condition is included in permit N-257-2 as part of this project:

- The total product emissions shall not exceed 3.4 pounds of VOC per 100 pounds of the raw beads processed, calculated daily. The total product emissions include emissions from the manufacturing operation, after controls, plus the residual blowing agent in the finished product. [District Rule 4682]

Note that the existing permit limits the total production emissions to 2.4 pounds of VOC per 100 pounds of total material processed, calculated over a monthly basis. This condition language is being updated and stated in the following manner in permit N-257-2:

- The total product emissions shall not exceed 2.4 pounds of VOC per 100 pounds of the raw beads processed, calculated over a monthly period. Exceeding this limit shall constitute violation for each day of that monthly period. The total product emissions include emissions from the manufacturing operation, after controls, plus the residual blowing agent in the finished product. [District Rule 4682]

Section 5.3 states that the operators subject to the provisions of Section 5.2.1, 5.2.2, or 5.2.3 who exceed the limit based on the monthly calculation, shall be considered to have been in violation for each day of that monthly period.

The permit requirement in section 5.2.3 enforces the requirements of this section; therefore, continued compliance is expected.

Section 5.4 states that facility emissions that would occur under 5.2.5 shall be calculated using the formula in this section, or other formula approved by the APCO and EPA.

This section is not applicable to this facility since they have chosen to comply with Section 5.2.3 of the Rule.

Section 5.5 requires the operator to submit a compliance plan. The facility already has obtained a permit to comply with the applicable requirements in this Rule. Therefore, no further discussion is required.

*Section 6.0 – Administrative Requirements*

Section 6.1.1 states that any person subject to the provisions of this rule, including exempt facilities, shall maintain records of operation, including but not limited to the amount of material processed, the equipment used, and the type of the blowing agent used. Records shall be maintained with minimum monthly totals with the ability to calculate daily averages in any given month.

Conditions 41 and 42 in draft permit N-257-2-5 enforce on-going compliance with this section.

Section 6.1.2 states that any person using an emissions control system as a means of complying with this rule, shall maintain daily records of key system operating and maintenance procedures which will demonstrate continuous operation and compliance of the emission control device. Key system operating parameters are those necessary to ensure compliance with VOC emission requirements such as temperature, pressures, and flow rates.

Dart uses continuous emissions monitoring system (CEMS) to measure the amount of VOCs and the laden airflow rate to the boilers. Condition 37 in permit N-257-2 enforces on-going compliance with this section.

Section 6.1.3 states that operators complying with Section 5.2.1, 5.2.2, or 5.2.3 shall maintain records necessary to show compliance with that section and shall, once every month, calculate the daily average VOC emissions, based on the records for the preceding monthly period, according to the approved VOC emission calculation formula.

Conditions 41 and 42 in draft permit N-257-2-5 requires records that will be used to calculate daily and monthly VOC emissions. The following condition will be included in the permit:

- The owner or operator shall maintain records necessary to show compliance with total product emission limit (lb-VOC/100 lb of raw beads processed) and shall, at least once every month, calculate the daily average VOC emissions, based on the records for the preceding monthly period. [District Rule 4682]

Section 6.1.4 states operators complying with Section 5.2.3 shall maintain records necessary to show compliance with that section and shall, once every

day, calculate the daily VOC emissions, according to the approved VOC emission calculation formula.

- The owner or operator shall maintain records necessary to show compliance with total product emission limit (lb-VOC/100 lb of raw beads processed) and shall, once every day, calculate the daily VOC emissions. [District Rule 4682]

Section 6.1.5 states operator shall keep in the facility all records required to demonstrate compliance with the requirements of this rule for a minimum of five years. The records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA. The records shall be submitted to the APCO, ARB, or EPA upon request.

Condition 49 in draft permit N-257-2-5 enforces on-going compliance with the above section.

Section 6.2 list various test methods. The existing permit N-257-2-3 includes all necessary test method requirements. These requirements will be replicated in the permit under this project. Therefore, continued compliance is expected.

Compliance is expected with this rule.

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

This subpart applies to steam generating units that are constructed, reconstructed, or modified after 6/9/89 and have a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. Subpart Dc has standards for SO<sub>x</sub> and PM<sub>10</sub> emissions.

The District records indicate that Authority to Construct permits for the boilers under permits N-257-4 and '-5 were issued on April 13, 1987, and the units were operating in June 1987. These units were never modified in a way that would result in an increase in emissions; therefore, these units are not subject to the requirements of this subpart. Note that the boiler permit N-258-5 includes requirements related to this subpart. The basis of these requirements was not found. Therefore, these requirements will be removed from the permit as part of this project.

#### **40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners**

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to

disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). These requirements are addressed in condition 28 of draft Title V permit N-257-0-3.

**40 CFR Part 82, Subpart F, Recycling and Emissions Reduction**

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). These requirements are addressed in condition 28 of draft Title V permit N-257-0-3.

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

40 CFR Part 64 requires CAM for units that meet the following three criteria:

1. Unit must have an emission limit for the pollutant;
2. Unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), SCR system, baghouses, and thermal/catalytic oxidizers; and
3. Unit must have a pre-control potential to emit of greater than the major source thresholds given below:

NOx:	20,000 lb/yr
SOx:	140,000 lb/yr
PM <sub>10</sub> :	140,000 lb/yr
CO:	200,000 lb/yr
VOC:	20,000 lb/yr

**N-257-2:**

This permit has VOC emission limit. VOC collected from the bead handling and pre-expansion systems are routed to the boilers. The pre and post control emissions are greater than the major source threshold for VOC emissions<sup>1</sup>. In general, if the unit has continuous emission monitors (CEMS) for the pollutants for which the facility is considered a Major Source, CAM does not apply. However, the CEMS system at the facility is used to determine the amount of VOC collected by the vapor recovery system. This CEMS system is not used to monitor VOC emissions released from each boiler's stack. Therefore, this facility is subject to CAM requirements.

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<sup>1</sup> Information from the application review under project N-1093342

Currently, Dart is required to measure and record laden air stream (cfm) and each boiler's chamber temperature, at least every 15-minutes. These parameters are required to be compared with the established laden air stream (cfm) and boilers' chamber temperature during the latest source test to detect any excursions. The monitoring and recording requirements are sufficient to demonstrate compliance with the CAM requirements. Condition 51 through 55 in permit N-257-2 enforces on-going compliance with this subpart.

N-257-4:

This permit has emissions limits for SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC but it does not have add-on control equipment to reduce these criteria pollutants. Therefore, this unit is not subject to CAM for SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC emissions.

This permit unit may be subject to CAM for NO<sub>x</sub>, as there is a NO<sub>x</sub> limit, and the unit is equipped with a flue gas recirculation (FGR) system. Using EF data from AP-42, Table 1.4-1, boiler equipped with FGR is expected to provide 36%<sup>2</sup> additional NO<sub>x</sub> control over the boiler equipped with low NO<sub>x</sub> burner system. The pre-control emissions from this would be:

$$\begin{aligned} &= (14.65 \text{ MMBtu/hr})(0.011 \text{ lb-NO}_x\text{/MMBtu})(8,760 \text{ hr/yr})/(1 - 0.36) \\ &= 2,206 \text{ lb-NO}_x\text{/year} \end{aligned}$$

Since the pre-control NO<sub>x</sub> emissions are less than the major source threshold for NO<sub>x</sub> emissions, this unit is not subject to CAM requirements.

