



DEC 21 2016

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

**Re: Notice of Final Action - Title V Permit Renewal
District Facility # C-36
Project # C-1152387**

Dear Mr. Berard:

The District has issued the Final Renewed Title V Permit for Pactiv LLC (see enclosure). The preliminary decision for this project was made on October 7, 2016. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

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

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

Sayed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
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**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

Title V Permit Renewal Evaluation
Pactiv, LLC
C-36

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TITLE V PERMIT RENEWAL EVALUATION
Polystyrene Foam Manufacturing

Engineer: Vanesa Gonzalez
Date: September 21, 2016

Facility Number: C-36
Facility Name: Pactiv, LLC
Mailing Address: 5370 E Home Ave
Fresno, CA 93727

Contact Name: Chris Berard
Phone: (559) 253-3402

Responsible Official: Chris Berard
Title: Plant Manager

Project # : C-1152387
Deemed Complete: August 25, 2015

I. PROPOSAL

Pactiv LLC was issued a Title V permit on September 30, 2002. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the previous Title V permit renewal on August 30, 2011.

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

II. FACILITY LOCATION

Pactiv, LLC is located at 5370 E Home Avenue in Fresno, CA.

III. EQUIPMENT LISTING

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

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit Template:

A. Template SJV-UM-0-1 Facility Wide Umbrella

The applicant has requested to utilize template No. 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 Renewed 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.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review.

Conditions 1 through 41 of the requirements for permit unit C-36-0-3.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated or Evaluated

- District Rule 2201 - New and Modified Stationary Source Review Rule (amended August 18, 2011 (SIP version of the Rule) ⇒ amended February 18, 2016)
- District Rule 2410, Prevention of Significant Deterioration (adopted June 16, 2011)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4682, Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing (amended September 20, 2007 ⇒ amended December 15, 2011)
- 40 CFR Part 64, Compliance Assurance Monitoring (adopted October 22, 1997)

B. Rules Removed

There have been no rules removed.

C. Rules Added

There have been no rules added.

D. Rules Not Updated

- District Rule 1070, Inspections (December 17, 1992)
- District Rule 1081, Source Sampling (December 19, 1993)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4202, Particulate Matter Emission Rate (amended December 17, 1992)
- District Rule 4623, Storage of Organic Liquids (amended May 19, 2001)
- District Rule 4662, Organic Solvent Degreasing Operations (September 20, 2007)

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

No non-SIP approved rules have been added.

B. Rules Updated

District Rule 2301, Emissions Reduction Credit Banking (as amended January 19, 2012)

The following conditions on the permit requirements are based on District Rule 2301 and will therefore not be discussed any further.

District Rule 2301 Compliance			
Permit Unit	Conditions	Permit Unit	Conditions
C-36-2-12	7 and 8	C-36-11-8	2
C-36-3-12	4	C-36-12-8	2
C-36-4-11	4	C-36-13-7	1
C-36-5-7	2	C-36-14-8	2
C-36-6-7	2	C-36-18-8	4
C-36-7-8	2	C-36-19-8	3
C-36-8-6	2	C-36-20-11	2
C-36-9-6	2	C-36-21-8	4
C-36-10-8	2	C-36-22-6	2

C. Rules Not Updated

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

The following conditions on the permit requirements are based on District Rule 4102 and will therefore not be discussed any further.

District Rule 4102 Compliance			
Permit Unit	Conditions	Permit Unit	Conditions
C-36-0-3	42	C-36-4-11	8
C-36-2-12	9 and 14	C-38-21-8	8
C-36-3-12	8		

VIII. PERMIT REQUIREMENTS

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

A. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's initial Title V permit was issued. 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

B. District Rule 2410 – Prevention of Significant Deterioration

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.

C. District Rule 2520 - Federally Mandated Operating Permits

The purpose of this rule is to provide for the following: an administrative mechanism for issuing operating permits for new and modified sources of air contaminants in accordance with requirements of 40 CFR Part 70; an administrative mechanism for issuing renewed operating permits for sources of air contaminants in accordance with requirements of 40 CFR Part 70; an administrative mechanism for revising, reopening, revoking, and terminating operating permits for sources of air contaminants in accordance with requirements of 40 CFR Part 70; an administrative mechanism for incorporating requirements authorized by preconstruction permits issued under District Rule 2201 (New and Modified Stationary Source Review) in a Part 70 permit as administrative amendments, provided that such permits meet the necessary procedural and compliance requirements. District Rule 2520 has not been amended since this facility's Title V permit was issued.

Greenhouse Gas Requirements

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40CFR Part 98) is not included in the definition of an

applicable requirement within Title V (per 40CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

D. District Rule 4682 – Polystyrene Foam, Polyethylene, and Polypropylene Manufacturing

The purpose of this rule is to limit emissions of VOC and trichlorofluoromethane (CFC-11) and dichlorofluoromethane (CFC-12) from manufacturing and processing of products composed of polystyrene, polyethylene, or polypropylene and from the storage of VOC blowing agents.

As discussed above, Pactiv, LLC operates a polystyrene foam manufacturing facility at this location. Therefore, District Rule 4682 applies to this facility.

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

- 5.1.1 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
- 5.1.2 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.

Condition 43 of the facility wide permit requirements (C-36-0-3) is a mechanism to ensure compliance with this section.

Section 5.2 states that the operator shall not conduct any manufacturing operations, as defined in Section 3.0, unless one of the following emission reduction methods is met:

- 5.2.1 Effective until December 31, 2012, the operator demonstrates, to the satisfaction of the APCO, that the total product emissions do not exceed 2.4 pounds of VOC per 100 pounds of total material processed, calculated over a monthly period.
- 5.2.2 Effective on and after January 1, 2013, the operator of an extrusion facility shall demonstrate, to the satisfaction of the APCO, that the total product emissions do not exceed 2.4 pounds of VOC per 100 pounds of total material processed, calculated over a monthly period.

- 5.2.3 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:
 - 5.2.3.1 3.4 pounds of VOC per 100 pounds of total material processed, calculated daily, and
 - 5.2.3.2 2.4 pounds of VOC per 100 pounds of total material processed, calculated over a monthly period.
- 5.2.4 A blowing agent other than a VOC or trichlorofluoromethane (CFC-11) or dichlorofluoromethane (CFC-12) is exclusively used.
- 5.2.5 An approved emission control system is installed and operating with manufacturing emissions vented only to the approved emission control system; and emissions from the final manufactured product are to be vented only to the approved emission control system for at least:
 - 5.2.5.1 48 hours, in the case of expandable polystyrene molding operations that process more than 800,000 pounds per calendar year of raw material; or
 - 5.2.5.2 24 hours, in the case of all other manufacturing operations.
 - 5.2.5.3 The provision of Section 5.2.5.1 or 5.2.5.2 are not required for any facility that only manufactures polystyrene products and the highest concentration of the blowing agent in the product is 1.8 percent or less by weight, within 15 minutes after the completion of the final processing step, prior to any finished product storage. Verification of the concentration shall be demonstrated annually, pursuant to a protocol submitted to the District and subject to approval by the APCO.
- 5.2.6 The operator demonstrates to the satisfaction of the APCO that the manufacturing emissions are no greater than the facility emissions which would occur under Section 5.2.5, as calculated according to Section 5.4, and which does not include the use of trichlorofluoromethane (CFC-11) or dichlorodifluoromethane (CFC-12).
- 5.2.7 A control system that meets all of the following requirements shall be deemed as meeting the requirements of Section 5.2.6, unless the APCO determines that additional controls are required.
 - 5.2.7.1 The beads used in manufacturing have an annual-average VOC content of less than 4.2% per weight; and

5.2.7.2 The manufacturing emissions (not including finished product storage emissions) are controlled with an overall capture and control efficiency of at least 93% by weight.