N-257-5:

This permit has emissions limits for SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC but it does not have add-on control equipment to reduce these criteria pollutants. Therefore, this unit is not subject to CAM for SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC emissions.

This permit unit may be subject to CAM for NO<sub>x</sub>, as there is a NO<sub>x</sub> limit, and the unit is equipped with a flue gas recirculation (FGR) system. As stated previously, boiler equipped with FGR is expected to provide 36% additional NO<sub>x</sub> control over the boiler equipped with low NO<sub>x</sub> burner system. The pre-control emissions from this would be:

$$\begin{aligned} &= (29.3 \text{ MMBtu/hr})(0.008 \text{ lb-NO}_x\text{/MMBtu})(8,760 \text{ hr/yr})/(1 - 0.36) \\ &= 3,208 \text{ lb-NO}_x\text{/year} \end{aligned}$$

Since the pre-control NO<sub>x</sub> emissions are less than the major source threshold for NO<sub>x</sub> emissions, this unit is not subject to CAM requirements.

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<sup>2</sup>(50 lb-NO<sub>x</sub>/10<sup>6</sup>scf - 32 lb-NO<sub>x</sub>/10<sup>6</sup>scf) / 50 lb-NO<sub>x</sub>/10<sup>6</sup>scf = 36%

N-257-6:

The permit does not include emission limits of any pollutant. Therefore, CAM is not required.

N-257-7:

This permit includes VOC emission limit. The pre-control emissions are estimated to be 192 lb/year (estimated under project N-1110917). These emissions are below the major source threshold for VOC emissions. Therefore, CAM is not required.

## **IX. PERMIT SHIELD**

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

### **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 has not requested any new permit shields. Therefore, no further discussion is necessary.

## **X. PERMIT CONDITIONS**

Dart Container Corporation has proposed to make changes to the following conditions in permit N-257-7:

\*\*\*\*Condition 4 in permit N-257-7-0\*\*\*\*

- Permittee shall keep a daily record of the quantity of UV ink used by each printing press, in lb. [District Rule 2201]

The company has requested to include a calculation method to estimate the amount of ink used. Therefore, the above condition is revised, and is being stated in the following manner:

- Permittee shall keep a daily record of the quantity of UV ink used by each printing press, in lb. The quantity of daily UV ink usage for each printing press shall be calculated using monthly records on the amount of UV ink used, number of days printing presses operated, and number of printers operated in that month, as follows: (total amount of UV ink used)/(number of days operated x number of printers utilized). [District Rules 2201 and 2520]

\*\*\*\*Condition 5 in permit N-257-7-0\*\*\*\*

- Permittee shall maintain a current file that includes a material safety data sheet (MSDS) or product data sheet for each ink used that includes the material name, manufacturer's name, the VOC content, less water and exempt compounds and as applied, the specific mixing instructions, and the density. [District Rules 2201 and 4607]

The company uses several types of inks. Some of the ink manufacturers provide generic MSDS or manufacturer data sheet or product data sheet that covers multiple inks. The company has requested to allow the use of such data sheets to estimate actual emissions, and/or to demonstrate compliance with the VOC content limit in the permit. Therefore, the above condition is revised, and is being stated in the following manner:

- Permittee shall maintain a current file that includes a material safety data sheet (MSDS) or manufacturer data sheet or product data sheet for each ink used that includes the material name, manufacturer's name, the VOC content, less water and exempt compounds and as applied, the specific mixing instructions, and the density. Generic MSDS or manufacturer data sheet or product data sheet that covers multiple inks may be utilized as long as that generic sheet(s) list range or the maximum VOC content, density, and other pertinent parameters that will be used to estimate actual emissions, and/or to demonstrate compliance with the VOC content limit in the permit. [District Rules 2201 and 4607]

See Attachment A - Draft Renewed Title V Operating Permit

## **XI. ATTACHMENTS**

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List



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# ATTACHMENT A

Draft Renewed Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: N-257-0-3

EXPIRATION DATE: 04/30/2016

## FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
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

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

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

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FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 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 Rules 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 Rules 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 Rules 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 Rules 8061 and 8011] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

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 Rules 8071 and 8011] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin November 30 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
42. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. Facility-wide daily NOx emissions shall not exceed 150 pounds in any one day. Facility-wide daily NOx emissions from the 14.65 MMBtu/hr Boiler (N-257-4) and the 29.3 MMBtu/hr Boiler (N-257-5) shall be calculated as follows: Daily NOx Emissions = [(0.011 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0512 x Daily Fuel Oil Combusted (MMBtu per day))] + [(0.008 x Daily Natural Gas Fuel Combusted (MMBtu per day)) + (0.0512 x Daily Fuel Oil Combusted (MMBtu per day))]. [District NSR Rule] Federally Enforceable Through Title V Permit

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

44. Facility-wide daily VOC emissions excluding the warehouse emissions shall not exceed 250 pounds in any one day. Facility-wide daily VOC emissions from the 14.65 MMBtu/hr Boiler (N-257-4) and the 29.3 MMBtu/hr Boiler (N-257-5) shall be calculated as follows:  $\text{Daily VOC Emissions} = [(0.0042 \times \text{Daily Natural Gas Fuel Combusted (MMBtu per day)}) + (0.0045 \times \text{Daily Fuel Oil Combusted (MMBtu per day)})] + [(0.0042 \times \text{Daily Natural Gas Fuel Combusted (MMBtu per day)}) + (0.0045 \times \text{Daily Fuel Oil Combusted (MMBtu per day)})]$ . [District NSR Rule] Federally Enforceable Through Title V Permit
45. The permittee shall maintain daily records of the calculated daily facility-wide NOx and VOC emissions. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
46. Records of the daily facility-wide NOx and VOC emissions shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-257-2-5

EXPIRATION DATE: 04/30/2016

## EQUIPMENT DESCRIPTION:

EXPANDABLE POLYSTYRENE (EPS) PROCESSING OPERATION: ENCLOSED BEAD DUMPING OPERATION CONSISTING OF A HOPPER AND DUMPER SYSTEM, ONE HOLDING TANK AND ONE BLENDER, FOUR RODMAN PRE-EXPANDERS WITH CASCADE DRYERS ALL VENTED TO THE VAPOR RECOVERY SYSTEM; ENCLOSED BEAD DUMPING OPERATION CONSISTING OF A HOPPER AND DUMPER SYSTEM, ONE HOLDING TANK, TWO FEEDERS, TWO FEED/WEIGH BINS, TWO HIRSCH PRE-EXPANDERS WITH VENTS AND DELUMPERS, AND TWO BLADDER TANKS ALL VENTED TO THE VAPOR RECOVERY SYSTEM; AND EIGHTY-SEVEN MOLDING MACHINES. THE VAPOR RECOVERY SYSTEM WITH AN IN-LINE CYCLONE SEPARATOR IS VENTED TO THE BOILERS PERMITTED UNDER N-257-4 AND N-257-5.

## PERMIT UNIT REQUIREMENTS

1. The permanent total enclosure (PTE) around the raw bead dumping operation serving Rodman pre-expanders shall follow PTE criteria in EPA Method 204, and shall be vented to the vapor recovery system at or above the average facial velocity of 200 feet per minute. [District Rule 4682] Federally Enforceable Through Title V Permit
2. The cascade dryers serving Rodman pre-expanders shall be completely sealed and vented to the vapor recovery system when Rodman pre-expander operates. [District Rule 4682] Federally Enforceable Through Title V Permit
3. The permittee shall operate and maintain two Hirsch pre-expanders. [District Rule 4682] Federally Enforceable Through Title V Permit
4. Two bladder bags, one for each Hirsch pre-expander, shall be used to collect pentane from each pre-expander vent. The collected vapors shall be released into the vapor recovery system. [District Rule 4682]
5. Delumpers (i.e. bottom part to which pre-puff is discharged) of Hirsch pre-expanders shall be completely sealed and vented to the vapor recovery system. [District Rule 4682] Federally Enforceable Through Title V Permit
6. The permittee shall operate and maintain a separate raw bead handling system for Hirsch pre-expanders. This bead handling system includes: a bead dumping operation transferring raw beads into a hopper, enclosed augers transferring beads from the hopper to a holding tank and from the holding tank to the feeders and weigh bins for Hirsch pre-expanders. The bead dumping operation shall be conducted inside a PTE that must meet PTE criteria in EPA Method 204. The bead transferring augers, product holding tanks, new feeders and weigh bins shall be enclosed and designed to meet PTE criteria in EPA Method 204. Each unit in the bead handling system shall be vented to the vapor recovery system. The average facial velocity shall be at or above 200 feet per minute for Hirsch bead dump PTE, each Hirsch holding tank, and each weigh bin PTE. [District Rule 4682] Federally Enforceable Through Title V Permit
7. The vapor recovery system shall be connected to the boilers (N-257-4 and N-257-5) at all times, except for periods of routine testing or emergency safety. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The vapor recovery system shall be operated in a manner which maximizes collection efficiency at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The polystyrene pellets shall be received and stored in cartons and/or bags lined with vapor transmission inhibiting film. [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.

Facility Name: DART CONTAINER CORPORATION  
Location: 1400 EAST VICTOR ROAD, LODI, CA 95240  
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10. The operator shall visibly inspect the polystyrene pellet cartons upon receipt and weekly thereafter for damage to the vapor transmission inhibiting film. If damage is discovered, the permittee shall take corrective action immediately by either processing the carton or re-sealing the carton. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. All conveyors shall be enclosed to minimize fugitive VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The chamber temperature of each Rodman pre-expander shall not exceed 215°F. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The pre-puff beads shall be processed in a manner that minimizes fugitive VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
14. There shall be no visible emissions from the bead handling systems, pre-expansion systems, or the molding systems. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The pentane content in the raw EPS beads shall be at or below 5.4% by weight, when the raw bead boxes are received from a vendor. EPS bead manufacturer certification receipt must be kept as a record to demonstrate compliance with this condition. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Manufacturing emissions are defined as the emissions from bead handling, pre-puffing, and molding processes. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The Manufacturing VOC emissions shall not exceed 161.1 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The amount of raw EPS beads processed through the Rodman and Hirsch pre-expanders shall not exceed 28,774 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The amount of raw EPS beads through any one Hirsch pre-expander shall not exceed 19,423 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The total product emissions shall not exceed 2.4 pounds of VOC per 100 pounds of the raw beads processed, calculated over a monthly period. Exceeding this limit shall constitute violation for each day of that monthly period. The total product emissions include emissions from the manufacturing operation, after controls, plus the residual blowing agent in the finished product. [District Rule 4682] Federally Enforceable Through Title V Permit
21. The total product emissions shall not exceed 3.4 pounds of VOC per 100 pounds of the raw beads processed, calculated daily. The total product emissions include emissions from the manufacturing operation, after controls, plus the residual blowing agent in the finished product. [District Rule 4682] Federally Enforceable Through Title V Permit
22. The boilers (N-257-4 and N-257-5) shall be operated to reduce at least 95% of the pentane entering these units. [District Rule 2201] Federally Enforceable Through Title V Permit
23. The overall pentane emissions from the bead handling systems shall be reduced by a minimum of 50% by weight, based on a monthly average basis. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Unless otherwise noted, for the purposes of this permit, P1 is the percent weight of pentane in raw EPS beads (taken directly from newly opened box), P2 is the percent weight of pentane in pre-puff beads, P3 is the percent weight of pentane in the molded product, CE is the VOC control efficiency of the boilers operating under N-257-4 and N-257-5. For daily calculation purposes, P1 value may be taken from EPS bead manufacturer certification receipt, which must be kept as a record. [District Rules 1081, 2201, 2520, 9.3.2, 4682] Federally Enforceable Through Title V Permit
25. The exhaust flue gas temperature of the boiler combusting VOC from the vapor recovery system shall be at least 274°F. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
26. The laden airflow rate from the vapor recovery system to boiler shall be at or above 880 cfm. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



27. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. 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
28. Annual source testing shall be conducted to verify compliance with the total product emissions limit (2.4 lb-VOC/100 lb-EPS processed), the daily Manufacturing VOC emission limit (161.1 lb/day), the overall pentane emission reductions from the bead handling systems (50% or more by weight), and the boilers (N-257-4 and N-257-5) control efficiency (95% or more by weight). [District Rule 2201 and 4682] Federally Enforceable Through Title V Permit
29. P1, P2, and P3 shall be determined annually for each EPS material. The samples shall be taken as follows: P1 - take 3 samples from a bead box; P2 - take 3 samples for each density product; P3 - take 3 samples for each density product. An average of the test results would establish a value for respective parameter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
30. P1, P2 and P3 for each EPS material shall be re-established, at least once every five years, or when pentane content in raw beads exceeds the pre-established limit. For determining P1, P2, and P3, the samples shall be taken as follows: P1 - take 6 samples from manufacturer lot #1, take 6 samples from manufacturer lot #2, take 3 samples from manufacturer lot #3; P2 - take 15 samples for each density product; P3 - take 3 samples for each density product. An average of the test results would establish a value for respective parameter. [District Rule 4682] Federally Enforceable Through Title V Permit
31. P1, P2 and P3 shall be determined using SCAQMD Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternate method as approved by the District, EPA and CARB. [District Rule 4682] Federally Enforceable Through Title V Permit
32. For processing multiple types of EPS materials in a given day, the daily Manufacturing VOC emissions shall be determined by taking the sum of the numbers obtained for each type of processing material using the following equation:  $[(P1 - P3) - (P1 - P2)(CE)](Processing Rate (lb-EPS/day))$ . [District Rule 2201] Federally Enforceable Through Title V Permit
33. For processing a single type of EPS material in a given day, the daily Manufacturing VOC emissions shall be determined using the following equation:  $[(P1 - P3)(Processing Rate (lb/day)) - (CEMS data, lb-VOC/day)(CE)]$ . [District Rule 2201] Federally Enforceable Through Title V Permit
34. Source testing to verify the overall pentane emission reductions from the bead handling systems and the minimum control efficiency of the boilers (N-257-4 and N-257-5) shall be conducted annually. The influent concentration from the vapor recovery system to the boilers and effluent concentration from the boiler stacks shall be measured using EPA Test Method 25 or 25A. These concentrations shall be converted to mass emission rates (lb-VOC/hr, lb-VOC/day) for determining overall pentane reductions, and the control efficiency of the boilers. [District Rule 1081 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. The overall pentane emissions reductions from the bead handling systems (%) shall be computed using the following equation:  $(100)\{(Mi - Mo)/Mi\}\{Mi/(E1+E2)\}$ , where  $Mi$  = mass emission rate at the inlet of boilers (lb-VOC/day),  $Mo$  = mass emission rate at boilers stack (lb-VOC/day),  $E1$  = (Processing Rate)(P1 - P2) lb-VOC/day for the material processed through the Rodman pre-expanders,  $E2$  = (Processing Rate)(P1 - P2) lb-VOC/day for the material processed through the Hirsch pre-expanders. [District Rule 1081 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
36. The operator shall verify the accuracy of the CEMS during each source test. This system shall be calibrated and operated in accordance with the requirements of 40 CFR Part 51. [District Rules 1081, 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
37. The permittee shall utilize continuous emissions monitor system (CEMS) to measure and record VOC concentration and volumetric airflow (cfm) of the laden air stream from the vapor recovery system. [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.