The facility will meet the requirements of section 5.2 by limiting the extrusion line to not exceed 2.4 pounds of VOC per 100 pounds of total material processed as allowed in Section 5.2.2

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

Section 5.4 describes the formula used to calculate the emission for units complying with this rule by installing an emission control system.

Section 5.5 states that compliance plans shall be submitted for operators complying with Sections 5.2.1, 5.2.6, or 5.2.7. The facility has not proposed to meet compliance with this rule by complying with these sections; therefore the requirements of this section are not applicable.

The following conditions on the permits requirements are a mechanism to ensure compliance with Section 5.0.

Rule 4682, Section 5.0 compliance			
Permit Unit	Conditions	Permit Unit	Conditions
C-36-2-12	17 and 23	C-36-12-8	5 and 6
C-36-3-12	11 and 12	C-36-13-7	4 and 5
C-36-4-11	11 and 12	C-36-14-8	8 and 9
C-36-5-7	5 and 6	C-36-18-8	7 and 8
C-36-6-7	5 and 6	C-36-19-8	8 and 9
C-36-7-8	5 and 6	C-36-20-11	5 and 6
C-36-8-6	5 and 6	C-36-21-8	11 and 12
C-36-9-6	5 and 6	C-36-22-6	8 and 9
C-36-10-8	5 and 6	C-36-23-5	6 and 7
C-36-11-8	5 and 6		

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.

Section 6.1.2 applies to persons using an emission control system as a means of complying with this rule. The facility has not proposed to meet

compliance with this rule with a control system; therefore the requirements of this section are not applicable.

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.

Section 6.1.4 applies to operators complying with Section 5.2.3. The facility has not proposed to meet compliance with this rule by complying with Section 5.2.3; therefore the requirements of this section are not applicable.

Section 6.1.5 states that the 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.

The following conditions on the permit requirements are a mechanism to ensure compliance with Section 6.0.

Rule 4682, Section 6.0 compliance			
Permit Unit	Conditions	Permit Unit	Conditions
C-36-2-12	26, 27, 28, 29, 33 and 36	C-36-12-8	8, 9, 12 and 14
C-36-3-12	14, 15, 16, 17, 20 and 22	C-36-13-7	7, 8, 11 and 15
C-36-4-11	14, 15, 16, 17, 20 and 22	C-36-14-8	11, 12, 13, 14, 25 and 27
C-36-5-7	8, 9, 12 and 14	C-36-18-8	10, 11, 20 and 22
C-36-6-7	8, 9, 12 and 14	C-36-19-8	11, 12, 13, 14, 25 and 27
C-36-7-8	8, 9, 12 and 14	C-36-20-11	8, 9, 12 and 14
C-36-8-6	8, 9, 12 and 14	C-36-21-8	14, 15, 16, 17, 20 and 22
C-36-9-6	8, 9, 12 and 14	C-36-22-6	11, 12, 13, 14, 25 and 27
C-36-10-8	8, 9, 12 and 14	C-36-23-5	12 and 14
C-36-11-8	8, 9, 12 and 14		

Section 6.2 lists the approved test methods for determining the control efficiency of the emission control device, the capture efficiency of the emission capture control system, exempt compounds and halogenated

blowing agents, and VOC blowing agent contained in polymeric materials. The facility is not required to perform any of these tests; therefore the requirements in this section are not applicable.

E. 40 CFR Part 64-CAM

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

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

- a) C-36-1-3: RAIL CAR UNLOADING, INCLUDING 3 RESIN SILOS, EACH 12 FT DIAM X 47 FT HIGH, PRODUCT SEPARATOR, VACUUM PUMP FILTER AND VACUUM PUMP #VB-01; STORAGE CAPACITY: 15,939 CUFT (119,221 GALLONS)

The permit requirements of this unit do not include an emissions limit for any pollutant. Therefore, CAM is not triggered by this unit.

- b) C-36-2-12: POLYSTYRENE FOAM EXTRUSION LINE #1 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD SERVED BY A 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER

C-36-3-12: POLYSTYRENE FOAM EXTRUSION LINE #2 CONSISTING OF #EX-20 PRIMARY EXTRUDER, #EX-21 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-11 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

C-36-4-11: POLYSTYRENE FOAM EXTRUSION LINE #3 CONSISTING OF #EX 30 PRIMARY EXTRUDER, #EX-31 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM FEED PUMP #VB-12 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

C-36-5-7: #G-91 THERMOFORMER LINE CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

C-36-6-7: #G-92 THERMOFORMER LINE CONSISTING OF GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE FLUFF SILOS DESCRIBED IN C-36-18

C-36-7-8: #G-93 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

C-36-8-6: #G-94 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

C-36-9-6: #G-95 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

C-36-10-8: #G-96 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

C-36-11-8: #G-97 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN PERMIT C-36-18

C-36-12-8: #G-98 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

C-36-13-7: #GR-90 BULK GRINDER WITH BLOWER, #GR-91 BULK GRINDER WITH BLOWER, AND #GR-92 SHEET GRINDER WITH BLOWER EACH FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

C-36-14-8: #EX-40 RECLAIM EXTRUDER #1 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19) AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17

C-36-18-8: SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A TORIT FILTER DUST COLLECTION SYSTEM AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

C-36-19-8: #EX-50 RECLAIM EXTRUDER #2 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED

WITH C-36-14) AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17

C-36-20-11: POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160'W X 22'H AVERAGE) VENTED TO THE THERMAL OXIDIZER DESCRIBED IN C-36-2

C-36-21-8: POLYSTYRENE EXTRUSION LINE #4 CONSISTING OF #EX-40 PRIMARY EXTRUDER, #EX-41 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-40 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

C-36-22-6: #EX-70 RECLAIM EXTRUDER #3 SERVED BY SMOG HOG MODEL SH20 E.P. AND A THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17

These units are all served by a thermal oxidizer, which is an add-on control for VOC, listed on permit C-36-2. The units also have a collective post-control VOC emission limit of 418.0 lb/day. Assuming an operating schedule of 365 day/year, maximum annual VOC emissions are 152,570 lb/year. Since the post-control VOC limit already exceeds the VOC major source threshold of 20,000 lb/year, the pre-control potential to emit is also greater than the major source threshold. These units are subject to CAM because they meet all three criteria for triggering CAM. CAM is satisfied by monitoring of the thermal oxidizer combustion bed temperature, which is a surrogate parameter for proper thermal oxidizer operation. The thermal oxidizer combustion bed is equipped with a thermocouple which continuously measures the combustion bed temperature. Since the permit units' potential to emit after control is greater than the Major Source threshold, monitoring data must be collected every 15 minutes. The automated temperature logger records the temperature at least once every 15 minutes.

These units are all controlled by the thermal oxidizer listed on permit C-36-2-12. Therefore, the following requirements will only be listed on C-36-2-12.

Condition 20 of the permit requirements of unit C-36-2-12 is a mechanism to ensure the thermal oxidizer is maintained at least 1500 °F.