38. The permittee shall use a handheld anemometer to measure average facial velocity (fpm) of natural draft openings for each permanent total enclosure on a monthly basis. These measurements shall be compared with the numbers established in this permit to detect a problem. [District Rule 2201] Federally Enforceable Through Title V Permit
39. Temperature of the Rodman pre-expanders shall be observed and recorded daily while any unit operates. The records shall include date of inspection and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
40. Visible emission inspection shall be performed daily. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
41. The permittee shall maintain records of the following items for the product processed through Rodman pre-expanders: (1) date, (2) amount of EPS processed (lb/day), (3) established P1, P2, and P3, and (4) P1, P2, and P3 during the latest source test. [District Rules 1070, 2520 - 9.4.2, 4682] Federally Enforceable Through Title V Permit
42. The permittee shall maintain records of the following items for the product processed through Hirsch pre-expanders: (1) date, (2) amount of EPS processed (lb/day), (3) established P1, P2, and P3, and (4) P1, P2, and P3 during the latest source test. [District Rules 1070, 2520 - 9.4.2, 4682] Federally Enforceable Through Title V Permit
43. The permittee shall maintain records of the daily Manufacturing VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
44. The permittee shall maintain records of the total product emissions (lb-VOC/100 lb of raw beads processed), calculated over a monthly period. [District Rules 4682] Federally Enforceable Through Title V Permit
45. The owner or operator shall maintain records necessary to show compliance with total product emission limit (lb-VOC/100 lb of raw beads processed) and shall, at least once every month, calculate the daily average VOC emissions, based on the records for the preceding monthly period. [District Rule 4682] Federally Enforceable Through Title V Permit
46. The owner or operator shall maintain records necessary to show compliance with total product emission limit (lb-VOC/100 lb of raw beads processed) and shall, once every day, calculate the daily VOC emissions. [District Rule 4682] Federally Enforceable Through Title V Permit
47. For each source test, the permittee shall maintain records of the date, type of the EPS material, name of the person and company collecting product samples to test P1, P2, P3, and a copy of test results. [District Rule 1070] Federally Enforceable Through Title V Permit
48. The permittee shall keep records of: (1) date, (2) system identification (e.g. bead dumping operation), (3) average facial velocity (fpm) across natural draft openings in this permit, and (4) average facial velocity measurement (fpm) with handheld anemometer. [District Rule 4682] Federally Enforceable Through Title V Permit
49. The operator shall keep all records for a minimum of five years. These records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA. The records shall be submitted to the APCO, ARB, or EPA upon request. [District Rules 1070, 2201, 2520 - 9.4.2, 4682] Federally Enforceable Through Title V Permit
50. The operator shall submit a written report to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

51. The laden air stream from the vapor recovery system shall be measured and recorded at least every 15-minute using airflow rate detection sensors. The recorded data shall be averaged over a 30-consecutive-minute block to demonstrate compliance with the established minimum airflow (cfm) in the permit. The averaged readings shall be recorded each day the pre-puff process operates. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rules 2201 and 4682, 40 CFR Part 64] Federally Enforceable Through Title V Permit
52. Each boiler's stack temperature shall be measured and recorded at least every 15-minute using a thermocouple. The recorded temperature data shall be averaged over a 30-consecutive-minute block to demonstrate compliance with the temperature established in the permit. The averaged readings shall be recorded each day the boilers operate. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rules 2201 and 4682, 40 CFR Part 64] Federally Enforceable Through Title V Permit
53. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7 for the boilers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
54. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9 for the boilers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
55. If the District or EPA determines per 40 CFR 64.7(d)(2) that a Quality Improvement Plan is required, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-257-4-7

EXPIRATION DATE: 04/30/2016

## EQUIPMENT DESCRIPTION:

14.65 MMBTU/HR CLEAVER BROOKS BOILER (MODEL CB 600-350-150) WITH A CLEAVER BROOKS MODEL CB-NTI LOW-NOX BURNER AND FLUE GAS RECIRCULATION

## PERMIT UNIT REQUIREMENTS

1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
3. The boiler shall be fired only on natural gas, fuel oil #2, or pentane. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The sulfur content of the fuel oil #2 shall not exceed 15 ppm, 0.0015% by weight. [District NSR Rule and District Rule 4320, 5.4.2] Federally Enforceable Through Title V Permit
5. Fuel oil #2 shall only be used during a natural gas curtailment for a period not to exceed 168 cumulative hours during any one calendar year plus 48 cumulative hours during any one calendar year for equipment testing and maintenance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
6. This boiler shall not be fired on fuel oil when the boiler permitted under N-257-5 is in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The permittee shall maintain a log of the cumulative annual hours of operation when the unit is fired on #2 fuel oil during natural gas curtailment periods and during testing and maintenance periods, the sulfur content of the fuel oil, the amount of fuel oil used and the duration of the natural gas curtailment period (in hours). [District Rules 4305, 4305 and 4320] Federally Enforceable Through Title V Permit
8. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by: ASTM D 240 or D 2382 for liquid hydrocarbon fuels; ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2, and 4320] Federally Enforceable Through Title V Permit
9. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. The pentane emissions collected from the pre-expanders shall be ducted to the boilers permitted under N-257-4 or N-257-5. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Emissions rates when this unit is firing on natural gas shall not exceed any of the following limits: 9.0 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 50 ppmv CO @ 3% O<sub>2</sub> or 0.039 lb-CO/MMBtu, or 0.0042 lb-VOC/MMBtu. [District NSR Rule and 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.

12. Emissions rates when this unit is firing on fuel oil #2 shall not exceed any of the following limits: 40.0 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0512 lb-NO<sub>x</sub>/MMBtu, 0.0016 lb-SO<sub>x</sub>/MMBtu, 0.015 lb-PM<sub>10</sub>/MMBtu, 100 ppmv CO @ 3% O<sub>2</sub> or 0.078 lb-CO/MMBtu, or 0.0045 lb-VOC/MMBtu. [District NSR Rule and Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. 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
14. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six 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 twelve months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. 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
16. 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
17. NO<sub>x</sub> 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
18. 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
19. Stack gas oxygen (O<sub>2</sub>) 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
20. 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
21. 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
22. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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
23. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, 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 the performing the notification and testing required by this condition. [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. 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
25. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (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
26. 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
27. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
28. 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

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-257-5-8

EXPIRATION DATE: 04/30/2016

## EQUIPMENT DESCRIPTION:

29.3 MMBTU/HR CLEAVER BROOKS BOILER MODEL #CB 400-700-150 WITH A CLEAVER BROOKS MODEL #CB-NTI-9PPM ULTRA LOW-NOX BURNER AND 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% CO<sub>2</sub> nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
2. The pentane emissions collected from the pre-expanders shall be ducted to the boilers permitted under N-257-4 or N-257-5. [District Rule 2201] 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 boiler shall be fired only on natural gas or fuel oil #2. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fuel oil #2 shall only be used during a natural gas curtailment for a period not to exceed 168 cumulative hours during any one calendar year plus 48 cumulative hours during any one calendar year for equipment testing and maintenance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
6. The sulfur content of the fuel oil #2 shall not exceed 15 ppm by weight. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. The NO<sub>x</sub> emissions, while firing on natural gas, shall not exceed 7 ppmvd @ 3% O<sub>2</sub> or 0.008 lb/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
8. The CO emissions, while firing on natural gas shall not exceed 50 ppmvd @ 3% O<sub>2</sub> or 0.037 lb/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
9. The VOC emissions, while firing on natural gas, shall not exceed 0.0042 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The SO<sub>x</sub> emissions, while firing on natural gas, shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The PM<sub>10</sub> emissions, while firing on natural gas, shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The NO<sub>x</sub> emissions, while firing on #2 fuel oil, shall not exceed 40 ppmvd @ 3% O<sub>2</sub> or 0.0512 lb/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
13. The CO emissions, while firing on #2 fuel oil, shall not exceed 50 ppmvd @ 3% O<sub>2</sub> or 0.039 lb/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
14. The VOC emissions, while firing on #2 fuel oil, shall not exceed 0.0045 lb/MMBtu. [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.

15. The SOx emissions, while firing on #2 fuel oil, shall not exceed 0.0016 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM10 emissions, while firing on #2 fuel oil, shall not exceed 0.015 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Operational characteristics recommended by the manufacturer and approved by the District shall be monitored on at least a monthly basis. [District Rule 4320, 5.7.2] Federally Enforceable Through Title V Permit
18. 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 analyzer 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
19. 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
20. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operation 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 (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of: (1) the date and time of NOX, CO, and O2 measurements, (2) the O2 concentration in percent by volume 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
22. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 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 twelve months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. 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, 7.1] Federally Enforceable Through Title V Permit
25. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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



26. 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
27. 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
28. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
29. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. 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
31. 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
32. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. The fuel oil sulfur content shall be determined utilizing ASTM method D-6920-03, ASTM method D-5453-99 or a District approved equivalent. [District Rule 4320] Federally Enforceable Through Title V Permit
34. {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]
35. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
36. An annual record of the cumulative number of hours of operation on #2 fuel oil and of the reason for this operation shall be kept. The record shall be updated at least monthly. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
37. 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, 4.0, 2520, 9.4.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley  
Air Pollution Control District

PERMIT UNIT: N-257-6-4

EXPIRATION DATE: 04/30/2016

**EQUIPMENT DESCRIPTION:**

121,680 SQ FT FINAL STYROFOAM PRODUCT STORAGE WAREHOUSE

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**PERMIT UNIT REQUIREMENTS**

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1. 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 4102]

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

Facility Name: DART CONTAINER CORPORATION  
Location: 1400 EAST VICTOR ROAD, LODI, CA 95240  
N-257-6-4 : Sep 28 2016 8:10AM - KAH/LONJ

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-257-7-1

EXPIRATION DATE: 04/30/2016

**EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF FOUR DART MODEL 250 AND EIGHT DART MODEL 200 FLEXOGRAPHIC/OFFSET LITHOGRAPHIC PRINTERS

## PERMIT UNIT REQUIREMENTS

1. The quantity of UV ink used by each printing press shall not exceed 15 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The VOC content of the UV inks used in this graphic arts operation shall not exceed 0.3% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Solvents used by this graphic arts operation shall not contain volatile organic compounds. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall keep a daily record of the quantity of UV ink used by each printing press, in lb. The quantity of daily UV ink usage for each printing press shall be calculated using monthly records on the amount of UV ink used, number of days printing presses operated, and number of printers operated in that month, as follows: (total amount of UV ink used)/(number of days operated x number of printers utilized). [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
5. Permittee shall maintain a current file that includes a material safety data sheet (MSDS) or manufacturer data sheet or product data sheet for each ink used that includes the material name, manufacturer's name, the VOC content, less water and exempt compounds and as applied, the specific mixing instructions, and the density. Generic MSDS or manufacturer data sheet or product data sheet that covers multiple inks may be utilized as long as that generic sheet(s) list range or the maximum VOC content, density, and other pertinent parameters that will be used to estimate actual emissions, and/or to demonstrate compliance with the VOC content limit in the permit. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
6. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT B

Previous Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: N-257-0-2

EXPIRATION DATE: 04/30/2016

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: DART CONTAINER CORPORATION

Location: 1400 EAST VICTOR ROAD, LODI, CA 95240

N-257-0-2; Sep 28 2016 8:53AM - KAHLOJ

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin November 30 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. Facility-wide daily NOx emissions shall not exceed 150 pounds in any one day. Facility-wide daily NOx emissions from the 14.65 MMBtu/hr Boiler (N-257-4) and the 29.3 MMBtu/hr Boiler (N-257-5) shall be calculated as follows: Daily NOx Emissions =  $[(0.011 \times \text{Daily Natural Gas Fuel Combusted (MMBtu per day)}) + (0.0512 \times \text{Daily Fuel Oil Combusted (MMBtu per day)})] + [(0.008 \times \text{Daily Natural Gas Fuel Combusted (MMBtu per day)}) + (0.0512 \times \text{Daily Fuel Oil Combusted (MMBtu per day)})]$ . [District NSR Rule] Federally Enforceable Through Title V Permit
44. Facility-wide daily VOC emissions excluding the warehouse emissions shall not exceed 250 pounds in any one day. Facility-wide daily VOC emissions from the 14.65 MMBtu/hr Boiler (N-257-4) and the 29.3 MMBtu/hr Boiler (N-257-5) shall be calculated as follows: Daily VOC Emissions =  $[(0.0042 \times \text{Daily Natural Gas Fuel Combusted (MMBtu per day)}) + (0.0045 \times \text{Daily Fuel Oil Combusted (MMBtu per day)})] + [(0.0042 \times \text{Daily Natural Gas Fuel Combusted (MMBtu per day)}) + (0.0045 \times \text{Daily Fuel Oil Combusted (MMBtu per day)})]$ . [District NSR Rule] Federally Enforceable Through Title V Permit
45. The permittee shall maintain daily records of the calculated daily facility-wide NOx and VOC emissions. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
46. Records of the daily facility-wide NOx and VOC emissions shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-257-2-3

EXPIRATION DATE: 04/30/2016

## EQUIPMENT DESCRIPTION:

EXPANDABLE POLYSTYRENE (EPS) PROCESSING OPERATION: ENCLOSED BEAD DUMPING OPERATION CONSISTING OF A HOPPER AND DUMPER SYSTEM, ONE HOLDING TANK AND ONE BLENDER, FOUR RODMAN PRE-EXPANDERS WITH CASCADE DRYERS ALL VENTED TO THE VAPOR RECOVERY SYSTEM; ENCLOSED BEAD DUMPING OPERATION CONSISTING OF A HOPPER AND DUMPER SYSTEM, ONE HOLDING TANK, TWO FEEDERS, TWO FEED/WEIGH BINS, TWO HIRSCH PRE-EXPANDERS WITH VENTS AND DELUMPERS, AND TWO BLADDER TANKS ALL VENTED TO THE VAPOR RECOVERY SYSTEM; AND EIGHTY-SEVEN MOLDING MACHINES. THE VAPOR RECOVERY SYSTEM WITH AN IN-LINE CYCLONE SEPARATOR IS VENTED TO THE BOILERS PERMITTED UNDER N-257-4 AND N-257-5.