Condition 21 of the permit requirements of unit C-36-2-12 requires the thermal oxidizer to be equipped with a continuous temperature monitor.

This condition was modified to add the clarification that data shall be collected at 15 minutes intervals.

- c. C-36-17-4: 17,960 CU. FT. (134,000 GALLON) RECLAIM STORAGE SILOS INCLUDING (2) 12' DIA. X 30' H WITH 60 DEG. CONES, (2) 12' DIA. X 30' H WITH 8' 45 DEG. CONES, AND (2) 12' DIA. X 32' H WITH 5'8" 45 DEG. CONES, RECEIVING PELLETS FROM RECLAIM EXTRUDERS

The permit requirements of this unit do not include an emissions limit for any pollutant. Therefore, CAM is not triggered by this unit.

- d. C-36-23-5: POLYSTYRENE FOAM PRODUCT STORAGE WAREHOUSE (28,480 SQ FT)

This permit unit is not equipped with a control device for VOC, the only pollutant emitted from this operation. Therefore, CAM is not triggered by this unit.

IX. PERMIT SHIELD

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

A. Requirements Addressed by Model General Permit Templates

Model General Permit Template SJV-UM-0-3

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template are included as conditions 39 and 40 of the facility-wide requirements (C-36-0-3).

B. Requirements not Addressed by Model General Permit Templates

The applicant has not request any permit shields.

X. PERMIT CONDITIONS

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
- D. Facility Comments and District Response

ATTACHMENT A

Renewed Title V Operating Permit



Permit to Operate

FACILITY: C-36

EXPIRATION DATE: 04/30/2021

LEGAL OWNER OR OPERATOR:

PACTIV, LLC

MAILING ADDRESS:

5370 E HOME AVE
FRESNO, CA 93727

FACILITY LOCATION:

5370 E HOME AVE
FRESNO, CA 93727

FACILITY DESCRIPTION:

PLASTIC FOAM PRODUCTS

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

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

Seyed Sadredin

Executive Director / APCO

Arnaud Marjollet

Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: C-36-0-3

EXPIRATION DATE: 04/30/2021

FACILITY-WIDE REQUIREMENTS

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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: PACTIV, LLC
Location: 5370 E HOME AVE, FRESNO, CA 93727
C-36-0-3 - Dec 8 2016 7:48AM - GONZALEV

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 1070 (12/17/ 92), District Rule 1081 (12/16/ 93), District Rule 2301 (12/17/ 92), District Rule 2520 (6/21/01), District Rule 4102 (12/17/ 92), District Rule 4201 (12/17/ 92), District Rule 4202 (12/17/ 92), District Rule 4623 (5/19/05), District Rule 4662 (9/20/07), and District Rule 4682 (9/20/07). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. All tanks, reservoirs or other containers which are pressure vessels having a capacity greater than 200 gallons, used to store or hold VOC containing blowing agents or organic liquids, shall maintain a working pressure sufficient at all times to prevent organic liquid loss or release of VOC emissions to the atmosphere under normal working conditions. [District Rules 4623 and 4682] Federally Enforceable Through Title V Permit
44. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
45. The operator shall ensure compliance with all applicable requirements of District Rule 4662, Organic Solvent Degreasing Operations, including but not limited to, general operating and control equipment requirements for cold cleaners, open-top vapor degreaser and conveyORIZED solvent degreasers. [District Rule 4662] Federally Enforceable Through Title V Permit
46. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin on September 30 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-1-3

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

RAIL CAR UNLOADING, INCLUDING 3 RESIN SILOS, EACH 12 FT DIAM X 47 FT HIGH, PRODUCT SEPARATOR, VACUUM PUMP FILTER AND VACUUM PUMP #VB-01. STORAGE CAPACITY: 15,939 CUFT (119,221 GALLONS)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
3. Dust collector filters shall be inspected at least annually when the unit is not operation for tears, scuffs, abrasions or holes which may interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
4. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
5. The records shall be maintained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-2-12

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION LINE #1 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD SERVED BY A 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shutdowns. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Shut down of the thermal oxidizer for routine maintenance shall be recorded and shall not exceed a total of 20 hours per calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
8. The destruction efficiency of the thermal oxidizer shall be maintained at a minimum of 95%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 1081, 2201, and 2301] Federally Enforceable Through Title V Permit
9. The exhaust stack of the thermal oxidizer shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
10. The thermal oxidizer shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The maximum total VOC blowing agent consumption for the entire facility shall not exceed 8,500 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The average total VOC blowing agent consumption for the entire facility shall not exceed 3,400 lb/day, calculated on a calendar quarter basis. [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.

14. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 3,000 lb/day or 547,500 lb/year. [District Rule 4102]
15. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
18. Emissions from the combustion of natural gas in the RTO burner shall not exceed any of the following limits: 0.10 lb-NOx/MMBtu; 0.084 lb-CO/MMBtu; 0.0076 lb-PM10/MMBtu; or 0.00285 lb-SOx/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The permittee shall maintain the thermal oxidizer in accordance with the manufacturer's instructions. A copy of the manufacturer's instructions shall be kept onsite and made available for inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The combustion zone of the thermal oxidizer shall be maintained at a minimum of 1,500 degrees Fahrenheit. [District Rule 2201 and 40 CFR 64] Federally Enforceable Through Title V Permit
21. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device, during operation the temperature shall be recorded at least every fifteen minutes. [District Rule 2201 and 40 CFR 64] Federally Enforceable Through Title V Permit
22. The permittee shall maintain the following minimum air flow rates (scfm) from the respective production areas to the thermal oxidizer when in production: 3500 from the roll storage warehouse; 528 from each foam extrusion die hood; and 203 from each reclaim line smog hog. [District Rule 2201] Federally Enforceable Through Title V Permit
23. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
24. Source testing to measure the minimum destruction efficiency of the thermal oxidizer and the minimum air flow rates from each production area shall be conducted at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 2201 and 1081] Federally Enforceable Through Title V Permit
26. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District 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. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
28. The following test methods shall be used: air flow rates - EPA Method 1 or 2; stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC - EPA Method 25 or 25A or ARB Method 100, referenced as methane; exempt VOC compounds - EPA Method 18, or alternative equivalent District and EPA approved test methods. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
29. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
30. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be calculated using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$$
where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rule 2201] Federally Enforceable Through Title V Permit
31. 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
32. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
34. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
35. The permittee shall maintain accurate daily records of the thermal oxidizer combustion temperature. [District Rule 2201] Federally Enforceable Through Title V Permit
36. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-3-12

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION LINE #2 CONSISTING OF #EX-20 PRIMARY EXTRUDER, #EX-21 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-11 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
5. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The VOC blowing agent consumption for the entire facility shall not exceed an average of 8,500 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The VOC blowing agent consumption for the entire facility shall not exceed an average of 3,400 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 3,000 lb/day or 547,500 lb/year. [District Rule 4102]
9. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 2201 and 1081] Federally Enforceable Through Title V Permit
14. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
16. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials), South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
17. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = \frac{(\text{TVI} - \text{CVT} - \text{VRFP})}{\text{TVI}} \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-4-11

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION LINE #3 CONSISTING OF #EX 30 PRIMARY EXTRUDER, #EX-31 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM FEED PUMP #VB-12 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
5. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The VOC blowing agent consumption for the entire facility shall not exceed an average of 8,500 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The VOC blowing agent consumption for the entire facility shall not exceed an average of 3,400 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 3,000 lb/day or 547,500 lb/year. [District Rule 4102]
9. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 2201 and 1081] Federally Enforceable Through Title V Permit
14. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
16. During any required source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
17. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-5-7

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

THERMOFORMER LINE #3 CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District 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.