## PERMIT UNIT REQUIREMENTS

1. The permanent total enclosure (PTE) around the raw bead dumping operation serving Rodman pre-expanders shall follow PTE criteria in EPA Method 204, and shall be vented to the vapor recovery system at or above the average facial velocity of 200 feet per minute. [District Rule 4682] Federally Enforceable Through Title V Permit
2. The cascade dryers serving Rodman pre-expanders shall be completely sealed and vented to the vapor recovery system when Rodman pre-expander operates. [District Rule 4682] Federally Enforceable Through Title V Permit
3. The permittee shall operate and maintain two Hirsch pre-expanders. [District Rule 4682] Federally Enforceable Through Title V Permit
4. Two bladder bags, one for each Hirsch pre-expander, shall be used to collect pentane from each pre-expander vent. The collected vapors shall be released into the vapor recovery system. [District Rule 4682]
5. Delumpers (i.e. bottom part to which pre-puff is discharged) of Hirsch pre-expanders shall be completely sealed and vented to the vapor recovery system. [District Rule 4682] Federally Enforceable Through Title V Permit
6. The permittee shall operate and maintain a separate raw bead handling system for Hirsch pre-expanders. This bead handling system includes: a bead dumping operation transferring raw beads into a hopper, enclosed augers transferring beads from the hopper to a holding tank and from the holding tank to the feeders and weigh bins for Hirsch pre-expanders. The bead dumping operation shall be conducted inside a PTE that must meet PTE criteria in EPA Method 204. The bead transferring augers, product holding tanks, new feeders and weigh bins shall be enclosed and designed to meet PTE criteria in EPA Method 204. Each unit in the bead handling system shall be vented to the vapor recovery system. The average facial velocity shall be at or above 200 feet per minute for Hirsch bead dump PTE, each Hirsch holding tank, and each weigh bin PTE. [District Rule 4682] Federally Enforceable Through Title V Permit
7. The vapor recovery system shall be connected to the boilers (N-257-4 and N-257-5) at all times, except for periods of routine testing or emergency safety. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The vapor recovery system shall be operated in a manner which maximizes collection efficiency at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The polystyrene pellets shall be received and stored in cartons and/or bags lined with vapor transmission inhibiting film. [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.

10. The operator shall visibly inspect the polystyrene pellet cartons upon receipt and weekly thereafter for damage to the vapor transmission inhibiting film. If damage is discovered, the permittee shall take corrective action immediately by either processing the carton or re-sealing the carton. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. All conveyors shall be enclosed to minimize fugitive VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The chamber temperature of each Rodman pre-expander shall not exceed 215°F. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The pre-puff beads shall be processed in a manner that minimizes fugitive VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
14. There shall be no visible emissions from the bead handling systems, pre-expansion systems, or the molding systems. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The pentane content in the raw EPS beads shall be at or below 5.4% by weight, when the raw bead boxes are received from a vendor. EPS bead manufacturer certification receipt must be kept as a record to demonstrate compliance with this condition. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Manufacturing emissions are defined as the emissions from bead handling, pre-puffing, and molding processes. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The Manufacturing VOC emissions shall not exceed 161.1 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The amount of raw EPS beads processed through the Rodman and Hirsch pre-expanders shall not exceed 28,774 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The amount of raw EPS beads through any one Hirsch pre-expander shall not exceed 19,423 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The total product emissions shall not exceed 2.4 pounds of VOC per 100 pounds of the raw beads processed, calculated over a monthly period. Exceeding this limit shall constitute violation for each day of that monthly period. The total product emissions is same as defined in Section 5.3.1 of Rule 4682 (9/20/2007). [District Rule 4682] Federally Enforceable Through Title V Permit
21. The boilers (N-257-4 and N-257-5) shall be operated to reduce at least 95% of the pentane entering these units. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The overall pentane emissions from the bead handling systems shall be reduced by a minimum of 50% by weight, based on a monthly average basis. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Unless otherwise noted, for the purposes of this permit, P1 is the percent weight of pentane in raw EPS beads (taken directly from newly opened box), P2 is the percent weight of pentane in pre-puff beads, P3 is the percent weight of pentane in the molded product, CE is the VOC control efficiency of the boilers operating under N-257-4 and N-257-5. For daily calculation purposes, P1 value may be taken from EPS bead manufacturer certification receipt, which must be kept as a record. [District Rules 1081, 2201, 2520, 9.3.2, 4682] Federally Enforceable Through Title V Permit
24. The exhaust flue gas temperature of the boiler combusting VOC from the vapor recovery system shall be at least 274°F. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
25. The laden airflow rate from the vapor recovery system to boiler shall be at or above 880 cfm. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
26. Source testing shall be District witnessed, or authorized and samples shall be collected by a California Air Resources Board certified testing laboratory. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

27. Annual source testing shall be conducted to verify compliance with the total product emissions limit (2.4 lb-VOC/100 lb-EPS processed), the daily Manufacturing VOC emission limit (161.1 lb/day), the overall pentane emission reductions from the bead handling systems (50% or more by weight), and the boilers (N-257-4 and N-257-5) control efficiency (95% or more by weight). [District Rule 2201 and 4682] Federally Enforceable Through Title V Permit
28. P1, P2, and P3 shall be determined annually for each EPS material. The samples shall be taken as follows: P1 - take 3 samples from a bead box; P2 - take 3 samples for each density product; P3 - take 3 samples for each density product. An average of the test results would establish a value for respective parameter. [District Rules 1081 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
29. P1, P2 and P3 for each EPS material shall be re-established, at least once every five years, or when pentane content in raw beads exceeds the pre-established limit. For determining P1, P2, and P3, the samples shall be taken as follows: P1 - take 6 samples from manufacturer lot #1, take 6 samples from manufacturer lot #2, take 3 samples from manufacturer lot #3; P2 - take 15 samples for each density product; P3 - take 3 samples for each density product. An average of the test results would establish a value for respective parameter. [District Rule 4682] Federally Enforceable Through Title V Permit
30. P1, P2 and P3 shall be determined using SCAQMD Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternate method as approved by the District, EPA and CARB. [District Rule 4682] Federally Enforceable Through Title V Permit
31. For processing multiple types of EPS materials in a given day, the daily Manufacturing VOC emissions shall be determined by taking the sum of the numbers obtained for each type of processing material using the following equation:  $[(P1 - P3) - (P1 - P2)(CE)](Processing\ Rate\ (lb-EPS/day))$ . [District Rule 2201] Federally Enforceable Through Title V Permit
32. For processing a single type of EPS material in a given day, the daily Manufacturing VOC emissions shall be determined using the following equation:  $[(P1 - P3)(Processing\ Rate\ (lb/day)) - (CEMS\ data,\ lb-VOC/day)(CE)]$ . [District Rule 2201] Federally Enforceable Through Title V Permit
33. Source testing to verify the overall pentane emission reductions from the bead handling systems and the minimum control efficiency of the boilers (N-257-4 and N-257-5) shall be conducted annually. The influent concentration from the vapor recovery system to the boilers and effluent concentration from the boiler stacks shall be measured using EPA Test Method 25 or 25A. These concentrations shall be converted to mass emission rates (lb-VOC/hr, lb-VOC/day) for determining overall pentane reductions, and the control efficiency of the boilers. [District Rule 1081 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
34. The overall pentane emissions reductions from the bead handling systems (%) shall be computed using the following equation:  $(100)\{(Mi - Mo)/Mi\}\{Mi/(E1+E2)\}$ , where  $Mi$  = mass emission rate at the inlet of boilers (lb-VOC/day),  $Mo$  = mass emission rate at boilers stack (lb-VOC/day),  $E1$  = (Processing Rate)(P1 - P2) lb-VOC/day for the material processed through the Rodman pre-expanders,  $E2$  = (Processing Rate)(P1 - P2) lb-VOC/day for the material processed through the Hirsch pre-expanders. [District Rule 1081 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
35. The operator shall verify the accuracy of the CEMS during each source test. This system shall be calibrated and operated in accordance with the requirements of 40 CFR Part 51. [District Rules 1081, 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
36. The permittee shall utilize continuous emissions monitor system (CEMS) to measure and record VOC concentration and volumetric airflow (cfm) of the laden air stream from the vapor recovery system. [District Rule 2201] Federally Enforceable Through Title V Permit
37. The permittee shall use a handheld anemometer to measure average facial velocity (fpm) of natural draft openings for each permanent total enclosure on a monthly basis. These measurements shall be compared with the numbers established in this permit to detect a problem. [District Rule 2201] Federally Enforceable Through Title V Permit
38. Temperature of the Rodman pre-expanders shall be observed and recorded daily while any unit operates. The records shall include date of inspection and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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39. Visible emission inspection shall be performed daily. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
40. The permittee shall maintain records of the following items for the product processed through Rodman pre-expanders: (1) date, (2) amount of EPS processed (lb/day), (3) established P1, P2, and P3, and (4) P1, P2, and P3 during the latest source test. [District Rules 1070, 2520 - 9.4.2, 4682] Federally Enforceable Through Title V Permit
41. The permittee shall maintain records of the following items for the product processed through Hirsch pre-expanders: (1) date, (2) amount of EPS processed (lb/day), (3) established P1, P2, and P3, and (4) P1, P2, and P3 during the latest source test. [District Rules 1070, 2520 - 9.4.2, 4682] Federally Enforceable Through Title V Permit
42. The permittee shall maintain records of the daily Manufacturing VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
43. The permittee shall maintain records of the total product emissions (lb-VOC/100 lb of raw beads processed), calculated over a monthly period. [District Rules 4682] Federally Enforceable Through Title V Permit
44. For each source test, the permittee shall maintain records of the date, type of the EPS material, name of the person and company collecting product samples to test P1, P2, P3, and a copy of test results. [District Rule 1070] Federally Enforceable Through Title V Permit
45. The permittee shall keep records of: (1) date, (2) system identification (e.g. bead dumping operation), (3) average facial velocity (fpm) across natural draft openings in this permit, and (4) average facial velocity measurement (fpm) with handheld anemometer. [District Rule 4682] Federally Enforceable Through Title V Permit
46. The operator shall keep all records for a minimum of five years. These records shall be made available at the facility during normal business hours to the APCO, ARB, or EPA. The records shall be submitted to the APCO, ARB, or EPA upon request. [District Rules 1070, 2201, 2520 - 9.4.2, 4682] Federally Enforceable Through Title V Permit
47. The operator shall submit a written report to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
48. The laden air stream from the vapor recovery system shall be measured and recorded at least every 15-minute using airflow rate detection sensors. The recorded data shall be averaged over a 30-consecutive-minute block to demonstrate compliance with the established minimum airflow (cfm) in the permit. The averaged readings shall be recorded each day the pre-puff process operates. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rules 2201 and 4682, 40 CFR Part 64] Federally Enforceable Through Title V Permit
49. Each boiler's stack temperature shall be measured and recorded at least every 15-minute using a thermocouple. The recorded temperature data shall be averaged over a 30-consecutive-minute block to demonstrate compliance with the temperature established in the permit. The averaged readings shall be recorded each day the boilers operate. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rules 2201 and 4682, 40 CFR Part 64] Federally Enforceable Through Title V Permit
50. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7 for the boilers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
51. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9 for the boilers. [40 CFR Part 64] 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.

52. If the District or EPA determines per 40 CFR 64.7(d)(2) that a Quality Improvement Plan is required, the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] 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-257-4-5

EXPIRATION DATE: 04/30/2016

## EQUIPMENT DESCRIPTION:

14.65 MMBTU/HR CLEAVER BROOKS BOILER (MODEL CB 600-350-150) WITH A CLEAVER BROOKS MODEL CE-NT1 LOW-NOX BURNER AND FLUE GAS RECIRCULATION

## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
3. The boiler shall be fired only on natural gas, fuel oil #2, or pentane. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The sulfur content of the fuel oil #2 shall not exceed 15 ppm, 0.0015% by weight. [District NSR Rule and District Rule 4320, 5.4.2] Federally Enforceable Through Title V Permit
5. Fuel oil #2 shall only be used during a natural gas curtailment for a period not to exceed 168 cumulative hours during any one calendar year plus 48 cumulative hours during any one calendar year for equipment testing and maintenance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
6. This boiler shall not be fired on fuel oil when the boiler permitted under N-257-5 is in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The permittee shall maintain a log of the cumulative annual hours of operation when the unit is fired on #2 fuel oil during natural gas curtailment periods and during testing and maintenance periods, the sulfur content of the fuel oil, the amount of fuel oil used and the duration of the natural gas curtailment period (in hours). [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
8. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by: ASTM D 240 or D 2382 for liquid hydrocarbon fuels; ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 2520, 9.3.2, and 4320] Federally Enforceable Through Title V Permit
9. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. The pentane emissions collected from the pre-expanders shall be ducted to the boilers permitted under N-257-4 or N-257-5. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Emissions rates when this unit is firing on natural gas shall not exceed any of the following limits: 9.0 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 50 ppmv CO @ 3% O<sub>2</sub> or 0.039 lb-CO/MMBtu, or 0.0042 lb-VOC/MMBtu. [District NSR Rule and 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.

12. Emissions rates when this unit is firing on fuel oil #2 shall not exceed any of the following limits: 40.0 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.0512 lb-NO<sub>x</sub>/MMBtu, 0.0016 lb-SO<sub>x</sub>/MMBtu, 0.015 lb-PM<sub>10</sub>/MMBtu, 100 ppmv CO @ 3% O<sub>2</sub> or 0.078 lb-CO/MMBtu, or 0.0045 lb-VOC/MMBtu. [District NSR Rule and Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
13. 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
14. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six 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 twelve months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
15. 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
16. 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
17. NO<sub>x</sub> 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
18. 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
19. Stack gas oxygen (O<sub>2</sub>) 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
20. 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
21. 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
22. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> 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
23. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, 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 the performing the notification and testing required by this condition. [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. 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
25. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (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
26. 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
27. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit
28. 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