9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-6-7

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

THERMOFORMER LINE #4 CONSISTING OF GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE FLUFF SILOS DESCRIBED IN C-36-18

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules and 2201 and 4682] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-7-8

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

THERMOFORMER LINE #5 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-8-6

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

THERMOFORMER LINE #6 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District 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.

9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-9-6

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

THERMOFORMER LINE #7 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District 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.

9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-10-8

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

THERMOFORMER LINE #8 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 2201 and 1081] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-11-8

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

THERMOFORMER LINE #9 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN PERMIT C-36-18

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District 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.

9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-12-8

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

THERMOFORMER LINE #10 CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-13-7

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

#GR-90 BULK GRINDER WITH BLOWER, #GR-91 BULK GRINDER WITH BLOWER, AND #GR-92 SHEET GRINDER WITH BLOWER EACH FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18

PERMIT UNIT REQUIREMENTS

1. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
2. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
5. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
7. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
8. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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9. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
10. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
11. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Each grinder and its associated ductwork shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
14. Records of grinder maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
15. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-14-8

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

#EX-40 RECLAIM EXTRUDER #1 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19) AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through reclaim extruder #1 shall not exceed 36,000 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
3. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions from the feed hopper shall be vented to and controlled by the 42-inch cyclone with filter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90%. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 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.

11. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. During any required source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
14. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
17. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
19. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
20. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
21. Dust collector filters shall be inspected at least annually, when the unit is not in operation, for tears, scuffs, abrasions or holes which may interfere with the particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
22. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. Records of dust collector and electrostatic precipitator inspections, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and name of the personnel performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
24. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #1 (in pounds), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-17-4

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

17,960 CU. FT. (134,000 GALLON) RECLAIM STORAGE SILOS INCLUDING (2) 12' DIA. X 30' H WITH 60 DEG. CONES, (2) 12' DIA. X 30' H WITH 8' 45 DEG. CONES, AND (2) 12' DIA. X 32' H WITH 5'8" 45 DEG. CONES, RECEIVING PELLETS FROM RECLAIM EXTRUDERS

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Owner/operator shall maintain accurate records indicating the type and quantity of polystyrene used, visible emissions checks and maintenance inspections. The records are to kept on site at all times and supplied to the District upon request for a period of five years. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
3. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
5. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
6. Records of enclosure maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-18-8

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A TORIT FILTER DUST COLLECTION SYSTEM AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

PERMIT UNIT REQUIREMENTS

1. Maintain the fluff storage silos at a negative pressure or in a sealed position. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Each fluff silo shall be vented to the dust collection system and then to the thermal oxidizer listed on permit C-36-2. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The VOC capture efficiency of the fluff silos shall be maintained at a minimum of 90%. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
5. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
8. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
10. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District 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.

11. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
13. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
14. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
15. The fluff silos shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
16. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
17. Dust collector system filters shall be inspected at least annually, when the unit is not in operation, for tears, scuffs, abrasions or holes which may interfere with the particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
18. Records of dust collector and associated ductwork maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
19. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-19-8

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

#EX-50 RECLAIM EXTRUDER #2 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14) AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through reclaim extruder #2 shall not exceed 28,800 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
4. Emissions from the feed hopper shall be vented to and controlled by the 42-inch cyclone with filter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90%. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 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.

11. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. During any required source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
14. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
17. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
19. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
20. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
21. Dust collector filters shall be inspected at least annually, when the unit is not in operation, for tears, scuffs, abrasions or holes which may interfere with the particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
22. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit

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

23. Records of dust collector and electrostatic precipitator inspections, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and name of the personnel performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
24. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #2 (in pounds), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-20-11

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160'W X 22'H AVERAGE) VENTED TO THE THERMAL OXIDIZER DESCRIBED IN C-36-2

PERMIT UNIT REQUIREMENTS

1. Roll storage area shall be vented to the thermal oxidizer listed on permit C-36-2. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-21-8

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

POLYSTYRENE EXTRUSION LINE #4 CONSISTING OF #EX-40 PRIMARY EXTRUDER, #EX-41 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-40 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
5. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The VOC blowing agent consumption for the entire facility shall not exceed an average of 8,500 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The VOC blowing agent consumption for the entire facility shall not exceed an average of 3,400 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 3,000 lb/day or 547,500 lb/year. [District Rule 4102]
9. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
14. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
16. During any required source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
17. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-22-6

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

#EX-70 RECLAIM EXTRUDER #3 SERVED BY SMOG HOG MODEL SH20 E.P. AND A THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through reclaim extruder #3 shall not exceed 48,000 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERCs resulting from the installation of the thermal oxidizer. [District Rules 2201 and 2301] Federally Enforceable Through Title V Permit
3. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions from the feed hopper shall be vented to and controlled by the MAC Model #39AVRC14 baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90% [District Rule 2201] Federally Enforceable Through Title V Permit
6. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
9. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 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.

11. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
12. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. During any required source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
14. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $VOC \text{ Capture Efficiency} = [1 - ((TVI - CVT - VRFP) / TVI)] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
17. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
19. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
20. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
21. Dust collector filters shall be inspected at least annually, when the unit is not in operation, for tears, scuffs, abrasions or holes which may interfere with the particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
22. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit

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

23. Records of dust collector and electrostatic precipitator inspections, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and name of the personnel performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
24. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District Rule 2201] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #3 (in pounds), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-23-5

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM PRODUCT STORAGE WAREHOUSE (28,480 SQ FT)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The maximum amount of polystyrene foam stored in the finished product warehouse shall not exceed 529,000 pounds on a daily basis (previous day-end storage total, minus amount shipped from storage today, plus amount produced and sent to storage today). [District Rule 2201] Federally Enforceable Through Title V Permit
3. The average amount of polystyrene foam stored in the finished product warehouse shall not exceed 266,000 pounds/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The maximum on-site VOC emissions from final product storage shall not exceed 254.6 lb/day, calculated on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The average on-site VOC emissions from final product storage shall not exceed 182.0 lb/day, calculated on a calendar quarter basis. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
7. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur in the approved mass balance model, the permittee shall notify the District and have the mass balance emissions model re-approved. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rules 1081 and 2201] Federally Enforceable Through Title V Permit
10. During any required source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District 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.

11. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: maximum on-site storage VOC emission rate (lb/day), the amount of product in storage, the amount of product shipped, the amount of product entering storage, and the lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of the calendar quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4682] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-24-1

EXPIRATION DATE: 04/30/2021

EQUIPMENT DESCRIPTION:

12,000 GALLON TOTALLY ENCLOSED METHYL FORMATE STORAGE TANK WITH VAPOR RETURN LINES WHEN UNLOADING TANKS OR VEHICLES

PERMIT UNIT REQUIREMENTS

1. Equipment shall be maintained and operated vapor tight so that there is no leakage of methyl formate to the atmosphere prior to use in extruders. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Previous Title V Operating Permit



Permit to Operate

FACILITY: C-36

EXPIRATION DATE: 04/30/2016

LEGAL OWNER OR OPERATOR:
MAILING ADDRESS:

PACTIV, LLC
5370 E HOME AVE
FRESNO, CA 93727

FACILITY LOCATION:

5370 E HOME AVE
FRESNO, CA 93727

FACILITY DESCRIPTION:

PLASTIC FOAM PRODUCTS

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

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

Seyed Sadredin
Executive Director / APCO

Arnaud Marjollet
Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: C-36-0-2

EXPIRATION DATE: 04/30/2016

FACILITY-WIDE REQUIREMENTS

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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: PACTIV, LLC
Location: 5370 E HOME AVE, FRESNO, CA 93727
C-36-0-2 : Dec 5 2016 2:40PM -- GONZALEV

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable requirements: District Rule 1070 (12/17/ 92), District Rule 1081 (12/16/ 93), District Rule 2301 (12/17/ 92), District Rule 2520 (6/21/01), District Rule 4102 (12/17/ 92), District Rule 4201 (12/17/ 92), District Rule 4202 (12/17/ 92), District Rule 4623 (5/19/05), District Rule 4662 (9/20/07), and District Rule 4682 (9/20/07). A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. All tanks, reservoirs or other containers which are pressure vessels having a capacity greater than 200 gallons, used to store or hold VOC containing blowing agents or organic liquids, shall maintain a working pressure sufficient at all times to prevent organic liquid loss or release of VOC emissions to the atmosphere under normal working conditions. [District Rule 4623 section 4.1.1 and District Rule 4682 section 5.2.1] Federally Enforceable Through Title V Permit
44. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
45. The operator shall ensure compliance with all applicable requirements of District Rule 4662, Organic Solvent Degreasing Operations, including but not limited to, general operating and control equipment requirements for cold cleaners, open-top vapor degreaser and conveyORIZED solvent degreasers. [District Rule 4662] Federally Enforceable Through Title V Permit
46. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin on September 30 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-1-2

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

RAIL CAR UNLOADING, INCLUDING 3 RESIN SILOS, EACH 12 FT DIAM X 47 FT HIGH, PRODUCT SEPARATOR, VACUUM PUMP FILTER AND VACUUM PUMP #VB-01. STORAGE CAPACITY: 15,939 CUFT (119,221 GALLONS).

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Dust collector filters shall be inspected at least annually when the unit is not operation for tears, scuffs, abrasions or holes which may interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
5. The records shall be maintained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-2-11

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION LINE #1 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD SERVED BY A 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the thermoformers, bulk grinders, reclaim extruders, or the fluff silos. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The thermal oxidizer and associated ventilation system shall be in use at all times of operation of the extruders and the roll storage area, except during routine oxidizer maintenance or complete production shutdowns. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Shut down of the thermal oxidizer for routine maintenance shall be recorded and shall not exceed a total of 20 hours per calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
8. The destruction efficiency of the thermal oxidizer shall be maintained at a minimum of 95%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rules 1081, 2301 and 4682] Federally Enforceable Through Title V Permit
9. The exhaust stack of the thermal oxidizer shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
10. The thermal oxidizer shall only be fired on PUC-regulated natural gas. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The maximum total VOC blowing agent consumption for the entire facility shall not exceed 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The average total VOC blowing agent consumption for the entire facility shall not exceed 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 3,000 lb/day or 547,500 lb/year. [District Rule 4102]
15. The maximum on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The average on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
17. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
18. Emissions from the combustion of natural gas in the RTO burner shall not exceed any of the following limits: 0.10 lb-NO_x/MMBtu; 0.084 lb-CO/MMBtu; 0.0076 lb-PM₁₀/MMBtu; or 0.00285 lb-SO_x/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
19. The permittee shall maintain the thermal oxidizer in accordance with the manufacturer's instructions. A copy of the manufacturer's instructions shall be kept onsite and made available for inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The combustion zone of the thermal oxidizer shall be maintained at a minimum of 1,500 degrees Fahrenheit. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The thermal oxidizer shall be equipped with a continuous temperature monitoring and recording device, in operation at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The permittee shall maintain the following minimum air flow rates (scfm) from the respective production areas to the thermal oxidizer when in production: 3500 from the roll storage warehouse; 528 from each foam extrusion die hood; and 203 from each reclaim line smog hog. [District NSR Rule] Federally Enforceable Through Title V Permit
23. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
24. Source testing to measure the minimum destruction efficiency of the thermal oxidizer and the minimum air flow rates from each production area shall be conducted at least once every twelve months. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
26. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
27. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

28. The following test methods shall be used: air flow rates - EPA Method 1 or 2; stack gas oxygen - EPA Method 3 or 3A or ARB Method 100; VOC - EPA Method 25 or 25A or ARB Method 100, referenced as methane; exempt VOC compounds - EPA Method 18, or alternative equivalent District and EPA approved test methods. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
29. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule] Federally Enforceable Through Title V Permit
30. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be calculated using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation:
$$\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$$
 where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule] Federally Enforceable Through Title V Permit
31. 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
32. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
34. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
35. The permittee shall maintain accurate daily records of the thermal oxidizer combustion temperature. [District NSR Rule and District Rule 4682, 6.1.2] Federally Enforceable Through Title V Permit
36. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-3-11

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION LINE #2 CONSISTING OF #EX-20 PRIMARY EXTRUDER, #EX-21 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-11 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The VOC blowing agent consumption for the entire facility shall not exceed an average of 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The VOC blowing agent consumption for the entire facility shall not exceed an average of 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 3,000 lb/day or 547,500 lb/year. [District Rule 4102]
9. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
12. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
14. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule and District Rule 4682] Federally Enforceable Through Title V Permit
15. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule and District Rule 4682] Federally Enforceable Through Title V Permit
16. During source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
17. During source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = \frac{(\text{TVI} - \text{CVT} - \text{VRFP})}{\text{TVI}} \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-4-10

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM EXTRUSION LINE #3 CONSISTING OF #EX 30 PRIMARY EXTRUDER, #EX-31 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM FEED PUMP #VB-12 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The VOC blowing agent consumption for the entire facility shall not exceed an average of 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The VOC blowing agent consumption for the entire facility shall not exceed an average of 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 3,000 lb/day or 547,500 lb/year. [District Rule 4102]
9. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
14. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
15. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
16. During any required source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
17. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-5-4

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

#G-91 THERMOFORMER LINE CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.31] Federally Enforceable Through Title V Permit

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

9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-6-4

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

#G-92 THERMOFORMER LINE CONSISTING OF GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit

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

9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-7-5

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

#G-93 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-8-3

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

#G-94 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit

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

9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-9-3

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

#G-95 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit

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

9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-10-5

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

#G-96 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit

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

9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-11-5

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

#G-97 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN PERMIT C-36-18.

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-12-5

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

#G-98 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The foam trays produced from the thermoformer shall be packaged and stored in vapor transmission inhibiting material. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-13-4

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

#GR-90 BULK GRINDER WITH BLOWER, #GR-91 BULK GRINDER WITH BLOWER, AND #GR-92 SHEET GRINDER WITH BLOWER EACH FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

PERMIT UNIT REQUIREMENTS

1. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
2. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
5. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
7. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $VOC \text{ Capture Efficiency} = [1 - ((TVI - CVT - VRFP) / TVI)] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit

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

9. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
10. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
11. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Each grinder and its associated ductwork shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Records of grinder maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-14-4

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

#EX-40 RECLAIM EXTRUDER #1 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19) AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17.

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through reclaim extruder #1 shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from the feed hopper shall be vented to and controlled by the 42-inch cyclone with bag filter. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90%. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
9. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit

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

11. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
12. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
13. During any required source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
14. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
17. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
19. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Dust collector filters shall be inspected at least annually, when the unit is not in operation, for tears, scuffs, abrasions or holes which may interfere with the particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. Records of dust collector and electrostatic precipitator inspections, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and name of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #1 (in pounds), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-17-3

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

17,960 CU. FT. (134,000 GALLON) RECLAIM STORAGE SILOS INCLUDING (2) 12' DIA. X 30' H WITH 60 DEG. CONES, (2) 12' DIA. X 30' H WITH 8' 45 DEG. CONES, AND (2) 12' DIA. X 32' H WITH 5'8" 45 DEG. CONES, RECEIVING PELLETS FROM RECLAIM EXTRUDERS.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Owner/operator shall maintain accurate records indicating the type and quantity of polystyrene used, visible emissions checks and maintenance inspections. The records are to kept on site at all times and supplied to the District upon request for a period of five years. [District NSR Rule and District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
3. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
5. Enclosure shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520 section 9.3.2] Federally Enforceable Through Title V Permit
6. Records of enclosure maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520 section 9.4.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-18-3

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A TORIT FILTER DUST COLLECTION SYSTEM AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.

PERMIT UNIT REQUIREMENTS

1. Maintain the fluff storage silos at a negative pressure or in a sealed position. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Each fluff silo shall be vented to the dust collection system and then to the thermal oxidizer listed on permit C-36-2. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The VOC capture efficiency of the fluff silos shall be maintained at a minimum of 90%. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
8. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
9. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
10. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
13. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
14. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
15. The fluff silos shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. Dust collector system filters shall be inspected at least annually, when the unit is not in operation, for tears, scuffs, abrasions or holes which may interfere with the particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. Records of dust collector and associated ductwork maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-19-4

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

#EX-50 RECLAIM EXTRUDER #2 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14) AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17.

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through reclaim extruder #2 shall not exceed 28,800 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
4. Emissions from the feed hopper shall be vented to and controlled by the 42-inch cyclone with bag filter. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90%. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682; 5.3.1] Federally Enforceable Through Title V Permit
9. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
12. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
13. During any required source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
14. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: VOC Capture Efficiency = $[1 - ((TVI - CVT - VRFP) / TVI)] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
17. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
19. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Dust collector filters shall be inspected at least annually, when the unit is not in operation, for tears, scuffs, abrasions or holes which may interfere with the particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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23. Records of dust collector and electrostatic precipitator inspections, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and name of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #2 (in pounds), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-20-7

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160'W X 22'H AVERAGE) VENTED TO THE THERMAL OXIDIZER DESCRIBED IN C-36-2.

PERMIT UNIT REQUIREMENTS

1. Roll storage area shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
6. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
7. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
12. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-21-7

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

POLYSTYRENE EXTRUSION LINE #4 CONSISTING OF #EX-40 PRIMARY EXTRUDER, #EX-41 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-40 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2

PERMIT UNIT REQUIREMENTS

1. Foam extrusion rate from this equipment shall not exceed 36,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The door(s) on the secondary extrusion die hood shall be closed when the extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Extrusion line shall be vented to the thermal oxidizer listed on permit C-36-2. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
5. Only isobutane or n-butane shall be used as VOC blowing agent components. Methyl formate, acetone, or carbon dioxide, or any combination thereof, shall be used as non-VOC blowing agent components. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The VOC blowing agent consumption for the entire facility shall not exceed an average of 8,500 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The VOC blowing agent consumption for the entire facility shall not exceed an average of 3,400 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The maximum total methyl formate blowing agent consumption for the entire facility shall not exceed either of the following limits: 3,000 lb/day or 547,500 lb/year. [District Rule 4102]
9. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
12. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
14. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
15. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
16. During any required source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
17. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
20. The permittee shall maintain records of the following: polystyrene foam extrusion rate (lb/day - per extrusion line), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-22-2

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

#EX-70 RECLAIM EXTRUDER #3 SERVED BY SMOG HOG MODEL SH20 E.P. AND A THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17.

PERMIT UNIT REQUIREMENTS

1. The quantity of polystyrene to be processed through reclaim extruder #3 shall not exceed 48,000 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be maintained at a minimum of 77.5%, to maintain ERC's resulting from the installation of the thermal oxidizer. [District NSR Rule and District Rule 2301] Federally Enforceable Through Title V Permit
3. Emissions from the reclaim extruder vent shall be vented to and controlled by the electrostatic precipitator and then the thermal oxidizer listed on permit C-36-2 at all times when the reclaim extrusion line is operating. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from the feed hopper shall be vented to and controlled by the MAC Model #39AVRC14 baghouse. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The VOC capture efficiency from the reclaim extruder shall be maintained at a minimum of 90% [District NSR Rule] Federally Enforceable Through Title V Permit
6. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 1,045.0 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The on-site VOC emissions from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall not exceed an average of 418.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
9. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur to the approved mass balance emissions model, the permittee shall notify the District within 30 days and have the mass balance emissions model re-approved. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
12. Permittee shall use the results of the most recent VOC capture efficiency test(s) performed at this facility to demonstrate ongoing compliance with the VOC capture efficiency limit specified within this permit. Permittee shall perform additional VOC capture efficiency testing within 60 days of any significant process changes that may have the potential to affect the capture efficiency at the extruders, thermoformers, grinders, reclaim extruders, fluff silos or roll storage area. Significant process changes may include, but are not limited to, modifications to the hoods and/or enclosures serving each piece of equipment or changes to the ventilation system and/or airflow rates from each piece of equipment. [District NSR Rule and District Rule 4682, 5.3.1] Federally Enforceable Through Title V Permit
13. During any required source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule and District Rule 4682, 6.2.4] Federally Enforceable Through Title V Permit
14. During any required source testing, the overall VOC capture efficiency from the extruders, thermoformers, grinders, reclaim extruders, fluff silos and roll storage area shall be measured using a mass balance and the allowable VOC test methods specified within this permit. The overall VOC capture efficiency shall be determined using the following equation: $\text{VOC Capture Efficiency} = [1 - ((\text{TVI} - \text{CVT} - \text{VRFP}) / \text{TVI})] \times 100\%$, where TVI is the total VOC input; CVT is the total amount of VOC captured and sent to the thermal oxidizer, measured at the inlet to the thermal oxidizer; and VRFP is the amount of VOC retained in the finished products at the packing table. [District NSR Rule and District Rule 4682, 6.2] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
17. The PM10 emissions from the feed hopper shall not exceed 0.0486 lb/1,000 lb of polystyrene processed. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; where the process throughput, P, is less than or equal to 30 ton/hr, or $E = 17.31 \times P^{0.16}$; where the process throughput, P, is greater than 30 ton/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
19. The reclaim extruder and its associated equipment shall be completely inspected annually for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. Visible emissions shall be checked annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Dust collector filters shall be inspected at least annually, when the unit is not in operation, for tears, scuffs, abrasions or holes which may interfere with the particulate matter collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
22. The electrostatic precipitator shall be inspected at least annually, when the unit is not in operation, for any problems which may interfere with the particulate matter collection efficiency and shall be repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. Records of dust collector and electrostatic precipitator inspections, maintenance, and repair shall be maintained. These records shall include identification of the dust collector, date of inspection, any corrective action taken as a result of inspection, and name of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
24. The permittee shall maintain a list of all the products manufactured at this facility and representative finished products associated VOC blowing agent retention rate(s). [District NSR Rule] Federally Enforceable Through Title V Permit
25. The permittee shall maintain records of the following: polystyrene foam extrusion rate through reclaim extruder #3 (in pounds), type and amount of each blowing agent used, maximum on-site process VOC emission rate (lb/day), and lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of each quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-23-3

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

POLYSTYRENE FOAM PRODUCT STORAGE WAREHOUSE (28,480 SQ FT).