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



# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-257-5-6

EXPIRATION DATE: 04/30/2016

## EQUIPMENT DESCRIPTION:

29.3 MMBTU/HR CLEAVER BROOKS BOILER MODEL #CB 400-700-150 WITH A CLEAVER BROOKS MODEL #CB-NTI-9PPM ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub> nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
2. The pentane emissions collected from the pre-expanders shall be ducted to the boilers permitted under N-257-4 or N-257-5. [District Rule 2201] 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 boiler shall be fired only on natural gas or fuel oil #2. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fuel oil #2 shall only be used during a natural gas curtailment for a period not to exceed 168 cumulative hours during any one calendar year plus 48 cumulative hours during any one calendar year for equipment testing and maintenance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
6. The sulfur content of the fuel oil #2 shall not exceed 15 ppm by weight. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
7. The NO<sub>x</sub> emissions, while firing on natural gas, shall not exceed 7 ppmvd @ 3% O<sub>2</sub> or 0.008 lb/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
8. The CO emissions, while firing on natural gas shall not exceed 50 ppmvd @ 3% O<sub>2</sub> or 0.037 lb/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
9. The VOC emissions, while firing on natural gas, shall not exceed 0.0042 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The SO<sub>x</sub> emissions, while firing on natural gas, shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The PM<sub>10</sub> emissions, while firing on natural gas, shall not exceed 0.0076 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The NO<sub>x</sub> emissions, while firing on #2 fuel oil, shall not exceed 40 ppmvd @ 3% O<sub>2</sub> or 0.0512 lb/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
13. The CO emissions, while firing on #2 fuel oil, shall not exceed 50 ppmvd @ 3% O<sub>2</sub> or 0.039 lb/MMBtu. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
14. The VOC emissions, while firing on #2 fuel oil, shall not exceed 0.0045 lb/MMBtu. [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.

15. The SOx emissions, while firing on #2 fuel oil, shall not exceed 0.0016 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM10 emissions, while firing on #2 fuel oil, shall not exceed 0.015 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Operational characteristics recommended by the manufacturer and approved by the District shall be monitored on at least a monthly basis. [District Rule 4320, 5.7.2] Federally Enforceable Through Title V Permit
18. 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 analyzer 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
19. 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
20. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operation 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 (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of: (1) the date and time of NOX, CO, and O2 measurements, (2) the O2 concentration in percent by volume 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
22. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081 and District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Source testing to measure natural gas-combustion NOx and CO emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. If the result of a 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 twelve months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
24. 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, 7.1] Federally Enforceable Through Title V Permit
25. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. 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
27. 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
28. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
29. Source testing to measure NOx emissions shall be conducted using EPA Method 7E, EPA Method 19, or CARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. 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
31. 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
32. Stack gas velocities shall be determined using EPA Method 2. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. The fuel oil sulfur content shall be determined utilizing ASTM method D-6920-03, ASTM method D-5453-99 or a District approved equivalent. [District Rule 4320] Federally Enforceable Through Title V Permit
34. 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]
35. A daily record of the duration of each start-up and shutdown period shall be kept. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
36. An annual record of the cumulative number of hours of operation on #2 fuel oil and of the reason for this operation shall be kept. The record shall be updated at least monthly. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
37. A record of the monthly quantity of each fuel burned shall be kept. [40 CFR Part 60.42c(g)] Federally Enforceable Through Title V Permit
38. 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, 4.0, 2520, 9.4.2, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
39. This unit is subject to the requirements of 40 CFR Part 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. [40 CFR Part 60, Subpart Dc] Federally Enforceable Through Title V Permit
40. The permittee shall comply with the reporting and record keeping requirements of 40 CFR Part 60.48c. [40 CFR Part 60, Subpart Dc] 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-257-6-3

**EXPIRATION DATE:** 04/30/2016

**EQUIPMENT DESCRIPTION:**

121,680 SQ FT FINAL STYROFOAM PRODUCT STORAGE WAREHOUSE

**PERMIT UNIT REQUIREMENTS**

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1. 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 4102]

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-257-7-0

EXPIRATION DATE: 04/30/2016

**EQUIPMENT DESCRIPTION:**

GRAPHIC ARTS PRINTING OPERATION CONSISTING OF FOUR DART MODEL 250 AND EIGHT DART MODEL 200 FLEXOGRAPHIC/OFFSET LITHOGRAPHIC PRINTERS

## PERMIT UNIT REQUIREMENTS

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1. The quantity of UV ink used by each printing press shall not exceed 15 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The VOC content of the UV inks used in this graphic arts operation shall not exceed 0.3% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Solvents used by this graphic arts operation shall not contain volatile organic compounds. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Permittee shall keep a daily record of the quantity of UV ink used by each printing press, in lb. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Permittee shall maintain a current file that includes a material safety data sheet (MSDS) or product data sheet for each ink used that includes the material name, manufacturer's name, the VOC content, less water and exempt compounds and as applied, the specific mixing instructions, and the density. [District Rules 2201 and 4607] Federally Enforceable Through Title V Permit
6. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4607] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT C

Detailed Facility List

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**Detailed Facility Report**  
For Facility=257 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

DART CONTAINER CORPORATION		FAC # N257		TYPE TitleV		EXPIRE ON 04/30/2016	
1400 EAST VICTOR ROAD		STATUS A		TOXIC ID 20358		AREA 17	
LODI CA 95240		TELEPHONE 2093338088		INSP DATE 10/16			

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-257-2-3	541 HP ELECTRIC MOTOR RATING	3020-01 F	1	666.00	666.00	A	EXPANDABLE POLYSTYRENE (EPS) PROCESSING OPERATION: ENCLOSED BEAD DUMPING OPERATION CONSISTING OF A HOPPER AND DUMPER SYSTEM, ONE HOLDING TANK AND ONE BLENDER, FOUR RODMAN PRE-EXPANDERS WITH CASCADE DRYERS ALL VENTED TO THE VAPOR RECOVERY SYSTEM; ENCLOSED BEAD DUMPING OPERATION CONSISTING OF A HOPPER AND DUMPER SYSTEM; ONE HOLDING TANK, TWO FEEDERS, TWO FEED/WEIGH BINS, TWO HIRSCH PRE-EXPANDERS WITH VENTS AND DELUMPER, AND TWO BLADDER TANKS ALL VENTED TO THE VAPOR RECOVERY SYSTEM; AND EIGHTY-SEVEN MOLDING MACHINES. THE VAPOR RECOVERY SYSTEM WITH AN IN-LINE CYCLONE SEPARATOR IS VENTED TO THE BOILERS PERMITTED UNDER N-257-4 AND N-257-5.
N-257-4-5	14.65 MMBTU/HR BOILER	3020-02 G	1	893.00	893.00	A	14.65 MMBTU/HR CLEAVER BROOKS BOILER (MODEL CB 600-350-150) WITH A CLEAVER BROOKS MODEL CB-NTI LOW-NOX BURNER AND FLUE GAS RECIRCULATION
N-257-5-6	29.3 MMBTU/HR BOILER	3020-02 H	1	1,128.00	1,128.00	A	29.3 MMBTU/HR CLEAVER BROOKS BOILER MODEL #CB 400-700-150 WITH A CLEAVER BROOKS MODEL #CB-NTI-9PPM ULTRA LOW-NOX BURNER AND FLUE GAS RECIRCULATION
N-257-6-3	miscellaneous	3020-06	1	116.00	116.00	A	121,680 SQ FT FINAL STYROFOAM PRODUCT STORAGE WAREHOUSE
N-257-7-0	60 electric HP	3020-01 C	1	217.00	217.00	A	GRAPHIC ARTS PRINTING OPERATION CONSISTING OF FOUR DART MODEL 250 AND EIGHT DART MODEL 200 FLEXOGRAPHIC/OFFSET LITHOGRAPHIC PRINTERS

Number of Facilities Reported: 1