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The maximum amount of polystyrene foam stored in the finished product warehouse shall not exceed 529,000 pounds on a daily basis (previous day-end storage total, minus amount shipped from storage today, plus amount produced and sent to storage today). [District NSR Rule] Federally Enforceable Through Title V Permit
3. The average amount of polystyrene foam stored in the finished product warehouse shall not exceed 266,000 pounds/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The maximum on-site VOC emissions from final product storage shall not exceed 254.6 lb/day, calculated on a monthly basis. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The average on-site VOC emissions from final product storage shall not exceed 182.0 lb/day, calculated on a calendar quarter basis. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The lifetime VOC emissions (LE) from the plastic foam products manufactured at this facility shall not exceed 2.4 pounds of VOC per 100 pounds of total material processed. [District NSR Rule and District Rule 4682] Federally Enforceable Through Title V Permit
7. On-site and lifetime VOC emissions shall be determined using Pactiv's District approved mass balance emissions model. Should any changes occur in the approved mass balance model, the permittee shall notify the District and have the mass balance emissions model re-approved. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Permittee shall use the results of the most recent blowing agent retention test(s) performed at this facility to demonstrate ongoing compliance with the VOC emission limits specified within this permit. Permittee shall perform additional blowing agent retention testing within 60 days of any significant product changes or any changes in the manufacturing process. A significant product change shall be considered as a change in the polymer used (e.g. switching from polyethylene to polypropylene) or a change in the type of blowing agent used. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District NSR Rule and District Rules 1081, 7.1] Federally Enforceable Through Title V Permit
10. During any required source testing, the weight of VOC blowing agent retained in polymeric materials shall be determined using ASTM Method D7132-05, Bay Area Test Method 45 (Determination of Butanes and Pentanes in Polymeric Materials, South Coast Test Method 306 (Analysis of Pentanes in Expandable Styrene Polymers), or an alternative equivalent District and EPA approved test method. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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12. The permittee shall maintain records of the following: maximum on-site storage VOC emission rate (lb/day), the amount of product in storage, the amount of product shipped, the amount of product entering storage, and the lifetime VOC emission rate (lb/100 pounds of total material processed). Records shall be maintained with minimum monthly totals with the ability to calculate daily averages based on the number of operating days in any given month. For each month, daily average records shall be updated by no later than the end of the following month. [District NSR Rule and District Rule 4682, 6.1.1 & 6.1.3] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of the average on-site process VOC emission rate (lb/day). Records shall be maintained with minimum quarterly totals with the ability to calculate daily averages based on the number of operating days in any calendar quarter. For each calendar quarter, daily average records shall be updated by no later than the end of the first month following the end of the calendar quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District NSR Rule and District Rule 4682, 6.1.4] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-36-24-0

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

12,000 GALLON TOTALLY ENCLOSED METHYL FORMATE STORAGE TANK WITH VAPOR RETURN LINES WHEN UNLOADING TANKS OR VEHICLES

PERMIT UNIT REQUIREMENTS

1. Equipment shall be maintained and operated vapor tight so that there is no leakage of methyl formate to the atmosphere prior to use in extruders. [District NSR Rule and District Rule 4623] Federally Enforceable Through Title V Permit

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

ATTACHMENT C

Detailed Facility List

Detailed Facility Report
For Facility=36 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

PACTIV, LLC 5370 E HOME AVE FRESNO, CA 93727	FAC # STATUS: TELEPHONE:	C-36 A	TYPE: TOXIC ID:	TitleV 40004	EXPIRE ON: AREA INSP. DATE:	04/30/2016 4/ 06/17
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-36-1-2	119.0 KGAL UNLOADING	3020-05 E	1	270.00	270.00	A	RAIL CAR UNLOADING, INCLUDING 3 RESIN SILOS, EACH 12 FT DIAM X 47 FT HIGH, PRODUCT SEPARATOR, VACUUM PUMP FILTER AND VACUUM PUMP #VB-01. STORAGE CAPACITY: 15,939 CUFT (119,221 GALLONS).
C-36-2-11	Extrusion Line #1	3020-01 E	1	451.00	451.00	A	POLYSTYRENE FOAM EXTRUSION LINE #1 CONSISTING OF #EX-10 PRIMARY EXTRUDER, #EX-11 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND #VB-10 VACUUM PUMP WITH SECONDARY EXTRUDER DIE HOOD SERVED BY A 5.78 MMBTU/HR ADWEST TECHNOLOGIES MODEL RETOX 20.0 RTO 95 DUAL CHAMBER REGENERATIVE THERMAL OXIDIZER
C-36-3-11	Extrusion Line #2	3020-01 E	1	451.00	451.00	A	POLYSTYRENE FOAM EXTRUSION LINE #2 CONSISTING OF #EX-20 PRIMARY EXTRUDER, #EX-21 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-11 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2
C-36-4-10	EXTRUSION LINE #3	3020-01 E	1	451.00	451.00	A	POLYSTYRENE FOAM EXTRUSION LINE #3 CONSISTING OF #EX 30 PRIMARY EXTRUDER, #EX-31 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM FEED PUMP #VB-12 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2
C-36-5-4	#G-91 Thermoformer Line	3020-01 A	1	97.00	97.00	A	#G-91 THERMOFORMER LINE CONSISTING OF A THERMOFORMER, TRIM PRESS, GRINDER AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
C-36-6-4	#G-92 Thermoformer Line	3020-01 A	1	97.00	97.00	A	#G-92 THERMOFORMER LINE CONSISTING OF GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE FLUFF SILOS DESCRIBED IN C-36-18.
C-36-7-5	#G-93 Thermoformer Line	3020-01 A	1	97.00	97.00	A	#G-93 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
C-36-8-3	#G-94 Thermoformer Line	3020-01 A	1	97.00	97.00	A	#G-94 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
C-36-9-3	#G-95 Thermoformer Line	3020-01 A	1	97.00	97.00	A	#G-95 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
C-36-10-5	#G-96 Thermoformer Line	3020-01 B	1	129.00	129.00	A	#G-96 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.

Detailed Facility Report

For Facility=36 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-36-11-5	#G-97 Thermoformer Line	3020-01 A	1	97.00	97.00	A	#G-97 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN PERMIT C-36-18.
C-36-12-5	#G-98 Grinder	3020-01 A	1	97.00	97.00	A	#G-98 THERMOFORMER LINE CONSISTING OF A GRINDER, THERMOFORMER, TRIM PRESS, AND BLOWER FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
C-36-13-4	#GR-90, 91 & 92 Grinders	3020-01 E	1	451.00	451.00	A	#GR-90 BULK GRINDER WITH BLOWER, #GR-91 BULK GRINDER WITH BLOWER, AND #GR-92 SHEET GRINDER WITH BLOWER EACH FEEDING THE SIX FLUFF SILOS DESCRIBED IN C-36-18.
C-36-14-4	Reclaim Extrusion Line #1	3020-01 E	1	451.00	451.00	A	#EX-40 RECLAIM EXTRUDER #1 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-19) AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17.
C-36-17-3	134 KGAL STORAGE	3020-05 E	1	270.00	270.00	A	17,960 CU. FT. (134,000 GALLON) RECLAIM STORAGE SILOS INCLUDING (2) 12' DIA. X 30' H WITH 60 DEG. CONES, (2) 12' DIA. X 30' H WITH 8' 45 DEG. CONES, AND (2) 12' DIA. X 32' H WITH 5'8" 45 DEG. CONES, RECEIVING PELLETS FROM RECLAIM EXTRUDERS.
C-36-18-3	152,000 Gallon Fluff Silos	3020-05 E	1	270.00	270.00	A	SIX (6) FLUFF SILOS, 12' DIA. X 30' H, ALL VENTED TO A TORIT FILTER DUST COLLECTION SYSTEM AND THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2.
C-36-19-4	Reclaim Extrusion Line #2	3020-01 E	1	451.00	451.00	A	#EX-50 RECLAIM EXTRUDER #2 SERVED BY A SMOG HOG MODEL 20 PE ELECTROSTATIC PRECIPITATOR (SHARED WITH C-36-14) AND THEN THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING THE SIX RECLAIM SILOS DESCRIBED IN C-36-17.
C-36-20-7	Roll Storage Area	3020-01 D	1	345.00	345.00	A	POLYSTYRENE FOAM SHEET ROLL STORAGE AREA (183'L X 160"W X 22"H AVERAGE) VENTED TO THE THERMAL OXIDIZER DESCRIBED IN C-36-2.
C-36-21-7	Extrusion line #4	3020-01 E	1	451.00	451.00	A	POLYSTYRENE EXTRUSION LINE #4 CONSISTING OF #EX-40 PRIMARY EXTRUDER, #EX-41 SECONDARY EXTRUDER, MELT PUMP (REMOVABLE), AND VACUUM PUMP #VB-40 WITH SECONDARY EXTRUDER DIE HOOD VENTED TO THE THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2
C-36-22-2	Reclaim Extrusion Line #3	3020-01 E	1	451.00	451.00	A	#EX-70 RECLAIM EXTRUDER #3 SERVED BY SMOG HOG MODEL SH20 E.P. AND A THERMAL OXIDIZER SYSTEM DESCRIBED IN C-36-2, FEEDING SIX RECLAIM SILOS DESCRIBED IN PTO C-36-17.
C-36-23-3	Finished Product Storage	3020-06	1	116.00	116.00	A	POLYSTYRENE FOAM PRODUCT STORAGE WAREHOUSE (28,480 SQ FT).
C-36-24-0	12,000 Gallon Storage Tank	3020-05 B	1	103.00	103.00	A	12,000 GALLON TOTALLY ENCLOSED METHYL FORMATE STORAGE TANK WITH VAPOR RETURN LINES WHEN UNLOADING TANKS OR VEHICLES

ATTACHMENT D

Facility Comments and District Response

Pactiv, LLC submitted comments to the District regarding the proposed Title V Permit renewal for their facility (C-36) under Project C-1152387. A copy of the November 4, 2016 email containing these comments is available at the District.

Comment 1 - Nomenclature update for grinders associated with thermoformer lines:

Permit units C-36-5 through C-36-12 represent the eight thermoformer lines at the facility. To more accurately reflect the operationally interchangeable nature of the grinders G-92 through G-98 to the thermoformer lines and to provide for greater operational flexibility, Pactiv requests that the reference to the grinder unit numbers be removed from the unit descriptions and that the thermoformer lines be referred to solely using their line numbers as per pages 2-1 and 2-2 of the permit application.

Response 1:

The line numbers have been modified as follows.

Permit Unit	Previous Line Number	Revised Line Number
C-36-5	G-91	3
C-36-6	G-92	4
C-36-7	G-93	5
C-36-8	G-94	6
G-36-9	G-95	7
G-36-10	G-96	8
G-36-11	G-97	9
G-36-12	G-98	10

Comment 2 - Update to equipment description for smog hogs associated with reclaim extruders #1, #2, and #3:

Permit units C-36-14, C-36-19 and C-36-22 represent the reclaim extruders at the facility. These units are described as having "Smog Hog Model 20" electrostatic precipitators, thereby requiring this specific model to be used to ensure compliance with the permit. The "Smog Hog Model 20" has been discontinued and is no longer readily available in the market. Pactiv requests removal of a specific model number from the equipment description for units C-36-14, C-36-19 and C-36-22.

Response 2:

The District is unable to remove the reference to make and model of the electrostatic precipitator during the Title V Renewal process. This modification to the equipment description would constitute a New Source Review (NSR) modification. An Authority to Construct application to modify these units is required to correctly evaluate any NSR implications if removing the make and model of the control equipment.

Comment 3 - Methyl format limit:

The methyl formate limit identified in Permit units C-36-2, C-36-3, C-36-4, and C-36-21 appear to have been inadvertently lowered from 3,000 lb/day to 1,500 lb/day. Pactiv requests that the limits be adjusted to reflect the most recently issued PTO for these permit units.

Response 3:

The methyl fromate limit from previous PTO was inadvertently left on the draft permits C-36-2-12, -3-12, -4-11 and -21-8. The throughput limit on these permits has been corrected to 3,000 lb/day.

Comment 4 - Reconciling of permit versioning:

A review of the draft Title V permit found that the following permit units have several versions that Pactiv internally is unable to reconcile. These were C-36-5, C-36-6, C-36-7, C-36-8, C-36-9, C-36-10, C-36-11, C-36-12, C-36-13, C-36-14, C-36-18, C-36-19, C-36-20, C-36-22, and C-36-23. If you could provide any insight/explanation on these, we would appreciate it.

Response 4:

The permits fall into two categories. One group of ATCs are included with the previous Title V Renewal, project C-1053827. The PTOs corresponding to those ATCs were not issued. Instead the renewed PTO contained the requirements from those ATCs. The other permit numbers corresponded to ATCs that have been cancelled. The following table will summarize the reconciliation of permits.

PTO	ATCs Included with Previous Title V Renewal	Cancelled ATCs	Renewed PTO
C-36-5-4	-5-5	-5-6	-5-7
C-36-6-4	-6-5	-6-6	-6-7
C-36-7-5	-7-6	-7-7	-7-8
C-36-8-3	-8-4	-8-5	-8-6
C-36-9-3	-9-4	-9-5	-9-5
C-36-10-5	-10-6	-10-7	-10-8
C-36-11-5	-11-6	-11-7	-11-8
C-36-12-5	-12-6	-12-7	-12-8
C-36-13-5	-13-6	-13-7	-13-8
C-36-14-4	-14-5 and -14-6	-14-7	-14-8
C-36-18-3	-18-4 and -18-5	-18-6	-18-7
C-36-19-4	-19-5 and -19-6	-19-7	-19-8
C-36-20-7	-20-8 and -20-9	-20-10	-20-11
C-36-22-2	-22-3 and -22-4	-22-5	-22-6
C-36-23-3	-23-4	---	-23-5